

# Code of Conduct & Consolidated Policies

for all employees

## Record of Document Changes

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VERSION	ISSUE DATE	NATURE OF AMENDMENT	AUTHOR
1.0	01/09/2019		SB
1.1	26/11/2019	Addition of minimum code of conduct language	SB

## Supporting Documents

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Table 1-1 Supporting Documents

DOCUMENT NAME	DESCRIPTION

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## Definition of “Code of Conduct and Consolidated Policies”

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To combine a number of Webjet Limited policies into a singular document.

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# 1. Introduction

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## 1.1 Document name

This policy is the “Webjet Limited Code of Conduct and Consolidated Policies”.

## 1.2 Document Objectives

Webjet Limited has established this document for all team members in relation to our commitment to providing transparent policies and procedures.

## 1.3 Document Applicability

This document sets out the Code of Conduct and Consolidated Policies of Webjet Limited and its wholly-owned companies (Webjet Group) for all Webjet Limited's officers, agents, employees and contractors (Staff Members).

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

Included in this document are:

- Webjet Limited Code of Business Conduct
- Confidentiality and Privacy Policy
- Internet, Email and Social Media Policy
- Equal Employment Opportunity, bullying, and Harassment Policy
- Occupational Health and Safety policy

This Code of Conduct and Consolidated Policies outlines the Webjet Limited’s minimum expectations of you in your code of conduct and policies we require you to comply with. Depending on the entity you work for within the Webjet Limited Group of companies, you may also have provisions within your Employment Agreement or policies specific to your division or entity that cover similar topics. For completeness, should there be any conflict between the provisions of this document and any policies of your company and/or your employment agreement, together known as “your Other Commitments”, your Other Commitments will prevail.

## 1.4 Document Versioning and Change Control

This policy is owned and maintained by the Group Chief Operating Officer.

Updates to the policy will be managed via the Change Management process.

When an updated version has been approved for release, it will be published on SharePoint and employees will be advised of availability.

Updated versions will have their Version Number incremented accordingly.

## 1.5 Document Next Review Date

This document must be reviewed annually. This is the responsibility of the Group Chief Operating Officer.

The next review must be on or before the 1st of July 2020.

## 2. Webjet Limited Code of Business Conduct

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### 2.1 Introduction

Webjet Limited believes that its 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 the wider community. One purpose of this Code of Business Conduct is to provide guidance for our behaviour when representing Webjet Limited.

### 2.2 Webjet Limited Policy on Ethical Behaviour

Webjet Limited 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 Limited 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 Webjet Limited.

### 2.3 Webjet Limited's Expectations

All Webjet Limited Staff Members are expected to comply with this Policy and conduct their activities on behalf of the Webjet Limited accordingly. Webjet Limited 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 Limited Staff Members and by third parties who need to be aware of it.

#### Key Requirements that must be observed

All Webjet Limited Staff Members should:

- comply with the letter and spirit of the laws affecting Webjet Limited's businesses and promote business success by the pursuit of competition within the regulatory rules;
- comply with the Webjet Limited Code of Business Conduct and Consolidated Policies;
- act honestly and with integrity and strive to earn and maintain the respect and trust of co-employees, customers and the wider community;
- use Webjet Limited's resources, including information systems, in an appropriate and responsible way;
- work safely and with due regard for the safety and well-being of fellow employees, customers and all persons affected by Webjet Limited's operations or products free from discrimination and harassment;
- avoid situations which involve or may involve a conflict between their personal interests and the interests of Webjet Limited;
- respect people's privacy;
- have due regard for cultural diversity in the workplace; and
- respect the environment and ensure that work activities are managed in an acceptable manner to give benefit to society.

Webjet Limited has adopted policies that commit it to meet its responsibilities in areas where ethical or legal issues arise. These are broadly characterised below.

### 2.4 Commercial Community

#### 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 Limited. Any potential conflict must be disclosed.

#### Trading in Webjet Limited and other securities

Webjet Limited 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 Limited Staff may only buy and/or sell Webjet Limited's shares in accordance with the Webjet Limited Share Trading and Conflicts Policy which accompanies this document and can be found on the company intranet, as well as on [www.webjetlimited.com](http://www.webjetlimited.com),

## 2.5 Commercial Relations

### Competition policy

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

## 2.6 Employment and Business Standards

### Complying with the law

All Staff Members who work for Webjet Limited 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 and privacy laws of each country in which Webjet Limited operates.

### Business practices - business integrity

Webjet Limited conducts its business with honesty, integrity, and respect for the interests of its stakeholders. Webjet Limited wants suspected improper conduct to be disclosed and also wants any person making a disclosure to be protected. Please refer to the Webjet Whistleblower policy for further information.

### Business practices - financial inducements

No Webjet Limited 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, but it is also an act that attracts criminal prosecution and serious penalties in many countries in which Webjet Limited operates.

No Webjet Limited 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.

### Dealing with fraud

Webjet Limited 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 Limited 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.

