Global (as defined below) strives to maintain throughout its operations a work environment that reflects the highest standards of business ethics and workplace behaviour, and is committed to legal compliance and ethical business practices in all of its operations in Europe. “Global” means any or all of Global Outdoor Media Limited, Primesight Limited, Primesight Airports Limited, InLink Limited, Outdoor Plus Limited, Exterion Media (Ireland) Limited, Exterion Media (Netherlands) BV, Exterion Media (France) S.A., Exterion Media Spain S.A. and each of their businesses, divisions, holding companies, subsidiaries, and group undertakings.

In the furtherance of these standards, Global expects all of its suppliers, contractors and others, with whom Global conducts business (collectively referred to as “Suppliers”), to comply with all applicable laws and regulations in the places in which they do business, and to maintain the highest degree of ethics in every aspect of their business with Global. This policy sets forth Global’s expectation of its Suppliers. Global is firm in its resolve to do business only with those suppliers who share in its commitment to integrity.

Global’s Suppliers should be familiar with Global’s Anti-Bribery Policy (“ABC Policy”). Hard copies of the ABC Policy are available on demand.

Global recognises that there are different legal and cultural environments in which Global operates throughout Europe. Regardless, this Policy sets forth the minimum requirements that Suppliers must meet to do business with Global. In order to comply with these requirements, Suppliers must communicate the principles of this Policy throughout their supply chain.

Global reserves the right to monitor compliance with this Policy and to ensure that it is being respected throughout its Supply Chain. Global reserves the right to request documentation, conduct audits, review and approve corrective action plans and verify implementation of corrective action, on at least an annual basis. Adoption of, and adherence to, this Policy by a supplier is a prerequisite for Global in its selection of new suppliers. To monitor this,

Global expects strict COMPLIANCE with the requirements of:

- all applicable anti-corruption and anti-bribery laws, including in all cases the United Kingdom Bribery Act 2010 and the United States Foreign Corrupt Practices Act, the Organization for Economic Cooperation and Development Convention on Combating Bribery of Foreign Public Officials in International Business Transactions, and EU and US sanctions laws and orders;

- all applicable laws regarding political contributions and payments;

- statutory and contractual requirements to maintain accurate financial reporting systems and records relating to each supplier’s dealings with Global;

- all applicable laws regarding employment including those prohibiting discrimination, harassment or victimisation of workers;

- all applicable laws, regulations and standards regarding public procurement;
Global Outdoor Media Limited, registered in England and Wales with company number 02866133 and having its registered office at 7th Floor, Lacon House, 84 Theobald’s Road, London WC1X 8NL

- all applicable laws, regulations and standards regarding privacy, data and information security;
- all applicable laws regarding imports and exports of technology and other goods;
- all applicable laws regarding slavery, servitude, child and/or forced or compulsory labour and human trafficking, including the UK Modern Slavery Act 2015, and expects its suppliers to have instituted and maintained appropriate policies and procedures to ensure that the same are not taking place in their own businesses or supply chains;
- all applicable laws, regulations and standards regarding fair and ethical employment practices including those relating to wages; hours; overtime and benefits; and health, safety and the environment;
- all rules, codes, standards, agreements and procedures notified to the Supplier which are required to be complied with by Global and its suppliers at any property, or in relation to any asset or infrastructure for which Global provides advertising or advertising services; and
- any ethical sourcing or fair labour principles notified to the Supplier which the purchaser of Global’s services requires to be complied with by Global and its Suppliers.

Global’s policy PROHIBITS all of the following conduct by any Supplier or any contractor to any Supplier of Global or by their employees, agents, directors or consultants:

- direct or indirect improper payments or offers of payment or benefits in kind to or from:
  - any domestic or foreign government official or employee;
  - their representatives, agents or family members;
  - any employee, officer, contractor or agent of Global or any customer of Global; or
  - any other person;

- the offering or giving of discounts, entertainment, meals, transportation, gifts or other favours or personal benefits to Global employees or any employee, officer, contractor or agent of any client of Exterion Media (other than as expressly provided in the ABC Policy) or the receipt by any employee, agent, officer, director or contractor of any improper payment, kickback or other improper benefit;

- entering into a business arrangement with employees of either Global or of its clients;

- anti-competitive business practices and non-adherence to applicable local and international antitrust laws;

- use of Global’s name, assets (including intellectual property), facilities or services without written authorisation or for any improper purpose;
• disclosure of confidential or proprietary information to any third party (including the press) without prior written authorisation;

• discrimination in the work environment; and

• acts of sexual, physical, verbal, psychological or any other form of harassment, abuse or discrimination in work environment.

To the extent the Supplier is a supplier to Global Outdoor Media Limited, the Supplier will:

• ensure that its employees are paid an hourly wage (or equivalent of an hourly wage) at least the hourly London Living Wage (defined below); and

• provide to Global such information concerning the London Living Wage as Global may reasonably require from time to time.

“London Living Wage” is the then current London Living Wage as calculated by the Centre for Research in Social Policy (or any replacement thereof) and as published by the Living Wage Foundation.

Suppliers are expected to assist Global in enforcing this Policy by communicating its principles to their employees and suppliers or contractors and by notifying to Global any breaches of this Policy.

If it is found that a Supplier has committed one or more violations of this policy, Global will take appropriate action, taking into account any mitigating factors such as timely notification, evidence of its regular communication etc. Such action may range from working with the Supplier to ensure that steps are taken to correct breaches and prevent their recurrence, to cancelling the affected contract, terminating the relationship with such Supplier, commencing legal action against such Supplier or other actions as warranted.

For any questions regarding Global’s Supplier Compliance Policy, please contact a member of Global’s Legal Department.

September 2019