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Introduction

A message from Dave

Our company has lived through many changes, but one thing has remained constant: our unwavering commitment to running our business with integrity. This is how we have earned and maintained the trust of our stakeholders. As the next chapter of Virgin Australia unfolds and we continue to dream even bigger and more boldly, we'll do what we've always done to succeed: stay true to our values.

- WE PUT SAFETY FIRST We prioritise the health and safety of our people, customers, and communities above all else.
- WE HAVE A BIG HEART Our customers are at the centre of everything we do.
- WE DO THE RIGHT THING Everything we do for our people, customers, and communities is done with absolute integrity, always.
- WE OWN IT We're different and proud of it. Each of us embodies Virgin's flair and laid-back, authentic spirit.

When we do business the right way, everybody wins — our customers, shareholders, communities, and team. Virgin Australia's Code of Conduct establishes clear standards for what it means to act with integrity. Use the Code as your guide for applying our values to your work and the decisions you make. While we play different roles, we share a joint responsibility to hold ourselves and each other accountable to these standards.

We value transparency and open communication at Virgin Australia. Every voice matters here, which is why we have our Speak Up program. This makes us stronger and creates an environment where we all can thrive. If you see or hear something that doesn't seem right, please speak up. I assure you that retaliation against team members who raise concerns will never be tolerated.

Please take the time to read the Code thoroughly and make it a fundamental part of your daily work at Virgin Australia.

Thank you for your commitment to our values.

> Dave Emerson Dave Emerson CEO



Introduction

Our Values

Our values are the cornerstones of our Code of Conduct, they reflect who we are, what we stand for and how we make decisions every day.

WE PUT SAFETY FIRST

We put the health and safety of our people, customers and communities above all else. So, it's on all of us to ensure everything - whether on the ground or in the air - is done as safely as possible. It's something we never compromise on.

- Safety always comes first.
- Everyone's responsible, no matter the role.
- When it comes to safety, we don't compromise.

WE HAVE A BIG HEART

Our customers live at the centre of everything we do. We always put them first, listen to what they want, and treat them with genuine care and respect. We believe we can make a positive difference for our guests. We're honest, authentic, passionate and proud to wear our hearts on our sleeves (or wings).

- We're good humans.
- Care for our people, customers and community.
- Always customer led.
- We deliver magic moments our customers love.

WE DO THE RIGHT THING

Everything we do - for our people, our customers and our community - is done with absolute integrity, always. We constantly question and change the way we work. And we're not afraid to challenge ourselves and others to do the right thing. It's the simple everyday actions that have an impact. It's a unique approach that sets us apart from the competition.

- Absolute integrity always.
- Challenge everyone to do the right thing.
- Constantly change and improve everything we do.

WE OWN IT

We're different. That's not going to change. We all (in our own way) embody Virgin's flair and laid back, authentic spirit. And because we're free to be ourselves, we're better able to own our personal responsibilities, we work together as one team to make amazing things happen and go the extra mile to help our customers.

- Free to be ourselves.
- Embrace responsibility.
- Work collaboratively. We are better together.
- Challenger spirit. Commercial focus.







Overview

Responsibilities

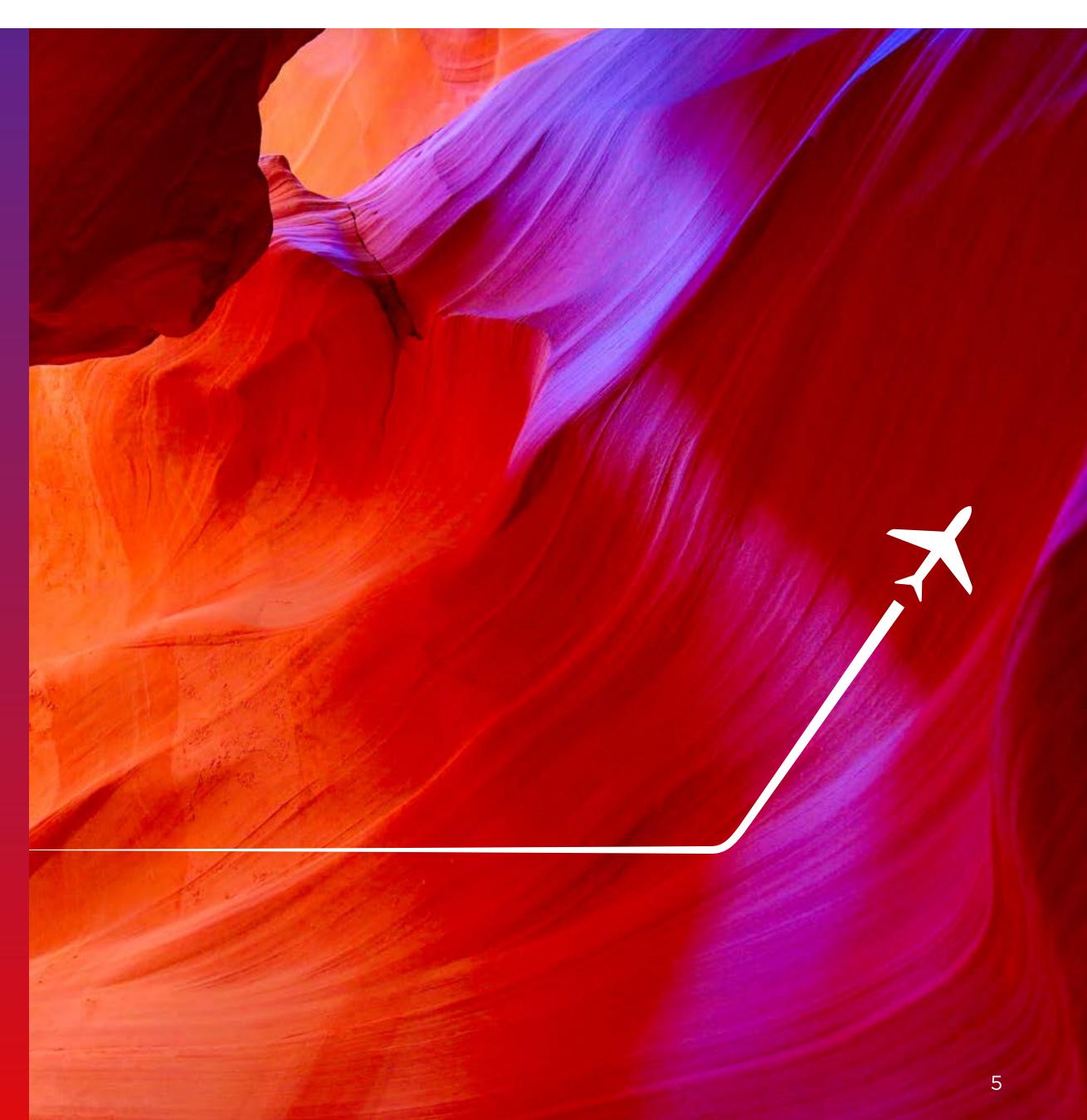
Our Ethical Decision Making Framework

Speak Up

No Retaliation

Leaders Set The Tone

How Leaders Handle Concerns







Overview

Our Code sets out how we behave and make decisions here at Virgin Australia including the legal and policy requirements which guide us while we perform work for Virgin Australia.

We've included a Values in Action section in each area of the Code which sets out examples of the behaviours required from everyone who works at Virgin Australia. Keep in mind that the Code is designed to guide you, but it can't cover every situation. If something comes up in any of the areas covered in the Code and you need more detail, take a look at our company policies or ask someone for guidance. Your leader, the People team and the Ethics and Compliance team are equipped to help you.



PLEASE NOTE

When we say Virgin Australia, we mean Virgin Australia Holdings Limited, Virgin Australia International Airlines Pty Ltd, and each of their respective subsidiaries, including: Virgin Australia Holdings, Virgin Australia International Airlines, Virgin Australia Regional Airlines, Velocity Frequent Flyer and Virgin Australia Cargo.







Responsibilities

All of the team at Virgin Australia — employees, officers, directors, consultants and contractors — are expected to uphold both the letter and the spirit of the law, and this Code.

We take this expectation seriously.

- No one can ask you to break the law or the Code.
- You can't direct someone to break the law or the Code.
- Breaking the law or violating the Code cannot be justified by saying that it helped Virgin Australia.
- Violations of both the law and the Code can land you in a world of trouble. You could face disciplinary action (including termination of employment or engagement) as well as criminal and civil penalties.





PLEASE NOTE

The Code of Conduct applies to all team members in the workplace, during and outside of normal working hours, outside of the workplace if the conduct takes place in a setting which is in connection with work (e.g. during layovers, while on staff or duty travel or at work-related events) or otherwise while team members are representing Virgin Australia.

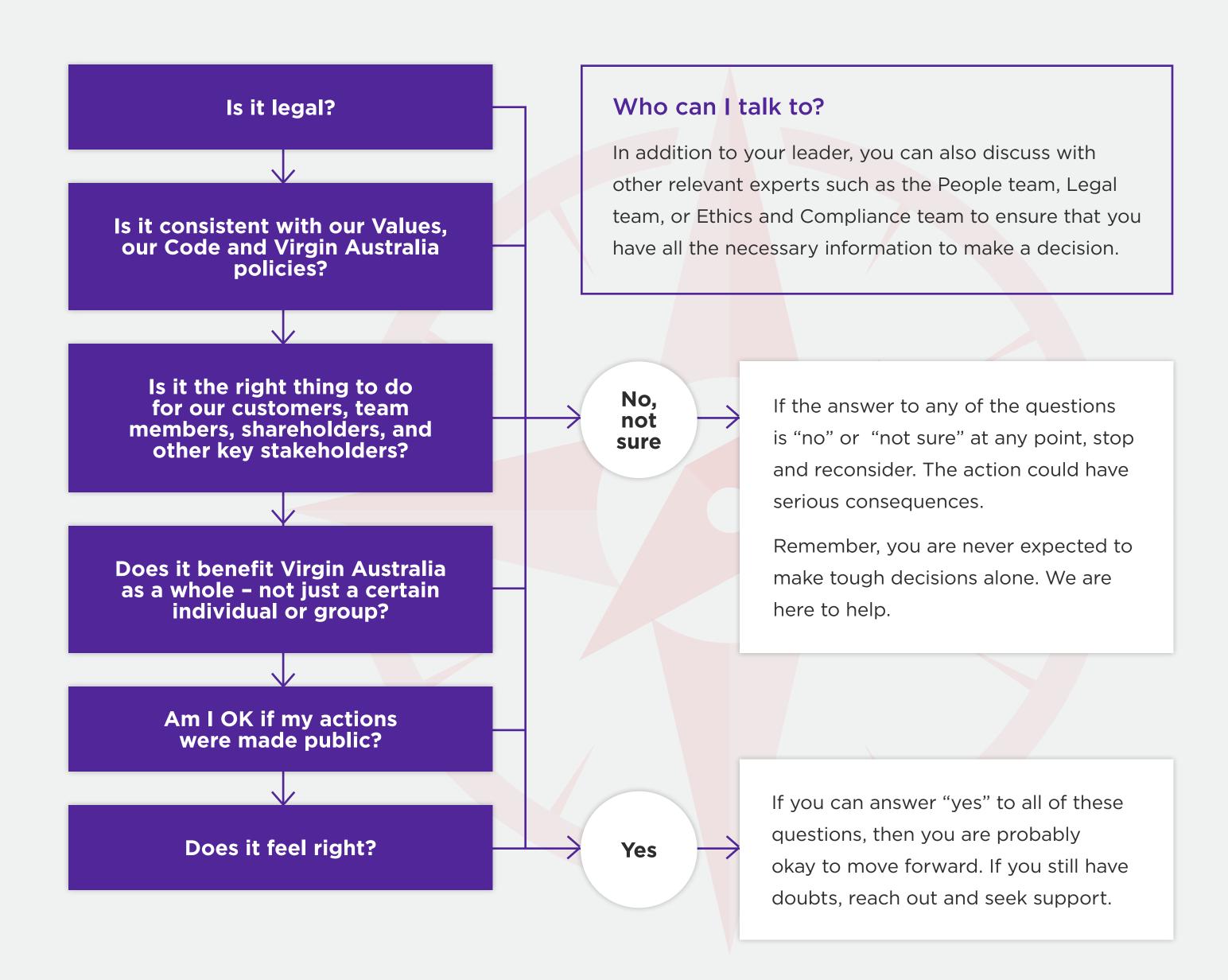
The Code of Conduct also applies to conduct which occurs online or through other electronic media where it is connected with work or the interests of Virgin Australia. For example, it may apply to conduct online where team members interact with other team members, guests or members of the public (e.g. on social media, through text messaging or email) whether this occurs inside or outside of the workplace or during or outside of normal working hours.



