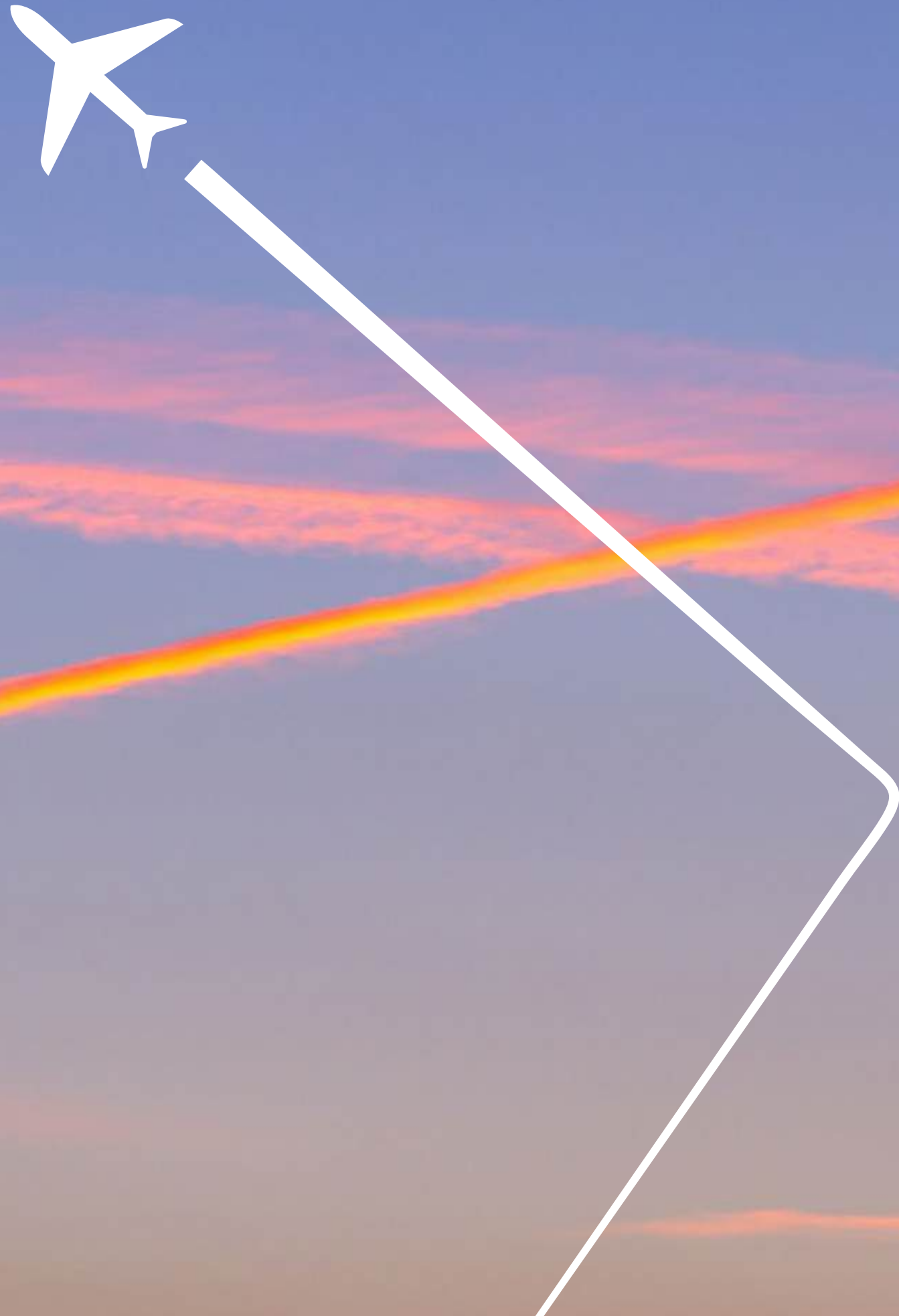




australia

Human Rights Policy

Contents



1. Purpose	3
2. Who does this Policy apply to?	4
3. Our commitments	5
4. Our focus areas	6
5. Implementing our commitments	7
6. Raising and responding to concerns	8
7. Related policies	9
8. Definitions	10
9. Roles and responsibilities	11
Document details	12

Human Rights Policy

1. Purpose

Virgin Australia is committed to respecting everyone's internationally recognised human rights.

Human rights are the basic rights and freedoms that every human being is entitled to enjoy. Human rights apply to everyone, everywhere without distinction and respecting human rights helps to ensure everyone is treated with equality, dignity and respect.

