

WEBJET GROUP CONSOLIDATED POLICIES AND PROCEDURES

This document sets out the Policies and Procedures of Webjet Limited and its wholly owned companies (**Webjet Group**) for all Webjet Group's officers, agents, employees and contractors (**Staff Members**), with respect to confidentiality and privacy, email and internet usage, social media and the Webjet Group Code of Business Conduct.

Please read these Policies and Procedures and ensure you understand them fully. All Staff Members must comply with them at all times. Failure to comply with these Policies and Procedures may result in disciplinary action, including termination.

POLICY NAME:	Confidentiality and Privacy Policy
Last Revised	September 2016

CONFIDENTIALITY AND PRIVACY POLICY

1. Defined Terms

Company means each and every member of the Webjet Group as the context permits.

Confidential Information means the following, whether or not in material form: all business plans, strategies, client lists, information in relation to commercial arrangements and contacts, any other personal information and other confidential information (including trade secrets and confidential know-how) of Webjet Group.

Interference with privacy means a breach of Webjet Group's obligations to comply with applicable laws, rules and regulations governing privacy.

Personal Information means information or an opinion (whether true or not) about an individual whose identity can be established from that information or opinion or other information regulated by a Privacy Act.

Privacy Act means applicable legislation, rules and regulations which govern privacy in the jurisdictions in which members of the Webjet Group operate.

2.1 Keep information confidential

Staff Members are required to:

- (a) keep Confidential Information of Webjet Group confidential;
- (b) only use the Confidential Information for the purpose of performing their functions as a Staff Member of Webjet Group, and otherwise for purposes associated directly with the operations and business of Webjet Group;
- (c) establish and maintain effective security measures to safeguard Confidential Information from loss, access, disclosure or use not authorised by this Policy or permitted by applicable laws such as a Privacy Act;
- (d) give Webjet Group notice if they become aware of any suspected or actual loss, unauthorised use, copying or disclosure of Confidential Information; and

- (e) immediately take all steps to prevent or stop the suspected or actual loss, unauthorised use, access copying or disclosure of Confidential Information.

2.2 Copying of Confidential Information

Staff Members are required to:

- (a) not copy Confidential Information without the written consent of Webjet Group; and
- (b) ensure that all copies of Confidential Information are prominently marked as **CONFIDENTIAL**.

2.3 Obligation to return Confidential Information

On termination of their engagement or employment, all Staff Members must immediately:

- (a) cease using the Confidential Information; and
- (b) at Webjet Group's option:
 - (i) return to Webjet Group; or
 - (ii) destroy and certify in writing to Webjet Group the destruction of, all Confidential Information in their possession or control.

2. Improper use or copying of Confidential Information

Webjet Group will not tolerate fraudulent activity against its interests or against any other person. Fraud is a deliberate deception and made with the intention of gaining an unjustified or illegal benefit or other dishonest advantage. Webjet Group's standard policy is to prosecute employees where it has reasonable grounds to suspect fraud. You must not engage in any fraudulent activity as it is illegal, undermines business principles and destroys trust.

3. Exclusions

The obligations of confidentiality under this Policy and Procedure do not extend to information which:

- (a) is rightfully known to or in the possession or control of a Staff Member and not subject to an obligation of confidentiality on the part of that Staff Member as described in this Policy;
- (b) is public knowledge (otherwise than as a result of a breach of this Policy or the obligations of confidentiality under this Policy); or
- (c) a Staff Member is required or authorised to disclose by law.

POLICY NAME:	Email and Internet Policy
Last Revised	September 2016

EMAIL & INTERNET POLICY

1. Purpose of Policy

The following Policy and Procedure measures are critical to Webjet Limited and its wholly owned companies (**Webjet Group**) given our dependence on our email, internet and other computer systems. As we rely almost 100% on our internal IT facilities and systems, anything that has the potential to jeopardise our ability to effectively operate at an optimum is a threat to our business. These measures are designed to optimise email and internet usage for the Webjet Group business and to protect Webjet Group from the introduction of malicious code such as viruses and malware.

