



Our Values

Clear Channel Outdoor, its businesses and affiliated companies ("Clear Channel Outdoor") is committed to ethical and responsible conduct in all of its operations and expects the same commitment from all of its Suppliers.

Our Values of Integrity, Innovation, Excellence and Safety, form the code we operate under as an international organization.

Our Integrity Value includes our Fair Principles listed in Appendix One ("Fair Principles") which demonstrate how we endeavor to take ownership of challenges, find ethical solutions, and behave ethically as a company, an employer and a business partner.

About this code

This Supplier Code of Conduct (this "Code") supplements contractual terms and conditions in your agreement with us (your "Agreement"). It is divided into headings which track Clear Channel Outdoor's Fair Principles.

This Code is based on U.S. and international law, recognized ethical standards, responsible business principles andbest practice. This Code is not a substitute for, nor should it be considered to override locally applicable laws and regulations.

Clear Channel Outdoor reserves the right to cancel outstanding orders, suspend future orders and/or terminate its contract with suppliers in the event of a breach of any applicable laws and regulations, whether or not they feature in this Code.

Your Commitment to the Fair Principles in this Code

We expect you to:

Commit to abiding by this Code where it applies to your arrangement with Clear Channel Outdoor; Hold your supply chain to the same or equivalent standards expressed in this Code:

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







A responsible, ethical business partner.



Your Commitment

You will, in your dealings with or on behalf of Clear Channel Outdoor:

ZERO TOLERANCE ON BRIBERY

- · refrain from offering or soliciting, directly or indirectly, benefits of any kind (including gifts, favors or any other advantage or "thing of value"), or cash payments to induce the recipient or any other person to act improperly in the performance of their functions, or to reward them for acting improperly to obtain a personal gain or a business advantage on behalf of Clear Channel Outdoor that could contravene bribery and corruption laws or otherwise bring Clear Channel Outdoor into disrepute or underpenalty;
- ensure gifts, hospitality, entertainment, donations and sponsorship which may be accepted or given by Clear Channel Outdoor employees are subject to adequate anti- corruption controls;
- ensure gifts or hospitality offered within reasonable limits are transparent and discoverable, (for example, sent to the place of work of the recipient and not to their personal residence);
- adequately train and equip all your employees, agents and contractors to combat the risks of bribery and corruption in our industry;
- refrain from providing any personal incentives to public officials in the course of your business or otherwise, ensuring dealings with public officials are transparent, fair and properly recorded; and
- notify us if you suspect bribery or corruption has or may take place in a transaction involving Clear Channel Outdoor.

TONE FROM THE TOP

- demonstrate your commitment to ethical working through visible leadership support, safe reporting channels, policies, procedures and training;
- have, maintain and adequately publicize reporting procedures for your employees to express any concern, or to report or condemn any breach of economic crime laws, without fear of reprisal and in accordance with applicable laws; and
- disclose in writing any direct or indirect Conflict of Interest (personal, professional, financial or other interest), including directorships, commissions and shareholdings or a Close Personal Relationship¹, which could interfere in any way in your engagement with Clear Channel Outdoor or otherwise create the appearance of a conflictof interest;

ADEQUATE PROCEDURES TO PREVENT ECONOMIC CRIME

- develop adequate procedures to prevent bribery, corruption, theft, fraud, tax evasion, money laundering or insider dealing;
- ensure your tax commitments are in accordance with applicable law, implement good tax governance, and accurately represent the value of transactions with Clear Channel Outdoor; and

maintain all current authorizations and approvals necessary, including active (and unexpired) certificates to carry out your commitments with Clear Channel Outdoor in accordance with the law.

FAIR THIRD PARTY RELATIONSHIPS

- conduct appropriate due diligence on third parties acting on behalf of Clear Channel Outdoor proportionate to the risk they pose, and respect sanction rules in force;
- only instruct any third party to act on behalf of Clear Channel Outdoor who has previously been convicted of an Economic Crime or could damage Clear Channel Outdoor's reputation with the express prior written approval of Clear Channel Outdoor:
- manage relationships to minimize and monitor the risk of **Economic Crime:**
- ensure any third parties you instruct on behalf of Clear Channel Outdoor have agreed to the Values in this Code: and
- sustain relationships that do not breach Economic Crime, competition or anti-trust laws.

