

Policy name: Code of Conduct

1. Purpose

Your behaviour and conduct directly contribute to Virgin Australia's overall business success and reflect the Virgin Australia brand and reputation. At Virgin Australia, we believe that everyone has a part to play in achieving our organisation's vision. A key component of this success relies upon the way in which team members conduct themselves.

Virgin Australia's Code of Conduct requires each of us to ask ourselves 'What is the right thing to do?' during our employment and engagement and ensuring that we do it. We are all responsible for our actions.

This Code provides a practical guide about the standards of personal behaviour and/or conduct that Virgin Australia expects of all team members in all business activities and dealing with each other, customers, suppliers and other external stakeholders. It also sets out the responsibilities and proper practices for team members during their course of employment or work with Virgin Australia.

This policy explains:

- what is considered appropriate behaviour and conduct in the workplace whilst you are employed or engaged by Virgin Australia;
- guidance on how to demonstrate Virgin Australia's organisational values when performing your role or acting on behalf of Virgin Australia; and
- the potential consequences and repercussions if a team member fails to comply with this Code.

2. Who does this policy apply to?

This Code applies to all team members during their course of employment or work with Virgin Australia, including:

- in the workplace, during and after normal working hours;
- in connection with work, even if it occurs outside normal working hours (e.g. during layovers or at company provided accommodation);
- during work activities and work-related events;
- at other functions in your capacity as a representative of Virgin Australia (for example, at social events organised by Virgin Australia);
- during all staff and duty travel while an employee of Virgin Australia (including during the flight and time spent at the airport prior to and following any such flight); and
- on social media, or through text messaging or email, where team members interact with other team members or guests.

3. Definitions

Term	Description
Laws	means all laws, regulations and codes of practice of every country in which Virgin Australia does business.
Team member	means any director, officer or employee of Virgin Australia, or contractor or consultant engaged by Virgin Australia.

Term	Description
Virgin Australia	means Virgin Australia Holdings Pty Limited, Virgin Australia Airlines Pty Ltd, Virgin Australia International Airlines Pty Ltd, Virgin Australia Airlines (NZ) Pty Ltd, Virgin Australia Airlines (NZ) Employment and Crewing Ltd, Virgin Australia Regional Airlines Pty Ltd and Virgin Tech Pty Ltd.
Workplace agreement	means an enterprise agreement made under the Fair Work Act 2009 (Cth) (as amended) or a collective employment agreement or an individual employment agreement made under the Employment Relations Act 2000 (NZ) (as amended).

4. What are my responsibilities?

It is your responsibility to demonstrate the behaviours and conduct required by Virgin Australia. All team members are required to abide by the following principles in all of their activities and dealing while working for Virgin Australia:

- act honestly;
- be aware of and comply with Virgin Australia’s policies, procedures, operating manuals, and any Workplace Agreement and/or employment contract applicable to your role with Virgin Australia.
- perform the duties of your role to the standards required by Virgin Australia and to the best of your ability;
- work in a safe, responsible and effective manner that ensures not only your own safety but the safety of others;
- comply with any lawful and reasonable direction given to you by the Virgin Australia;
- present for work fit for duty;
- subject to taking authorised leave, maintain regular and punctual attendance at work;
- obey all Laws relevant to your employment (for example, complying with work health and safety laws, environmental laws, Civil Aviation Safety Authority laws and anti-discrimination laws);
- treat customers, guests, suppliers, fellow team members and the public with dignity, courtesy and respect;
- uphold the principles of equal employment opportunity and maintain a work environment free from discrimination, harassment, workplace bullying and victimisation (in accordance with the Equal Employment Opportunity Policy);
- respect and safeguard the property of customers, suppliers and fellow team members;
- not take advantage of Virgin Australia or customer property or information for personal gain or to cause detriment to Virgin Australia or our customers;
- seek further guidance as required about your responsibilities through your Leader or a member of the People Team;
- ensure you notify your Leader if other team members are not behaving in accordance with this code;
- be proactive in protecting and furthering Virgin Australia's best interests, and always act in the best interests of Virgin Australia;
- act in a manner that reflects and upholds Virgin Australia’s brand, reputation and values;
- ensure personal business, financial and other outside interests do not conflict with your duty to Virgin Australia.

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5. Compliance with the law

Virgin Australia expects you to know, understand and comply with the Laws that apply to you:

- as a member of society (such as the prohibition of theft, assault and possession of illegal substances);
- as a team member of Virgin Australia (including privacy, equal employment opportunity and health and safety laws); and
- in the specific job and location in which you work (for example, requirements of the Civil Aviation Safety Authority).

