

oOh!media

Code of Conduct

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Purpose of the oOh! Code of Conduct

The oOh! Code of Conduct (the **oOh! Code**) sets out how we act, make decisions and represent oOh!. It brings together our Purpose, Values and key Policies so that every decision reflects who we are and the outcomes we stand for.

The oOh! Code helps us make the right choices, especially when things feel uncertain or the answer is not obvious. It guides how we work, how we treat each other and how we make decisions that build trust and protect our reputation.

Living by the oOh! Code helps ensure we act ethically, make responsible decisions and protect the trust of our colleagues, customers, partners and communities.

Who is Covered by the oOh! Code

The oOh! Code applies to everyone at oOh!media and its related entities. That means all team members including contractors and Board members. It guides how we interact with our colleagues, customers, partners, suppliers, competitors, shareholders, government and the communities where we operate.

Each of us is responsible for understanding and following the oOh! Code and the policies that apply to our role.

Using the oOh! Code

The oOh! Code is here to help you make thoughtful, informed decisions regarding what you do and how you act. It's not about having all the answers but about knowing how to find them.

Before making a decision, pause to consider the impact and ask yourself the following questions:

Do I have to?

The law is our minimum standard. Everyone at oOh! must understand the legal and regulatory requirements that apply to their role, complete training when needed and assigned, and follow those requirements consistently and responsibly. When something new arises, we must approach it in a way that builds trust and strengthens oOh!'s reputation as an ethical and responsible business.

Am I allowed to?

Is this action consistent with our policies and legal obligations? If not, it must not proceed.

Is it the right thing to do?

Does this decision align with our Values and the outcomes we expect for our people, customers and communities?

If you are unsure, you can reach out and seek advice from your People Leader, People & Culture, Legal, or a trusted colleague before you take action.

Taking a moment to check your decision through these questions helps ensure we always do what is right for oOh!, for each other, and for the communities we reach.

What We Expect of You

Everyone at oOh! plays a part in bringing the Code to life. It is not just about knowing what it says, but using it to guide the choices we make and how we work together.

We expect you to:

- ✔ Understand the Code, our Values, and the policies and procedures relevant to your role.
- ✔ Apply sound judgement and act with integrity in everything you do.
- ✔ Treat others with respect, inclusion and fairness, and contribute to a positive and safe environment for everyone.
- ✔ Follow lawful and reasonable management directions and comply with the expectations set out in our policies and procedures, where these align with the Code and our Values.
- ✔ Speak up when you see or hear of behaviour or decisions that do not reflect our Values.
- ✔ Regularly reflect on your work and team goals to make sure they align with our Values and the outcomes we expect. Self-reflection helps keep our actions and decisions consistent with the outcomes we expect.
- ✔ Be open to feedback and respectful challenge from others. It helps us all make better decisions and live our Values.

If you lead others, you also have an extra responsibility to set the tone, to create an environment where people feel safe to speak up, and to ensure the oOh! Code is embedded in your team's daily work.



Our Commitment to You

At oOh!, we are committed to making the oOh! Code meaningful and practical.

You can expect us to:

- ✔ Be clear about what the oOh! Code requires of you and apply these standards fairly and transparently across the business.
- ✔ Create an environment where questions and concerns can be raised safely and with confidence.
- ✔ Protect those who speak up in good faith from any form of victimisation, harassment or disadvantage.
- ✔ Foster a culture of mutual respect and collaboration, where we support each other in upholding our shared standards.
- ✔ Provide guidance, tools and support to help you make good decisions in line with our Values.
- ✔ Continuously learn from our experiences, review outcomes, and improve how we apply the Code and our Values.
- ✔ Inspire a shared vision for oOh!'s future, where living our Code helps us all achieve lasting success and a positive impact

Following the oOh! Code is not optional. It is a shared responsibility across all of us at oOh!.

We will respond to breaches of the oOh! Code in a way that is fair, transparent and proportionate. Where conduct falls short, we will take appropriate action, which may include disciplinary measures or, in serious cases, ending employment or engagement.

Together, we create a workplace where doing the right thing is simply how we work.



Our Values

Our Values are what we stand for: they guide how we work, make decisions and treat each other every day.

Grow sustainably

We look for opportunities to grow personally, and as a business, in ethical, responsible and forward-thinking ways.

Play with heart

We bring energy, pride and empathy to our work, celebrate success together and never lose the fun along the way.

Stronger together

We achieve our best when we are transparent, inclusive and collaborative, connecting diverse ideas and perspectives to deliver more.

Our purpose

We exist to make public spaces better and to connect people and communities through unmissable experiences.



Speaking Up

Speaking up is part of living our Values.