Our Ethical Decision Making Framework

Sometimes we face difficult decisions or situations where the right thing to do isn't clear. That's when our commitment to doing the right thing matters most. When you encounter this, ask yourself:







Speak Up

If you see something that violates the law, the Code, or Virgin Australia policies, say something, because it's the right thing to do. Trust your instincts. If something doesn't seem quite right, then it probably isn't. And remember, you don't have to have all the details or be sure that something is wrong to raise a concern.

Got a question or concern? We're here for you.

A good place to start is by talking to your leader. If you're not comfortable using this avenue or don't feel they have resolved your concern, Virgin Australia provides these other options:



People team at

PeopleTeamQueries@virginaustralia.com

Ethics and Compliance team at ethicsandcompliance@virginaustralia.com



Our Ethics Hotline: This 24/7 resource is managed by a leading third-party reporting service. You have the option to remain anonymous.

Australia: 1800 829 466 (free call New Zealand: 0800 934 742 (free call)

International: +61 3 9278 1017

Text: +61 499 221 005

Web: www.rightcall.com.au/ethicsline

You can raise concerns including Whistleblower reports through this service.

These resources are available to help you but keep in mind that nothing in this Code or in any Virgin Australia policy or agreement prevents you from making a report to outside government or regulatory authorities if you have reasonable grounds to do so.

You can trust that we'll treat your reports seriously, fairly and promptly. If something needs to be fixed, we'll take action based on what we learn.



Learn More

Whistleblower Policy Workplace Behaviour Policy





No Retaliation

We don't tolerate retaliation - ever. Anyone who reports a possible violation of the law, this Code or any Virgin Australia policy in good faith is protected from retaliation. Any team member who is found to have retaliated will be subject to disciplinary action, such as termination of your employment or engagement.

What do we mean by no retaliation? When we say that you will not be retaliated against for making a report, we mean that you will be protected from adverse action against you.

This action could include:

- Threatening to discipline or actually disciplining you.
- Negative comments in communications (like on social media) about you.
- Not promoting you because you made a report.



Q&A's - Guiding Examples





Leaders Set The Tone

If you are a leader, you have a special responsibility for setting the culture and the work environment for your team. The way you make decisions, and handle concerns, different opinions, and even bad news, will set the foundation for trust with your teams, our customers, and stakeholders.



Values In Action

- ✓ Talk to your team about ethics and integrity and be clear that you expect work to be done ethically.
- Call out and recognise those that do the right thing.
- ✓ Take care of problems before they become bigger problems.
- Lead by example, by modelling ethical decision-making.
- Ensure your team knows that for results to matter, they must be achieved in the right way. Then, satisfy yourself that results have been achieved the right way.
- ✓ Make sure your team knows you will listen, even if they have something difficult to say. Let them know that speaking up is the right thing to do.
- ✓ Demonstrate zero tolerance for retaliation. No one gets punished for raising a ethical concern or possible legal, Code or Virgin Australia policy violation.





How Leaders Handle Concerns

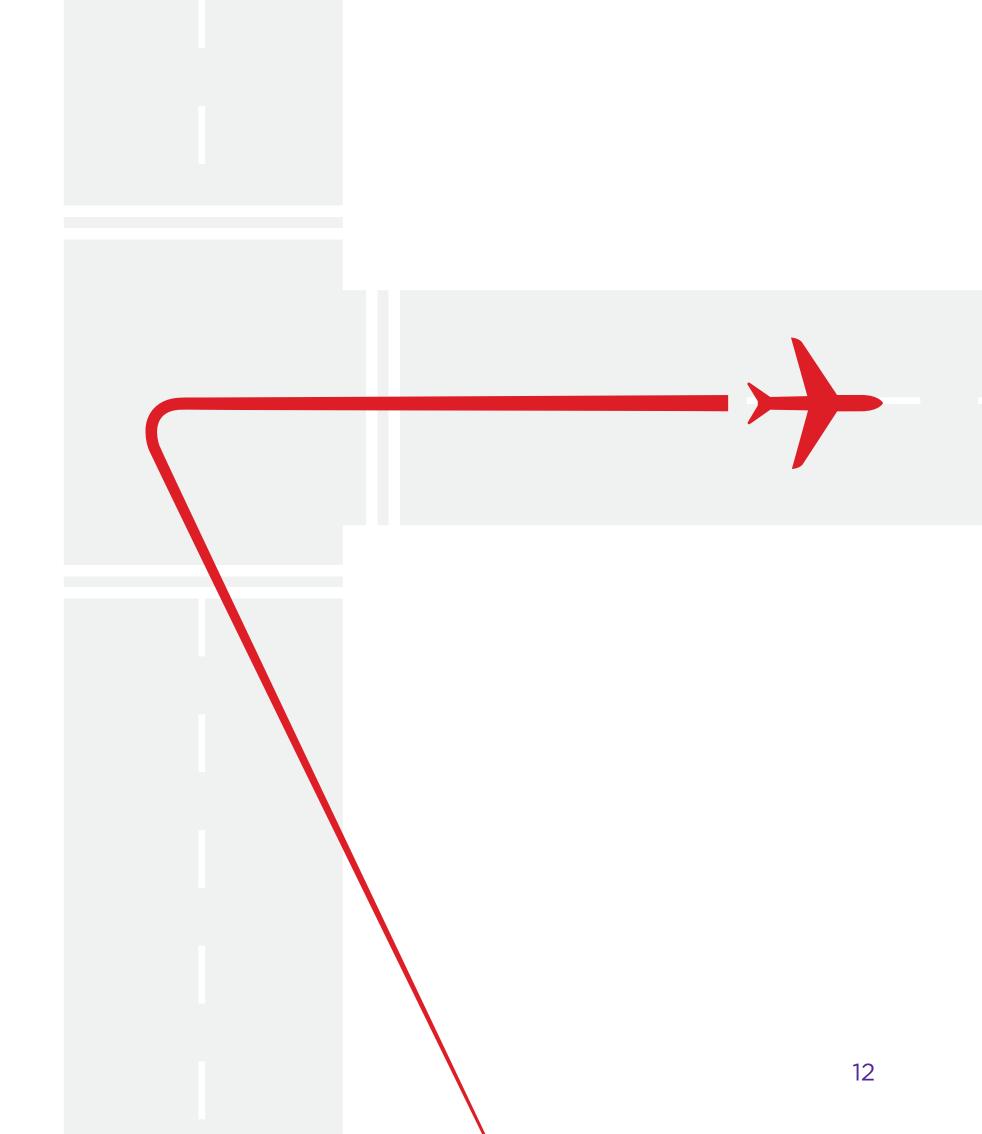
When someone comes to you with a concern, you have a special responsibility to listen and act. Handling concerns the right way is critical to maintaining the trust of your team and protecting Virgin Australia. When a team member raises a concern:

LISTEN: Remove distractions and listen carefully. Thank the person for speaking up - remember that they've just done something difficult and very important for Virgin Australia.

RESPOND: Respectfully and take every concern seriously, even if you disagree. Do not take sides or make judgements based solely on a report or limited information. Show you are committed to addressing their concerns. Tell them what you will do, do it, and tell them what you did.

PROTECT: Reporters from retaliation. Take reasonable steps to safeguard confidentiality. Only discuss the conversation with someone who has a business need to know. View reports of misconduct as a positive opportunity to address the issue and set the right example. Treat the reporting team member just as you did before they spoke up.

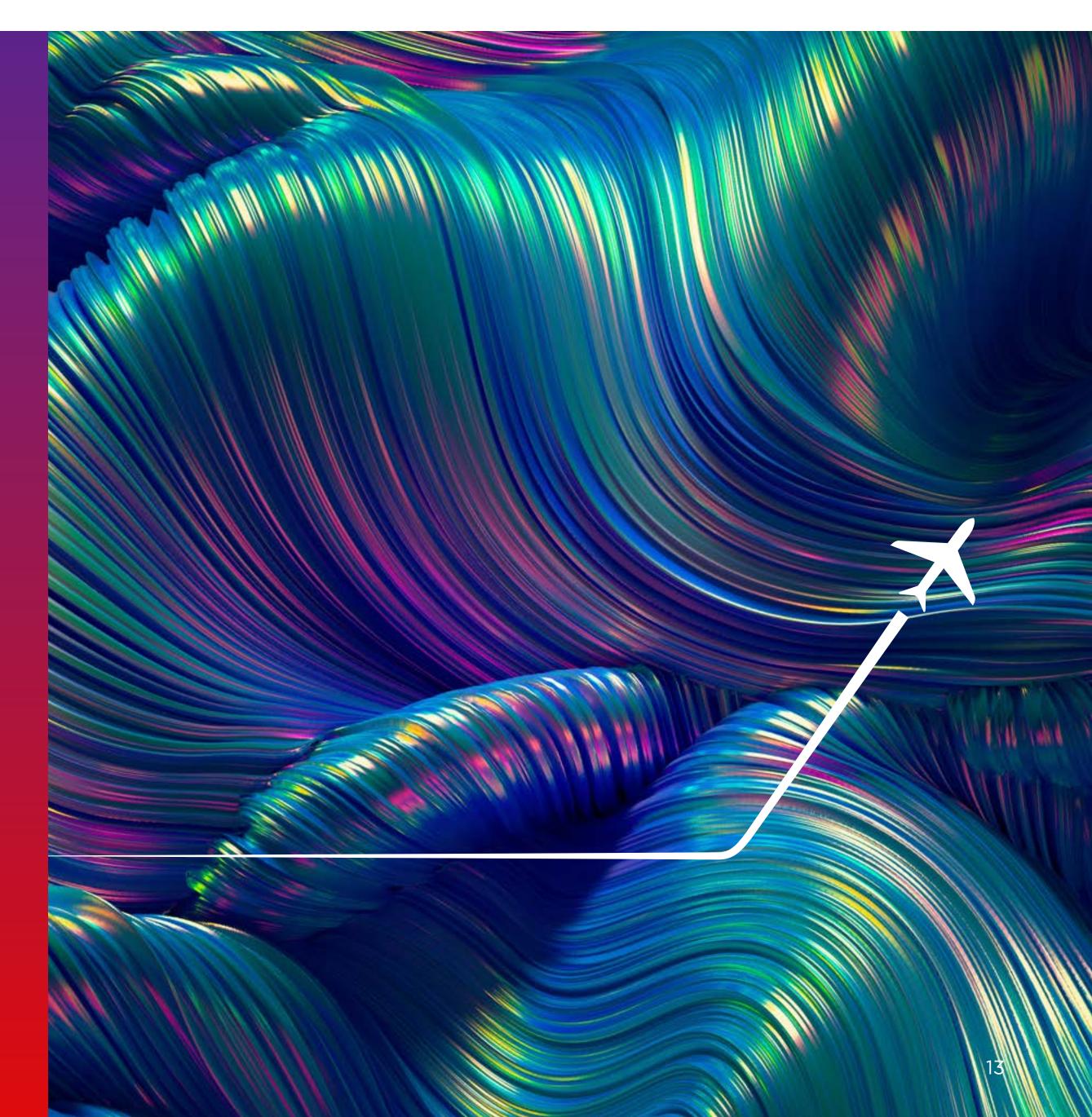
ESCALATE CONCERNS ABOUT MISCONDUCT: As a leader, you are empowered to resolve performance issues yourself, but you should escalate concerns about potential violations of Code, Virgin Australia policies or laws in a timely manner to the Ethics and Compliance team. If you have a question or aren't sure whether you can or should resolve the issue yourself, you can always contact your leader, the Ethics and Compliance team or the People team.