Ignorance of the law does not excuse you from your obligations to comply with the law or this Code. If there is any question about legal issues or legal compliance, advice should be obtained before any decision is taken.

6. Business integrity

Honesty, Integrity and Fairness

Team members must perform their duties and conduct Virgin Australia's operations in a manner which is honest and of the highest integrity. We must maintain our business relationships in a manner which is consistent with the principles of respect for others and fairness.

While compliance with applicable legal obligations is expected, our conduct must be of a standard which meets community expectations for an airline, including standards relating to safety and social responsibility.

Reporting

Team members must not knowingly participate in any illegal or unethical activity. Virgin Australia is committed to fostering an environment where concerns about illegal or unethical behaviour which affect Virgin Australia or its business can be reported in good faith without fear of punishment. If a team member becomes aware of unlawful or unethical behaviour a report can be made via the reporting avenues outlined in Virgin Australia's Whistleblower Policy.

The identity of the person making the report will remain confidential unless disclosure of the identity of the person making the complaint is required as part of the investigation process, by law or during legal proceedings. Any person who reports improper conduct in good faith and with reasonable grounds (provided they have not been involved in the conduct), will not be personally disadvantaged for having made the report.

All reports of illegal or unethical conduct will be treated very seriously, will be reviewed and, where possible, investigated.

Another reporting avenue is the Ethics Hotline. Virgin Australia treats reports to the Ethics Hotline seriously, and investigate and act on them appropriately and promptly. You may access the Ethics Hotline through the following numbers:

- Calls from Australia: 1800 829 466 (fee call)
- Calls from New Zealand: 0800 934 742 (free call)
- International calls: +61 3 92781017

For further information about the Ethics Hotline please refer to the Ethics Hotline Policy.

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Political involvement

Virgin Australia may represent its views to governments and other third parties on matters which affect its business interests and the interests of its shareholders, employees and others involved in their businesses and operations, but otherwise Virgin Australia will remain apolitical.

Team members are free to have political views or associations, but cannot use their role with Virgin Australia for political interests at any time.

Political donations must be disclosed in accordance with Virgin Australia's Political Donations Policy.

Competition

Virgin Australia supports the principles of free competition in the market in compliance with applicable competition laws. Virgin Australia strongly believes in the promotion of competition in business and in the protection of the interests of consumers.

Competition laws generally outlaw anti-competitive agreements or understandings between competitors, certain 'exclusive' supply or distribution arrangements, misuse of market power to damage competition or other anti-competitive, misleading or deceptive conduct. Conduct in breach of these laws is strictly prohibited and must be avoided.

Insider Trading

Insider trading (the dealing in shares of any company while in possession of material information about that company which has not become public) is illegal. All team members must comply with Virgin Australia's Securities Trading Policy.

7. Working for Virgin Australia

Drugs, alcohol and smoking

You are required to comply with Virgin Australia's Drug and Alcohol Management Policy. This means that you are responsible for attending for work free from the influence of illegal drugs or alcohol, and in a condition to perform your duties. In addition, you must not use, possess or sell illegal drugs on Virgin Australia's premises, in Virgin Australia vehicles, using Virgin Australia's telecommunications equipment, or in conjunction with Virgin Australia business or at Virgin Australia functions.

In addition, if you are required to take any prescription or other medicines, temporarily or otherwise, which may impact on the safe or efficient performance of your work, you must inform your Leader immediately.

Smoking is prohibited on Virgin Australia premises or in Virgin Australia vehicles.

Equal Employment Opportunity

Virgin Australia is committed to providing a workplace free of all forms of unlawful discrimination, sexual harassment, workplace bullying or victimisation. Virgin Australia will not tolerate verbal or physical harassment or other behaviour where the purpose or effect, even if unintended, is to create an offensive, hostile or intimidating work environment or which disrupts another person's ability to work. This obligation extends to the use of social media or networking sites.

Virgin Australia's Equal Employment Opportunity Policy provides further information about the obligations of team members in this regard.

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Punctuality and diligence

Reliable, consistent attendance at work is a requirement of all positions. Team members are expected to be punctual in attending work (that is, being ready to start work at the scheduled commencement time) and, subject to the taking of authorised leave, diligent and dependable in their attendance at work. Any absences must be notified in accordance with Virgin Australia's policies and procedures.

Safety

Safety is critical to an airline. Virgin Australia will put the safety of our guests, air work colleagues, the public and ourselves as our highest priority. All team members acknowledge their accountability and responsibility to the shareholders, the Board, fellow employees and to our guests in the provision of safe and reliable regular public transport services to the public.

