



australia

Supplier Code of Conduct

1. Overview

Virgin Australia is committed to ensuring that our people and community are at the centre of everything we do.

The Virgin Australia Supplier Code of Conduct (**Code**) clearly sets out the expectations we have of our Suppliers. Suppliers include contractors, vendors, service providers and their employees and suppliers. The expectations outlined in the Code are not substitutes for any applicable laws, nor do they amend contracted obligations.

The Code supplements Virgin Australia's Supplier Commitments. As a Virgin Australia Supplier, we expect you will commit to and act in accordance with our Code and ask that you clearly communicate these same expectations to your employees and suppliers.

Suppliers' ability to meet or exceed the Code's expectations will be taken into account by Virgin Australia when making procurement and supply-related decisions, regardless of whether or not the Code has been formally incorporated into a relevant contract with the Supplier. Where our contracts set out more specific social, environmental and/or ethical requirements, this Code will supplement those provisions.

We expect our Suppliers to follow and align to the Code, to support our commitment to the highest standards of integrity and accountability. We encourage our Suppliers to Speak Up when our values and policies are not being followed (a 'business conduct concern'), through our Ethics Hotline referred to in Section 13.

2. Our Values

Our values guide our behaviour and apply to every aspect of our business.

Virgin Australia's values are:



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 communities 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.

3. Compliance with laws

Virgin Australia is committed to fully complying with applicable laws and regulatory requirements wherever it operates.

Our expectations of our Suppliers include that they:

- Operate their business in full compliance with, and ensure their goods and/or services comply with, the laws, rules, regulations and standards of the countries in which they operate and where the goods and/or services are provided to Virgin Australia.
- Act in a manner that does not result in or cause Virgin Australia to contravene any laws, rules, regulations or standards.
- Maintain accurate and transparent business records in accordance with all applicable laws, regulations and generally accepted accounting standards.

4. Safety and security

Providing a safe and secure environment for our employees, officers, directors, contractors and consultants (Team Members), customers and visitors are – as always – our number one priority.

Our expectations of our Suppliers include that they:

- Be proactive and take reasonable measures to provide a safe and healthy working environment for all those with whom they work.
- Promote a positive safety culture within their organisation and supply chain.
- Comply with all applicable workplace health and safety (WHS), aviation safety and security laws, rules and regulations.
- Demonstrate continuous improvement in WHS practices.
- Comply with any Virgin Australia safety and security requirements of which the Supplier is made aware.
- Ensure all products meet relevant standards and legislative requirements, with all equipment, plant and machinery to be appropriately maintained.

5. Human rights and employment practices

All Personnel are entitled to work in an environment free from discrimination, bullying and harassment. Virgin Australia takes modern slavery seriously, strongly opposing it in all its forms, together with human trafficking and forced or child labour. We are committed to doing all we can to ensure that such abhorrent practices do not occur in our business or in any segment of our supply chains. We actively encourage equal employment opportunities, fair pay and freedom of association.

Our expectations of our Suppliers include that they:

- Foster a culture where people feel respected, recognised and rewarded for their work.
- Have zero tolerance for any form of physical, sexual, psychological or verbal harassment or abuse in their organisation.
- Ensure their Personnel are aware of and understand their rights by having effective human resources support embedded in their business.
- Comply with all applicable laws and regulations relating to discrimination and employment practices, including wages, work conditions, work hours and overtime.

- Ensure no use of forced, bonded, involuntary or child labour, human trafficking, slavery or servitude within their operations and supply chain, and that work activities are undertaken voluntarily, without threat of penalty or sanction and not based on deception.
- Conduct their business in ways that recognise, respect and promote human rights, including aligning work practices to the International Bill of Human Rights and to the ILO Declaration on Fundamental Principles and Rights at Work.
- Identify, avoid, minimise or mitigate and remedy any human rights impacts on communities.
- Strive to deliver working conditions that go beyond minimum requirements, with a demonstrable focus on employee health and wellbeing.
- Have in place effective policies and processes to identify and mitigate against risks of modern slavery in its operations and supply chains.
- Ensure adequate disciplinary practices with no violence, threats of violence, or other forms of physical coercion or harassment.