### Equal employment opportunity, bullying 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 Limited will take account of these criteria.

Unlawful discrimination, bullying, and sexual harassment are prohibited by Webjet Limited and will not be tolerated. Appropriate action will be taken if discrimination, bullying, or harassment occurs.

### Health and Safety in the Workplace

Webjet Limited 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 services which could lead to injury or illness amongst its Staff Members, customers and the wider community. Webjet Limited 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.

## 3. Gifts, Entertainment, Meals And Travel From Vendors

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### 3.1 Policy

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

### 3.2 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 Webjet Limited 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

## 4. The Wider Community

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### 4.1 Safety, Health and the Environment

Webjet Limited 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.

## 5. Confidentiality and Privacy Policy

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### 5.1 Defined Terms

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

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

**Interference with privacy** means a breach of Webjet Limited'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 Limited operate.

### 5.2 Keep information confidential

Staff Members are required to:

- keep Confidential Information of Webjet Limited confidential;

- only use the Confidential Information for the purpose of performing their functions as a Staff Member of Webjet Limited, and otherwise for purposes associated directly with the operations and business of Webjet Limited;
- 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;
- give Webjet Group notice if they become aware of any suspected or actual loss, unauthorised use, copying or disclosure of Confidential Information; and
- immediately take all steps to prevent or stop the suspected or actual loss, unauthorised use, access copying or disclosure of Confidential Information.

### 5.3 Copying of Confidential Information

Staff Members are required to:

- not copy Confidential Information without the written consent of Webjet Limited; and
- ensure that all copies of Confidential Information are prominently marked as CONFIDENTIAL.

### 5.4 Obligation to return Confidential Information

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

- cease using the Confidential Information; and
- at Webjet Limited's option:
  - return to Webjet Limited; or
  - destroy and certify in writing to Webjet Limited the destruction of, all Confidential Information in their possession or control.

### 5.5 Improper use or copying of Confidential Information

Webjet Limited will not tolerate the improper use or copying of Confidential Information. Webjet Limited's standard policy is to prosecute employees where it has reasonable grounds to suspect improper use of Confidential Information.

### 5.6 Exclusions

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

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

## 6. Internet, Email and Social Media Policy

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The following Policy and Procedure measures are critical to Webjet Limited and its wholly-owned companies (Webjet Limited) 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 Limited business and to protect Webjet Limited from the introduction of malicious code such as viruses and malware.

This Policy sets out the responsibilities and obligations of all Webjet Limited officers, agents, employees and contractors (Staff Members) who are granted rights to access and use Webjet Limited's email system and the internet via Webjet Limited'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).

This Policy also applies whenever a Staff Member's use of social media relates or impacts on their capacity to perform their role as a Webjet Limited Staff Member or affects Webjet Limited, including the reputation and standing of the Webjet Limited.



Any personal social media interactions using Webjet Limited's Computer Systems, whether or not the interactions relate to Webjet Limited, are covered by this Policy. The use of social media outside of the workplace is also subject to the terms of this Policy

### **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 Limited and may expose that Staff Member to a range of disciplinary actions by Webjet Limited, including termination of their engagement or employment.

### **User-IDs 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.

## **6.1 Emails**

### **Permitted Use and Requirements**

Each Staff Member who is granted the right to access and use Webjet Limited'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 Limited, and otherwise for purposes associated directly with the operations and business of Webjet Limited. Subject absolutely to any contrary management directive, reasonable personal use is permitted.

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 Limited 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.

### **Ownership of Email**

Email is available on your own in-house computer system and externally via the Internet. This system is to be used for communicating with staff and clients on a professional basis and for business purposes.

In consideration of being granted a right to access and use Webjet Limited's email system, each Staff Member agrees that all email messages sent and received by that Staff Member, using Webjet Limited's email system, are the property of Webjet Limited. For the avoidance of doubt, all intellectual property rights subsisting in email messages that a Staff Member creates and/or sends using Webjet Limited's email system become the absolute property of Webjet Limited. 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 Limited's email system, each Staff Member also agrees to waive their moral rights in email messages, created and sent using Webjet Limited'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.

All Staff Members must observe Webjet Limited's policies and procedures in relation to any material that might be attached to an email. You may open an attachment only if it was sent for business purposes. You must not send unnecessary emails nor enclose programs, graphics, movies or music.

### **Prohibited Use**

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

- email or attach to an email, any confidential or proprietary information of Webjet Limited, or any client-sensitive or personal information, unless duly authorised to do so expressly or in terms of your role at Webjet Limited;
- create send or forward emails containing personal and/or unauthorised opinions, forecasts or statements about Webjet Limited, it's business, financial affairs, customers, employees or contractors;

- create, send or forward emails containing (or which contain links to) material that is, or maybe 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;
- 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;
- use email to distribute spam or mass mail or to send or receive chain mail;
- use Webjet Limited's email system to conduct any private business or commercial activities for personal gain, or to solicit others for activities unrelated to Webjet Limited's business activities;
- use Webjet Limited'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
- send copies of materials in violation of the laws of copyright, trademarks, designs, patents or circuit layouts, or infringe Webjet Limited's or a third party's intellectual property right.