Workplace Health and Safety

australia

Bullying, Discimination and Sexual Harassment







Workplace Health and Safety

We put the health and safety of our people, customers, 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.



Learn More

Safety and Welfare on Layovers Policy

Safety Policy

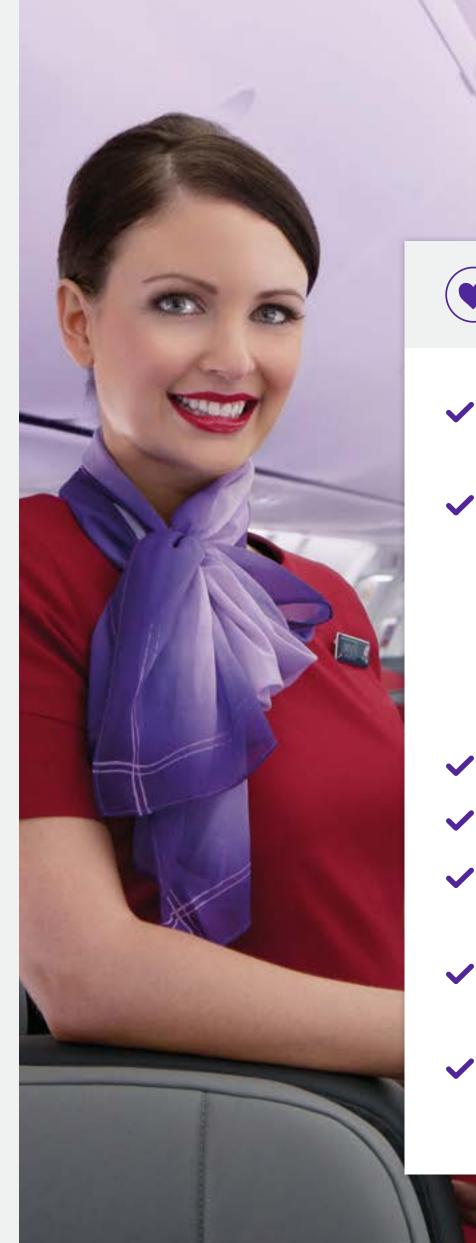
Safety Culture Policy

Information Security Policy

Drug and Alcohol Management Policy (DAMP)

Employee Assistance Program

Better Me, Axis onsite physiotherapy and Injury Illness Reporting (VA Care)





Q&A's - Guiding Examples



Values In Action

- Know the health and safety policies and procedures that apply to your role and follow them.
- ✓ Present for work fit for duty. Comply with the Drug and Alcohol Management Program (DAMP). This means do not attend work, undertake or perform any work (including being on-call), impaired with drugs or alcohol or with alcohol or other drugs present in your system above the limits clearly outlined in DAMP.
- Complete required training.
- Challenge unsafe behaviours in others.
- Identify and report any health and safety hazards and security concerns.
- Resolve problems respectfully, and never resort to acts or threats of violence.
- Wear the right personal protective equipment and know what to do in case of an injury or emergency.





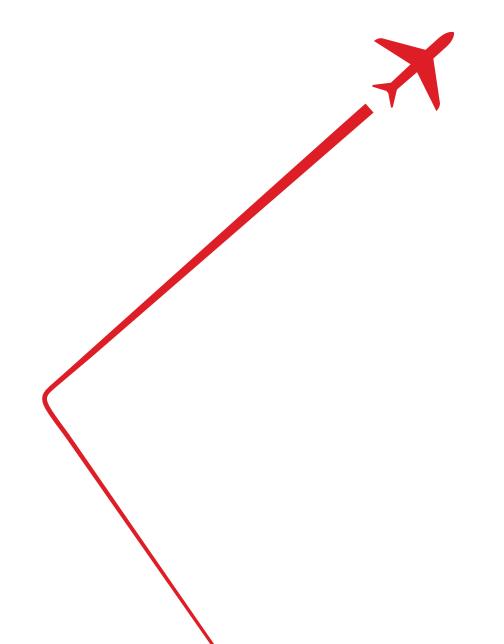
Bullying, Discrimination and Sexual Harassment

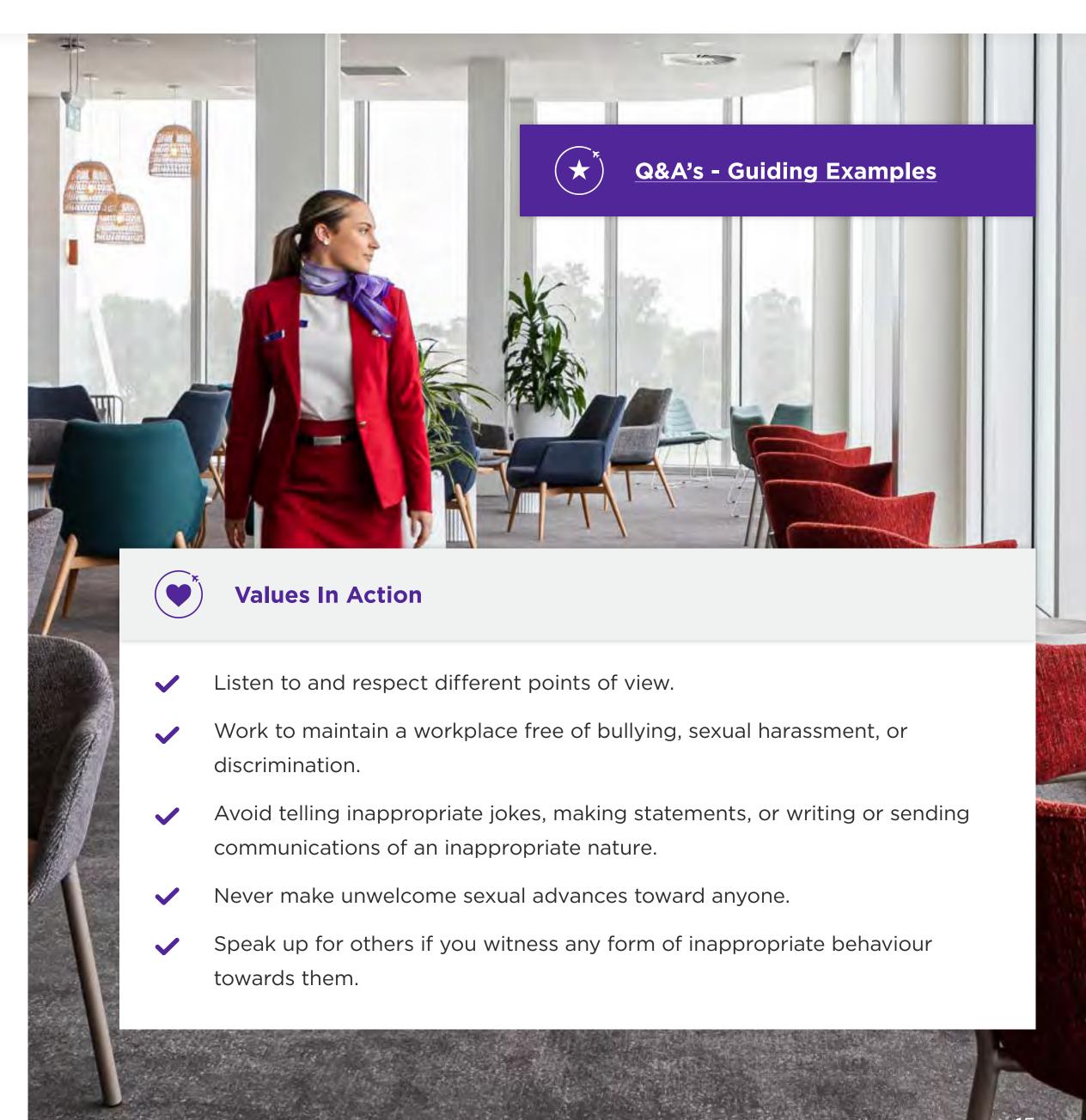
We're good humans. We are committed to a workplace that is free of bullying, sexual harassment, and discrimination. We do not tolerate any behaviour that diminishes the dignity of a person, inappropriately or unreasonably interferes with work performance, or creates an intimidating, hostile, or otherwise offensive work environment.



Learn more

Workplace Behaviour Policy Whistleblower Policy









Bullying, Discrimination and Sexual Harassment



What is Bullying?

Bullying is repeated verbal, physical, social or psychological abuse of a worker by a person or group of people at work. This would include any behaviour that is victimising, humiliating, intimidating or threatening. This could include:

- maliciously excluding or isolating team members from workplace activities.
- using abusive, insulting or offensive language about a person.
- making comments or using gestures which humiliate or embarrass a person.



What is Sexual Harassment?

Sexual harassment may include unwelcome touching, suggestive comments or jokes, insults of a sexual nature, or sending sexually explicit emails or messages. The impact of the action or behaviour on the recipient, not just the intent, is considered when determining whether the action or behaviour is harassment.



What is Discrimination?

Discrimination can be direct or indirect. Direct discrimination is when a person or a group of people are treated less favourably than another because of a specific attribute or characteristic. Indirect discrimination is when a person or a group of people with a specific attribute or characteristic cannot comply with a particular policy or condition because of their attribute or characteristic and the policy or condition is unreasonable. It doesn't matter what our intention is – our actions can still be discriminatory.