6. Acting with ethics and integrity

Virgin Australia's business objectives are best achieved through acting fairly, honestly and with integrity. Ours is an environment where concerns about illegal or unethical behaviour can be reported without fear of retaliation.

Our expectations of our Suppliers include that they:

- Foster a culture of honesty and transparency.
- Provide clear ways for Personnel, Suppliers and partners to speak up if they see something that is unsafe, unethical or potentially harmful involving Virgin Australia's operations or activities through avenues such as Virgin Australia's Ethics Hotline and Virgin Australia's Whistleblower Policy.
- Ensure their Personnel are made aware of Virgin Australia's Ethics Hotline.
- Embed sound corporate governance protocols and procedures within their organisation that comply with applicable laws and regulations, including accurate record keeping and risk and compliance reporting.
- Must also be aware of confidentiality requirements when working with Virgin Australia and sharing of potential inside information.
- Not engage in illegal conduct such as fraud, theft, bribery (including not making facilitation payments), extortion or other corrupt conduct, as well as declaring to us any actual or potential

conflict of interest to Virgin Australia.

- Not act on Virgin Australia's behalf with any government official without approval from Virgin Australia including Virgin Australia's Ethics and Compliance team.
- Make efforts to be a good corporate citizen.

We also expect Suppliers to have in place effective policies and procedures to proactively prevent:

- Bribery and corruption, or any activities aimed at securing an improper advantage, such as attempting to influence someone, including government officials to improperly perform their duties, inducing a person to act illegally or dishonestly or corrupt decision-making processes, and improperly influencing the judgement or conduct of a Supplier, customer or competitor.
- Money laundering, including hiding illegal funds (especially those with possible links to terrorism or criminal activity) or giving such funds apparent legitimacy.
- Violations of all applicable laws and regulations relating to sanctions, export, re-export, import and trade controls.
- Actual or apparent conflicts of interest between personal and business interests, including using Virgin Australia's information and resources for improper gains.
- Anti-competitive conduct, including any form of agreement or understanding with competitors to fix prices, rig bids, allocate customers or restrict supply.
- Inappropriate provision of gifts, entertainment, or meals to Personnel employed by or representing Virgin Australia.
- Ensure a formal complaints management process is implemented to allow confidentiality of complaints to encourage participation in the process.

7. Emergency response and business resilience

Virgin Australia has established a corporate risk framework comprising clear business resilience and emergency response procedures and plans. This robust framework acts to effectively protect our people, our assets, our brand and our operations in the event of a major disruption, incident, emergency or crisis.

Our expectations of our Suppliers include that they:

- Embed within their own organisation a culture focused on mitigating risks to the day-to-day management and continuity of their business.
- Have clear, documented business continuity and recovery plans to minimise disruption resulting from unplanned events.

- Promptly notify Virgin Australia of any disruption to their normal operations that may impact supply chain activities that Virgin Australia relies upon.
- Uphold appropriate risk frameworks and regularly review internal and external risks to their organisation and supply chain.
- Strive to continually strengthen the resilience and preparedness of their operations and supply chain (including but not limited to, ensuring they have appropriate emergency equipment available and instructions on operating the equipment in an incident or emergency).

8. Driving sustainable development

We recognise that making a positive contribution to the community, our people, the economy and the environment is essential to our business' longevity. Virgin Australia works hard to achieve this by embedding these considerations into how we operate.