Webjet Limited reserves the right to filter and block offensive emails or attachments.

## 6.2 Internet

### 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 Limited, and otherwise for purposes associated directly with the operations and business of Webjet Limited 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 is permitted.

### Prohibited Use

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

- intentionally use the internet to post, upload, transmit, receive or download any images, content or materials that:
  - are, or may be construed to be, defamatory, an interference with privacy, harassing, bullying, threatening, vilifying, obscene, offensive, discriminatory, pornographic, sexually explicit, sexist, racist, abusive or illegal;
  - harass or promote hatred or discrimination based on any unlawful grounds against any person;
  - contain any virus, worm, Trojan or other harmful or destructive code;
  - injure the reputation of Webjet Limited, expose Webjet Limited to civil or criminal liability (including compensation for damages) or penalties, or investigations by any regulator, or cause embarrassment to Webjet Limited; or
  - contain another person's personal information, trademarks or copyrighted materials without specific authorisation to do so from the appropriate person;
- 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;
- use the internet to gain, or attempt to gain, unauthorised access to any person's (including Webjet Limited's) servers, networks or databases;
- use the internet to engage in online gambling or day trading;
- use the internet to engage in outside business ventures, or to engage in the sale of goods or services;
- 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 Limited, or statements of opinion or forecasts in relation to the business, operations, members, customers or management of Webjet Limited, on such unsecured sites;
- use the internet to perform any activity using a misleading identity;
- access the internet using another Staff Member's user ID or account;
- download any personal material, such as music, data or software without prior express written authorisation;
- attempt to penetrate the computer or network of any third party, or otherwise obtain unauthorised access to another person's computer or email account; or
- Taking part in any activities, whether connected with your role or otherwise, which might bring Webjet Limited into disrepute or jeopardise its relationships with clients or the general public.

Staff members are reminded that Internet and Email use must comply with Webjet Limited's Equal Employment Opportunity, Bullying, and Harassment Policy.

Misuse of Computer Systems may lead to disciplinary action (including Internet access being removed from your machine) and/or dismissal.

It is your responsibility to ensure that you do not store material on Webjet's computers that may amount to a breach of any law, including copyright law.

### 6.3 Social Media

In our rapidly expanding world of electronic communication, it is important to be cognisant of how we are sharing company-related information. Social media encompasses all means of communicating, posting information or content on the Internet and not only includes the most common platforms like LinkedIn, Facebook and Twitter, but also other platforms that support user conversations such as YouTube, Instagram, blogs, wikis, and comments to posts on any of these platforms.

Always remember that anything posted on social media can go viral, no matter what your privacy settings may be, so be sure that you are only posting content that you would feel comfortable explaining if it showed up in your manager's inbox, your co-worker's Twitter feed, the front page of a major news site or by a prospect or customer.

#### **Webjet Limited's expectations and you**

As a member of the broader community, Webjet Limited expects you to exercise prudence and good judgment when using Social Media. Webjet Limited encourages Staff Members to think about how and what they are communicating when using Social Media. Staff Members must understand the broad reach of social media and the potential for social media to disseminate messages rapidly and uncontrollably.

Only Staff Members expressly authorised by Webjet Limited may represent Webjet Limited on social media. Unless authorised, Staff Members may not comment on policy, strategy, operations or any other matter affecting Webjet Limited. If you are an authorised Webjet Limited Social Media representative, you shall act in the best interests of Webjet Limited and in accordance with your manager's instructions.

If you identify an issue that Webjet Limited 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:**

- Either
    - Be silent on your role with Webjet Limited
  - or*
  - Be clear and declare who you are and your role with Webjet Limited
- 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
- Only participate for yourself as an individual unless you have Webjet Limited's prior authorisation to participate on its behalf in Social Media.
  - You should remove reference to Webjet Limited from social media platforms unless authorised to do so, and, in any event, make it clear that your comments are your personal comments.
  - 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 which might reflect negatively on Webjet Limited's reputation.
  - Protect all confidential and proprietary Information of Webjet Limited and do not publish it in any form (including postings and texts) – it is not public information so it must not be shared.
  - Never share personal information (including name, telephone numbers, addresses or medical information) regarding other employees, contractors or suppliers.
  - Do not post photos or videos of Webjet Limited premises or events or any activities taking place at those premises without prior permission of your manager
  - Do not post or tweet comments which oppose the Webjet Limited's views or which you could reasonably be expected to know opposes Webjet Limited's values.
  - Do not post any adverse or critical comments about any other employee of Webjet Limited unless authorised to do so;
  - Do not make deliberately false or misleading claims about Webjet Limited or its products or services;
  - Do not endorse or cite any client, partner or supplier of Webjet Limited without the explicit prior authorisation of Webjet Limited;

- Do demonstrate respect for others' opinions, be polite and respectful of all individuals and communities in which they interact, even in times of heated debate and discussion;
- Do comply with relevant Webjet Limited policies; and
- Be respectful of others and Webjet Limited.