This Policy sets out the responsibilities and obligations of all Webjet Group officers, agents, employees and contractors (**Staff Members**) who are granted rights to access and use Webjet Group's email system and the internet via Webjet Group's computers and facilities, including the use of the local or hard drive, intranet, internet, email, electronic diaries and other electronic communication technologies (**Computer Systems**).

2. Staff Member's Responsibilities

By using the Computer Systems, all Staff Members accept responsibility to comply with these Policies and guidelines. Any failure or refusal of any Staff Member to adhere to these Policies will be investigated by Webjet Group and may expose that Staff Member to a range of disciplinary actions by Webjet Group, including termination of their engagement or employment.

3. User-id's and Passwords

The use of the Computer Systems is controlled through a "user id" and access rights are governed by a "password" that is personal to each Staff Member.

Passwords must not be divulged to others, as each Staff Member is responsible for any actions executed through their user id. If a Staff Member considers that others may have discovered his/her password, it is the Staff Member's responsibility to change the password as soon as possible.

Staff Members are also responsible to ensure that any Confidential Information transferred (for a proper purpose) to any other device available to them is also password protected, noting that information protected by privacy laws, should not be downloaded to any other device in any circumstances.

4. Emails

4.1 Permitted Use and Requirements

- (a) Each Staff Member who is granted the right to access and use Webjet Group's email system, must strictly only send and receive email from their account to enable them to perform their functions as a Staff Member of Webjet Group, and otherwise for purposes associated directly with the operations and business of Webjet Group. Subject absolutely to any contrary management directive, reasonable personal use is permitted.

- (b) Staff Members should be aware that each email sent or received by them could constitute a formal record, and may be used as evidence in legal proceedings or investigations by regulators such as the Privacy Commissioner, or be required to be disclosed by Webjet Group in such proceedings. This will be the case irrespective of the size of the email, and whether the sender intended such email to be a formal communication.

4.2 Ownership of Email

In consideration of being granted a right to access and use Webjet Group's email system, each Staff Member agrees that all email messages sent and received by that Staff Member, using Webjet Group's email system, are the property of Webjet Group. For the avoidance of doubt, all intellectual property rights subsisting in email messages that a Staff Member creates and/or sends using Webjet Group's email system become the absolute property of Webjet Group. If requested to do so, a Staff Member will execute such documents as are necessary to give effect to this paragraph.

By accessing and using Webjet Group's email system, each Staff Member also agrees to waive their moral rights in email messages, created and sent using Webjet Group's email system, relating to attribution of authorship (or false attribution of authorship) and to preserving the integrity (and refraining from any derogatory treatment) of each such message.

4.3 Prohibited Use

Each Staff Member who is granted the right to access and use Webjet Group's email system must not:

- (a) email or attach to an email, any confidential or proprietary information of Webjet Group, or any client-sensitive or personal information, unless duly authorised to do so expressly or in terms of your role at Webjet Group;
- (b) create send or forward emails containing personal and/or unauthorised opinions, forecasts or statements about Webjet Group, its business, financial affairs, customers, employees or contractors;
- (c) create, send or forward emails containing (or which contain links to) material that is, or may be construed to be, defamatory, an interference with privacy, harassing, threatening, vilifying, obscene, offensive, discriminatory, sexually explicit, sexist, racist, or abusive, or which harasses or promotes hatred or discrimination based on any unlawful grounds against any person;
- (d) use email for illegal purposes, including, but not limited to, the manufacture, use, sale or purchase of illegal drugs or dangerous materials and the distribution of pornography, seditious material or other material prohibited under applicable laws;
- (e) use email to distribute spam or mass mail or to send or receive chain mail;
- (f) use Webjet Group's email system to conduct any private business or commercial activities for personal gain, or to solicit others for activities unrelated to Webjet Group's business activities;
- (g) use Webjet Group's email system as a method of distributing software in a manner that is inconsistent with any third party's licence agreements, or the intellectual property rights of that software's owners or licensees; or

- (h) send copies of materials in violation of the laws of copyright, trademarks, designs, patents or circuit layouts, or infringe Webjet Group's or a third party's intellectual property rights.

