
Code of Ethics and Conduct

Helloworld Travel Limited

Introduction

What is a Code of Ethics and Conduct?

Helloworld believes in empowering its employees to enable them to fulfil their potential and achieve the best outcomes for its customers, shareholders and the overall business. With this in mind, the company recognises that, for this culture to operate effectively, it is essential that all employees are aware of, and act in accordance with certain standards set out by the Company.

It is a fundamental principle of Helloworld that all business dealings and interactions with all of the employer's employees, clients, customers, suppliers, and the general public are conducted professionally, legally, ethically, with honesty and integrity at all times. This Code of Ethics and Conduct is based on that principle.

Who does the Code of Ethics and Conduct apply to?

The Code of Ethics and Conduct applies to employees and directors of Helloworld, employees of the subsidiary companies and associated entities of Helloworld (together 'Helloworld'), and independent contractors (referred to as 'employees' in this policy), unless otherwise specified.

This Code of Ethics and Conduct operates in conjunction with all other relevant Helloworld policies as well as applicable awards/agreements and/or relevant legislation and applies in respect of conduct which relates to or is connected with, in any way, employment or engagement with Helloworld, or in connection with a Helloworld provided benefit.

It is required that each employee of Helloworld and its subsidiary companies;

- reads this Code of Conduct, makes sure he/she understands it and asks the Human Resources Department if there is anything that he/she does not understand;
- follows the Code of Conduct at all times during their employment.

Who is responsible for this?

Managers are responsible for:

- ensuring that employees are aware of and are taking reasonable steps to ensure they comply with policies and procedures and relevant legislation;
- upholding and promoting these standards of conduct and providing employees with a positive role model;
- ensuring that employees are familiar with internal avenues for raising Grievances;
- dealing with Grievances about Unacceptable Behaviour and Misconduct including Discrimination, Harassment and Bullying;
- taking ownership in managing employees who are non-compliant with this Code of Ethics and Conduct; and
- seeking further information or assistance from the HR Team where necessary.

Managers also have responsibilities as employees (see section below).

Employees are responsible for:

- their own behaviour and actions;
- being aware of, and complying with, this policy, other Helloworld policies, procedures and relevant legislation;
- treating customers and other employees with respect;
- acting in the best interests of Helloworld; and
- promptly informing their Manager or the HR Team if they believe that they or someone else has been harassed, bullied, discriminated against or otherwise been the object of Unacceptable Behaviour.

Code of Ethics and Conduct Statements

What are our Code of Ethics and Conduct Statements?

The Code of Ethics and Conduct Statements provide information and guidelines to assist in the understanding of the ethical values and standards of behaviour that apply to us all, which will act in accordance with Company Visions, Values and will maintain Helloworld's reputation as a business and as a workplace. Standards of Conduct are necessary in order to help employees understand the expectations the Company has of them. The Code of Ethics and Conduct Statements are outlined as follows;

1. Helloworld Travel Organisation Values

WE MAKE OUR FUTURE



- Our future is in our hands
- We focus on delivering sustainable outcomes for our stakeholders
- If it's going to happen, we have to make it happen!

WE WORK AS ONE



- We work as one team
- We value our partnerships with all stakeholders
- We share and collaborate and don't treat knowledge as power

WE ACT WITH INTEGRITY AT ALL TIMES



- We demonstrate integrity in everything we do
- We deliver on what we promise and when we promise
- We are accountable and responsible for our behaviours and actions
- We are open, respectful and professional in our interactions

OUR CUSTOMERS ARE AT THE CORE OF OUR BUSINESS



- Our customers are why we exist
- We differentiate our offerings through innovations, expertise and creativity
- We anticipate, ask, listen and deliver on our customers' needs

2. Upholding and Enhancing the Success and Reputation of Helloworld Travel Limited.'

Helloworld prides itself on its exceptional quality and service. Maintaining this standard is integral to the success of the business.

We are all equally responsible for this and must ensure that we uphold the reputation and success of Helloworld and all that is associated.

This includes but is not limited to the following;

- Identifying opportunities to set new standards
- Inspiring our customers, suppliers and peers by providing an exceptional service at all times
- Taking prompt action in the cases where the products and services provided by Helloworld are not satisfactory to customers
- Ensuring that every decision made has Helloworld's best interest at the forefront
- Only representing Helloworld publicly (directly or indirectly) with authorisation from the business
- Ensuring that your role and responsibilities are carried out conscientiously, efficiently, economically and effectively in line with company expectations
- Present a professional image in personal appearance, manner and approach, which is outlined as follows:

Dress Code Standards

In order to uphold and enhance the success and reputation of Helloworld, it is vital that all employees present a professional business like image in personal appearance, grooming standards and personal hygiene, which reflects the high standards in which we operate. The expectation is that business attire is worn at all times, which includes;

- Collared shirt (polo or button through) or blouse, Tailored/smart pants (full length or ¾ length) or businesslike skirts and/or dresses with an appropriate hemline and closed in business shoes (no sneakers). A tie and/or suit jacket is encouraged to be worn where there is a business meeting with a client or visitor.