The purpose of this Policy is to communicate Virgin Australia's commitment to respect human rights and the expectations we set for third parties who work with us, including our suppliers and other business partners .

Our values underpin our commitment to respecting human rights across our business activities and value chain:

- **We put safety first** - we put the health and safety of our people, customers and communities above all else.
- **We have a big heart** - our customers live at the centre of everything we do.
- **We do the right thing** - everything we do for our people, our customers and our community – is done with absolute integrity, always.
- **We own it** - we're different and that's not going to change. We all, in our own way, embody Virgin's flair and laid back, authentic spirit.



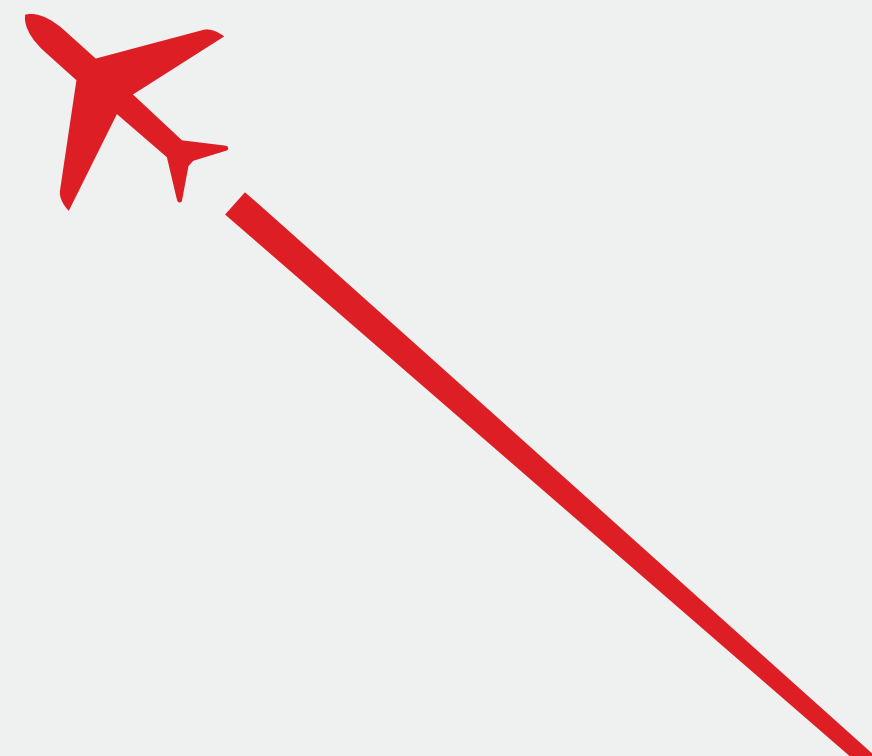
Human Rights Policy

2. Who does this Policy apply to?

This Policy applies to Virgin Australia Holdings Limited, Virgin Australia International Holdings and each of their respective subsidiaries. This Policy uses the term ‘Virgin Australia’ to describe all of these companies unless otherwise indicated.

All Virgin Australia employees, officers, directors, contractors, and consultants (Team Members) working for Virgin Australia must comply with this Policy.

We also expect the third parties we do business with, including our suppliers and other business partners to respect human rights and uphold the principles set out in this Policy. For example, the Virgin Australia Supplier Code of Conduct requires our suppliers to respect human rights.



Human Rights Policy

3. Our commitments

Virgin Australia is committed to respecting all internationally recognised human rights through our business activities and our business relationships across our value chain, and doing business in line with the UN Guiding Principles on Business and Human Rights (UNGPs).

This means we are committed to:

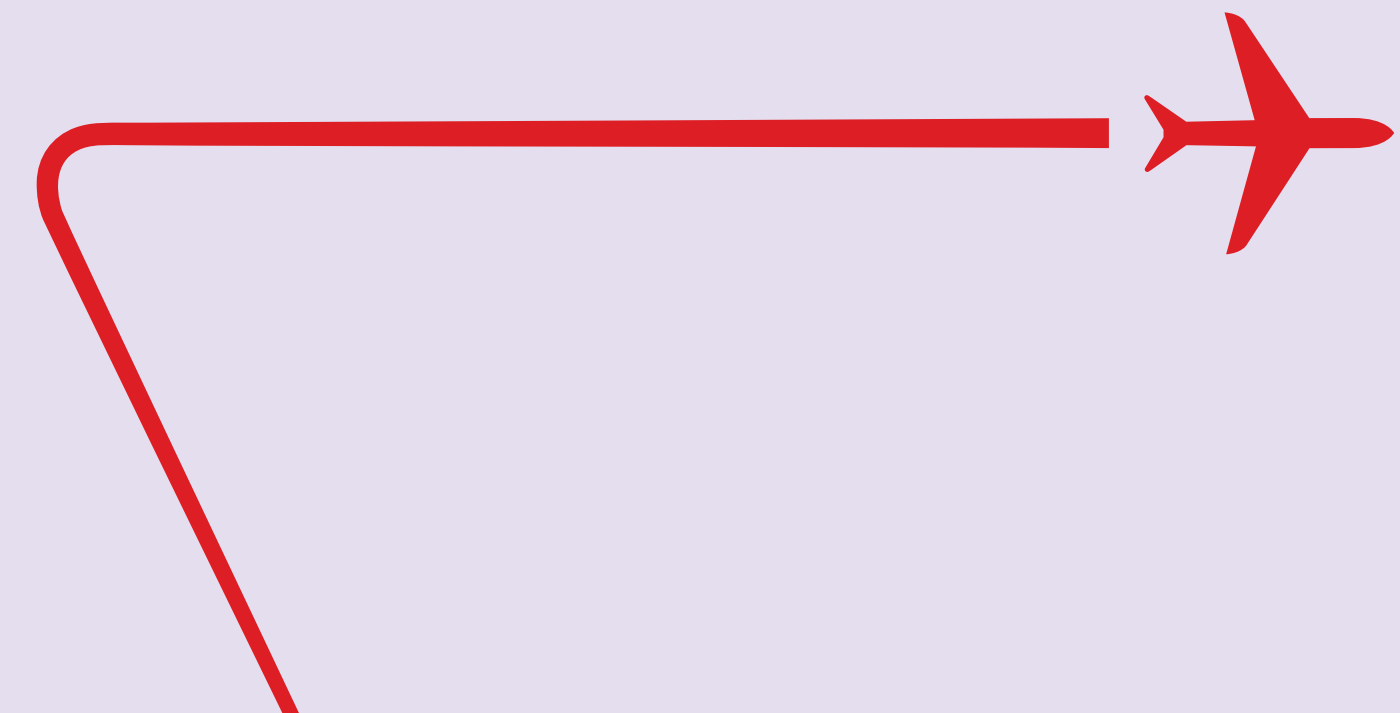
- Avoiding causing or contributing to adverse human rights impacts through our own activities and addressing any impacts we identify;
- Seeking to prevent and mitigate human rights impacts that we identify Virgin Australia may be directly linked to through our business relationships;
- Explaining our commitment to respect human rights and our expectations to our Team Members, suppliers and other business partners, our customers and other stakeholders;
- Tracking our human rights performance, including to identify opportunities for continuous improvement;
- Maintaining fit for purpose reporting pathways to enable our Team Members and other stakeholders to report human rights concerns safely and without retaliation;
- Providing for, or cooperating in, remediation through legitimate processes where we identify that we have caused or contributed to harm; and
- Engaging with external stakeholders, including suppliers, industry peers, government and civil society to share insights and support meaningful change.



KEY TERMS

Internationally recognised human rights are those set out in the International Bill of Human Rights and the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work.

The **UN Guiding Principles on Business and Human Rights** are the authoritative global standard for managing business related human rights impacts.



Human Rights Policy

4. Our focus areas

We are a business on the move. As our business has grown and evolved, we recognise that our potential impacts on human rights have changed too.

We understand that the aviation sector can involve a range of human rights impacts, including in the following areas:

- **Health and safety:** Everything we do as an airline is focused on keeping our guests and crew healthy and safe. We put the health and safety of our team members, guests, contractors, visitors, partners and communities above all else. So, it's on all of us to ensure everything we do – whether on the ground or in the air – is done as safely as possible. It's something we never compromise on.
- **Team wellbeing:** Our people are at the heart of our business and we are proud to create and nurture an environment where everyone feels like they belong without discrimination or harassment. How we treat each other and work together every day matters and we strive to create an inclusive, accessible and diverse working environment.
- **Modern slavery:** We recognise that risks of modern slavery exist in the operations and supply chains of all businesses, including our own. We work to identify and address any risks

of modern slavery and other forms of labour exploitation in our operations and supply chain, including the risks that airline services could be exploited by human traffickers.

