

Whistleblower Policy

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Whistleblower Policy

Statement

At Nine, our values guide everything we do.

We **Walk the Talk**, **Keep It Human**, **Turn Over Every Stone**, and **Move Forward as One**. These values shape how we work together, how we make decisions, and how we speak up when something isn't right.

We want everyone across Nine to feel safe, supported, and empowered to raise concerns about conduct that may be unlawful, unethical, unsafe, or inconsistent with our values or policies. Speaking up protects our people, our audiences, and the integrity of our business — and helps us move forward collectively and responsibly.

We also recognise that raising a concern can feel challenging. This Policy explains how to make a report, the protections available to you, and how Nine will respond — with fairness, respect and confidentiality at all stages.

Purpose

The purpose of this Whistleblower Policy (**Policy**) is to provide a safe, confidential and supportive way for anyone connected with Nine to speak up about concerns relating to unlawful, unethical, unsafe or improper conduct.

This Policy outlines how concerns can be raised, how they will be investigated, and the protections available to whistleblowers under

- in Australia, the Corporations Act 2001 (Cth) and the Taxation Administration Act 1953 (Cth) (**Australian Legislation**); or
- in New Zealand, the Protected Disclosures (Protection of Whistleblowers) Act 2022 (NZ) (**New Zealand Legislation**).

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It reflects Nine's commitment to **Walk the Talk**, **Keep It Human**, **Turn Over Every Stone** and **Move Forward as One** by ensuring issues are identified early, addressed fairly, and resolved in a way that protects our people, our and the integrity of our business.

Scope

This Policy applies to everyone who engages with Nine, including all eligible whistleblowers (as defined by the Australian Legislation). Eligible whistleblowers include current and former:

- employees;
- officers;
- contractors, consultants, agents and suppliers (and their employees);
- associates of Nine; and
- directors, interns, volunteers and temporary staff
- relatives, dependents, or spouses of any of the above.

In New Zealand, this Policy applies to all disclosers (as defined by the New Zealand Legislation), which includes current and former:

- employees;
- secondees;
- independent contractors;
- individuals concerned in Nine's management (for example, board members); and
- volunteers.

This Policy applies to all Nine entities and brands across the entire Group.

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What You Can Report

You are encouraged to speak up if you have reasonable grounds to suspect that there is, or has been, serious wrongdoing in or by Nine.

This may include any of the following conduct that has happened or is happening in Nine's workplace:

- breaches of any law or regulation
- dishonest, corrupt, fraudulent or improper conduct
- breaches of Nine's Code of Conduct or policies
- unsafe behaviour or risks to health and safety of any person, the public, or the environment
- corruption, fraud or the irregular use of public funds or public resources
- harassment, discrimination, bullying or victimisation
- any act or omission that is oppressive, unlawfully discriminatory, or grossly negligent
- conduct that could damage Nine's reputation or financial standing
- improper accounting, audit or record-keeping practices
- breaches of the Supplier Code of Conduct
- any attempt to conceal wrongdoing
- any other conduct that may otherwise be protected under the Australian Legislation or New Zealand Legislation

If something doesn't feel right, trust your instincts — and raise it. We **Move Forward as One** when people feel safe to speak up.

What This Policy Doesn't Cover

This Policy does not cover personal work-related concerns that do not fall within the bullet points above, e.g.:

- role changes;
- rostering issues;
- performance management or performance reviews; or
- interpersonal disagreements.

A protected disclosure is a disclosure of information that qualifies for protection under the Australian Legislation or New Zealand Legislation.

Concerns about breaches of Nine policies or standards, or conduct that may affect Nine's reputation, may not be protected unless they involve serious wrongdoing of the kind described above. But you can still report them using the processes in this Policy.

How to Make a Report

At Nine, we want you to feel safe and supported when you speak up. In line with our values — **Walk the Talk, Keep It Human, Turn Over Every Stone** and **Move Forward as One** — you can raise a concern through any of the reporting channels set out below.

Internal Reporting Options

The best place to start is to contact **Nine's General Counsel**.

If your concern involves the General Counsel, you can contact **Nine's Chief People Officer** instead.

You may also make a disclosure to:

- **a Nine Director;**
- **the Chief Executive Officer;**
- **the Chief Financial Officer; or**
- **another member of the Executive Leadership Team.**

You can reach them by email, phone, mail, or by arranging a meeting — whatever is easiest for you.

Independent Reporting Option – Your Call

If you would prefer to report your concerns through an independent reporting service, you may contact **Your Call**.

Your Call receives and reviews disclosures before confidentially providing them to nominated representatives at Nine. You can report something to Your Call anonymously or in a way that withholds your identity from Nine.

- **Phone:** 1800 197 069 (AU) or 0800 123 508 (NZ) (7am–midnight on business days)
- **Online:** www.yourcall.com.au/nine

External Reporting Avenues

You can also make a protected disclosure to recipients outside of Nine, even if you have already made a disclosure to Nine. We encourage you to seek independent legal advice before doing so.