At oOh! we believe people want to do the right thing, but sometimes the right answer isn't obvious. You might see or hear of something that doesn't feel right or face a situation that hasn't come up before. Asking questions, seeking guidance and speaking up are all part of living the oOh! Code. We expect everyone to act with integrity when raising concerns. Deliberately false, misleading or vexatious reports do not align with our Values or behavioural expectations.

It's up to all of us to make sure the Code is put into practice.

You can raise concerns about:

Behaviour or activities that may be inconsistent with the oOh! Code, our Values, or any oOh! policy.

Issues that impact safety and/or wellbeing at oOh! or the experience of others in their roles, even if the issue does not affect you directly.

Conduct, decisions or practices that feel unfair or inconsistent with our culture of integrity, fairness and merit.

Suspected fraud, misconduct, unethical behaviour, or actions that may cause harm to people, oOh!, our customers or communities.

Our commitment

- Every concern raised honestly and sincerely will be taken seriously and treated confidentially where safe to do so.
- We will protect anyone who speaks up in good faith from victimisation, harassment or disadvantage.
- Where possible, we will provide feedback on the outcome of your report.

How to Speak Up

If you have questions or concerns, we want to hear from you. Wherever possible, concerns should be raised as close to the issue as possible, usually with your immediate **People Leader**. If you are not comfortable raising the issue with your immediate People Leader, **you can raise it with:**

A **Senior Leadership Team** member in your area, or

Any member of the **Executive Leadership Team**, or

Any member of the **People & Culture team**, or

oOh's **General Counsel**

In situations where you are not comfortable raising concerns with any of the teams or individuals listed above, you may contact the **CEO** directly

If you prefer to raise a concern confidentially or anonymously, you can use the independent Whistleblower Service using the channels set out in our [Whistleblower Policy](#):

Call: Australia - 1800 173 918 or
New Zealand - 0800 403 478 (24/7 hotline)

Email: whistleblower@deloitte.com.au

Online: www.whistleblower.deloitte.com.au

Your willingness to speak up helps us continuously improve, build a stronger culture, and ensure oOh! remains a great place to work for everyone.



Our Key Policies and the Outcomes We Expect

Our Values guide how we behave, and our policies turn those Values into clear standards for how we work.

Every action and decision at oOh! should be consistent with both our Values and our key policies. Together, they describe the conduct we expect of ourselves and each other.

Our key policies and the outcomes we expect are grouped into three areas that guide how we work:



Business and Sustainability

How we deliver responsibly for our customers, communities and the environment.



Governance and Integrity

How we act with transparency and comply with our obligations.



People

How we create a safe, fair and inclusive workplace.

These are our key policies, not a full or definitive list. Depending on your role and responsibilities, other policies or procedures may also apply.

We expect everyone at oOh! to read, understand and adhere to the policies referenced in this Code and those specific to your role or area of the business. These policies set out the detail that supports the principles of the oOh! Code and help ensure we all act consistently and with integrity.

Business and Sustainability

When we make decisions about how we run our business and the impact we have on the world around us, we are guided by our Values and by a range of oOh! policies, including those listed below. These policies help guide our decisions and describe how we work responsibly and with integrity.

Outcomes

- ✓ We are accountable for fair and transparent outcomes for customers, partners and communities at the centre of every decision.
- ✓ Our services are responsible, trusted and designed to create value for customers and communities.
- ✓ We identify potential issues early, act on them quickly and manage complaints fairly.
- ✓ We act ethically and responsibly in all dealings. We do not tolerate anti-competitive behaviour, misuse of information or conflicts of interest.
- ✓ We recognise that environmental and social risks affect both our business and the communities we serve, and we take active steps to manage these responsibly.

Key Policies

The following policies support these outcomes and provide further guidance:

 [Sustainability Policy](#)

 [Anti-Modern Slavery Policy](#)

 [Quality Policy](#)

 [Vendor Engagement Policy](#)

 [Privacy Policy](#)

 [Travel and Entertainment Policy](#)

(Other policies may also apply depending on your role and responsibilities.)

Governance and Integrity

When we make decisions about how we govern our business, manage risk and meet our obligations, we are guided by our Values and by a range of oOh! policies, including those listed below. These policies help shape the way we act with transparency, accountability and integrity.

Outcomes

- ✔ We understand and meet the legal and regulatory obligations that apply to our work, and we do so in a way that reflects our Values and ethical standards.
- ✔ Privacy and confidentiality are respected. Information is kept secure, used responsibly and only for legitimate business purposes and is protected in line with our legal and ethical obligations.
- ✔ We act with integrity in all dealings. We must never engage in bribery, corruption, fraud or any misuse of company resources or information.
- ✔ We make fair, transparent and well-informed decisions that align with this Code, our risk management practices and our responsibilities to shareholders, customers and the community.
- ✔ We regularly review and strengthen the way we manage risk and governance to ensure our practices remain effective, ethical and trusted. Strong governance enables us to make better decisions and build confidence in oOh! for our customers, shareholders and communities.