- **The environment:** We recognise that human rights and environmental impacts are interconnected. Aviation has an important role to play in reducing global emissions and protecting the environment and we are committed to targeting net zero carbon emissions by 2050 from our operations. We are also taking other steps to minimise our footprint on resources and the environment.
- **Data Privacy:** We collect, use, share and store our customers' and Team Members' data with care. Privacy matters to us. Honouring it in everything we do enables us to maintain trust with each other, our customers and with our stakeholders. Committing to privacy means embedding accountability, designing with privacy in mind in everything we do, and ensuring that we continue to safeguard the privacy and security of the personal information we are entrusted with.

We understand that certain groups may be particularly vulnerable to these and other human rights impacts, including women and children, people living with a disability, Indigenous peoples and migrant workers. We also recognise that Human Rights and Environmental Defenders play an important role in promoting and protecting human rights and that civil society organisations more broadly can play a valuable role in supporting and advocating for responsible business conduct.



Human Rights Policy

5. Implementing our commitments

Flying requires a team effort. We bring this same commitment and practical and collaborative approach to the implementation of this Policy and our human rights response.

Governance

Our Audit, Risk and Compliance Committee (a committee of the Board of Directors) oversees, and is accountable for, our human rights response. Our Head of Ethics and Compliance manages the implementation of this Policy and our human rights risk management, with support from functions across the business including Sustainability, Procurement, Legal and People.

Communicating our response

It is important that everyone understands our human rights commitments, both inside and outside of the business. We are committed to communicating this Policy internally, including by equipping our Team Members through training and other initiatives.

We also communicate this Policy and our human rights expectations externally, including through our sustainability and modern slavery reporting and supplier engagement.

Where relevant, we also collaborate with external stakeholders to explore opportunities for collective action, including on issues such as child exploitation in travel and tourism.

Managing inconsistencies and conflicts with local or national laws

Where international human rights standards and national or local laws conflict, we will seek to respect internationally recognised human rights principles to the greatest extent possible in the circumstances.



Human Rights Policy

6. Raising and responding to concerns

In any area of our business, if something goes wrong, we aim to make it right.

Where we identify that we have caused or contributed to an adverse human rights impact, we will provide for or cooperate in remediation through legitimate processes.

We will also look for opportunities to encourage remediation where we identify we are directly linked to human rights harm.

We believe in a 'speak up' culture and encourage our people, our customers, our suppliers and their workers and other stakeholders to report any human rights concerns.

Our Ethics Hotline provides a secure channel to safely report concerns. It is available to all Virgin Australia Team Members, contractors, vendors/suppliers, community members and others in our supply chain that are connected to the provision of services to Virgin Australia.