In **Australia**, protected disclosures may be made to:

- Nine's auditor

- a legal practitioner for the purpose of obtaining legal advice about whistleblower protections;
- regulatory bodies, including ASIC, APRA, the Commissioner of Taxation; or
- in limited circumstances, a journalist or member of Parliament where the disclosure is protected by law and required for public interest or in an emergency. You should seek legal advice before making a disclosure in this way.

In **New Zealand**, protected disclosures may be made to:

- the head of any public sector organisation;
- an Officer of Parliament (but not a Minister or member of Parliament);
- the membership body of a particular profession with disciplinary power over its members; or
- any other appropriate authority listed in Schedule 2 of the Protected Disclosures (Protection of Whistleblowers) Act 2022.

Anonymous Reports

You can make a report anonymously if you choose. Anonymous disclosures will be assessed and investigated where possible. However, anonymity may limit our ability to investigate fully or follow up with you.

Information to Include in Your Report

Providing clear, factual detail helps us **Turn Over Every Stone** and act quickly. Where possible, please share:

- a description of the conduct
- who was involved
- when and where it happened
- any other relevant information, documents, or observations.

Please base your disclosure on firsthand knowledge as much as possible.

False or Malicious Reports

Speaking up honestly is part of how we **Move Forward as One**. Nine encourages all individuals to speak up where they have reasonable grounds to suspect serious wrongdoing.

However, if you deliberately make a false, misleading, or malicious disclosure, — for example, to cause harm to someone else — that is not protected under this Policy and may result in disciplinary action.

We will always support people who raise concerns in good faith and with reasonable grounds.

How Your Report Will Be Handled

When you speak up, we take that seriously. In line with our commitment to **Walk the Talk** and **Turn Over Every Stone**, every report made under this Policy will be handled promptly, respectfully and confidentially.

How your report is handled

The person who receives your report **must immediately notify Nine's General Counsel** (unless your concern involves the General Counsel).

Protecting your confidentiality reflects our commitment to **Keep It Human**. Nine will use its best endeavours to keep confidential any information that might identify you. However, there may be circumstances where Nine requires your identifying information to properly investigate, address, or resolve the matters raised in the disclosure. In such circumstances, Nine will consult with you in accordance with applicable law.

How We Will Investigate Your Disclosure

Where an investigation is considered appropriate, Nine's General Counsel will:

- investigate the report themselves; or
- appoint a suitably qualified investigator, who may be independent of Nine.

The investigator will provide their findings to the General Counsel and the CEO.

If the concern relates to a **Director, the CEO or the General Counsel**, the **Chair of Nine (or their delegate)** will appoint an **independent investigator**. That investigator will report to the Chair and, where appropriate, the General Counsel.

All records relating to an investigation will be stored securely, with access limited to those directly involved in managing the matter and any leaders who need to take appropriate action.

Keeping You Informed

Where appropriate and in line with confidentiality and privacy obligations, we will keep you updated on the progress and outcome of any investigation.

This transparency supports our value of **Move Forward as One** — ensuring we work together toward resolution.

Nine Will Support Whistleblowers

We want you to feel safe speaking up.

The Australian Legislation and New Zealand Legislation provide important protections for individuals who make a protected disclosure. While the specific requirements vary between jurisdictions, protections will generally apply if:

- you have reasonable grounds to suspect wrongdoing of the kind described in this Policy; and
- you make a disclosure through one of the reporting channels identified in this Policy.

No one is allowed to take action against you — or threaten to — for raising a concern in good faith under this Policy. Any employee who engages in detrimental treatment will face disciplinary action.

Protection from detrimental treatment

If you make a protected disclosure, or disclose information in support of another person's protected disclosure, you are entitled to the following protections under applicable law:

- protection from retaliation, victimisation, or other detrimental treatment because of the protected disclosure;
- confidentiality protections as described in this Policy; and
- protection from civil, criminal, and disciplinary proceedings arising from making the protected disclosure.

If you make a report under this Policy, you are protected from any actual or threatened negative treatment, including:

- dismissal or demotion
- changes to duties
- discrimination or harassment
- intimidation or retaliation
- disciplinary action
- damage to your reputation, property, business interests or financial position physical or psychological harm

- threats of any of the above

These protections apply even if the concern raised is ultimately not substantiated, provided your report was made honestly and on reasonable grounds.

However, if you have personally engaged in misconduct, making a report does not prevent Nine from taking appropriate action regarding that conduct.

If you are unsure whether your concern is protected under applicable whistleblower laws, you should obtain independent legal advice to determine what protections may apply to you.

Wellbeing and Ongoing Support

Protecting and supporting individuals who make a disclosure under this Policy is central to how we **Keep It Human** and **Move Forward as One**.

Nine's **Chief People Officer**, with support from People & Culture, is responsible for:

- supporting you throughout the process
- monitoring your wellbeing
- ensuring you are protected from negative treatment
- intervening quickly if any concerns about victimisation arise

You also have access to **Sonder**, our wellbeing and safety support service, at any time.

If you feel unsafe or victimised

If at any point you believe you are being treated unfairly or adversely because you raised a concern, please contact:

- Nine's General Counsel;

- Nine's Chief People Officer; or
- Your Call.

We will act quickly to ensure you are safe and supported.