




Issued By: <i>Legal Department</i>	Policy No & Version: <i>LEG – 02 & v.01</i>	Date: <i>January 1, 2025</i>
Subject / Title: <i>Whistleblower Policy / Ethics and Compliance Hotline</i>		Page 1 of 5

Policy Approval: The signatures below acknowledge the approval of the policy and / or procedure detailed in this document by Senior Management and the corresponding Departmental or Functional Head.



Richard D. Lara
EVP, General Counsel

01/1/2025

Date



Alex Aleman
SVP of Operations Consolidated

01/01/2025

Date

Objective – The SBS Whistleblower Policy is designed to uphold the organization’s commitment to integrity, transparency, and accountability. It establishes a secure process for reporting potential violations of laws, regulations, or company policies, while protecting individuals who report in good faith from retaliation. This policy also outlines procedures for submitting complaints related to accounting, internal accounting controls, auditing matters, or breaches of Spanish Broadcasting System, Inc.’s (SBS) policies and procedures, including the Stock and Trading Policy, the Code of Business Conduct and Ethics, or applicable laws.

Applicability – This policy applies to all SBS employees, contractors, officers, and stakeholders across all locations and levels of the organization. It covers all operations, activities, and relationships under SBS’s purview.

Effective Date – January 1, 2025

This updated Whistleblower Policy becomes effective on January 1, 2025, and supersedes all previous versions.

Purpose

Spanish Broadcasting System, Inc. (the "Company") establishes procedures for:

(a) the receipt, retention, and treatment of complaints received by the Company regarding accounting, internal accounting controls, or auditing matters; and (b) the confidential, anonymous submission by employees of the Company of concerns regarding questionable accounting or auditing matters. The Company will use the policy and procedure set forth below to provide employees with an avenue to submit complaints regarding non-compliance with any of the Company's policies and procedures, including the Stock Trading Policy and its Code of Business Conduct and Ethics, as well as complaints regarding possible violations of law, and other complaints that may otherwise amount to conduct deemed to be seriously improper.

The SBS Whistleblower Policy is intended to ensure compliance with these goals and to provide employees, contractors, and stakeholders with a clear and secure mechanism for reporting potential violations of laws, regulations, or company policies, including concerns related to financial misconduct.

This policy reinforces SBS's commitment to ethical business practices and accountability by creating a safe environment where individuals can report concerns in good faith without fear of retaliation.

Policy

The following procedures are in place:

1. Any employee of SBS is encouraged to submit, on a confidential, anonymous basis, any good faith concerns regarding accounting, internal accounting, auditing matters, violations of the Company's policies and procedures, including the Stock Trading Policy and its Code of Business Conduct and Ethics, as well as complaints regarding possible violations of law, and other complaints that may otherwise amount to conduct deemed to be seriously improper.
2. SBS provides various alternatives for reporting all such concerns. Employees can directly contact their supervisor, any member of the management team, or use the SBS Ethics and Compliance Hotline.
3. As part of our effort to ensure all employees have readily accessible and easy-to-use opportunities to report ethics concerns, the SBS Whistleblower Hotline is confidential and available 24 hours a day, seven days a week. It offers an automated voice-recorded message box for Employees. Employees who wish to discuss any matter on a non-confidential or non-anonymous basis should provide contact information, such as a telephone number, with their complaint.
4. SBS encourages employees to include their contact information with complaints or concerns to enable effective follow-up and investigation. Prompt reporting supports a thorough investigation and ensures protection against retaliation for raising legitimate concerns. The Company will assess the credibility and seriousness of each issue, as well as the likelihood of verifying allegations.

5. Following the receipt of any complaints, management will investigate each matter and take corrective and disciplinary actions, as it deems appropriate, alone or in combination, including, but not limited to, reprimands, warnings, probation or suspension without pay, demotion, reduction in salary, discharge for cause, and restitution.

6. SBS will not discipline, discriminate against, or retaliate against any employee who reports concerns in good faith, unless it is determined that the report was knowingly false or made with intent to harm another. Malicious allegations may result in disciplinary action, as described in Section 5 above.

Responsibilities

Doing business the right way is everyone's responsibility at SBS. If you suspect a possible violation of a law, regulation, or SBS ethical standard, you should promptly contact any of the following:

Your Manager

The Human Resources Department

The Legal Department

A member of the management team

The **SBS Whistleblower Hotline: 786-474-3802**

Email: SBSHumanResources@sbscorporate.com

Address: 7007 NW 77th Ave., Miami, FL 33166

Maintaining ethical standards—including appropriate accounting practices and effective internal accounting controls—is the responsibility of every member of the SBS family and is critical to our commitment to conducting business while maintaining high standards of ethics and integrity.

Whistleblower Policy / Ethics and Compliance Hotline

Acknowledgement Form

I have received, either in print or by viewing it on the Company's website, a copy of Spanish Broadcasting System, Inc.'s Whistleblower Policy / Ethics and Compliance Hotline. I have read and understand the Policy.

Employee's Name (Printed)

Date

Signature: _____