**Staff Members must 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 another entity, including Webjet Limited stakeholders or competitors, or which uses ethnic slurs, hateful remarks or personal identity;
- use the identity of, or purport to be, any other person, including another Webjet Limited Staff Member;
- participate (other than reasonable use) in personal, non-business related Social Media during work hours;
- use other people's property such as trademarks, logos or copyrighted music, photos, videos, or news articles, including logos or trademarks of the Webjet Limited without permission.
- publish any material that may be offensive or obscene and may infringe relevant online classification laws (including pornographic or sexually suggestive material).

Webjet Limited may monitor postings and will report any crimes to the proper authorities.

Think before you post – you own the consequences.

**Reporting inappropriate use**

If you notice inappropriate content relating to Webjet Limited and/or its employees or stakeholders, you should report the incident to the Chief Executive Officer of your business entity, the Chief Information Officer, the Chief Financial Officer or the Group Chief Commercial Officer. If any of the previously listed executives are involved, report the incident to the Group Chief Commercial Officer. If the Group Chief Commercial Officer is involved, please report to the Managing Director.

**6.4 Monitoring**

All actions performed using the Computer Systems are logged and may be monitored by Webjet Limited or another person on Webjet Limited's behalf. Webjet Limited may copy, access or disclose any information or files that are stored, processed or transmitted using the Computer Systems. Log files are retained indefinitely and are accessible by Webjet Limited. This includes document creation, file management, electronic diaries, electronic communications that 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 Limited will monitor the Computer Systems on an ongoing basis. Staff Members should expect this monitoring to be continuous.

Webjet Limited reserves the right to censor and screen offensive or non-business-related material.

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 Limited management as it considers appropriate, including files that may have been deleted that exist in Webjet Limited's backup systems.

Webjet Limited may monitor external postings and review any internal postings for compliance with this Policy.

**6.5 Privacy**

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

In order to comply with Webjet Limited'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.

**6.6 Bullying and Harassment**

Staff must abide by the applicable Webjet Equal Employment Opportunity, Bullying and Harassment Policy in your jurisdiction when engaging in social media. It is important to note that legislation in certain jurisdictions makes cyberbullying a criminal offence.

## 6.7 Breach of Policy

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 Limited 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.

# 7. Equal Employment Opportunity, Bullying and Harassment Policy

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At Webjet Limited and its wholly-owned companies (Webjet Group), we are committed to treating all people with dignity and respect. Webjet firmly believes that all people are entitled to work in an environment free from discrimination, harassment, workplace bullying, and victimisation/retaliation. Such conduct constitutes unacceptable behaviour.

## 7.1 Application

This policy sets out the standard of behaviour that everyone working for Webjet Limited, whether or not they are Webjet Limited employees, must follow. It applies to all officers, agents, employees, and contractors (Staff Members) of Webjet.

This policy applies equally to the treatment of our Staff Members, customers, clients, and visitors. It applies when people are:

- working at a Webjet Limited workplace, whether during or outside normal working hours;
- performing work activities off-site, for example, at a client's premises;
- attending work-related functions or external meetings;
- travelling for work; or
- engaging in an activity where there is a relevant connection to the workplace or which has a significant effect on the workplace (e.g. posting a message about a Webjet Limited employee or customer on Facebook or another social networking site, tweeting about a Webjet Limited contractor or visitor on Twitter, or behaviour at a party following a work-related event that has a significant effect on the workplace or relationships with colleagues).

Webjet Limited will comply with the minimum standards set out in this policy. In the event a legal obligation imposes a higher standard or requirement on Webjet Limited, the legal obligation will prevail over the applicable minimum standard.

## 7.2 Unacceptable behaviour

### Discrimination

Webjet Limited is committed to maintaining a workplace that promotes equal opportunity for all job applicants, employees, contractors, visitors, and customers.

Webjet Limited aims to ensure that decisions about employment (including recruitment, terms, and conditions of employment, promotions, discretionary bonuses, leave, training and termination) are made based on merit and do not involve or give rise to unlawful discrimination.

Discrimination is treating, or proposing to treat, someone unfavourably because of a personal characteristic protected by the law (such as sex, age or disability). They are often referred to as "protected attributes". These attributes may include but are not limited to:

Protected personal characteristics under discrimination law can include:

- A disability, disease or injury, including work-related injury;
- Marital status, whether married, divorced, unmarried or in a de facto relationship or same-sex relationship;
- Parental status or family status such as being a carer;
- Race, colour, descent, national origin, or ethnic background
- Age;
- Sex or gender;

- Industrial activity, including being a member of an industrial organisation or trade union, taking part in industrial activity, or deciding not to join a union;
- Religion/ethical belief;
- Pregnancy and breastfeeding;
- Sexual orientation, intersex status or gender identity, including gay, lesbian, bisexual, transsexual, transgender and heterosexual;
- Political opinion;
- Social origin;
- Medical record;
- Employment status;
- An association with someone who has, or is assumed to have, one of these characteristics, such as being the parent of a child with a disability.