In acknowledging this responsibility, each team member also acknowledges and takes responsibility for the duty of care entrusted to us by our guests to ensure that their safety is held foremost and above all other requirements at all time.

8. What is serious misconduct?

Serious misconduct is inappropriate, improper and/or unacceptable behaviour, or behaviour that is otherwise inconsistent with a team members' obligations to Virgin Australia which may justify summary dismissal (i.e. termination of employment or engagement, effective immediately, without notice).

Serious misconduct includes, (but is not limited to):

- conduct that does or has the potential to damage the reputation, viability or profitability of the Virgin Australia business;
- conduct that does or has the potential to damage Virgin Australia property or the property of the Virgin Australia customers or suppliers, or cause loss to Virgin Australia;
- conduct that breaches Virgin Australia's policies, procedures or operating manuals (e.g. Equal Employment Opportunity Policy), or conduct that breaches applicable law (e.g. anti-discrimination laws, workplace health and safety laws and Civil Aviation Safety Authority laws);
- conduct that is inconsistent with the duties required of a team member of Virgin Australia (e.g. duty to carry out all lawful and reasonable directions, act honestly and in Virgin Australia's best interests);
- willful or deliberate behaviour by a team member that is inconsistent with the continuation of the contract of employment;
- conduct that causes imminent and/or serious risk to health or safety, including any deliberate, reckless or wilful act;
- acts of dishonesty; theft; fraud; assault; or abuse;
- discrimination, sexual harassment, workplace bullying or victimisation;
- being under the influence of drugs and or alcohol while at work;
- persistent or repeated acts of misconduct;
- viewing, sending or receiving pornographic images in the workplace (refer to the Computer Usage Policy);
- conviction of an offence that constitutes a serious impediment to the carrying out of a team member's duties.

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If you are alleged to have engaged in serious misconduct, you may be stood down effective immediately.

9. Virgin Australia property and Information

Using Virgin Australia's resources

Virgin Australia's assets should be used for the benefit of Virgin Australia in the conduct of its business. All team members who have control of or access to Virgin Australia's funds, assets, equipment, property, or goods are personally accountable for them. This means that we all have a responsibility to safeguard and use Virgin Australia's resources properly, and to use such assets responsibly and only in the best interests of Virgin Australia. Using Virgin Australia funds, assets or opportunities for ourselves or other than for Virgin Australia's business purposes or interests is unacceptable. Assets include our equipment, computer and information systems, data vehicles, telephones and computers.

At all times, team members must use Virgin Australia funds sensibly and effectively. Expenditures must be reported accurately and in a timely way.

Virgin Australia recognises that many team members have family and domestic responsibilities and that it may be necessary to make or receive calls or emails from family and/or friends during the course of the working day. This benefit shouldn't be abused however, and personal calls and emails should be kept to a minimum number and duration so as to not interfere with your job performance.

Intellectual property

Intellectual Property (**IP**) is a collection of intangible legal rights that allows the IP owner to do certain things to the exclusion of others. IP rights include confidential information, business and domain names.

Virgin Australia owns the IP rights to anything you create or develop during the course of your employment or engagement with Virgin Australia (for example, a report, web pages, software, a product, service, process or concept, etc.). Virgin Australia is entitled to the exclusive benefit of the works created by you, and may request that you waive your moral rights to those works.

You must not engage in the unauthorised use of a third party's intellectual property.

This obligation continues after your employment with Virgin Australia ends.

Confidential information

If you have access to confidential information you are responsible for ensuring that information is only used for authorised purposes and is protected from theft, unauthorised disclosure or inappropriate use.

Confidential information must not be disclosed to anyone outside Virgin Australia without first obtaining approval from the General Manager of your Division. Your obligations to maintain confidentiality of Virgin Australia's confidential information continue after your employment with Virgin Australia ends.

Privacy

Team members may have access to sensitive and personal information about fellow team members and Virgin Australia's customers and suppliers and are responsible for protecting the privacy of that information.

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Team members must only collect sensitive and personal information ethically, lawfully, in a fair manner and in a way that is not unreasonably intrusive. In doing so, team members must also inform the purpose involved of the purpose for which the information is being collected.

If team members do not have a business reason to access particular sensitive or personal information they should not seek to do so. If team members do have a legitimate business need to access sensitive or personal information, they must take precautions to ensure it is appropriately stored and that is not subject to inappropriate or unauthorised use or disclosure.

10. Conflict of Interest

We all have interests and activities outside of our work for Virgin Australia. However, there is a possibility of a conflict of interest arising because of these outside interests.