TRUSTWORTHY BOOKS AND RECORDS

- promote accountability, transparency and commercial confidentiality through your systems and record keeping;
- disclose fee, commission and rebate arrangements that you have with Clear Channel Outdoor as required by
- provide Clear Channel Outdoor transparent information concerning the economic and financial ownership structure and circumstances of your business to assist us to fulfil our due diligence obligations; and
- maintain records of contracts with advertising agencies and advertisers entered on behalf of Clear Channel Outdoor.

FAIR COMPETITION

- act competitively in accordance with applicable competition law wherever you do business;
- refrain from undertaking any abusive or illegal behavior, or the exploitation of any customer or supplier in a manner which could restrict competition illegally under applicable laws;
- protect Clear Channel Outdoor's confidential or proprietary information (including commercially and strategically sensitive information which is not public) to which you have access, from competitors and other third parties, and refrain from sharing Clear Channel Outdoor or its competitors' confidential information or otherwise exploit our relationship to gain an unfair competitive advantage;
- inform Clear Channel Outdoor of any leak of its information that you believe to be unauthorized by Clear Channel Outdoor; and
- respect the intellectual property rights of Clear Channel Outdoor including its inventions, innovations, developments, concepts, trade secrets, patents, copyrights and trademarks, refraining from reproducing images of Clear Channel Outdoor street furniture and/or trademarks on any medium whatsoever without the prior written consent of Clear Channel Outdoor.



 $^{\rm I}$ Close Personal Relationships include (for example) those with

your spouse orpartner, children, parents, siblings, in-laws or other close family members and friends and existing or historical fellow business associates (including business partners, companies or charities).





Transparent, honest & accountable transactions.

MAINTAIN COMPLETE AND ACCURATE FINANCIAL STATEMENTS

- · comply with your financial reporting commitments in accordance with applicable law, regulations and
- · maintain management accounts and financial statements which fairly present the financial condition and results of the company in all material respects, which do not contain any material untrue statements or omissions and could be considered misleading; and
- ensure that your tax obligations are fulfilled in accordance with the jurisdiction(s) in which you operate, and the true state of your tax affairs are disclosed to us should they be required.

APPROPRIATE AND ADEQUATE REVIEW OF FINANCIAL DUTIES

ensure sufficient segregation of duties for all key tasks with suitable management review and approval in place.

EFFECTIVE INTERNAL CONTROLS AND PROCEDURES FOR FINANCIAL REPORTING

implement, assess and monitor the scope and operating effectiveness of the control environment in relation to the financial reporting and records processes.

COMPLIANCE WITH APPLICABLE LAWS AND **COMPANY POLICIES**

adhere to all applicable laws, regulations and policies relating to financial controls.

MAINTAIN SUFFICIENT DOCUMENTATION

record information and retain evidence to support the operation of controls and existence of the figures in your financial records.

MANAGEMENT ACCOUNTABILITY

ensure your senior management take responsibility and attest to the effectiveness of your controls and accuracy of your numbers.











Protecting the data we use.

When dealing with personal data on Clear Channel Outdoor's behalf ("Clear Channel Outdoor Personal Data"):

ADEQUATE, RELEVANT, ACCURATE AND NECESSARY PERSONAL DATA

- ensure Clear Channel Outdoor Personal Data collected is adequate and relevant for the intended purposes, accurate and up to date;
- ensure you do not collect excessive Clear Channel Outdoor Personal Data; and
- only process sensitive Clear Channel Outdoor Personal Data in limited circumstances, with our explicit written consent; where it is needed in relation to legal claims or legitimate regulatory requirements; or where we have already made the information public.

LAWFULNESS, TRANSPARENCY AND RESPECT FOR DATA **SUBJECT RIGHTS**

- ensure Clear Channel Outdoor Personal Data is processed lawfully and only for the purposes required to fulfil our mutual contractual obligations; or to pursue Clear Channel Outdoor's legitimate interests 2:
- make available to Clear Channel Outdoor a Privacy Notice which clarifies how Clear Channel Outdoor Personal Data is processed; and
- assist Clear Channel Outdoor with fulfilling Data Subject requests relating to Clear Channel Outdoor Personal Data you hold.