Discrimination may occur even if there is no intention to discriminate.

Discrimination can be direct or indirect:

- **direct discrimination** occurs when a person is treated unfavourably because of a particular attribute such as their gender, age, religion, sexual orientation, cultural/ethnic origin, disability, caring responsibilities, etc
  - *An example of direct discrimination would be if a manager approved everyone in their team for an external training course, except for a pregnant team member, on the grounds that the pregnant team member doesn't need training because she will be going on parental leave soon.*
- **indirect discrimination** occurs when there is a requirement, rule, policy, practice or procedure that disadvantages a person with a particular attribute, such as their gender, age, religion, sexual orientation, cultural/ethnic origin, disability, caring responsibilities etc. This type of 'requirement' is likely to be indirect discrimination unless the requirement is reasonable in all the circumstances.
  - *An example of indirect discrimination would be if Webjet required all prospective candidates to provide a current driver's license when applying for a position, even though an ability to drive is not a core requirement of the role. This requirement could indirectly discriminate against vision-impaired candidates who are not able to obtain a driver's license.*

## Harassment

Harassment occurs when someone engages in unwelcome behaviour in relation to a particular attribute that results in a person feeling offended, humiliated or intimidated, and under the circumstances, it would be reasonable for them to feel this way.

Some examples can include telling insulting jokes about a person's sexual orientation or particular racial group and making derogatory comments or taunts about someone's religion.

Even if there is no intention to offend or humiliate, seemingly harmless acts such as gossip, jokes, teasing or the use of inappropriate nicknames, could all possibly constitute harassment.

## Sexual harassment

Sexual harassment is unwelcome sexual behaviour, which could be expected to make a person feel offended, humiliated, or intimidated. Sexual harassment can be physical, spoken or written.

A single incident is enough to constitute sexual harassment. It doesn't have to be repeated.

Sexual harassment can take many forms and may include:

- unwelcome physical contact such as massaging a person without invitation;
- kisses or embraces;
- exposing genitals or sexual gestures;
- staring or leering at a person or at parts of their body;
- requests for sexual favours, or making other sexual advances;
- leering, wolf whistles, obscene gestures, jokes or innuendo;
- comments or a conversation about a person's sex life or relationships;
- displays of sexually offensive material, such as emails, posters, pictures, graffiti, screen savers or text;
- messages, or sharing inappropriate information with work colleagues via social media such as Facebook, or;
- suggestive or sexual jokes, suggestive behaviour or telephone calls.

It is unlawful to sexually harass another person even if you did not intend to do so. You should be aware that what may be perceived as acceptable behaviours to some people may be acceptable to others. Conduct that is directed at one person could constitute sexual harassment of a third person who is exposed to the conduct.

- *For example, two colleagues are engaged in 'friendly banter' about a date that one of them went on the night before and everything that happened on the date. The colleague who wasn't on the date talks about what he would have done if he was in his colleague's position. A third colleague sitting nearby hears the conversation and is offended by the graphic content of the conversation.*

Sexual harassment is against the law under the Sex Discrimination Act 1984 (Cth) and other state or territory legislation in Australia. You may be personally liable for sexual harassment. Webjet Limited may also be liable for your actions if you engage in sexual harassment in breach of this policy or the law. If you do not understand your obligations under this policy in relation to sexual harassment you should speak to your manager.

Sexual harassment is not behaviour which is based on mutual attraction, friendship, and respect. However, in some cases even though the behaviour may not breach this policy, it may still be viewed as inappropriate behaviour in the workplace.

### **Bullying**

Workplace bullying is any repeated 'unreasonable behaviour' directed towards a person, or group of people, that creates a risk to their mental or physical health and safety. 'Unreasonable behaviour' means behaviour that a reasonable person, having regard to all the circumstances, would expect to victimise, humiliate, undermine or threaten another person. 'Behaviour' includes actions of individuals or a group and may involve using a system of work as a means of victimising, humiliating, undermining or threatening. Bullying is always unacceptable and may be against the law.

Some examples of behaviour that may constitute bullying include:

- verbal abuse, screaming, insults, swearing at a person or name-calling
- deliberate exclusion or isolation from workplace activities
- intimidation and threats
- assigning meaningless tasks unrelated to a person's job, or
- deliberately withholding information that is vital for effective work performance

Bullying is not:

- occasional differences of opinion, non-aggressive conflicts, and problems in working relations
- allocation of work in accordance with Webjet systems, or
- workplace counselling, constructive feedback, managing underperformance and other disciplinary action in accordance with Webjet policies and processes

### **Victimisation/Retaliation**

Victimisation/retaliation occurs if someone suffers unfavourable treatment because they have made, or propose to make, a genuine complaint of unacceptable behaviour, or appear as a witness or provide information about such a complaint.