Virgin Australia Group — Code of Conduct

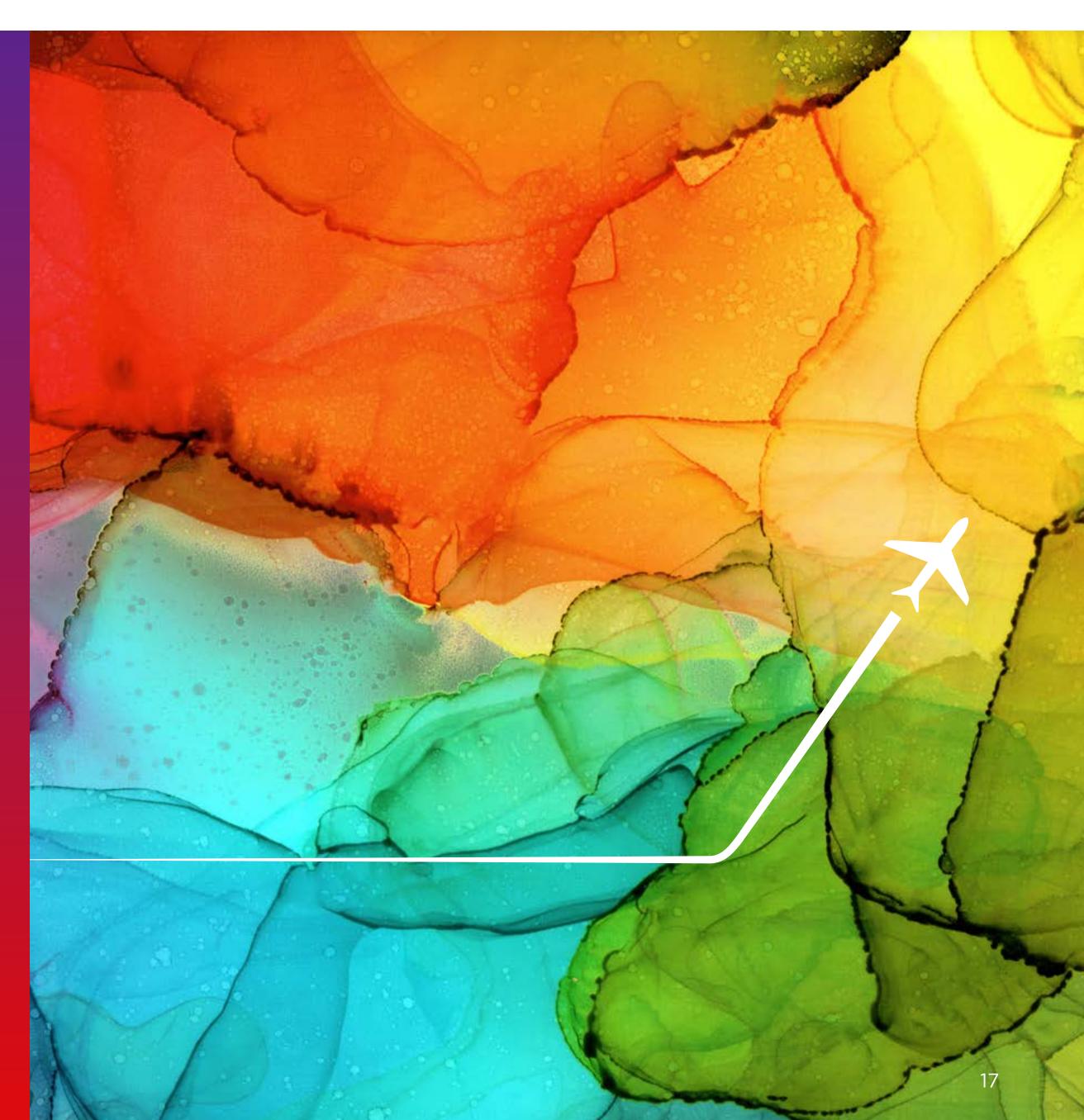


Belonging

australia

Privacy

Sustainability









Belonging

We recognise and celebrate the things that make each person unique. Our team is made up of people with diverse identities, backgrounds, perspectives, and life experiences — we know we work better together and perform better overall when we have a diverse workplace and we are free to be our authentic selves.

Our differences are a valuable asset because they spark conversations, big ideas, and new ways of doing things. This is what we call Virgin Flair, and it's at the heart of who we are and what we strive for. We aspire to be a force for good in our communities, and a big part of that is making sure we represent the communities in which we live, work and fly. Embracing diversity allows us to better understand and serve our customers' best interests.



Learn more

Belonging Policy

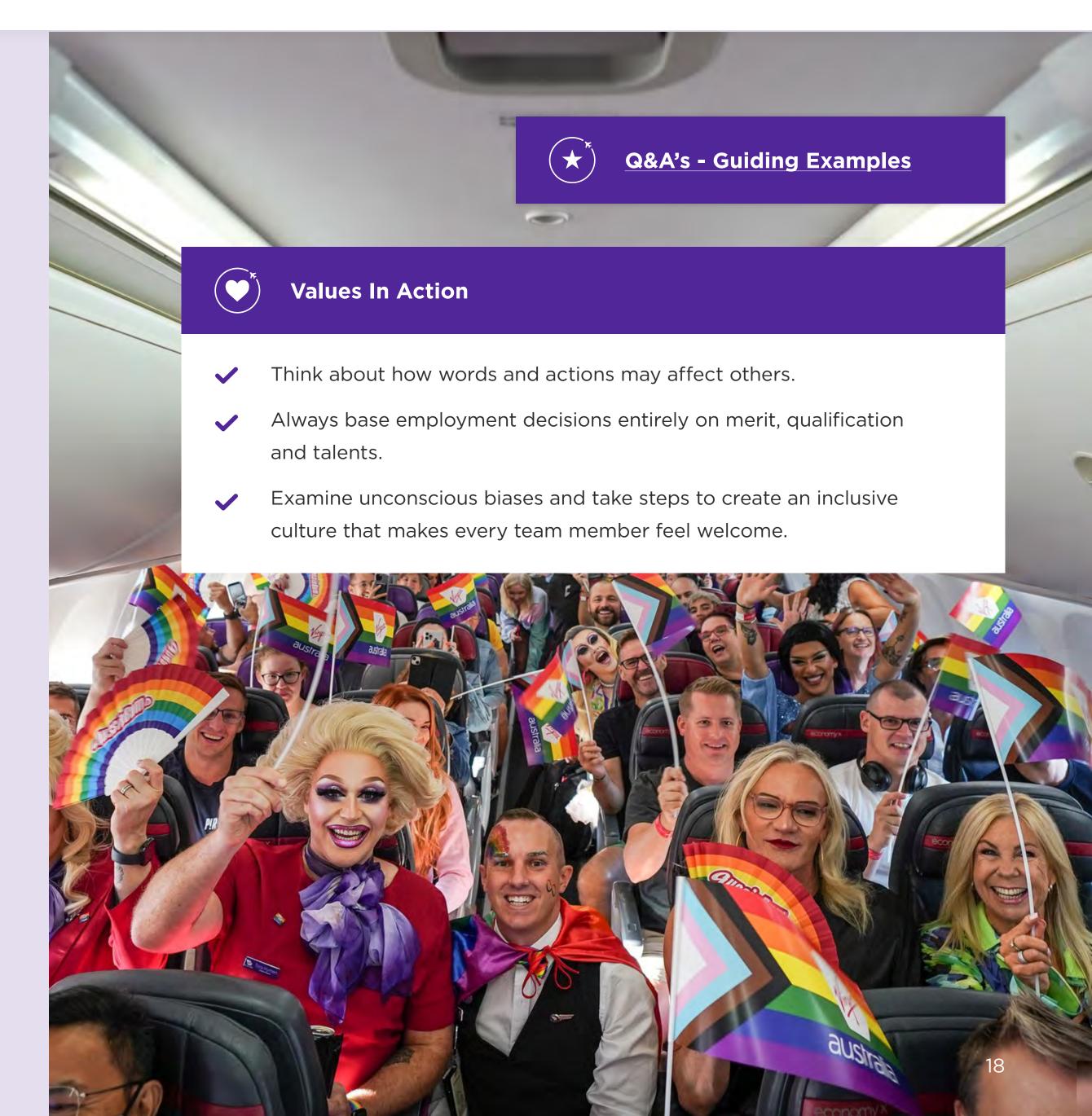
Recruitment Policy

Gender Affirmation Policy

Workplace Behaviour Policy

Flexible Work Arrangements Policy

Whistleblower Policy

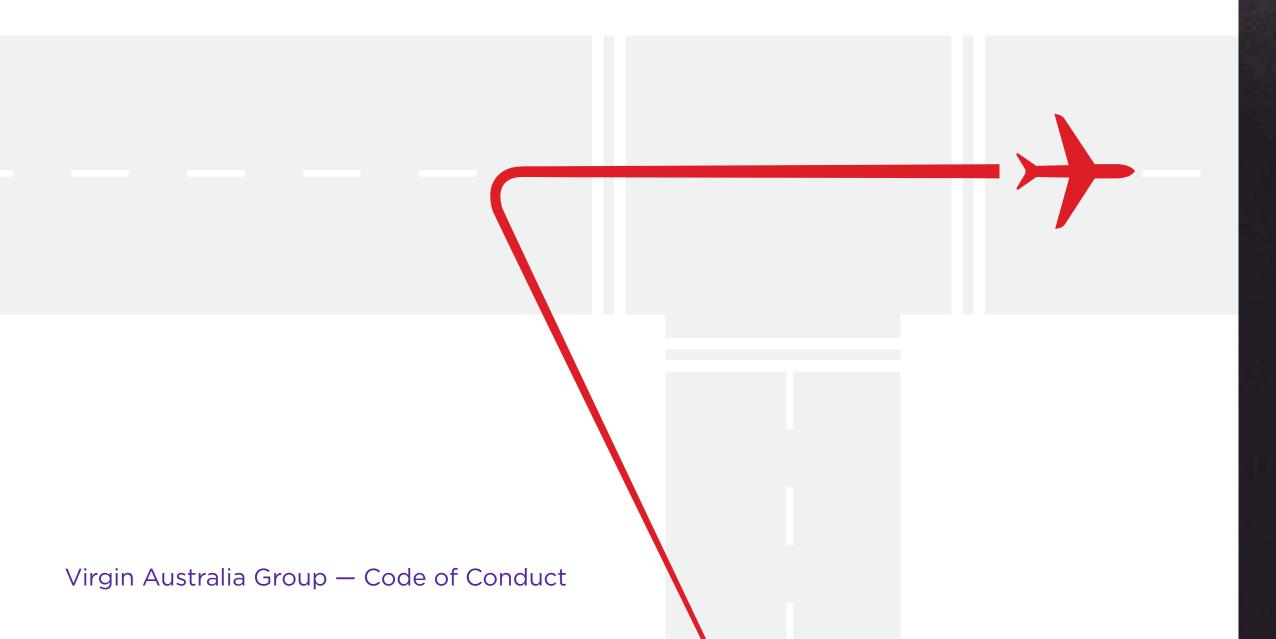




Privacy

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.





- Understand and follow Virgin Australia's privacy policies, procedures and controls that apply to your role and follow them when handling personal information.
- ✓ Do not access personal information unless it is required to perform your duties and you have appropriate authorisation.
- ✓ Be thoughtful. We must protect the personal information we collect, so make sure we need it before you collect it. Always do it in a lawful and fair manner.
- Seek guidance if you have questions about how to handle personal information, identify privacy risks or which laws and policies apply. Do it before you start.
- ✓ Immediately notify the Privacy team at PrivacyAlert@virginaustralia.com of any known or suspected misuse, interference, unauthorised access, disclosure, or loss of personal information.





