



# Clear Channel Outdoor Holdings, Inc.

## Human Rights Policy

Owner of this policy: Clear Channel Outdoor Holdings, Inc  
Active date: August 2023  
Queries on this policy: [contact\\_compliance@clearchannel.com](mailto:contact_compliance@clearchannel.com)



# Foreword from our CEO.

## **Clear Channel is committed to promoting business ethics & integrity through our approach to employee rights, and health and safety at work.**

This Clear Channel Human Rights Policy reflects our internal Clear Channel principles set out in our Code of Conduct and Business Ethics, and our divisional Values of Integrity and Fairness.

As a trusted business partner, we seek to operate in accordance with the principles in this Policy in relation to any work we undertake, wherever in the world we do business.

### **Scott Wells**

CEO  
Clear Channel Outdoor Holdings, Inc

# This Policy and Our Values

Clear Channel Outdoor Holdings, Inc. (Clear Channel) has two divisions, (Clear Channel Outdoor Americas and Clear Channel International) each with their own Values.

Both our sets of Values put ethics, fairness and integrity at the forefront of what we do as a company, an employer and a business partner.

We seek to be ethical and responsible community partners in our operations and to provide a safe, and respectful working environment for our employees and contractors, celebrating their diversity of thought and experience, wherever in the world they work for us.

# Application of this Policy

This Policy sets out the ethical framework for Clear Channel Outdoor Holdings, Inc and its global subsidiaries. It is based on international law, recognised ethical standards, responsible business principles and best practice.

This Policy has been developed in reference to the United Nations’ Universal Declaration of Human Rights, the Fundamental Conventions of the International Labour Organisation (ILO), the UN Declaration on the Rights of Indigenous Peoples and the guidelines set by the Organisation for Economic Cooperation and Development (OECD).

This Policy is not a substitute for, nor should it be considered to override, locally applicable laws and regulations. If local regulations impose more restrictive rules and practices than this Policy, local legislation shall take precedence in that jurisdiction. If a principle set out in this Policy is not permissible due to a local law or regulation, the local Clear Channel entity shall implement that principle to the extent possible and practical in a manner which is locally permissible and compatible with the relevant jurisdiction’s laws.

# Our Commitment to this Policy

**We expect our Business Units and markets across our divisions to:**

Commit to abiding by, and communicating, this Policy.

Hold our supply chain to the same or equivalent standards expressed in this Policy.

Where local industry standards are higher than applicable legal requirements, to meet the higher standards.

Publicize the available HR and hotline contact details for employees to report violations of this Policy.

### PROMOTE THE EQUAL TREATMENT, DIVERSITY AND INCLUSION OF ALL PEOPLE WE WORK WITH

- afford all employees equal and honest treatment, and ban any discrimination made on the basis of race, color, sex, religion, political opinion, nationality, social origin or any other category protected by applicable law <sup>5</sup>;
- grant a minimum number of days of maternity leave in accordance with the local or national regulations in force and use best endeavors to ensure that the employee on leave returns to her job - or an equivalent job - upon returning to work.

### ENSURE THE HUMANE AND SAFE TREATMENT OF EMPLOYEES AND BUSINESS PARTNERS IN ACCORDANCE WITH INTERNATIONAL LAW

- never use any form of forced or compulsory labor obtained under the threat of sanctions, not withhold identity documents, any security deposit from workers, or any other constraint <sup>6</sup>;
- take active measures to ensure our business and its supply chain does not use any form of modern slavery or human trafficking;
- refrain from employing persons whose age is lower than that of the completion of compulsory schooling in the relevant jurisdiction or in any event any workers under the age of 15 <sup>7</sup>;
- never use any form of corporal punishment, physical violence, or psychological or sexual harassment;
- acknowledge and respect the freedom of association of all employees and the right of collective bargaining <sup>8</sup>;
- comply with national and local regulations relating to the limits set on the number of working hours and the management of overtime hours <sup>9</sup>;
- grant a minimum of twenty-four consecutive hours of rest in every seven day period to each employee <sup>10</sup>;
- adopt remuneration policies which meet or exceed the legal minimum wage fixed by applicable legislation; or, as a minimum provide a regular living wage which meets employee basic needs;
- grant our employees a minimum paid leave per year of service in accordance with applicable legislation; and
- contribute to the mandatory social security systems in force in each jurisdiction.