Our expectations of our Suppliers include that they:

- Promote a company culture that values the importance of minimising the impact of their operations on the environment through:
 - o Compliance with all applicable environmental laws, regulations, standards and international treaty obligations (including but not limited to, sustainability reporting, environmental permits, and the collection, handling, storage, transport and treatment of dangerous goods and hazardous wastes);
 - o Use of resource and energy efficient alternatives to reduce energy consumption; and
 - o Record keeping, monitoring and treatment of potential pollutants.
- Create and encourage a culture of diversity and inclusion relating to gender, age, religion, race, sexual orientation, cultural background and disability (for example, including but not limited to, demonstrated progress to improve gender equality, and opportunities for those disadvantaged and with disability).
- Foster positive social impacts and work as partners with the communities in which they operate.
- Work with their suppliers and partners to ensure alignment with this approach to business and effective management through the maintenance and implementation of policies, procedures, codes and operational management systems. Transparently report on their environmental and community performance.

9. Safeguarding information

Virgin Australia takes the protection of personal information and data, and confidential information and data (Information) very seriously, including our compliance with applicable laws and regulations.

Our expectations of our Suppliers include that they:

- Comply with all laws, regulations and standards (including privacy and information security laws and requirements) applicable to the protection or use of Information relating to the provision of goods and/or services to Virgin Australia;
- Create a culture which recognises the value of trust and compliance, where Personnel are educated on the proper handling of Information;
- Ensure the appropriate safeguarding of Information through best practice security procedures and protocols; and
- Notify us immediately of any breach involving Information relating to the provision of goods and/or services to Virgin Australia and swiftly provide all assistance requested by us in connection with such a breach.

10. Supply chain risk management program

Virgin Australia's Supply Chain Risk Management program monitors our supply chain and implements the necessary systems, controls and processes to protect us from disruption, risk or activities unaligned with the expectations set out in this Code.

We may sometimes request information from our Suppliers, including, but not limited to, Supplier and subcontractor names and locations, factory locations, sources of raw materials and results of historic audits. We may also obtain Supplier-related information from third party sources.

Our expectations of our Suppliers include that they:

- Participate in Virgin Australia's Supply Chain Risk Management activities;
- Be transparent, providing honest, accurate and comprehensive information when requested;
- When becoming aware of a risk that is in breach of this Code, notify Virgin Australia immediately;
- Commit to working with Virgin Australia on supply chain improvements where risks are identified, including participating in any required management plan to manage the identified risks, and taking part in any audit for compliance with this Code; and
- Retain and make available documentation demonstrating compliance with this Code.

11. Continuous improvement

Virgin Australia is committed to the continuous improvement and establishment of better practices to meet and exceed all standards included in this Code.

Virgin Australia supports all Suppliers in actively improving practices in accordance with this Code.

12. Further information and advice

If you would like further information or advice about this Code or making a report under it, you can contact Virgin Australia's Ethics Hotline.

If you have questions or suggestions about any aspect of this Code, or about Virgin Australia's Supplier expectations, please get in touch with your Virgin Australia contact and/or our Procurement team.

Our **Ethics Hotline** is a 24/7 resource 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

13. Definitions

TERM	DEFINITION
Agreement	means the agreement between the Supplier and the Virgin Australia Group Customer for the provision of goods or services to one or more members of the Virgin Australia Group.
ILO	means the United Nations’ International Labour Organisation agency.
ILO Declaration on Fundamental Principles and Rights at Work	means the principles and standards defended by the International Labour Organisation, including providing a living wage, providing adequate rest periods, leave, minimum wage requirements, freedom of association, and collective bargaining.
Personnel	means any employee, contractor, director, officer, representative or agent of the Supplier, or anyone acting for or on behalf of the Supplier in connection with the Agreement, and includes Personnel of the Supplier’s subcontractors that are involved in performing the Supplier’s obligations under the Agreement.
Supplier	means the supplier that is a party to the Agreement.
Team Members	refer to all Virgin Australia employees, officers, directors, contractors, and consultants working for Virgin Australia.
Virgin Australia	means Virgin Australia Holdings Limited, Virgin Australia International Holdings Ltd and each of their respective subsidiaries.