Privacy

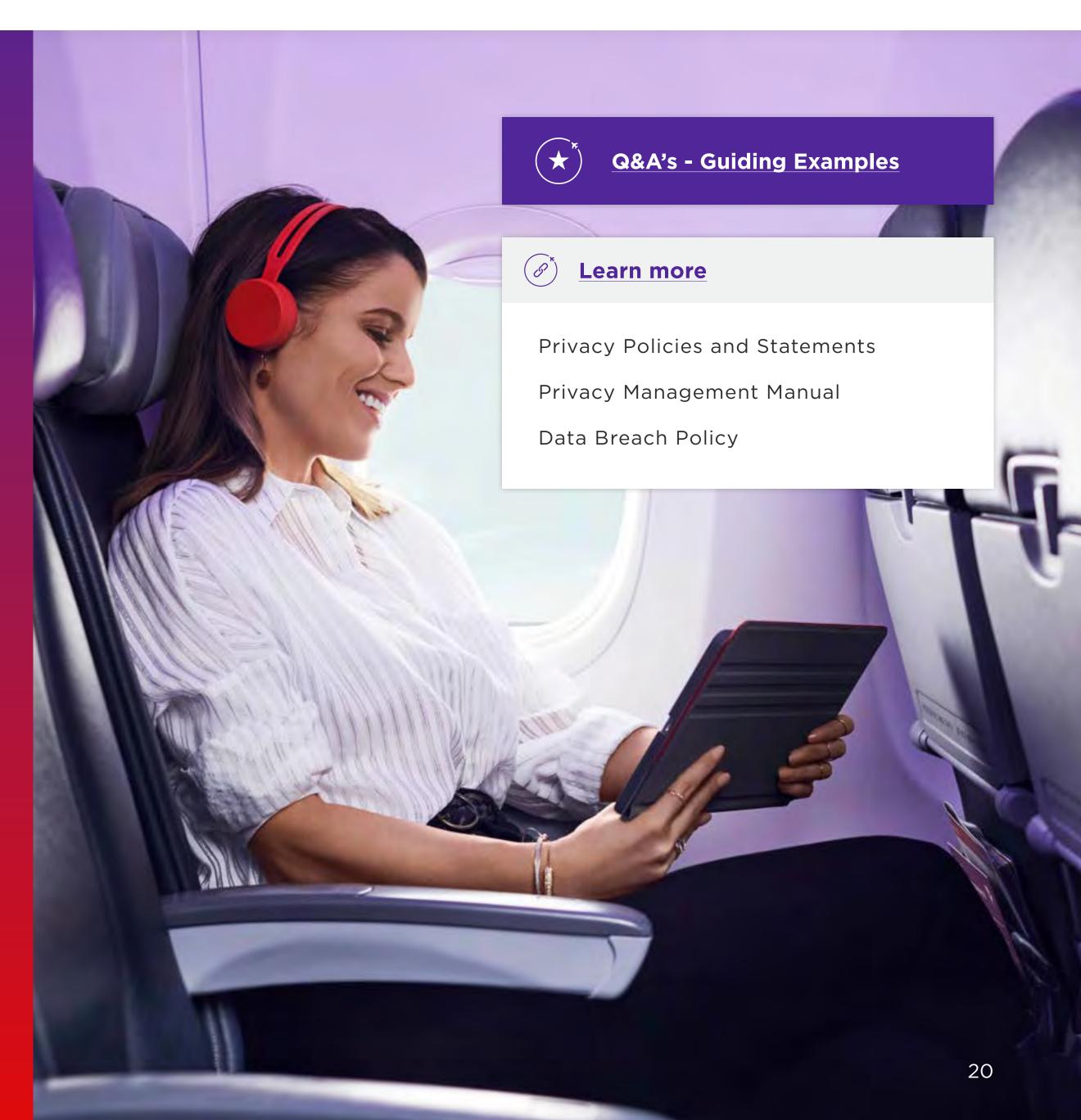
We have obligations to protect personal information of people that interact with Virgin Australia. This can be guests, suppliers, employees, contractors or other members of the public (like those who engage with us on social media).

Personal information can include:

- Name, address, phone number and email address
- Date of birth and gender
- Passport or driver licence number
- Velocity membership number
- Personal interests or preferences

There are also some other pieces of personal information which are sensitive, and attract additional obligations when we collect, use or disclose these categories of personal information. Sensitive personal information can include information about a person's:

- Health (including records like special assistance requirements or vaccination records)
- Race
- Ethnicity
- Political opinions
- Sexual orientation
- Trade or professional memberships or affiliations





Sustainability

Sustainability means more than just environmental stewardship. It's our ability to thrive in the long-term through a holistic approach that considers our impact on people, the planet and communities.

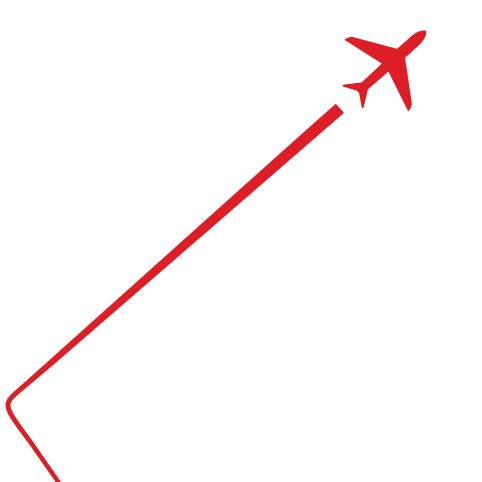
Our sustainability strategy defines our key focus areas and helps direct financial and resource investments to be most impactful in achieving our sustainability goals. It is informed by international guidelines to ensure we are aligned with global aviation best practice.

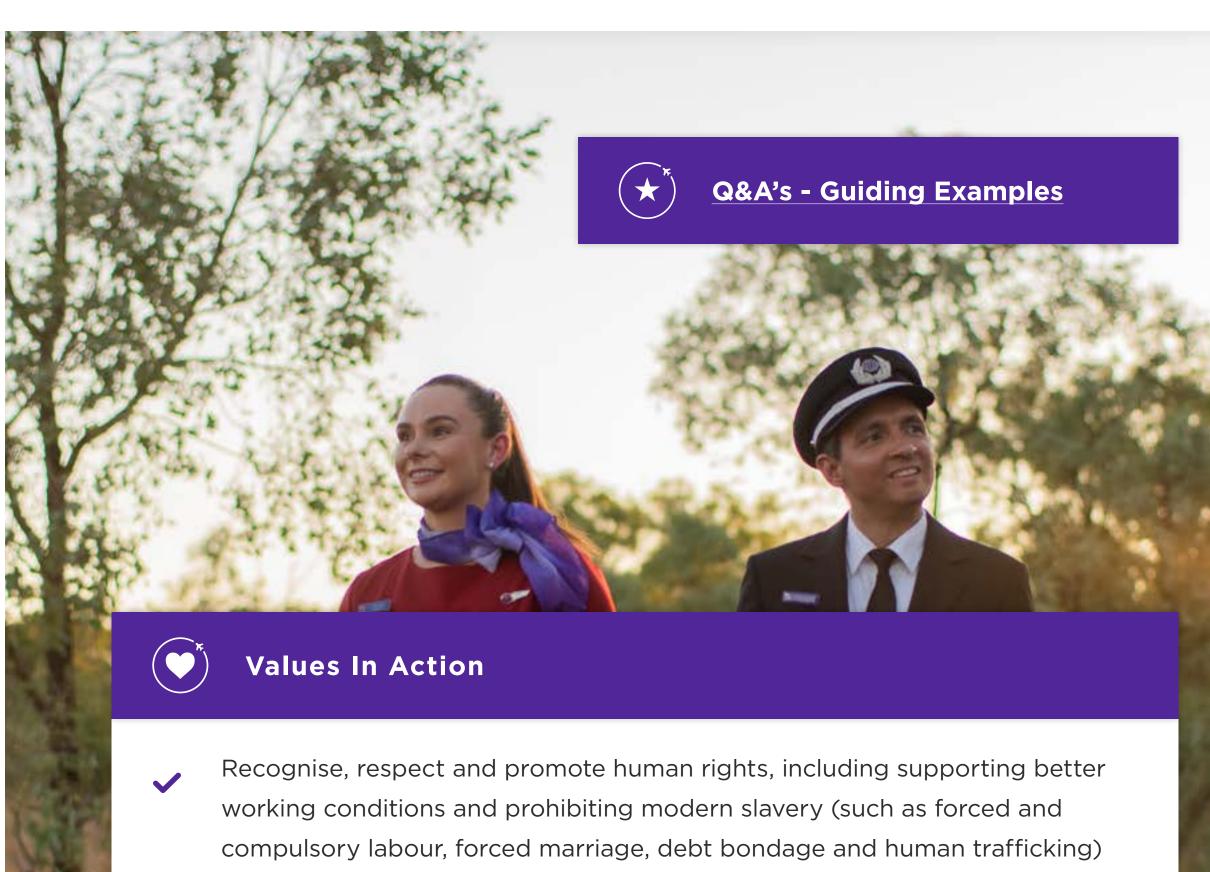
We are passionate about empowering individuals to address issues that matter to them, and we collaborate with our customers, partners and communities to take on shared global challenges—bringing value to both our business and our society.



Learn more

Sustainability Portal Human Rights Policy





- across Virgin Australia and Virgin Australia's supply chains.
- Work to improve our longer-term social, economic and environmental performance.
- Pursue sustainable design principles in our business decisions.
- Promote the efficient and responsible use of fuel, energy, water and other resources throughout our business.
- Speak up if you see an environmental incident or risk.



Fair Competition

Conflicts of Interest

Gifts and Entertainment

Bribery and Corruption

Anti-Money Laundering and Trade Sanctions





Fair Competition

The way we compete is as important as the result we achieve.

Competing fairly means that we:

- make independent business decisions and comply with relevant competition laws;
- ✓ are truthful in marketing and advertising, comply with relevant consumer laws; and
- seek legal advice in case of any doubt.

By competing fairly, we ensure that we meet our business objectives with our integrity intact. Competing fairly also ensures that we are providing our customers the best price, quality, and service possible.

What do we mean by competitor? A competitor is any organisation or person that offers, or is capable of offering, the same, similar, linked or substitutable products or services as Virgin Australia.

Remember: Competition and consumer laws are designed to promote competitive markets and protect consumers. Non-compliance with these laws can lead to substantial penalties against Virgin Australia and the individual employees involved in any breach.



Values in Action

- Know the competition and consumer laws that apply to your role and follow them.
- ✓ Never discuss competitively sensitive information with a competitor or make business decisions in agreement with a competitor. Example: prices we offer, bids we make, products and services we offer, geographies we compete in, which customers we aim for, strategic plans, etc.
- Immediately notify the Legal team if you become aware of any conduct that might be anti-competitive.