Some examples of victimisation/retaliation include:

- suggesting to a would-be complainant that it would be better for them (or the team) if they did not make a formal complaint
- threatening behaviour
- disciplinary action (e.g. dismissal) that is not otherwise warranted and would not have been taken if a complaint had not been made
- unreasonable change in duties or relocation
- exclusion or isolation, or
- failure to promote a person or downgrading a performance rating because they are regarded as a 'trouble maker' due to the complaint

## **7.3 Consequences of unacceptable behaviours**

Webjet Limited does not tolerate any unlawful discrimination, bullying or harassment in employment. Violation of this policy can result in disciplinary action up to and including immediate termination of employment.

## **7.4 Reporting inappropriate behaviours**

Webjet encourages the reporting of all incidents of bullying, harassment or sexual harassment, regardless of who the offender may be.

There are several different options and steps for dealing with unacceptable behaviours.

In many cases, simply telling the person concerned that their behaviour is causing distress, explaining why it is unwelcome and asking for it to stop will be sufficient. Sometimes, a person is not aware that their behaviour is causing distress, and they will stop immediately once told. Unless you feel uncomfortable doing so, you should consider approaching the person or people involved to resolve your concern, by means of direct discussion.

If a complaint cannot be resolved by direct discussion, is not an appropriate matter to be dealt with by way of direct discussion, or you do not feel comfortable doing so, you should notify your 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 and take preventative measures in the workplace (if warranted following any investigation).

The manager to whom a complaint is made is responsible for promptly notifying the Chief Executive Officer of their business unit, or CIO, CFO or Group CCO, (or the Group Chief Commercial Officer, if any of the aforementioned 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. Examples of actions that may be taken include a change to work practices, an apology being given and accepted, and training.

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. Webjet is committed to treating all persons involved in this process fairly and with respect.

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.

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

All employees are required to cooperate truthfully and in good faith with the Company in any investigation under this policy. Knowingly making false charges of harassment or a false statement in connection with an investigation, or deliberately interfering with an investigation is a violation of this policy and may result in disciplinary action being taken.

No employee shall be subject to any form of retaliation or victimisation for reporting any violation or participating in any investigation. Employees who believe that they have been retaliated or victimised against in violation of this policy may utilise the same complaint procedure described above.

## **What you need to do**

### *Employees*

- If you have a special need within your work environment, please discuss it with your manager, who will give it due consideration, in line with business needs
- It is every individual's responsibility to maintain and encourage a workplace inclusive of difference and free of harassment, bullying, and discrimination
- If you observe discrimination, harassment, bullying or victimisation of someone who makes a complaint or of someone who has supported the complaint, do not become involved in it. Take action to see that it stops, by reporting it to your HR representative. Respecting the confidentiality of the complaint helps to prevent victimisation
- If you are the subject of discrimination, bullying, harassment or victimization and you are unable to stop it or you don't feel comfortable approaching the person directly you should bring the circumstances to the attention of your manager, or if for some reason this is not appropriate, you should contact an HR representative
- Tell only the people who need to know. A complaint made in good faith to the appropriate people is protected from defamation proceedings. A complaint circulated by way of gossip is not given this protection
- You may also take your case to the relevant authority such as the Australian Human Rights Commission in Australia or other relative national authorities

### *Managers*

- You must maintain and encourage a work environment that respects and values diversity and encourages inclusion. You must ensure that the work environment is free from discrimination, bullying, and harassment. Part of your responsibility is to ensure that all your staff are aware of and comply with this policy.



- You must take appropriate action to ensure that any breaches of this policy do not continue.
- You must ensure that no one is disadvantaged because they have put forward a complaint or are witness to an incident. Only the people directly involved in a grievance or in resolving it must have access to information about the complaint.
- All current and future employees are to be treated equally by you and given every opportunity to develop their career and personal aspirations, based on merit.
- If you have an employee who brings a complaint to you, you must investigate it in line with the guidelines provided by Webjet Limited.
- Both parties must be advised of Webjet Limited's decision irrespective of the outcome.
- Disciplinary action may occur if there is a breach of this policy which may involve a transfer or a serious case that may lead to termination of employment.
- If you have an employee who wishes to discuss a special need that they have within the workplace, you must show respect for their needs, consider their request and follow it through appropriately, in line with business needs.

## 8. Occupational Health and Safety Policy

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The health and welfare of Webjet Limited and its wholly-owned companies (Webjet Group) employees, contractors, visitors, and clients are of the utmost importance to Webjet. We will ensure that every effort is made, and every precaution taken to ensure that our staff are provided with comfortable and safe and healthy working conditions.

Webjet Limited will aim to create and maintain a safe and healthy work environment complying with all relevant occupational health and safety legislation believing that the health and safety of people within the workplace is vital to the successful functioning of its business.