5. Internet

5.1 Permitted Use and Requirements

Each Staff Member who is granted the right to access and use the internet via the Computer Systems, must use these facilities to enable them to perform their functions as a Staff Member of Webjet Group, and otherwise for purposes associated directly with the operations and business of Webjet Group subject absolutely to any contrary management directive, reasonable personal use of private email accounts and reasonable personal use of social networking websites via the internet, such as "Facebook" is permitted.

5.2 Prohibited Use

Each Staff Member who is granted the right to access and use the internet must not:

- (a) intentionally use the internet to post, upload, transmit, receive or download any images, content or materials that:
 - (i) are, or may be construed to be, defamatory, an interference with privacy, harassing, bullying, threatening, vilifying, obscene, offensive, discriminatory, pornographic, sexually explicit, sexist, racist or abusive;
 - (ii) harass or promote hatred or discrimination based on any unlawful grounds against any person;
 - (iii) contain any virus, worm, Trojan or other harmful or destructive code;
 - (iv) injure the reputation of Webjet Group, expose Webjet Group to civil or criminal liability (including compensation for damages) or penalties, or investigations by any regulator, or cause embarrassment to Webjet Group; or
 - (v) contain another person's personal information, trademarks or copyrighted materials without specific authorisation to do so from the appropriate person;
- (b) use the internet for any illegal purposes, including but not limited to, the manufacture, use, sale or purchase of illegal drugs or dangerous materials and/or the distribution of pornography or seditious material;
- (c) use the internet to gain, or attempt to gain, unauthorised access to any person's (including Webjet Group's) servers, networks or databases;
- (d) use the internet to engage in online gambling or day trading;
- (e) use the internet to engage in outside business ventures, or to engage in the sale of goods or services;
- (f) use the internet to access or contribute to blogs, electronic bulletin boards or chat rooms, and in particular must not post confidential information of, or in the possession of, Webjet Group, or statements of opinion or forecasts in relation to the business, operations, members, customers or management of Webjet Group, on such unsecured sites;
- (g) use the internet to perform any activity using an anonymous or misleading identity;
- (h) access the internet using another Staff Member's user id or account;
- (i) download any personal material, such as music, data or software without prior express written authorisation; or
- (j) attempt to penetrate the computer or network of any third party, or otherwise obtain unauthorised access to another person's computer or email account.

6. **Monitoring**

All actions performed using the Computer Systems are logged and may be monitored by Webjet Group or another person on Webjet Group's behalf. Webjet Group may copy, access or disclose any information or files that are stored, processed or transmitted using the Computer Systems. This includes document creation, file management, electronic diaries, electronic communications which are sent to or by Staff Members internally or externally and internet activity (including the sites visited, the contents of those sites and the time spent at each site).

Webjet Group will monitor the Computer Systems on an ongoing basis. Staff Members should expect this monitoring to be continuous.

Staff Members using the Computer Systems should not have any expectation of privacy for any actions performed using the Computer Systems, including email, electronic diaries or documents. Staff Members should also be aware that emails, documents, diaries etc. might be archived by Webjet Group management as it considers appropriate, including files which may have been deleted that exist in Webjet Group's backup systems.

7. **Privacy**

In the course of carrying out duties as a Staff Member of Webjet Group, or by virtue of them being provided with access to Webjet Group files or Webjet Group electronic resources, Staff Members may have access to, or handle, personal information relating to others, including Webjet Group customers, other Staff Members of Webjet Group, suppliers and contractors. Email should not be used to disclose personal information of another person except in accordance with Webjet Group's privacy policies and the *Privacy Act* for the purposes of performing that Staff Member's duties.

In order to comply with Webjet Group's obligations under privacy law, Staff Members are encouraged to use the blind copy option when sending external emails to multiple recipients, as disclosure of those persons' email addresses may interfere with their privacy.

