



## SUPPLIER COMPLIANCE POLICY

OUTFRONT Media Inc. and its subsidiaries (collectively, the “Company”) strive to maintain throughout its global operations a work environment that reflects the highest standards of business ethics and workplace behavior, and is committed to legal compliance and ethical business practices in all of its domestic and foreign operations. In furtherance of these standards, the Company expects all of its suppliers (“suppliers”) to comply with all applicable laws and regulations in the places in which they do business, to take strong measures to ensure that their suppliers do so as well, and to maintain the highest degree of ethics in every aspect of their business with the company and others. The Company is firm in its resolve to do business only with those suppliers who share its commitment to integrity and ethical business practices.

Accordingly, the Company expects strict **COMPLIANCE** with:

- All applicable anti-corruption and anti-bribery laws, including in all cases the United States Foreign Corrupt Practices Act, the United Kingdom Bribery Act, the Organization for Economic Cooperation and Development Convention on Combating Bribery of Foreign Public Officials in International Business Transactions, and United States anti-boycott laws;
- All applicable laws regarding fair trade including free competition, anti-trust laws, and intellectual property rights;
- All applicable laws regarding political contributions and payments;
- Maintaining accurate financial reporting systems and records relating to each supplier’s dealings with the Company;
- All applicable laws prohibiting discrimination, harassment and retaliation;
- All applicable laws regarding government contracting;
- All applicable laws regarding privacy, data and information security;
- All applicable laws regarding imports, exports and manufacturing, including those related to importation or exportation of technology, and responsible sourcing such as the Dodd-Frank conflicts minerals regulations, and regulations concerning the import or export of goods containing prohibited animal wildlife, plant product or by product;
- All applicable laws respecting fair and ethical employment practices including those

relating to child and forced labor, immigration, wages, days of service, rest periods, hours, overtime, benefits, leaves, and occupational health and safety; and,

- All applicable laws regarding the environment.

The Company **PROHIBITS** all of the following conduct by its suppliers:

- Direct or indirect improper payments or offers of payment to any domestic or foreign government official or employee, as well as their representatives, agents or family members;
- Actual or perceived unethical or compromising conduct in relationships, actions and communications, such as the offering or giving of discounts, entertainment, meals, transportation, gifts or other favors or personal benefits to the Company's employees other than as expressly provided in the Company's Code of Conduct ("Code") which can be found at [investor.outfrontmedia.com](http://investor.outfrontmedia.com);
- Anti-competitive business practices and non-adherence to applicable local and international antitrust laws;
- Use of the company name, assets (including, without limitation, its intellectual property), facilities or services without prior written authorization or for any improper purpose;
- Disclosure of the company confidential and proprietary information to any third party (including, without limitation, the press) without prior written authorization;
- Acts of sexual, physical, mental or any other form of harassment, retaliation, abuse or improper discrimination in the workplace and in any work-related setting outside the workplace, such as during business trips, business meetings and business-related social events;
- Employing workers in breach of immigration laws, applicable minimum age of work laws or any other form of unlawful child labor;
- Employing workers by means of force, threats of force or physical restraint, or by means of actual or threatened abuse of law or legal process, or by any other means of scheme, plan or pattern intended to cause the person to believe that if that person did not perform such labor or service, that person or another person would suffer serious harm or physical restraint; and
- Behavior that violates import or export laws.

The Company cooperates with law enforcement authorities in the proper execution of their responsibilities.

**By contracting with the Company, each supplier is representing and certifying to the Company that it is in compliance with the Policy set forth above.** Should any supplier discover that it is not in compliance with this Policy, it must promptly provide written disclosure to the Company.

The Company also reserves the right to survey or audit its suppliers with respect to the Company business. Such surveys or audits may be conducted by the Company or through an independent third party. Audits may entail on-site inspections (whether announced or unannounced), interviews of suppliers' employees or agents or examining third-party environmental certifications.<sup>1</sup> If it is found that a supplier has committed one or more violations of this Policy, the Company will take action as it determines is warranted. Such action may include working with the supplier to ensure that steps are taken to address the violations and prevent their recurrence, to canceling the affected contract, terminating the relationship with such supplier, or commencing legal action against such supplier.<sup>2</sup>

For any questions regarding the Company's Supplier Compliance Policy, please contact the Company's Chief Compliance Officer. The Code identifies, and contains instructions on, the various means of communicating with the company's Chief Compliance Officer.

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<sup>1</sup> To the extent that the right to audit a supplier as set forth herein contradicts any existing agreement between the Company and a supplier, it is expressly understood that the language set forth in the existing agreement is controlling.

<sup>2</sup> Nothing herein is intended to create an employment relationship with a supplier's employees or agents, to infringe upon the freedom of association rights of a supplier's employees or agents, or to create new or additional third party or supplier employee rights.