The management of Webjet Limited is responsible for the promotion and maintenance of occupational health and safety within the company. However, to achieve a healthy organisation it is important that everyone within Webjet Limited accepts responsibility for the health and well-being of all persons in the workplace.

A safe and healthy working environment impacts on the ability of our employees to safely perform their job. Safety is everyone's responsibility. To ensure the maintenance of a safe and healthy working environment for our employees we have implemented and are continuing to implement and revise safe work practices. We are also focused on developing and encouraging consultation and training within our workplace.

Risk management is the responsibility of everyone, including all managers and employees within the Webjet Limited. To ensure a safe work environment it is essential that everyone is mindful of risk management.

This Policy applies to all Webjet Limited's officers, agents, employees and contractors (Staff Members).

### Safety Guidelines

Preventing occupational injury and illness is a top priority for you and Webjet Limited. We all share in the responsibility to keep our workplace safe. Following are some basic safety policies and guidelines:

- Report any job-related injury, illness, property damage, or safety issue immediately to your manager.
- Observe all-hazard, warnings, and "no smoking" signs.
- Keep aisles, walkways, hallways, and working areas clear of slipping or tripping hazards.
- Know the location of fire/safety exits and evacuation procedures.
- Keep all emergency equipment (such as fire extinguishers, fire alarms, fire hoses, exit doors, and stairways) clear of obstacles.
- Operate only the equipment for which you have been properly authorised and instructed.
- Observe safe operating procedures for all equipment.
- Always use proper lifting procedures.
- Ride as a passenger in a vehicle only if it is equipped with a rider's side seatbelt and always wear your seat belt when riding or driving in vehicles.
- Obey all posted speed limits, warning signs and restricted areas.
- Inform your co-workers if you see them about to commit or committing an unsafe or potentially unsafe act.
- Do not bring firearms on Webjet Limited premises.

## **Fire Safety**

It is important that you maintain an awareness of and comply with office evacuation and emergency procedures. In the event of a fire or other threat to your safety, it may be decided to evacuate the premises. Employees should familiarise themselves with their nearest available Fire Exit.

## **First Aid**

If you suffer a minor injury, a qualified first aid officer will administer first aid supplies. If you or someone else suffers a serious injury an ambulance should be called, and your manager representative advised immediately.

If you experience a work-related accident or incident, even if the incident did not result in injury or illness, you must report it to your manager as soon as it occurs. Depending on your country of employment, if you are injured at work or during your 'normal' journey to and from work, you may be eligible to receive workers' compensation. For further details you should contact your appropriate HR representative or manager.

## **Manual Handling**

It is important that you are aware of, and practice, principles of safe manual handling when lifting items. Employees should consider the following:

- Stand with your feet apart (but no wider than shoulder-width) and positioned with one foot slightly forward alongside the object pointing in the direction of movement. Never lift and twist at the same time.
- Bend at your knees and not your back.
- Get a firm grip with your whole hand and not just your fingertips.
- Keep your back straight, chin tucked in, head up and lift by straightening your legs
- Keep the load close to your body with the heaviest side nearest
- You should always be able to see over the load
- Ask someone to help open doors if necessary
- Avoid trapping your fingers when placing the load down.
- Never attempt to lift a load beyond your physical capabilities;
- always seek help if you have any doubts;
- do not take short cuts or get impatient, wait for help if you need it.

## **Bomb Alerts**

If you receive a suspicious call or notice a suspicious package this must be reported to your manager. In the event of a bomb alert, please follow instructions given by the your manager or appropriate senior leadership.

## **Electrical appliances in offices**

It is important that you inspect electrical equipment prior to use, and that equipment with frayed cords or damaged fittings are removed from use and reported to your manager immediately. Electrical cords must not be placed across walkways, and power boards and double adaptors must not be double-used.

## **Driving at work**

Employees who drive on Webjet Limited business are required to hold a valid driving licence and appropriate insurance for business use. It is also important to ensure that your vehicle is maintained in a safe and roadworthy condition whilst complying with all local regulations.

Employees are advised to take regular breaks during prolonged driving to avoid becoming tired. Consumption of alcohol and prescription/over-the-counter drugs can affect a person's ability to drive safely - you should make sure that you are in a fit condition to drive legally.

## **Policy Against Violence**

The safety and security of our employees, residents, tenants, vendors, contractors and the general public are of essential importance. Actual or perceived threats or acts of violence made by an employee against another person's life, health, well-being, family or property will not be tolerated. Any act of intimidation, threat of violence or act of violence committed against any person on Webjet Limited property is prohibited. Workplace violence includes:

- verbal or physical threats of violence,
- physically aggressive or violent behaviour,
- attempts to instil fear of physical harm in others,
- other behaviours that suggest a propensity toward violence, which can include belligerent speech, excessive arguing or swearing, sabotage, threats of sabotage of Webjet Limited property, or a demonstrated pattern of refusal to follow policies and procedures,

- defacing Webjet Limited property or causing physical damage to the facility or
- bringing weapons or firearms of any kind on Webjet Limited premises or events.