8. **Breach of Policy**

Breaches of this Policy will be reviewed on an individual basis, however serious breaches may result in disciplinary action including the termination of a Staff Member's employment or engagement. Further, Webjet Group has a responsibility to notify the Police if it is reasonably believed a criminal offence may have been committed.

If you have any concerns or questions in relation to this Policy, please discuss these with your department manager as soon as practicable.

POLICY NAME:	Social Media Policy
Last Revised	September 2016

SOCIAL MEDIA POLICY

1. Purpose of Policy

This Policy applies to Webjet Limited and its wholly owned companies (**Webjet Group**) and all Webjet Group's officers, agents, employees and contractors (**Staff Members**). It applies whenever a Staff member's use of Social Media relates or impacts on their capacity to perform their role as a Webjet Group Staff Member or impacts the standing or reputation of Webjet Group. Any personal Social Media interactions using Webjet Group's computers and facilities, including the use of the local or hard drive, intranet, internet, email, electronic diaries and other electronic communication technologies (**Computer Systems**), whether or not the interactions relate to Webjet Group, are also covered by this Policy.

Breaches of this Policy can result in counselling and disciplinary procedures up to and including termination of employment or engagement (as the case may be). Breaches can also lead to involvement of external authorities including but not limited to law enforcement agencies.

2. What is Social Media

This Policy applies to all types of social media platforms and communication tools that exist now or may exist in the future. Social Media refers to the connection of people in an online environment.

3. Webjet Group's expectations and you

As a member of the broader community, Webjet Group expects you to exercise prudence and good judgment when using Social Media. Webjet Group encourages Staff Members to think about how and what they are communicating when using Social Media.

Unless you are an authorised Webjet Group Social Media representative, you may not comment on policy, strategy, operations or any other matter affecting Webjet Group. If you are an authorised Webjet Group Social Media representative, you shall act in the best interests of Webjet Group and in accordance with your manager's instructions.

If you identify an issue that Webjet Group should be interested in or respond to, or any proposal for use of Social Media to engage with an audience or stakeholder, this should be referred to your Manager.

When using Social Media:

1. Either

Be silent on your role with Webjet Group

OR

Be clear and declare who you are and your role with Webjet Group

But be accurate e.g.

do not represent yourself as a manager if that is not the case

do not represent yourself as someone else

Ensure your profile content is consistent with Webjet Group's values.

2. Only participate for yourself as an individual unless you have Webjet Group's prior approval to participate on its behalf in Social Media.
3. Ensure that you do not make a public comment, even if you make it in your private capacity, in circumstances where the comment could be taken to be an official comment or you are advising or directly involved in the subject of the comment.
4. If you have disclosed your role with Webjet Group, declare that your comments are your own views and not those of Webjet Group.
5. You should remove reference to Webjet Group from your profile if you want to write or comment about Webjet Group, and, in any event make it clear that your comments are your personal comments.
6. Protect all confidential and proprietary Information of Webjet Group and do not publish it in any form (including postings and texts) – it is not public information so it must not be shared.
7. Never share personal information (including name, telephone numbers, addresses or medical information) regarding other employees, contractors or suppliers.
8. Do not post photos or videos of Webjet Group premises or events or any activities taking place at those premises.
9. Be respectful of others and Webjet Group. Do not post material that is or could be perceived to be demeaning, denigrating, obscene, defamatory, threatening, harassing, discriminatory or hateful about your co-workers, customers, suppliers, contractors or Webjet Group's competitors.
10. Do not participate (other than reasonable use) in personal, non-business related Social Media during work hours.
11. Do not use other people's property such as trademarks, logos or copyrighted music, photos, videos, or news articles, without their permission.
12. Webjet Group may monitor postings and will report any crimes to the proper authorities.
13. Think before you post – you own the consequences,

4. Consequences of a breach of Policy

Webjet Group may monitor external postings and review any internal postings for compliance with this Policy. Any crimes will be reported to the proper authorities. Any breach of this Policy may result in disciplinary action, including, but not limited to, termination of employment or any service agreement. In addition, Webjet Group may further restrict or withdraw your access to the Computer Systems and there may be civil or criminal prosecution or other action brought. You may also be held liable financially for all loss and damage caused by your actions or omissions.