A conflict of interest exists where your loyalties are divided – where your personal interests or activities influence, or could appear to influence, your ability to act in the best interests of Virgin Australia. Conflicts of interest must be avoided. Employees and officers owe their first duty of loyalty to Virgin Australia. It is your responsibility to avoid placing yourself in situations or arrangements that may result in an actual, potential or perceived conflict of interest between yourself and Virgin Australia.

Where a conflict of interest does arise, full disclosure must be made immediately and all relevant persons must not participate in any related decision-making process. Team members must not place themselves in situations which result in divided loyalties. Divided loyalties may arise:

- when a team member's private interests conflict directly or indirectly with the team member's obligations to Virgin Australia; or
- when a team member owns, operates or is involved in any business or organisation that is in competition with any business of Virgin Australia;
- when a team member receives benefits from a person doing, or seeking to do, business with Virgin Australia which could be seen as creating an obligation to someone other than Virgin Australia.

Further, team members must not act in ways which may cause others to question their loyalty to Virgin Australia. Team members shall not accept payments, gifts or entertainment beyond that which is considered normal business practice. If any such benefit is offered that could be construed by others as improper, the offer must be reported to your General Manager.

Virgin Australia expects you to devote all of your working time, attention and energy to the growth and success of Virgin Australia. However, if you decide you want to take up a role in another business whilst you are working for Virgin Australia, you must:

- notify your Leader before you decide to take up a role in another business
- not take up that role unless you first obtain your Leader's written approval.

If Virgin Australia provides its written approval, you must ensure:

- any work that you perform for that other business does not affect your Virgin Australia work (e.g. conflicting hours, reduced flexibility around hours you can work, being tired etc. so that you cannot properly carry out your Virgin Australia);
- you do not use Virgin Australia' equipment or resources for that other work; and
- you notify your Leader if other team members are not behaving the same way in accordance with this policy.

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11. Acceptance of Gifts or inducements

All team members can only accept gifts in accordance with Virgin Australia's Gifts Policy. The following items may not be accepted in any circumstances no matter what their value unless approved by a Group Executive:

- cash;
- shares;
- gifts received during contract negotiations or a tender process if you are in a position to influence the outcome of the contract negotiations or tender award;
- gifts received from direct competitors;
- anything that may be reasonably construed or carry the suggestion of a bribe or inducement;
- anything that may reasonably appear to others to compromise the judgement of the person who is receiving the item; and
- anything that could embarrass Virgin Australia if the gift was made public

12. Dress Code

Virgin Australia has a general expectation that its team members will dress to a standard that is neat and presentable and which maintains a professional image. Grooming, personal hygiene and clothing standards are seen as important factors in upholding the Virgin Australia image.

If you are in a role where you are required to wear a uniform, it is important that you read and comply with your Department's grooming and hygiene guidelines.

If you are not required to wear a uniform, or dress to a certain standard due to the nature of your role, it is important that you dress in standard which is neat and presentable and appropriate to your role (particularly at an airport where you may be identifiable by our customers). You should speak with your manager for guidance about the appropriate dress standard.

At times, Virgin Australia may choose to relax its dress standards for special occasions, e.g. 'jeans for genes' day. Virgin Australia's dress code standards apply outside the workplace in any circumstances or situations where there is a connection to your employment with Virgin Australia.

13. Compliance with this Code

Virgin Australia takes its commitment to this code very seriously. All team members must comply with this Code (as may be amended from time to time).

Any breach of this policy will be treated as a serious matter and may have serious consequences, including disciplinary action up to and including the termination of employment or engagement. In addition, if you breach the law you may be personally liable for your actions.

If you become aware of any actual or possible breach of the code of conduct, you are encouraged to discuss your concerns with your Leader or a member of the People Team. You may also raise your concerns with a member of management, or report any conduct which may be considered unethical or improper via the Ethics Hotline Policy.

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14. Variations

Virgin Australia may change or withdraw this policy at any time, including to take into account changes in legislation, industrial instruments and operational requirements.

15. Policy Links

- Equal Employment Opportunity Policy
- A Fair Go Policy
- Drug & Alcohol Management Policy
- Securities Trading Policy
- Social Media Policy
- Computer Usage Policy
- Privacy Policy
- Ethics Hotline Policy
- Virgin Australia Values Compass
- Virgin Australia Staff Travel (leisure and duty) Policy
- Staff Travel Dress Code
- Whistleblower Policy
- Gifts Policy
- Political Donations Policy

16. Modification history

Date	Version	Policy Owner	Approval
10 January 2014	1	General Manager, People	Group Executive, People, Culture and Sustainability
31 March 2015	2	General Manager, Workplace Relations	Group Executive, People, Culture and Sustainability