USE PERSONAL DATA FOR LIMITED PURPOSES

- only process Clear Channel Outdoor Personal Data for specified, explicit and legitimate purposes; and
- do not sell, rent, or lease Clear Channel Outdoor Personal Data.

STORE PERSONAL DATA FOR ONLY **AS LONG AS NECESSARY**

- return or destroy Clear Channel Outdoor Personal Data when no longer required for the purposes for which they are held, considering the amount, nature and sensitivity of that Clear Channel Outdoor Personal Data and the potential risk of harm from its unauthorized use or disclosure:
- anonymize or pseudonymize Clear Channel Outdoor Personal Data where possible and appropriate (for example by aggregating Personal Data collected for statistical or research reasons).

PROTECT PERSONAL DATA IN TRANSFER

- · only share Clear Channel Outdoor Personal Data in accordance with your agreement with us;
- only transfer Clear Channel Outdoor Personal Data cross border(in connection with your legitimate business interests or for legal reasons) to those jurisdictions considered to have an adequate level of protection in relation to Personal Data by the country in which you operate. If there is no adequate level of protection, ensure such transfers take place only under an agreement ensuring appropriate and suitable safeguards and with our consent; and
- in no other circumstances transfer Clear Channel Outdoor Personal Data to any other party without our explicit written consent.

ADEQUATELY SECURED

- respect the confidentiality, integrity and security of Clear Channel Outdoor Personal Data; and
- have in place appropriate physical, technical, and administrative security and organizational measures to protect the integrity and confidentiality of Clear Channel Outdoor Personal Data from unauthorized access, improper use or disclosure, unauthorized modification and unlawful destruction or loss.
 - ²Where those interests are not overridden because the processing prejudices the interests or fundamental rights and freedoms of the individual concerned.





³ For example, for European businesses, adequacy determined by the European Commission, and under standard contractual terms adopted by the European Commission.





Securing our information & systems.

INFORMATION RISK MANAGEMENT

- have an effective, management-supported information security governance and management framework in place; and
- have a rigorous process in place to consistently and effectively manage information security risks.

CONFIDENTIALITY, INTEGRITY, AVAILABILITY

- process, store, and transmit Clear Channel Outdoor information assets in accordance with established policies and procedures that satisfy Clear Channel Outdoor's legislative and regulatory requirements (e.g., applicable Data Protection laws), Clear Channel Outdoor's Information Security Policy Framework, and any additional reasonable security requirements issued by Clear Channel Outdoor from time to time;
- treat Clear Channel Outdoor's information assets you process in accordance with Clear Channel Outdoor's Data Protection Policy and Data Classification and Handling Standard:
- immediately inform Clear Channel Outdoor of any changes in your methods of doing business which may affect the performance of your obligations under the existing agreement with Clear Channel Outdoor; and/or all material requirements in place; and
- ensure that at the end of the agreed retention period or termination of your contractual agreement with Clear Channel Outdoor, the information assets in scope are
 - securely transferred to Clear Channel Outdoor or other formallyindicated entity; or
 - securely sanitized and appropriate proof of secure destruction and disposal maintained.

INDIVIDUAL ACCOUNTABILITY

- ensure that all personnel processing Clear Channel Outdoor information assets are:
 - individually accountable;
 - trained on effective cybersecurity best practices; and
 - suitably knowledgeable and experienced to perform their work effectively.



INFORMATION SECURITY BY DESIGN

- rigorously enforce effective role-based access controls (or equivalent) to Clear Channel Outdoor information
- processed on authorized devices meeting reasonable security standards;
- periodically review access to Clear Channel Outdoor information assets, documenting that review;
- maintain confidentiality, integrity and appropriate availability of Clear Channel Outdoor information assets at all times, keeping them:
 - accurate;
 - protected from unauthorized and unlawful access;
 - included as part of a tested incident response plan;
 - covered by an appropriate business continuity and disaster recovery arrangement;
 - regularly assessed to identity and manage control gaps relating to security, and;
 - considered in established vendor risk management processes
- protect all facilities where Clear Channel Outdoor information assets are processed against unauthorized entry including effective anomaly detection; and
- destroy Clear Channel Outdoor information assets that are nolonger necessary in a secure manner to render those assets permanently irretrievable.