5. Reporting inappropriate use

If you notice inappropriate content relating to Webjet Group and/or its employees or stakeholders, you should report the incident to the Chief Executive Officer of your business entity, or the Group Chief Commercial Officer if the Chief Operating Officer is involved.

POLICY NAME:	Webjet Group Code of Business Conduct
Last Revised	September 2018

WEBJET GROUP CODE OF BUSINESS CONDUCT

1. Introduction

Webjet Limited and its wholly owned companies (**Webjet Group**) believe that its officers, agents, employees and contractors (**Staff Members**) should conduct themselves in an ethical manner at all times. Ethical conduct relates to standards of behaviour characterised not only by complying with the law but also by acting honestly and fairly and with respect for others.

The manner, in which we conduct ourselves, both in our working and private lives, is a major element in the way we are regarded within the business and wider community. One purpose of this Code of Business Conduct is to provide guidance for our behavior when representing Webjet Group.

2. Webjet Group Policy on Ethical Behaviour

Webjet Group is committed to operating to the highest standards of ethical behaviour and honesty and with full regard for the safety and health of its Staff Members, customers, the wider community and the environment. Webjet Group Staff Members must act with integrity and honesty in the day to day performance of their jobs and in any situation where their conduct and behaviour could influence respect for the Company.

3. Webjet Group's Expectations

All Webjet Group Staff Members are expected to comply with this Policy and conduct their activities on behalf of the Webjet Group accordingly. Webjet Group management must positively promote the Policy by personal example, by giving clear and unambiguous guidance and assistance on its operation and by ensuring that it is communicated and understood by all Webjet Group Staff Members and by third parties who need to be aware of it.

3.1 Key Requirements that must be observed

All Webjet Group Staff Members should:

- (a) comply with the letter and spirit of the laws affecting Webjet Group's businesses and promote business success by the pursuit of competition within the regulatory rules;
- (b) comply with the Webjet Group Code of Business Conduct and Webjet Group's Policies and Procedures;
- (c) act honestly and with integrity and strive to earn and maintain the respect and trust of co-employees, customers and the wider community;
- (d) use Webjet Group's resources, including information systems, in an appropriate and responsible way;
- (e) work safely and with due regard for the safety and well-being of fellow employees, customers and all persons affected by Webjet Group's operations or products free from discrimination and harassment;
- (f) avoid situations which involve or may involve a conflict between their personal interests and the interests of Webjet Group;
- (g) respect people's privacy;
- (h) have due regard for cultural diversity in the workplace; and

- (i) respect the environment and ensure that work activities are managed in an acceptable manner so as to give benefit to society.

Webjet Group has adopted policies which commit it to meeting its responsibilities in areas where ethical or legal issues arise. These are broadly characterised below.

4. Commercial Community

(a) Conflict of interest

Staff Members should avoid any situation which involves or may involve an actual or perceived conflict between their personal interests and the interests of Webjet Group. Any potential conflict must be disclosed.

(b) Trading in Webjet Limited and other securities

Webjet Group Staff must not, directly or indirectly, buy or sell the shares or other securities of any company, including Webjet Limited, when in possession of unpublished price sensitive information which could materially affect the value of those securities, nor should they engage in short-term dealing in Webjet Limited's shares or those of any related corporation.

Subject to this restriction, Webjet Group Staff may only buy and/or sell Webjet Limited's shares in accordance with the Webjet Group Share Trading and Conflicts Policy which accompanies this document and can be found on the company intranet, as well as the Webjet AU website under Investor relations.

6. Commercial Relations

(a) Competition policy

Webjet Group and its Staff Members, while competing vigorously in the marketplace, will comply with the competition/anti-trust laws of those countries in which Webjet Group operates, including the competition and consumer legislation of Australia.