To make a whistleblower report

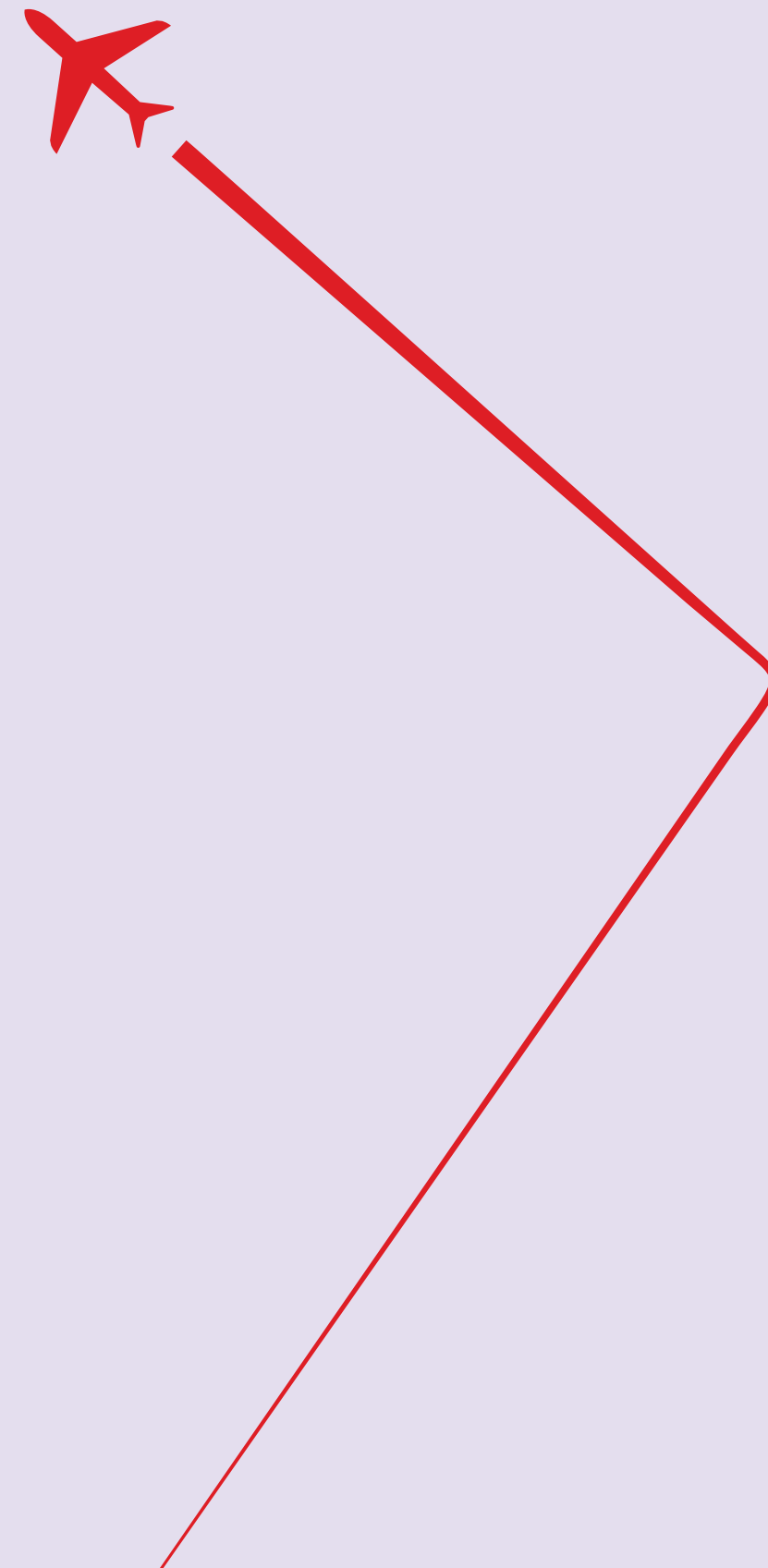
- Australia: 1800 829 466 (free call)
- New Zealand: 8000 934 742 (free call)
- International: +61 499 221 005
- Text: +61 499 221 005
- Web: www.rightcall.com.au/ethicsline
- Email: ethicsline@rightcall.com.au
- Post: GPO Box 24371, Melbourne, VIC 3000 (addressed to Ethics Hotline marked confidential)

Human Rights Policy

7. Related policies

This Policy provides the foundation for our approach to human rights. Our commitment to respect human rights is also supported by other policies, including:

- [Code of Conduct](#)
- [Supplier Code of Conduct](#)
- [Whistleblower Policy](#)
- [Privacy Policy](#)
- Respectful Culture Policy
- Procurement Purchasing Policy
- [Guest Charter](#)
- [Reconciliation Action Plan](#)
- Modern Slavery Incident Response and Remediation Policy



Human Rights Policy

8. Definitions

Board refers to the board of directors of Virgin Australia.

International recognised human rights mean those set out in the International Bill of Human Rights and the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work.

Team Members means all Virgin Australia employees, officers, directors, contractors, consultants, agents or other person or entity who performs service for or on behalf of Virgin Australia.

The **UN Guiding Principles on Business and Human Rights** are the authoritative global standard for managing business related human rights impacts.

Virgin Australia means Virgin Australia Holdings Limited, Virgin Australia International Holdings and each of their respective subsidiaries.



Human Rights Policy

9. Roles and responsibilities

ROLE	RESPONSIBILITY
Audit, Risk, Sustainability and Compliance Committee	Provide oversight of this Policy.
General Manager, Ethics and Compliance	Administers and manages implementation of this Policy.
Team Members	Comply with this Policy.



Document details

Version 2.0

Policy owner

General Manager, Ethics and Compliance and Chief Legal Officer

Approval authority

VAH and VAIH Boards

Approval date

June 2024

Revised date

July 2026

Next revision date

June 2028

Review period

This Policy may be reviewed and amended from time to time and at least every two years.

Consequences

All our Team Members are responsible for complying with this Policy. Virgin Australia treats non-compliance seriously and resulting action could include suspension or termination of employment or engagement with Virgin Australia.

We will also take appropriate action if we identify that a supplier has acted inconsistently with the expectations set out in the Policy.

Governance, monitoring and reporting

The General Manager, Ethics and Compliance is responsible for implementation of this Policy, with oversight from the Audit, Risk, Sustainability, and Compliance Committee.