INFORMATION SECURITY BY ASSOCIATION

- obtain explicit prior written Clear Channel Outdoor approvalbefore engaging any new entity in processing Clear Channel Outdoor information assets;
- cascade all relevant information security requirements and provisions applicable to your engagement with Clear Channel Outdoor down throughout your entire delivery chain, including personnel/subcontractors so they:
 - comply with security principles outlined in this document at all times;
 - do not remove or transfer information assets outside designed facilities; and
- upon Clear Channel Outdoor's request, agree to undergo onsitesecurity risk assessment of information and physical security of your business environment, which may include providing Clear Channel Outdoor with necessary accessand documentation, mitigating or eliminating risk as perthe severity and priority level established during the assessment.

EFFECTIVE INFORMATION SECURITY INCIDENT RESPONSE

maintain an effective information security incident management process with clearly established operational levels for responding to and notifying Clear Channel Outdoor of any suspected or confirmed incidents affecting Clear Channel Outdoor information assets.





Contributing to a healthy, safer world.

REDUCE OUR IMPACT, PROTECT THE ENVIRONMENT AND CONSIDER WHOLE LIFE IMPACTS

- establish frameworks for understanding impacts and risks and help develop strategies for reducing environmental impacts; and
- avoid waste and promote resource efficiency and circularity where possible, from initial manufacture and installation and throughout the lifecycle of products supplied to Clear Channel Outdoor.

ADHERE TO ALL RELEVANT STATUTORY AND **REGULATORY REQUIREMENTS**

- maintain all licences, permits, authorizations, certifications and approvals necessary for carrying out your commitments to Clear Channel Outdoor; and
- to carry out your commitments with Clear Channel Outdoor in accordance with any applicable statutory and regulatory environmental requirements. 4

RESPECT LOCAL COMMUNITIES IN WHICH WE OPFRATE

· respect and understand local cultures in places where you work.

FACILITATE A SAFE AND SANITARY WORKING ENVIRONMENT

- assess, control and anticipate the health and safety risks linked to your activities, raising awareness among employees and your supply chain;
- · comply with laws and regulations in force in your jurisdiction and take the necessary measures to ensure a safe and hygienic working environment;
- ensure that your buildings comply with the building maintenance and safety standards in force by having experts regularly inspect such buildings and ensure that the machinery and equipment in the workplace are safe;
- train your workers to operate machinery and equipment and inform them of the safety procedures with respect to such machinery and equipment;
- identify and continuously assess Health & Safety risks, implemented prevention procedures and action plans, and prepare your workers to react in the event of an emergency;
- implement procedures and systems to prevent, manage and monitor accidents at work and occupational diseases, complying with applicable occupational health and safety laws and applicable insurance requirements such as workers compensation insurance;
- identify and assess the degree of exposure of employees to chemical, biological and physical agents; and provide employees with appropriate protective equipment;

- identify and assess the exposure of employees to the dangers of certain physical tasks: handling operations, transporting heavy objects, standing for long periods, overly-repeated tasks, etc.; and
- ensure your workplace premises are:
 - clean and ventilated;
 - have usable sanitary facilities, access to drinking water and eating areas; and
 - any accommodation and dormitories made available by suppliers is clean, hygienic, safe and liveable (hot water, heating and ventilation, and have sufficient space).

EXERCISE RESPONSIBLE ENVIRONMENTAL I FADERSHIP

- define clear environmental responsibilities and leadership throughout your organization; and
- provide appropriate training and adequate resources for all staff with responsibilities that may impact upon the environment.

UNDERSTAND AND REACT RESPONSIBLY TO **GEOPOLITICAL AND CLIMATE CHANGE RISK**

- strengthen resilience and adaptive capacity to climaterelated hazards and natural disasters; and
- where possible, integrate climate change measures and decarbonization commitments intoyour policies, strategies and planning.
 - ⁴ Having an Accredited EMS will give an understanding of applicable legislation and regulations and how to comply with them









Treating all people equally & with respect.

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 ;
- grant a minimum number of days of approved leave (including for maternity) in accordance with the local, state, federal or national regulations in force and use best endeavors to ensure that the parent on leave returns to their job - or an equivalent job - upon returning to work.