(b) Product stewardship

Is the process by which Webjet Group identifies and manages its safety, health and environment ("SHE") performance as applied to the development, manufacture, distribution, marketing, use and disposal of its products. The SHE factors associated with any product from its conception through to ultimate use and disposal must be managed responsibly and ethically.

7. Employment and Business Standards

(a) Complying with the law

All Staff Members who work for Webjet Group must comply with the general laws relating to the workplace such as occupational health, equal opportunity and harassment) as well as the laws and regulations that specifically relate to their work, including, in particular, the competition laws of each country in which Webjet Group operates and privacy laws.

(b) Business practices – business integrity

Webjet Group conducts its business with honesty, integrity and respect for the interests of its stakeholders. Webjet Group wants suspected Improper Conduct to be disclosed and also wants any person making a disclosure to be protected.

In this context:

Compliance Officer means the Group Chief Commercial Officer.

Whistleblower means any employee, director, officer or contractor of the Webjet Group who, whether anonymously or not attempts to make a disclosure of Improper Conduct.

Improper Conduct means corrupt activity, fraudulent activity, or a substantial mismanagement of Webjet Group's resources, conduct involving substantial risk to public health or safety, or conduct involving substantial risk to the environment.

Protected Disclosure means any good faith communication based on reasonable grounds that discloses or evidences an intention to disclose Improper Conduct.

All Staff Members are encouraged and have the responsibility to report any known or suspected incidences of Improper Conduct by making a Protected Disclosure. Protected Disclosures should be made either to their manager, or to the Compliance Officer. Any manager to whom a Protected Disclosure is made shall as soon as practical communicate that disclosure to the Compliance Officer, and no other person.

Webjet Group will take reasonable steps to protect the identity of the Whistleblower. The Compliance Officer will ensure the Whistleblower is kept informed of action taken in relation to his or her disclosure. Webjet Group acknowledges that the act of whistleblowing will not shield whistleblowers from the reasonable consequences of involvement in Improper Conduct. However in some circumstances an admission may be a mitigating factor when considering disciplinary or other action.

(c) **Business practices — financial inducements**

No Webjet Group Staff Member will make or offer to make any illegal payment to achieve any business objective nor will they offer or accept a bribe, "kickback" or secret commission. Bribery is not only against company policy, it is also an act that attracts criminal prosecution and serious penalties in many countries in which Webjet Group operates.

No Webjet Group Staff Member will, in any transaction, offer, promise or give any payment, gift, rebate or other exchange to or for the benefit of any third party as consideration for performing or refraining from performing the transaction.

(d) **Dealing with fraud**

Webjet Group is committed to maintaining a secure working environment that protects people, company assets and company information from deliberate harm, damage or loss. In appropriate cases and after proper investigation, Webjet Group reserves the right to summarily dismiss Staff Members found to be defrauding the company and, where appropriate, will press for criminal prosecution and seek financial recovery through civil proceedings.

(e) **Equity in employment and harassment**

Recruitment, selection for specific jobs and career progression will be determined by personal merit, competency and the individual's potential to

effectively perform the job. Employment decisions of Webjet Group will take account of these criteria.

Unlawful discrimination and harassment acts prohibited by Webjet Group and will not be tolerated. Appropriate action will be taken if discrimination or harassment occurs.

(f) Health and Safety in the Workplace

Webjet Group has adopted strategies, policies and practices, the objective of which is to eliminate all incidents and circumstances relating to its operations and use of its products which could lead to injury or illness amongst its Staff Members, customers and the wider community. Webjet Group will monitor any health or safety incidents or complaints against remedial or preventative measures in place in order to determine whether those remedial or preventative measures are working.

If a Staff Member wishes to report a health or safety matter or make a complaint about any health and safety matter, he or she should notify his or her manager (or that person's manager if that person is the subject of the complaint). It is the responsibility of management to treat any complaint made sympathetically and seriously, to deal with the complaint, investigate the complaint promptly (ideally within seven days) and take preventative measures in the workplace (if warranted following the investigation).