Q&A's - Guiding Examples



Learn more

Competition Law Policy
Consumer Law Policy



Conflicts of Interest

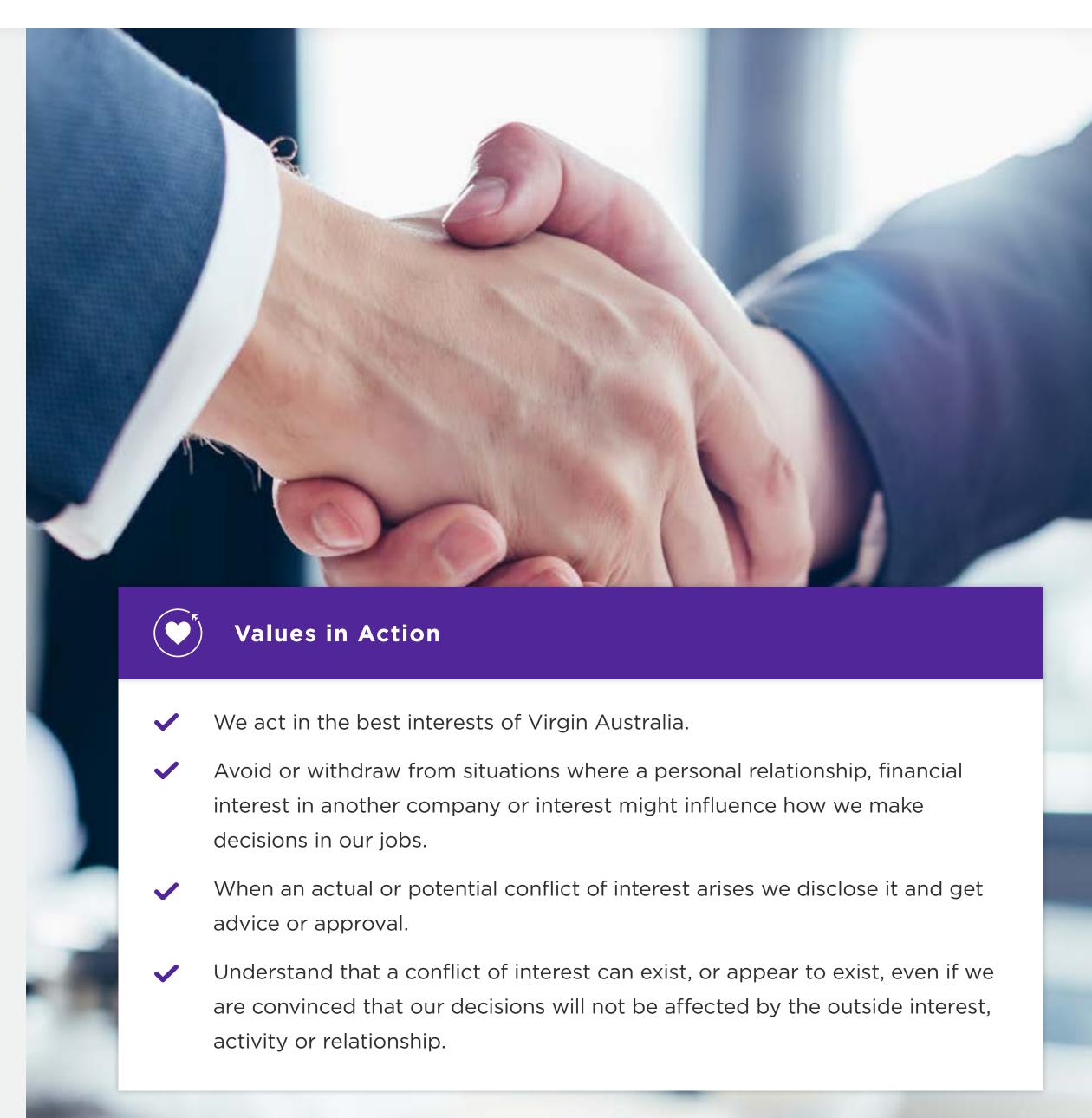
Many of us have personal interests and relationships outside of work. It's important that those interests and relationships don't get in the way of being loyal to and doing what's best for Virgin Australia. If they do, that's called a conflict of interest.

A conflict of interest is hard to define because it can take many forms. Put simply, it's when your loyalties are divided. When your personal or financial interests, or other activities, influence or could reasonably appear to others to influence— decisions you make on Virgin Australia's behalf.

Sometimes conflicts seem innocent. After all, maybe you're just trying to help a friend or relative. Or you're confident the activity, interest or relationship won't affect your work for Virgin Australia.

But to make sure you're doing the right thing, don't try and make that determination on your own. Talk over the situation with your leader and then submit a conflict review request.

Confirmed conflict of interest situations will be determined by your leader in consultation with the Ethics and Compliance team and other impacted stakeholders as appropriate. And remember, a conflict of interest itself is not necessarily a problem but it must be promptly disclosed and properly managed.







Conflict of Interest



Situations where a conflict of interest could arise

- A family member, close friend, or someone with whom you have a romantic relationship also works, or is applying to work, at Virgin Australia.
- (!) Hiring or supervising a family member, close friend, or romantic partner at Virgin Australia.
- ① Owning or investing in a company that competes or seeks to do business with Virgin Australia.
- (!) Participating in the selection of a third party that your family member, close friend or romantic partner works for or owns.
- (1) Taking for yourself a business opportunity that belongs to Virgin Australia.
- (!) Working a second job.
- (!) Accepting any outside position or serving on an outside Board of Directors (including on the Board of a not-for-profit organisation).
- Using Virgin Australia's name or resources to support an outside charitable or political activity.
- 1 Hiring a former employee of the government, a competitor or supplier or customer.

REMEMBER: For any of the above situations, you **must** promptly submit a conflict review request.



Q&A's - Guiding Examples



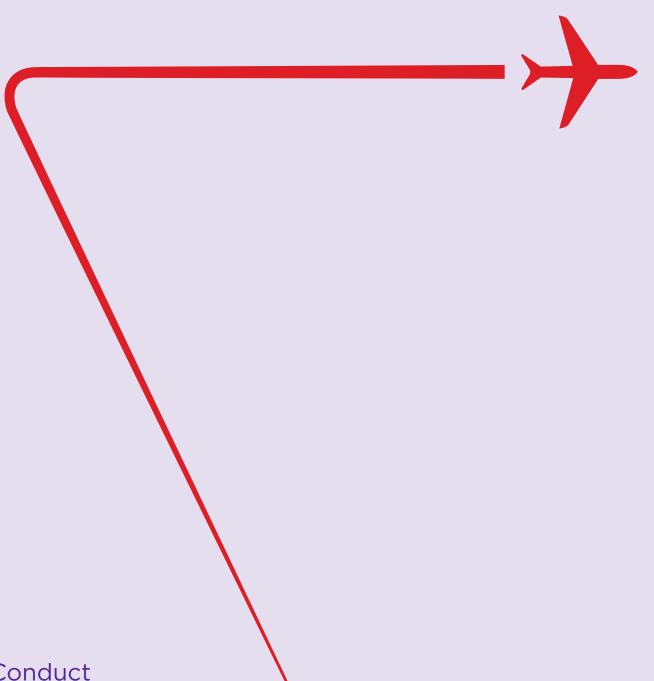
Learn more

Conflict of Interest Policy



Gifts and Entertainment

We responsibly invest in our business relationships but never offer or accept gifts, entertainment, or anything else of value to improperly influence people. These actions can create conflicts of interest, be seen as a form of bribery or corruption, or raise questions about our judgement.





Values In Action

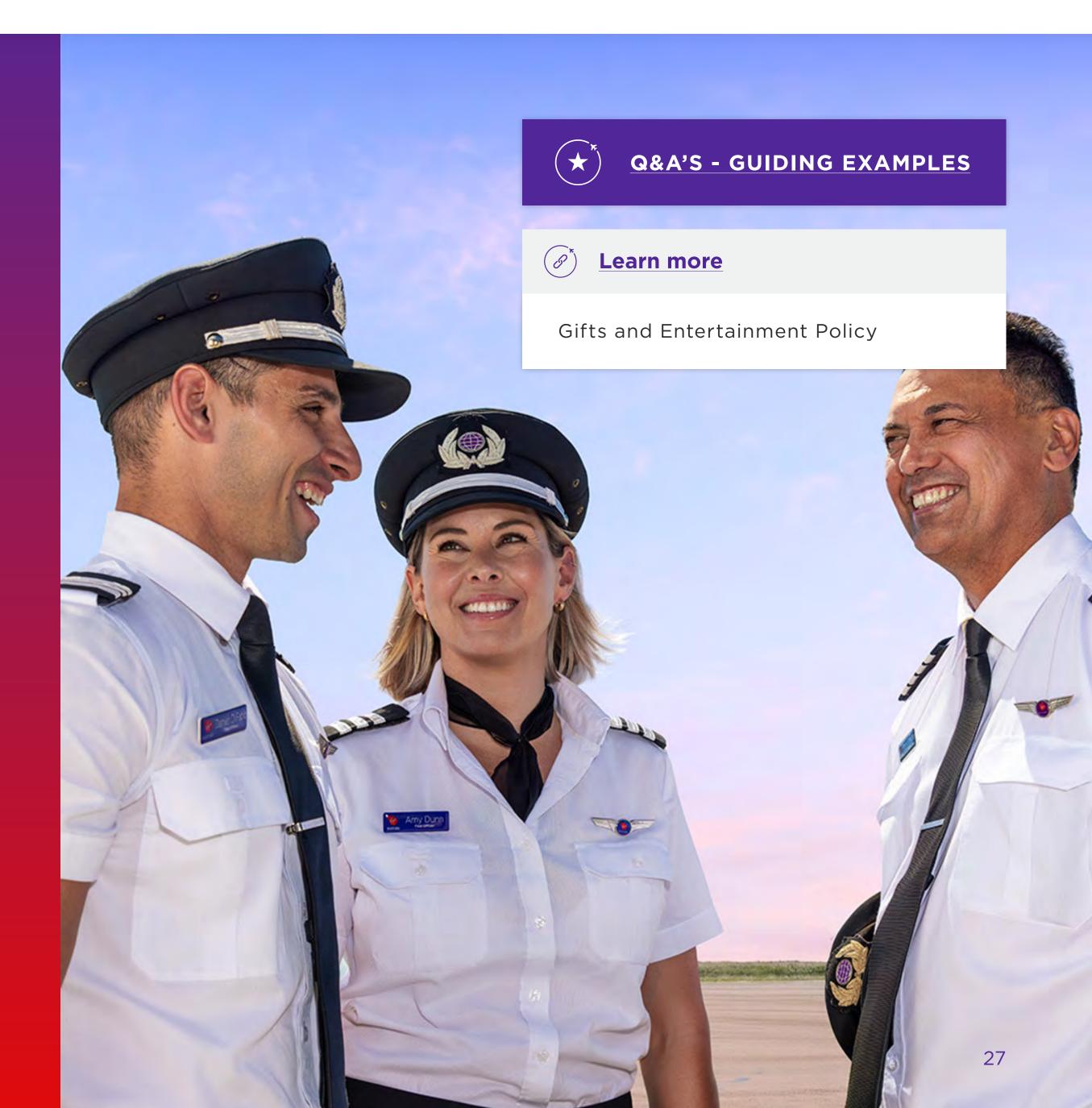
- Seek guidance and prior approval before exchanging gifts or offers of entertainment that exceed the \$200 threshold.
- Obtain approval for and correctly record any donations, sponsorships, charitable contributions, gifts, and hospitality you accept from, or give to, a third party on behalf of Virgin Australia.
- During contract negotiations with customers and suppliers, decline all gifts, entertainment and offers to pay for or reimburse travel expenses.
- It's fine if you attend a social function hosted by a vendor or supplier. Just talk with your leader first and make sure the event meets these conditions.
- In situations involving government officials, offering or providing a gift or entertainment (including meals) is OK only with prior approval by the Ethics and Compliance team.
- Immediately return any gift of cash or cash equivalent and explain that Virgin Australia's policies don't permit you to accept it. If you're unable to return the gift, ask your leader or the Ethics and Compliance team for guidance.
- Never ask our suppliers, customers, or other third parties for gifts or entertainment.



Gifts and Entertainment

It's generally OK to offer or accept gifts and entertainment, so long as these conditions are met:

- They're legal and serve a legitimate business purpose.
- They're not an effort to influence a business decision or gain special treatment and are not likely to be seen as one.
- They do not involve a government official.
- They would not embarrass Virgin Australia or harm our reputation.
- The gift is not cash (or a cash equivalent).
- The entertainment is not frequent or routine.
- The gifts or entertainment you give or receive have the relevant approval from your leader (over \$200) or your ELT member (over \$1000).
- The gifts or entertainment you give or receive are approved and are accurately reflected in the Gifts and Entertainment register (above \$200), expense records and accounting records as appropriate.







Bribery and Corruption

We win on our merits. We never - directly or indirectly through a third party - offer, give, promise, or receive anything of value to influence a business decision, policy decision or create a reciprocal obligation.