### ADHERE TO ILO PRINCIPLES, BUSINESS AND HUMAN RIGHTS ETHICS

- comply with International Human Rights Law including the International Labor Organization (ILO) Conventions, seeking ways to honor the principles of internationally recognized human rights when faced with conflicting requirements;
- treat as a legal compliance issue the risk of causing or contributing to gross human rights abuses wherever we operate;
- commit to the rights of indigenous peoples as expressed within ILO Convention 169 on Indigenous Peoples;
- endeavor to cover any shortcomings in State employee protection systems by putting in employee safeguards and encouraging the same in our supply chains;
- adopt appropriate due diligence policies to identify, prevent and mitigate human rights risks, and commit to monitoring and evaluating implementation;

- adopt or participate in effective grievance mechanisms which are transparent, equitable and predictable, to enable the remediation of significant adverse human rights impacts to which we contribute;
- be transparent about policies, activities and impacts, and report on human rights issues and risks as appropriate; and
- maintain a hotline reporting procedure in accordance with local laws.

### ADDRESS THE RISK OF HUMAN RIGHTS ABUSES IN OUR SUPPLY CHAINS

- ensure that there is no **slavery** ("slavery" meaning the recruitment, movement, harboring or receiving of children, women or men through the use of force, coercion, abuse of vulnerability, deception or other means for the purpose of exploitation) in our organization and carry out proportionate inspections to ensure that remains the case;
- produce a publicly available anti-slavery statement <sup>11</sup> where required by law;
- conduct reasonable due diligence on suppliers we engage with and not contract with any suppliers engaged in any practice of slavery and servitude, forced or compulsory labor or human trafficking;
- actively monitor our factory and other working conditions, along with any accommodation to identify any instances or risk of modern slavery;
- preserve the right to audit the working conditions of third parties with whom we engage; and
- immediately cease further dealings with any third party connected with human rights abuses;

### PROMOTE INTEGRITY, HONESTY AND TRANSPARENCY IN OUR COMMERCIAL DEALINGS

- comply with applicable laws and regulations in force that require transparency and integrity in our commercial dealings and financial obligations;
- disclose the true account of our financial records to the relevant regulatory bodies; and
- inform our stakeholders of any relevant financial detriment that risks our commercial dealings;

### MAINTAIN AND EVOLVE COMMUNITY RELATIONS

- support local communities and our development of community support programs and charitable campaigns;
- endeavor to engage in corporate social responsibility programs;
- promote good relationships with local communities; and
- consider the impact of our working practices on local communities.

<sup>5</sup> (ILO Conventions No. 100 and No. 111)

<sup>6</sup> (ILO Conventions No. 29 and No. 105)

<sup>7</sup> (ILO Convention No. 138)

<sup>8</sup> (ILO Conventions No. 87 and No. 98)

<sup>9</sup> (ILO Convention No. 30)

<sup>10</sup> (ILO Conventions No. 14 and No. 106)

<sup>11</sup> Clear Channel is committed to complying with the UK Modern Slavery Act and will not knowingly deal with parties engaged in any practice of slavery, servitude, forced or compulsory labor or human trafficking.

# Implementation

Clear Channel provide annual training on our Code of Business Conduct and Ethics, and tailored training on underlying policies and procedures.

Clear Channel carry out employee engagement surveys in both our divisions on matters contained in this Policy.

Clear Channel maintain confidential reporting procedures, including a whistleblowing hotline.

The Clear Channel Corporate Social Responsibility program is reported to shareholders as appropriate.

# Oversight Responsibility

Executive oversight of this Policy is the responsibility of CCOH management. Ultimate responsibility for this Policy lies with the Board.

The Nominating and Governance Committee of the Board evaluates Clear Channel programs, policies and procedures relating to Corporate Social Responsibility.