Helloworld's dress code standards apply outside the workplace in any circumstances or situations where there is a connection to your employment with Helloworld.

At times, Helloworld may choose to relax its dress standards for special occasions, e.g. 'Charity Events, FAMIL (refer to the Helloworld FAMIL policy) and Casual Fridays'.

If you are unsure as to whether your clothing attire is appropriate for work, please consult with your manager.

Compliance: Your Responsibilities

As employees of Helloworld, we are required to act, behave, work and comply in accordance with laws, rules and regulations regarding the Company's reputation.

This includes but is not limited to the following;

- You must actively promote compliance with applicable laws, rules, regulations and this Code of Ethics and Conduct.
- You will act in accordance and comply with all Helloworld Policies and Procedures and follow reasonable management instruction.
- All activity associated with Helloworld will be conducted in a legal and ethical way.
- You will act in accordance of and fulfil the responsibilities of your role, as set out by the business.

Treating each other with Respect and Dignity

It is essential that at all times employees act in a dignified and respectful manner and that this is demonstrated in all circumstances whilst in association with Helloworld.

This includes but is not limited to the following;

- Inspire our colleagues and teams by working collaboratively, inclusively and fairly with an equal opportunities 'one team' perspective
- Being mindful of the sensitivities of others
- Respecting confidentiality
- Acknowledging the contributions of others
- Ensuring the environment is free from Bullying, Harassment and Discrimination (please refer to Helloworld Bullying Harassment and Discrimination Policy)
- Being mindful of your communication and how this may be received by others

Act with Honesty and Integrity

Helloworld places trust and confidence in all employees and expects individuals to act with honesty and integrity throughout any dealings or involvement with Helloworld.

This includes but is not limited to the following;

- Being courteous and honest
- Take accountability for your own actions
- Never misuse any privilege, authority or status
- Make clear to all suppliers and potential suppliers that we expect them to compete honestly and fairly

- The importance of ethical behaviour i.e. using personal judgement to determine whether something is right or wrong and acting upon this accordingly

3. Harassment, Discrimination and Bullying

Helloworld does not tolerate harassment, discrimination or bullying in the workplace. Differences between individuals are not only tolerated, but valued.

As an employee of Helloworld, you can expect to be treated in a fair and professional manner. The following behaviours are unacceptable under the Helloworld terms of employment:

Harassment

Harassment involves subjecting people to unwelcome or uninvited attention that intimidates, humiliates or offends them.

Discrimination

Discrimination is defined as adverse action taken against a person (including an employee or prospective employee), because of the person's race, colour, sex, sexual orientation, age, physical or mental disability, marital status, family or carer's responsibilities, pregnancy, religion, political opinion, national extraction or social origin.

Bullying

Bullying at work, as defined by the Fair Work Act 2009, occurs when: a person or a group of people behaves unreasonably and repeatedly towards a worker or a group of workers while at work, and the behaviour creates a risk to health and safety. *(This does not include management action carried out in a reasonable way)*

Please refer to the Helloworld Discrimination, Harassment and Bullying Policy for a more comprehensive description.

Harassment, discrimination and bullying should be reported to Management and dealt with according to the Harassment, Discrimination and Bullying Resolution procedure as detailed in the Bullying, Discrimination and Harassment Policy

4. Promoting a Safe and Healthy Workplace/Environment

Over and above its legal obligations, Helloworld is committed to providing a safe and healthy workplace. All employees must adhere to health and safety standards and policies as set out by Helloworld, in addition to looking out for the wellbeing of their self, colleagues and peers.

This includes but is not limited to the following;

- Taking responsibility for your own wellbeing and ensuring that you are fit for duty whilst in the workplace
- Demonstrating a duty of care towards customers and colleagues/peers
- Reporting or taking appropriate action with any identified or potential hazards in or around the workplace
- Free from the adverse effects of drugs and alcohol at work, whilst driving (please refer to relevant state and territory laws) or whilst performing your role, ensuring your capacity to perform your duties is not impaired
- A moderate and responsible approach to consumption of alcohol in circumstances where it is appropriate to consume alcohol i.e. work functions, industry events, Christmas Party

Company Property

Company property or assets belonging to Helloworld must be used in a safe and secure way and for the purpose intended. They must not be used for personal use, benefit or gain. Each employee has a role to play in this process by respecting property that belongs to others.

Unauthorised possession or use of property belonging to the Company, other employees, customers or suppliers will not be tolerated by Helloworld. This includes, but is not limited to:

- Merchandise
- Money
- Computer equipment
- Computer Software / emails (please refer to Helloworld IT Policy)
- Corporate Cards and Expense Accounts (please refer to Helloworld Travel Expense Policy)
- Stationary
- Uniforms

You are personally accountable for ensuring that company property and assets are protected.