What do we mean by anything of value? We mean improper gifts, entertainment, cash, travel, accommodation, gratuities, favours, donations, sponsorship, inflated tenders, or any other inappropriate transfer of value.

Keep in mind that the laws around bribery of government officials are especially strict. Make sure to follow our policies and never offer anything that could even give the appearance of something improper.

A government official is:

- An elected official
- A candidate for political office
- An official or employee of a political party
- An official or employee of a government department, ministry or agency
- An official or employee of a government owned entity
- An individual with dual capacity in government and private business
- An official or employee of a public nongovernmental organisation



Values In Action

- Know enough about the people we do business with to determine whether they are reputable, and whether they are government officials. Ensure you have KO3P approval before engaging with a third party.
- Be cautious when giving or receiving gifts or entertainment, especially when a government official is involved. The same goes for requests for donations to charities or organisations as they could be affiliated with a government official.
- Before engaging a third party that will be interacting with government officials on Virgin Australia's behalf, contact the Ethics and Compliance team to evaluate whether we need to conduct additional due diligence.
- Maintain complete and timely records and accounts to accurately reflect all business transactions.



Learn more

Anti-Bribery and Corruption Policy







Bribery and Corruption

Anti-bribery laws can be complex. It is important to understand the terminology involved. Here are some definitions of important anti-bribery terms.



Q&A's - Guiding Examples



What is Bribery?

Bribery is offering, giving, promising, authorising, soliciting, accepting or agreeing to accept anything of value (financial or non-financial) to a government official or any other person, directly or indirectly through a third party, to improperly influence a person, reward or induce a person to act improperly, or to obtain or retain any business or personal advantage.



What is Corruption?

Corruption is the abuse of entrusted power for personal gain, or for any other improper purpose. Bribery and fraud are considered corrupt practices.



What are Facilitation Payments?

Facilitation payments (also known as expedition fees) are a type of bribe. They are usually defined as payments made to expedite or facilitate the performance by a government official of a non-discretionary, routine governmental action. Facilitation payments, whether legal or not in a country, are prohibited under this Policy. You must immediately notify the General Manager, Ethics and Compliance if you

identify a facilitation payment request, or the suspicion of a facilitation payment.



What is Fraud?

Fraud involves all situations where a person dishonestly or deceptively makes a false representation, wrongfully fails to disclose information, or abuses a position of trust with intent to make a gain or cause a loss or to expose a person, Virgin Australia or other entities to a risk of loss. Examples of fraud include, but are not limited to:

- manipulating, falsifying or altering information; and
- theft or unauthorised use of Virgin Australia assets.







Anti-Money Laundering and Trade Sanctions

Organised crime and terrorism are global problems, with serious social, economic, and political impacts for every country in the world, including Australia. Money laundering is the use of transactions by criminals, terrorists, or others to conceal the illegal source of their funds. We are committed to the highest standards of anti-money laundering compliance to prevent use of our products and services for money laundering purposes or for financing of terrorism.

We must also comply with global trade controls and economic sanctions that prohibit us from doing business with certain countries, governments, entities, and individuals. Sanctions differ depending on the target party and the nature of the transaction, and they can change frequently. Contact the Ethics and Compliance team with questions on how sanctions laws may affect your Virgin Australia business relationships or transactions.



Q&A's - Guiding Examples



Values In Action

- Avoid any activity that conceals or disguises the nature, location, source, ownership, or control of funds.
- Conduct business only with reputable third parties, for legitimate business purposes, with funds derived from legitimate sources.
- Follow Virgin Australia's KO3P due diligence processes when selecting and monitoring third parties such as suppliers, agents, or other service providers.
- Detect, manage, and mitigate the risk of money laundering and the financing of terrorism using defined processes in your area.
- Reach out to the Ethics and Compliance team with any questions or if you have any doubts or suspicions related to a third party or transaction.





Communications

Collaborating with Third Parties

Assets, Confidential Information, and

Intellectual Property

Insider Trading

Accurate Record Keeping and Reporting

Political Contributions and Engagement







Communications

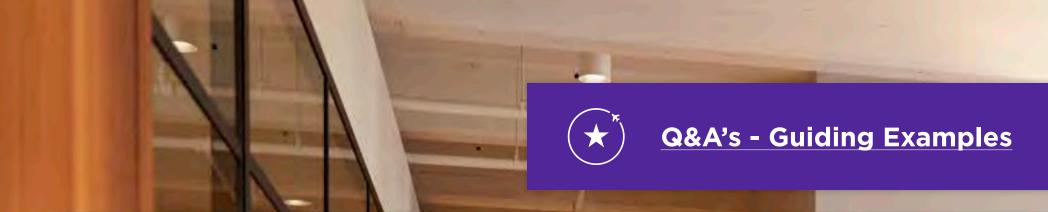
As Virgin Australia team members, everything we say and share reflects on us individually and on Virgin Australia. Whether we are in a meeting, having a coffee, walking together, or communicating online, what we say and how we say it matters.

Truthful and accurate public statements

Investors, customers, and our business partners need to trust what we say because they make financial, and business decisions based on our disclosures. At Virgin Australia we take that trust seriously and avoid making misleading public statements, particularly those related to our finances and any other data about the company. Likewise, we are truthful and honest when communicating with third parties about our business.

REMEMBER! Investor and Media Inquiries

When we provide information about Virgin Australia to the general public, our shareholders and the media, we must do so in a way that assures all information is timely, appropriate and accurate. All inquiries or requests for information from analysts or investors and shareholders must be immediately forwarded to the Investor Relations team. Press and media inquiries, and other requests from the public should be forwarded to the Corporate Affairs team.





Values In Action

- Be clear, truthful, transparent, courteous, and professional in internal and external communications.
- Don't speak to the media (on or off the record) about Virgin Australia related matters unless explicitly authorised to do so.
- Be accountable for what you do and say on social media. Comply with all applicable laws and Virgin Australia's policies when using social media in your personal and work capacity. Doing so means you will protect Virgin Australia's confidential information, reputation, and brand.
- Promptly forward all press and media inquiries to the Corporate Affairs team.
- Make sure that any communications about our services and products are honest and accurate.
- Seek approval before agreeing to a speaking engagement or publishing an article on behalf of Virgin Australia.
- Forward all investor queries to the Investor Relations team.



Learn more

Social Media Policy Stakeholder Communication Policy

Media Policy



Collaborating with Third Parties

We look for third parties who share our values — who are ethical, hard-working, and customer-focused. We want them to share our commitment to diversity, human rights and business practices that are fair and considerate of their workers and the environment.



Speak Up

Our annual Modern Slavery Statement outlines our commitment to identifying and addressing any modern slavery in our operations and supply chain. Speak up if you become aware of any conduct (including that of any of our people, a supplier, third party or other individual), which you believe might be violating another person's human rights.



Q&A's - Guiding Examples



Values In Action

- Follow procurement and contracting policies, KO3P due diligence and onboarding requirements to ensure that we only engage third parties who will comply with applicable laws and policies, and who will not tarnish Virgin Australia's brand or reputation.
- Base decisions on objective criteria, such as quality, price, service, reliability, availability, technical excellence and delivery, as well as ethical business practices.
- Clearly communicate our values and non-negotiables, such as those included in our contracts, our Supplier Commitments and Supplier Code of Conduct.
- Stay alert and report to your leader any activity by third parties that is inconsistent with Virgin Australia's policies and ethical standards.



Learn more

Procurement Policy Supplier Code of Conduct Delegated Authority Manual **Human Rights Policy Contract Policy Supplier Commitments**

Modern Slavery Incident Response Policy



Assets, Confidential Information, and Intellectual Property

Let's all take care of Virgin Australia. Use company funds, property, equipment, and office supplies first and foremost for company business. Try not to lose or waste them and take common sense steps to protect them from theft.

We're in a fiercely competitive industry.

Our success is based on our ability to use our business information and Virgin Flair to create experiences that our customers love.

We keep this valuable intellectual property

(IP) and commercial information confidential.

We don't disclose it to anyone outside the company unless we get advanced approval from our leader. That goes for any confidential company information - like product plans, acquisition, divestiture financial information and details about our network, and also for Virgin Australia's IP - like our trademarks, copyrights, designs, patents, trade secrets and know-how.



Q&A's - Guiding Examples



Values In Action

- ✓ Follow established policies to protect Virgin Australia's IP and all confidential information.
- Respect the IP rights and confidential information of everyone, including third parties and competitors.
- ✓ When researching, developing, or preparing to launch new brands, products, services, designs, inventions, advertising, and promotional materials, ensure all necessary IP clearance searches have occurred and any steps required to secure Virgin Australia's IP rights under relevant laws such as registration have been taken.
- Only use our brands or permit others to do so in accordance with our applicable brand guidelines, subject at all times to our policies and processes for approving brand use.
- ✓ Use Virgin Australia's assets and resources with care and for legitimate business purposes—assets should not be stolen, wasted or used for personal gain.
- Respect and safeguard the property of guests, contractors, fellow team members and members of the public.



Insider Trading

We treat inside information responsibly and do not engage in insider trading.

Insider trading is the practice of dealing in any company's securities by anybody with price sensitive information. Price sensitive information is information not generally available, but if it were generally available would, or would be likely to, influence another person's decision to deal in a company's securities.

Legally, insider trading is an offence that carries severe financial penalties for individuals, possible imprisonment and disciplinary action being taken such as termination of employment.

Examples of price sensitive information include:

- Virgin Australia considering a major acquisition or disposal of assets;
- the threat of major litigation against Virgin Australia;
- Virgin Australia's financial results materially exceeding (or falling short of) the market's expectations;
- a significant new development proposal;
- the likely granting (or loss) of a major contract or government approval;
- a proposed dividend or change in dividend policy;
- a proposed new share issue; and
- a significant change in senior management or the Board.



Values In Action

- Understand the importance of protecting our company, our shareholders, and the financial markets from the improper use of inside information.
- ✓ Don't make decisions on when to buy, sell or trade Virgin Australia's or any third-party shares or securities when you have inside information.
- Don't disclose information or provide tips based on inside information to anybody.
- ✓ Only trade the Company's securities during Trading Windows.
- Designated Persons must always obtain written approval before trading the Company's securities.
- ✓ If you have any doubt about your obligations in any given situation, contact the Corporate Governance team.