The manager to whom a complaint is made is responsible for promptly notifying the Chief Executive Officer of their business unit, (or the Group Chief Commercial Officer, if the Chief Executive Officer is the subject of the complaint) and, in conjunction with the Group Chief Commercial Officer or the Chief Executive Officer (as applicable) appropriately documenting, investigating and resolving the complaint.

Any person making a complaint and any person the subject of a complaint shall be informed by management of the outcome of the investigation arising from the complaint and actions (if any) to be taken. Any such investigation shall be conducted by a competent member of management who is impartial. Webjet Group is committed to treating all persons involved in this process fairly and with respect.

Webjet Group is committed to ensuring that employees and contractors work in an environment where people are treated with mutual respect. Bullying is inappropriate and unacceptable behavior as it creates a risk to health and safety. When directed towards an individual and repeated, or occurring as part of a pattern of behavior, use of demeaning language or verbal abuse; use of threats, physical or verbal intimidation; angry or aggressive outbursts; excluding or isolating employees; and ganging up on an employee may be considered bullying.

Reasonable management actions including setting performance goals, standards and deadlines; informing an employee about unsatisfactory work performance; informing an employee about inappropriate behavior; implementing organisational change or downsizing; performance management; and providing constructive feedback are not considered bullying.

Staff Members may deal with bullying either by resolving the issue themselves by discussing the problem with the person involved or by seeking assistance from their manager (or that person's manager if the alleged bullying involves their manager). It is important that Staff Members act honestly, in good faith and, whether the person complaining or the person the subject of the complaint, co-operate in any investigation and resolution processes initiated by management. Examples of actions which may be taken include a change to work practices, an apology being given and accepted, and training.

Staff members found to have been involved in or having condoned bullying in the workplace will be subject to disciplinary action which may include termination of their employment or their terms of engagement.

7. Gifts, Entertainment, Meals and Travel from Vendors

(a) Policy

It is the Policy of the Webjet Group that employees maintain ethical relationships with vendors, and negotiate, award, inspect, or audit contracts with the best interest of the Company uppermost in mind.

(b) Guidelines

Subject to the following guidelines, employees are prohibited from receiving gifts, entertainment, meals, or travel from vendors that might directly or indirectly influence an employee's business judgment or decisions, or that might give the appearance of impropriety.

In conducting company business with vendors, employees must follow the following guidelines as they relate to receiving gifts, entertainment, meals or travel from vendors.

For the purpose of these guidelines, business gifts from vendors shall be defined to include any item or service of value. While gifts should be generally refused, employees may accept gifts, subject to the following guidelines:

- If accepted, the cumulative value of gifts received from a vendor should not exceed \$300 in any 12 month period
- Gifts exceeding the cumulative value may be accepted from vendors if the received gift will be used as a "give-away" or a shared item (e.g. food baskets) at a Company or departmental function
- Gifts of cash or other negotiable instruments, including loans, are prohibited in all cases
- The gift is not made during a time period when bids are being sought to establish a new contract or renegotiate an existing contract with the vendor
- Gifts won from vendors as part of a contest or "give-away", where other individuals have an equal chance of winning, shall be excluded from this Policy
- All business gifts (including meals and entertainment) are to be advised to your manager at the time they are received.

8. The Wider Community

Safety, Health and the Environment

Webjet Group is committed to managing its activities with concern for people and the environment and will conduct its business for the benefit of society and without compromising the quality of life of future generations.

9. Further Information and Help

This can be obtained from your department manager. In any situation where there is doubt, Staff Members should discuss it with their manager or supervisor. All Staff Members are encouraged to comment and contribute to this code by bringing their ideas and comments to their manager's or supervisor's attention.

ACKNOWLEDGEMENT BY WEBJET GROUP STAFF MEMBER

By signing this document you confirm that you have read and understood the policies contained in this document.

Dated this day of 2016.

(Name)
(Signature)