ENSURE THE HUMANE TREATMENT OF EMPLOYEES AND BUSINESS PARTNERS IN ACCORDANCE WITH APPLICABLE LAW, THE U.S DEPARTMENT OF LABOR AND CLEAR CHANNEL OUTDOOR'S HUMAN RIGHTS POLICY

- 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 ';
- take active measures to ensure your 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 7;
- 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;
- observe applicable national and local regulations relating to working hours and management of overtime hours *;
- adopt remuneration policies which meet or exceed the legal minimum wage fixed by applicable laws; or, as a minimum provide a regular living wage which meets employee basic needs;
- grant your full-time employees a minimum paid leave per year of service in accordance with applicable laws; 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 Labour Organisation (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 you operate;
- endeavor to cover any shortcomings in State employee protection systems by putting in employee safeguards and encouraging the same in your 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 you cause or to which you 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 your organization and carry out proportionate inspections to ensure that remains the case;
- produce a publicly available anti-slavery statement " where required by law;
- conduct reasonable due diligence on suppliers you engage with on behalf of Clear Channel Outdoor and not contract with any suppliers engaged in any practice of slavery and servitude, forced or compulsory labor or human trafficking;
- actively monitor your 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 you engage on Clear Channel Outdoor's behalf; and
- immediately cease further dealings with any third party connected with human rights abuses.

PROMOTE INTEGRITY, HONESTY AND TRANSPARENCY IN YOUR COMMERCIAL DEALINGS

- comply with applicable laws and regulations in force that require transparency and integrity in your commercial dealings and financial obligations to Clear Channel Outdoor;
- disclose the true account of your financial records to the relevant regulatory bodies and to Clear Channel Outdoor when appropriate under our agreement with you; and
- inform Clear Channel Outdoor of any financial detriment that risksour agreement with you.

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 the local communities; and
- consider the impact of your working practices on local communities.
 - ⁵ (ILO Conventions No. 100 and No. 111)
 - 6 (ILO Conventions No. 29 and No. 105)
 - 7 (ILO Convention No. 138)
 - 8 (ILO Conventions No. 87 and No. 98)
 - 9 (ILO Convention No. 30)
 - ¹⁰ (ILO Conventions No. 14 and No. 106)
 - "Clear Channel Outdoor is committed to complying with the UK Modern Slavery Actand will not knowingly deal with parties engaged in any practice



Appendix one

Fair Dealing

- I. Zero Tolerance on Bribery
- 2. Strong Tone From the Top
- 3. Adequate Procedures to combat Economic Crime
- 4. Fair Third Party Relationships
- 5. Trustworthy Books and Records
- 6. Fair Competition

Fair Reporting

- I. Complete and Accurate Financial Statements
- 2. Appropriate and Adequate Review of Financial Duties
- 3. Effective Internal Controls and Procedures for financial reporting
- 4. Compliance with Applicable Laws and Company **Policies**
- 5. Sufficient Documentation
- 6. Management Accountability

Fair Processing

- I. Adequate, Relevant, Accurate and Necessary Personal Data
- 2. Lawfulness, Transparency and Respect for Data Subject Rights
- 3. Personal Data used for Limited Purposes
- 4. Personal Data stored for only as long as Necessary
- 5. Personal Data protected in Transfer
- 6. Adequately Secured Personal Data

Fair Information Security

- I. Adequate Information Risk Management
- 2. Confidentiality, Integrity, Availability
- 3. Individual Employee Accountability
- 4. Information Security By Design
- 5. Information Security By Association
- 6. Effective Information Security Incident Response

Fair Environment

- I. Protect the Environment, reducing our impact where possible
- 2. Adhere to Statutory and Regulatory **Environmental Requirements**
- 3. Respect Communities in which we operate
- 4. Facilitate a Safe and Sanitary working environment
- 5. Exercise Responsible Environmental Leadership
- 6. Understand and React Responsibly to Geopolitical and Climate Change Risks

Fair Relationships

- I. Promote Equal Treatment of All People
- 2. Humane Treatment of Employees and Business Partners in accordance with Applicable Law
- 3. Adherence to ILO principles
- 4. Adequately Address the Risk of Modern Slavery in our Supply Chains
- 5. Promote Integrity, Honesty and Transparency
- 6. Maintain and Evolve Community Relations through Social and Charitable Campaigns