Learn more

Securities Trading Policy

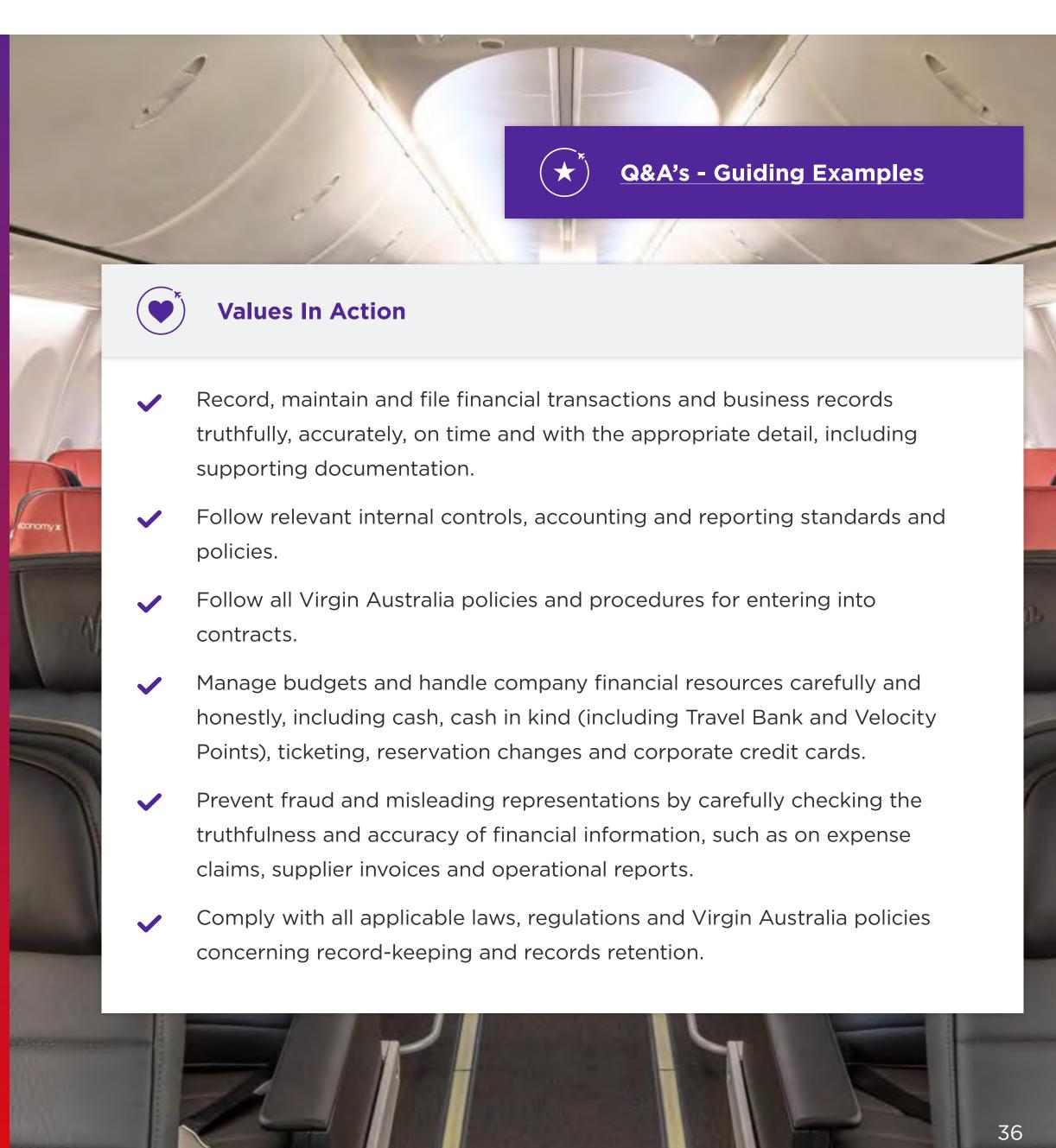




Accurate Record Keeping and Reporting

Accurate, clear, and complete records are essential to making the best business decisions, preserving our reputation for financial integrity, and meeting our obligations to our stakeholders. Virgin Australia, our community, investors, regulators, and others rely on the information we provide to understand our financial results and measure our success as a company.







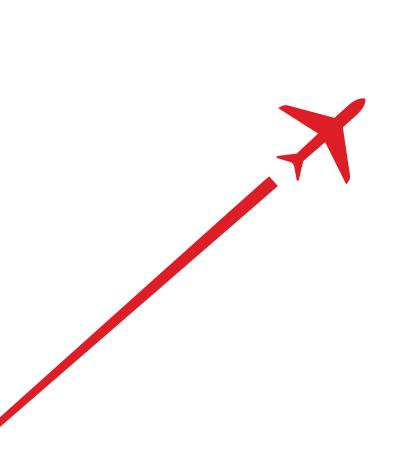


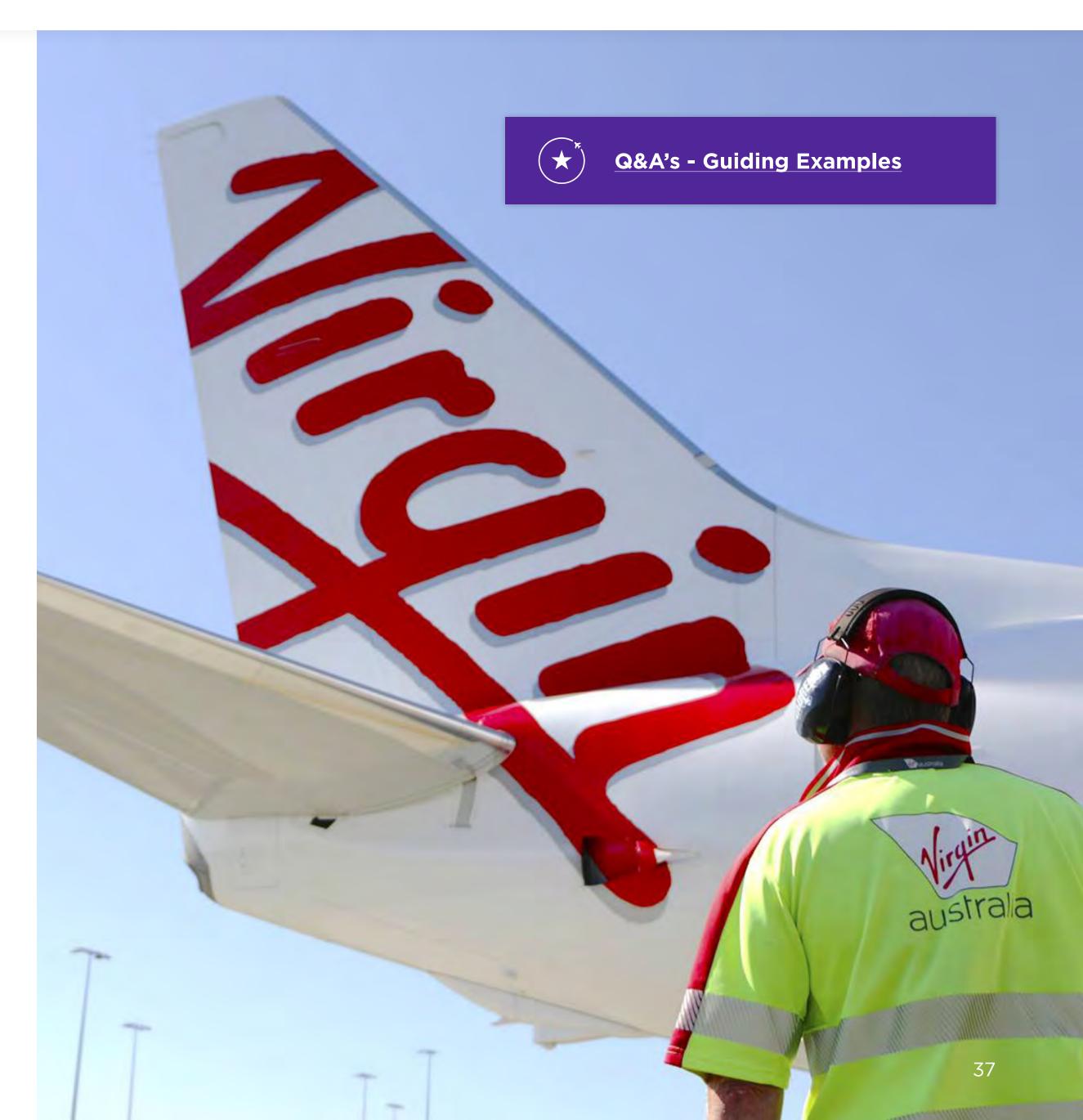
Political Contributions and Engagement

Virgin Australia wants to inform and guide government decisions that impact our business, people, customers, and communities, so we actively participate in the political process.

We engage the right way—by following all applicable contribution and advocacy laws and ethical standards. Keep in mind that only authorised employees are allowed to lobby government officials on behalf of Virgin Australia.

We encourage you to support causes that you care about, but keep in mind that political participation (including volunteer efforts and donations) must remain separate from your work at Virgin Australia.









Political Contributions and Engagement



Learn more

Political Contributions and Engagement Policy Anti-Bribery and Corruption Policy



Values In Action

- Report to Government Relations team all interactions with the political and bureaucratic arms of government outside of the day-to-day operations and meetings that Virgin Australia would ordinarily engage in.
- Seek approval from Government Relations team prior to:
 - engaging with political stakeholders or the political or bureaucratic levels of government as it relates to policy proposals and submissions;
 - attending political functions, forums, or events in your capacity as a Virgin Australia team member, regardless of whether they are paid or complimentary; or
 - providing prizes or in-kind donations for fundraising or charitable purposes in connection with events held by political stakeholders. This includes indirect requests by third parties made with the intention of benefitting political stakeholders.
- Always make it clear that your personal political views and actions are your own, and not those of Virgin Australia.
- Never make any direct or indirect political contributions on behalf of Virgin Australia without advance approval.
- Never use improper means in attempting to influence political stakeholders to produce an outcome that is favourable to Virgin Australia.
- Follow all applicable rules regarding disclosure and reporting requirements related to political contributions and advocacy activities.





Resources



For	Resource	
Reporting Code of Conduct Concerns	Your leader, People leader or ELT Member. Alternatively, the General Manager, Ethics and Compliance	People team on 1300 215 414 or PeopleTeamQueries@virginaustralia.com Kiara Tarrant, General Manager, Ethics and Compliance Kiara.Tarrant@virginaustralia.com
Whistleblower Reports	Chief Legal Officer Ethics Hotline	Susan Schneider, Chief Legal Officer Susan.Schneider@virginaustralia.com Ethics Hotline Australia: 1800 829 466 (free call); New Zealand: 0800 934 742 (free call); International: +61 3 9278 1017; Text: +61 499 221 005; Web: www.rightcall.com.au/ethicsline
Legal, Ethical or Compliance questions	Legal team Ethics and Compliance team	LegalTeamReview@virginaustralia.com ethicsandcompliance@virginaustralia.com
Safety questions or concerns	Safety team	Safety Systems (sharepoint.com)
Privacy questions	Privacy team	Privacy@virginaustralia.com
Conflicts of interest and gifts and entertainment policy and procedure questions	Ethics and Compliance team	ethicsandcompliance@virginaustralia.com
Accounting and finance policy and procedure questions	Finance team	Finance - Meet the team (sharepoint.com)
Questions about our Code of Conduct	Ethics and Compliance team	ethicsandcompliance@virginaustralia.com
Questions on political donations and/or interactions with Government	Government Relations team	government.relations@virginaustralia.com



Document details

Version 2

Policy Owner

General Manager, Ethics and Compliance and Chief Legal Officer

Policy Contact

Ethics and Compliance team

Approval Authority

VAH and VAIH Boards

Approval Date

May 2025

Last Amendment Date

August 2022

Revision Date

May 2025

Next Revision Date

May 2027

Review Period

This Policy may be reviewed and amended from time to time and at least every two years to ensure it is operating effectively.

Consequences

Breaches of the Code will be reported to the Audit, Risk and Compliance Committee of the Board or the Board as appropriate.

It's each team member's responsibility to understand and comply with the Code.

Virgin Australia treats non-compliance seriously and resulting action could include suspension or termination of employment or engagement with Virgin Australia.

Governance, Monitoring and Reporting

General Manager, Ethics and Compliance is responsible for oversight and implementation of this Policy, and for establishing reporting and compliance procedures designed to ensure that Virgin Australia's interests are appropriately protected. Audit and other compliance monitoring measures will be applied from time to time to ensure that this policy is being complied with.

Further Information and Advice:

This policy is non-contractual and may be replaced, amended from time to time in accordance with legislative changes or operational requirements or withdrawn.