No person shall possess or have control of any firearm, deadly weapon or prohibited knife, as legally defined, while on Webjet Limited property, except as required in the lawful course of business or as authorised by law.

It is a requirement that employees report to their manager or HR (as applicable), any behaviour that compromises the Webjet Limited's ability to maintain a safe work environment. All reports will be investigated immediately and kept confidential, except where there is a legitimate need to know. Employees who violate this policy may be subject to criminal charges as well as a discipline up to and including termination of employment.

### **Drug and Alcohol Use**

Webjet Limited does not tolerate the use of drugs or other substances, which are illegal or impair your ability to perform your work.

The following rules and standards of conduct apply to all employees either on Webjet Limited property or during the workday, including meals, rest periods and at Webjet Limited events. Behaviour that violates Webjet Limited policy includes:

- Possession or use of an illegal or controlled substance, or being under the influence of an illegal or controlled substance while on the job;
- Driving a Webjet Limited vehicle while under the influence of alcohol or an illegal or controlled substance; and
- Distribution, sale or purchase of an illegal or controlled substance while on the job.

Violation of these rules and standards of conduct will not be tolerated. Webjet Limited may bring the matter to the attention of appropriate law enforcement authorities. Please note that Webjet may have a legal obligation to report certain matters to law enforcement authorities.

In order to enforce this policy, Webjet Limited reserves the right to conduct searches of Webjet Limited property or employees and/or their personal property and to implement other measures necessary to deter and detect abuse of this policy.

If there is a reason to believe that you are under the influence of such a substance, you will be told of this reason and asked to leave the workplace, with any absence recorded as leave. This behaviour will be investigated using our disciplinary procedures and may lead to warnings and/or dismissal. Webjet Limited will encourage you to seek professional counselling and will assist wherever possible. Webjet Limited may require employees to undergo appropriate tests designed to detect the presence of alcohol or drugs (i.e. blood test or urinalysis) where it has reason to believe that an employee may be under the influence of or impaired by alcohol or drugs at work.

Any infringements by any member of staff or management will be dealt with through disciplinary action. In addition, any employee can, by law, be liable for prosecution.

All offices are smoke-free environments, therefore smoking in the office or building is prohibited.

Refer to the Webjet Limited Drugs and Alcohol Policy for full details.

### **What you need to do**

#### *Employees*

- It is important that you comply with this policy and take all the steps you can to ensure your health and safety and that you do not endanger any other person through any act or omission at work.
- In the interests of proactive safety, you must immediately report any apparent hazards in or around the office to your manager or HR representative. If you wish to report a health or safety matter or make a complaint about a health or safety matter, you should notify your manager (or that person's manager if that person is the subject of the complaint).
- If you suffer from a medical condition it is advisable to let the HR representative know, with any relevant particulars. This information will remain confidential.

#### *Managers*

- You are responsible and held accountable for ensuring that Webjet's policy is implemented in your areas of control, promoting a healthy and safe work environment for the work areas you manage.
- You will discuss with employees' issues affecting their health and safety and any concerns they have regarding unsafe or unhealthy work conditions.
- You must report all work-related accidents or incidents (even if the incident did not result in injury or illness) of your staff, as soon as they occur, to the HR representative. Detailed records of accidents/incidents are

maintained in an accident/incident register, which also assists over time with risk assessment. This is important because we aim to be proactive in our OH&S management, preventing injury, illness or death wherever possible.

- You are responsible for making contractors, subcontractors, and visitors aware of Webjet's safety procedures.
- You are responsible for ensuring that adequate training, information, instruction, and supervision are provided so that work is conducted safely.

## 9. Further Information and Help

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If you require any further assistance or clarification of any of these policies, you can obtain that from your department manager.

In any situation where there is doubt about how you should proceed, Staff Members should discuss it with their manager or their manager's manager. All Staff Members are encouraged to comment and contribute to this code by bringing their ideas and comments to their manager's or manager's attention.

If you have any concerns or questions that are not answered by the above escalation, please forward your queries to Webjet's Compliance Officer, contactable on [shelley.beasley@webjet.com.au](mailto:shelley.beasley@webjet.com.au) or +61 407 720 772

## 10. Acknowledgement by Staff Member

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By signing this document, you confirm that you:

- have read and understood the policies contained in and referred to in this document;
- understand you are to familiarise yourself with these, and all policies of Webjet Limited, and follow them when performing work for Webjet Limited;
- understand that although the policies do not form part of any contract between you and Webjet Limited, that you are required to comply with the policies as amended from time to time;
- understand that Webjet Limited may modify, amend, supplement, or rescind any of the policies from time to time as it determined to be appropriate.

Signature \_\_\_\_\_

Print Name \_\_\_\_\_

Date \_\_\_\_\_

[www.webjetlimited.com](http://www.webjetlimited.com)

**Webjet Limited**

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