Key Policies

The following policies support these outcomes and provide further guidance:

 [Continuous Disclosure Policy](#)


 [Delegated Authority Policy](#)

 [Share Trading Policy](#)

 [Tax Risk Management Policy & Framework](#)

 [Whistleblower Policy](#)

 [Information Communications Technology Policy](#)

 [Conflict of Interest Policy](#)

(Other policies may also apply depending on your role and responsibilities.)



People

Our people are at the heart of oOh!. The way we work together shapes our culture, drives our success, and brings our Values to life.

When making decisions that affect people at oOh!, we are guided by our Values and by a range of policies, including those listed below. These policies help create a safe, inclusive and supportive workplace where everyone can do their best work.

Outcomes

- ✔ We maintain a workplace that is safe, inclusive and respectful, free from discrimination, bullying and harassment.
- ✔ Wellbeing is supported and we treat each other with fairness, respect and care.
- ✔ Conflicts of interest are disclosed and managed appropriately to protect the trust placed in us.
- ✔ Everyone uses company resources, technology and social media responsibly with integrity and in accordance with our policies and procedures.
- ✔ People are hired, developed, recognised and rewarded based on their contribution and their alignment with our Values.
- ✔ We foster a collaborative environment where diverse perspectives are valued, and we support each other's growth and success.
- ✔ Training, learning and accreditation requirements are met so we can perform at our best.
- ✔ We empower our people to grow, innovate, and collectively shape a thriving future for oOh!.

Key Policies

The following policies support these outcomes and provide further guidance:

 [Diversity, Equity and Inclusion Policy](#)

 [Wellbeing, Safety & Environment Policy](#)

 [Workplace Behaviour Policy](#)

 [Anti-Racism Policy](#)

 [Mandatory Learning Policy](#)

(Other policies may also apply depending on your role and responsibilities.)



Leadership Mindset

At oOh!, our leaders are the architects of our culture and the catalysts for our success.

Leadership here is a powerful commitment, defined not by your title, but by the profound influence you have every single day. It's about how you inspire, empower, and guide your people, serve our customers, and positively impact the communities we operate within. Your leadership shadow – your actions and behaviours – builds the trust, sets the standards, and unleashes the full potential in everyone around you.

Integrity sits at the heart of leadership. We expect our leaders to champion our Purpose and Values, acting always in the best interests of oOh!, our people, and our stakeholders. This means using your influence fairly, transparently, and without self-interest, ensuring every decision strengthens our collective journey towards high performance.

oOh! People Leaders bring our Purpose and Values to life by leading with accountability, clarity, courage and energy.

When you lead others, you are expected to:

Be Accountable

Own outcomes, follow through on commitments, and take full responsibility for your decisions and your team's results. This includes using sound judgement, making timely decisions, and staying accountable for outcomes, even when work is delegated.

Be Bold

Have the courage to make the right calls, even when it is uncomfortable, and actively create space for innovation, learning, and agile problem-solving.

Be Clear

Set transparent expectations, communicate the "why" behind decisions, identify and address issues quickly, and provide appropriate clarity, recognition, and support for your team

Be Energising

Build diverse, high-performing teams, celebrate success and passionately help others reach their potential. Foster a culture of respect, safety, and openness where people feel confident to speak up, and strengthen collaboration across teams and functions to achieve collective success.

As leaders, we are the pulse of oOh!. The way we lead shapes our culture, strengthens our teams and builds the enduring trust vital for our success. Leadership that compromises integrity has no place at oOh!

Review and Updates

The oOh! Code will be reviewed regularly to make sure it stays current, practical and aligned with our Purpose, Values and legal obligations. Updates may be made when laws, business needs or community expectations change.

Everyone at oOh! is expected to stay familiar with the most recent version of the Code and to understand how it applies to their role. References to the “oOh! Code” or “the Code” in any other documents refer to the most recent version of this Code of Conduct.

The oOh! Code does not form part of any employment contract, but it sets the standards of behaviour we expect from everyone who works with us.

Further Information and Support

If you have questions about the oOh! Code or how it applies to your role, speak with:

- Your People Leader, a Senior Leadership team member or an Executive Leadership team member
- People & Culture
- The General Counsel or another member of the Legal Team
- The CEO

You can also refer to the policies linked throughout this Code for more detailed information.

The oOh! Code belongs to all of us. Understanding it, living it and holding ourselves and each other to account, builds a workplace that reflects the best of who we are.





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