If any item is lost, stolen, misplaced or damaged whilst under your control you may be accountable. Please report this to your Manager as soon as possible.

Helloworld property and merchandise is not to be removed from Helloworld premises without authorisation from the appropriate authority.

5. Security inspections

Helloworld may carry out inspections at any time including when an employee enters, leaves or is on Helloworld Premises of when duties are being performed.

The theft, fraud, attempted theft or fraud or unauthorised removal of Helloworld property, the property of Helloworld Staff or property entrusted to the care of the Helloworld, is an act of Serious Misconduct.

The consequence of theft or fraud may result in dismissal and may require police involvement. Suspicious behaviour must be reported to your Line Manager or HR Team.

6. Conflict of Interest

Helloworld employees are asked to avoid situations or transactions in which their own interests conflict, or might be seen to conflict, with the interests of Helloworld.

A conflict of interest exists where loyalties are divided. Employees of Helloworld have a potential conflict of interest if, in the course of performing their duties, any decision made provides any improper gain or benefit to themselves or a third party. Any situation potentially involving direct or indirect conflict of interest should be avoided.

The following situations are examples of conflicts of interest:

- Being employed by, or providing services to, another company which has business dealings or is in competition with Helloworld
- Doing business with outside companies (directly or indirectly) in which you, or members of your family, have significant interests

As employees of Helloworld, we are encouraged to protect the interests of the Company and our own reputation against potential accusations of inappropriate behaviour by avoiding conflicts of interest altogether. The existence of, or potential for, a conflict of interest should be brought to the attention of your Line Manager.

7. Prohibited Payments

Bribes, kickbacks, inducements or similar payments must not be made to or for the benefit of any government official (of any country), customer, supplier or any other party in connection with obtaining orders, any business advantage, favourable treatment or for any other purpose.

This prohibition extends not only to direct payments but also to indirect payments made in any form through distributors, representatives, contractors, consultants, agents or other third parties.

Staff must not seek or accept any type of compensation, fee, commission or gratuity from a third party in connection with the operations of Helloworld.

8. Gifts and Benefits

It is always wrong to ask for, or appear to expect gifts or benefits from suppliers, colleagues, subordinates, customers or others with whom you may come into contact in the course of your work at Helloworld.

Staff must not give, seek or accept in connection with the operation of Helloworld any gift, hospitality, benefit or other personal favour or assistance which goes beyond common courtesies associated with accepted ethical and general commercial practice.

The purpose and reason for this rule is to ensure that the offer or acceptance of a gift does not create an obligation or become construed or used by others to allege favouritism, discrimination, collusion or similarly unacceptable practices by Helloworld.

Any staff member who receives a gift or hospitality exceeding AUD\$150 in value, or multiple gifts from a single source, and holds a position with influence over material contracts, must consult their manager regarding the appropriateness of accepting the gift or hospitality.

Gifts or hospitality below the AUD\$150 threshold do not require prior approval, provided all other provisions of this Code of Ethics and Conduct are adhered to, while gifts exceeding this threshold require managerial approval.

Recipients must adhere to the following protocol when offered a gift or hospitality:

- Seek approval from a manager.
- Provide details of the gift or hospitality to the Group Company Secretary, including:
 - Manager approval (identify)
 - Date of receipt
 - Description of the gift or hospitality
 - Recipient's name
 - Donor's name
 - Occasion or purpose
 - Estimated value in \$AUD.

9. Confidentiality and Privacy

It is important that we all understand and adhere to the confidentiality agreement set out by Helloworld.

During your employment with Helloworld you may obtain confidential information about operational or financial aspects of the business. This information is confidential and must be treated sensitively.

Helloworld will respect the confidentiality of personal information supplied to the Company by its employees. Similarly, as an employee of Helloworld Travel Limited, you must:

- acknowledge the need for confidentiality as part of your contract of employment (refer to letter of offer, signed upon commencement of employment);
- not breach Helloworld confidentiality or make use of confidential information obtained from Helloworld for personal gain or in a manner which would be detrimental to Helloworld;
- treat confidential information belonging to third parties (such as suppliers) with the same levels of respect and care that you treat information relating specifically to Helloworld; and
- only use confidential information in ways which are authorised by Helloworld.

Helloworld employees must comply with applicable privacy laws and regulations worldwide.

Staff must keep personal information of Helloworld customers and Staff confidential and secure and must not disclose or use that information, or permit its disclosure or use, unless permitted by applicable privacy law and Helloworld policy.

10. What if the Code of Ethics and Conduct is not adhered to?

Helloworld is firmly committed to the compliance and adherence of the Code of Ethics and Conduct. Any action or behaviour that is deemed contrary to this policy will be treated seriously and may lead to disciplinary action, up to and including termination of employment.

If you believe that someone is not following the Code of Ethics and Conduct, please report this to management or the HR Team or refer to the Helloworld Workplace Resolution Procedure. All reports are investigated promptly and confidentially, without recrimination against the person reporting an incident.