WORKING TOWARDS OUR VISION
An overview of Qantas Group Business Practices
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Important notes:
Qantas personnel are to ensure that they read the Qantas Group Policies and other applicable policies referred to in this document. "our", "we", "us", "you" used throughout this document refers to directors, employees, contractors and agents of Qantas Airways Limited, its wholly owned (legally or beneficially) subsidiaries and related bodies corporate (Qantas Group) and any person or organisation that acts for the Qantas Group, unless the context dictates otherwise.
The Qantas Group is one of Australia’s most respected companies, and the oldest continuously operating airline in the world.

We’ve succeeded for more than 100 years because of a commitment to high standards in everything we do.

That commitment is something everyone who works at the Qantas Group is responsible for — whether it is how we treat co-workers, how we reduce our impact on the environment, embrace diversity or how we respond in a crisis.

Being part of the national carrier means agreeing to proudly uphold these standards.

It is important that you take the time to read this booklet and its supporting policies and apply them in your work every day.

Thank you.

Alan Joyce
Qantas Group Chief Executive Officer
Purpose

We take the spirit of Australia further

The Qantas Group Business Practices Document provides an overview of the principles, beliefs and values that underpin our organisation. It sets out our business practices across a range of areas and highlights the minimum standards we expect to be upheld by all personnel.

Principles, Behaviours and Values

Non-Negotiable Business Principles

The Qantas Group has eight Board approved Non-Negotiable Business Principles (Principles) which, together with our Behaviours and Values, guide how we undertake business and make decisions.

The Principles are:
1. We are committed to safety as our first priority;
2. We comply with laws and regulations;
3. We treat people with respect;
4. We act with honesty and integrity, upholding ethical standards;
5. We are committed to true and fair financial reporting;
6. We are committed to environmental sustainability;
7. We have a responsibility to safeguard Qantas Group reputation, brands, property, assets and information; and
8. We proactively manage risk.

The Principles are the foundation for our Group Policies. A supporting mandatory training program ensures that the Principles and Group Policies are understood and consistently applied in the business.

Qantas Group Behaviours

Our Behaviours are how we do things every day, they are built on what makes us unique and sets us apart, and they provide a common language to guide expectations of ourselves and others.

Responsible
Always care and be responsible

Resilient
A positive attitude to everyday challenges

Excellence
Striving for excellence (in all we do)

Respectful
Working together and being respectful and inclusive

Qantas Values

Qantas’ Brand Values support the vision ‘to be a great airline that champions the Spirit of Australia’. They are:
- Together;
- Genuine;
- Inventive;
- Optimistic; and
- Experienced.

Jetstar Values

Jetstar’s Values support its strategic vision of being the ‘World’s Best Low Fares Airline’. They are:
- Be Safe and Responsible;
- Be Energetically Efficient;
- Be Consistently Can Do;
- Genuinely Caring;
- Passionately Orange; and
- One Team.
Qantas Group Policies

The Qantas Group has a set of 10 Group Policies, which reflect the Non-Negotiable Business Principles and outline the minimum expected standards across a range of governance areas where compliance is necessary for legal reasons and to protect our brands and reputation.

These are the Qantas Group Policies:
1. Code of Conduct and Ethics;
2. Business Resilience Policy;
3. Contract Execution Policy;
4. Cyber Policy;
5. Environment Policy;
6. Group Finance Policy;
7. Legal Matters Policy;
8. Risk Management Policy;
9. Safety and Health Policy; and
10. Security Policy.

The Group Policies apply to Qantas Group entities and personnel in line with the Group’s Corporate Governance Framework.

Human resource and other policies exist at entity or business unit level, which also outline the minimum expected standards for our people in the context of their employment.

Complying with Qantas Group and other Policies

All of our people are expected to be aware of and comply with Qantas Group and other applicable policies (e.g. business unit policies and human resources policies). In general, our people are responsible for:

- their own behaviour and actions at all times;
- being aware of and complying with applicable policies, procedures and relevant legislation;
- treating customers and colleagues fairly and respecting human rights;
- upholding the highest standards of integrity, and acting ethically and in the best interests of the Qantas Group at all times; and
- seeking advice and/or authorisation when actions or decisions may conflict with any applicable policy document, or where the ‘right’ thing to do is unclear.

Any breach of applicable laws, prevailing business ethics or other requirements set out in any policy document may result in disciplinary action. Such disciplinary action may include, depending on the severity of the breach, counselling, formal warning, or termination of employment.

Similar disciplinary action may be taken against any supervisor or manager who directly approves and/or condones such breaches or has knowledge of a breach and does not take appropriate action.

Some legislation may also find people individually liable if their conduct has contravened the law.

To understand their obligations, our people must read all Qantas Group and other policies relevant to them.
HOW WE DO BUSINESS
We are committed to complying with all applicable laws and regulations, and conducting business with the highest level of ethics and integrity.

Compliance with Laws and Ethical Standards

Introduction
We are committed to:
- compliance with all relevant laws and regulations;
- demonstrating the highest level of ethics and integrity; and
- a zero tolerance approach to crime and corruption in relation to our operations.

Compliance with the law means observing the letter and spirit of the law, as well as managing our business so that both the Qantas Group and our people (in connection with their employment) are recognised as good corporate citizens at all times.

It is recognised that, in some cases, there may be uncertainty about which laws and regulations are applicable when conducting business and there may be difficulties in interpretation. In such circumstances, our people must seek advice from their manager, or the Qantas Group Legal Department, to ensure understanding and compliance.

Our people must conduct themselves and the business of the Qantas Group with the highest level of ethics and integrity and in the best interest of the Qantas Group. This obligation applies to dealings with each other, customers, suppliers, competitors, governments, regulators, shareholders, and all other stakeholders.

Complying with Competition and Consumer Laws
Our people are responsible for understanding how their obligations under competition and consumer laws affect their dealings with customers, competitors and suppliers.

Our people and every person representing the Qantas Group must, regardless of their position or location, comply with Australian and any local competition and consumer laws. This means that our people working overseas must comply with Australian competition and consumer law even if this sets a higher standard than would otherwise apply in the local area.

Our people must:
- understand and comply with relevant policies, supporting materials and processes;
- undertake mandatory competition and consumer law compliance training, where relevant;
- immediately report suspected, attempted or actual non-compliance (however minor) to the Competition Law Team within the Qantas Group Legal Department;
- immediately refer any correspondence received from competition and consumer law regulators to the Competition Law Team; and
- immediately contact the Competition Law Team with any questions or concerns.

To understand their obligations, our people must read:
- Qantas Group Code of Conduct and Ethics (which includes the Competition and Consumer Law Compliance Policy)
- Qantas Group Legal Matters Policy
- Human resources policies and procedures (applicable to them)
Complying with Anti-Bribery Laws

Our people and every person representing the Qantas Group must, regardless of their position or location, comply with all applicable anti-bribery laws. This means that our people must not offer, give or receive bribes, in any form, to or from any person including public officials, customers or suppliers, or authorise any of those actions, in order to improperly influence an outcome or secure or retain business. Any conduct that creates the perception of bribery should also be avoided. Our people will not suffer adverse consequences for refusing to pay a bribe, even if doing so leads to a negative impact on Qantas Group operations.

Our people must:
- understand and comply with relevant laws, policies and standards regarding anti-corruption;
- not commit, authorise, or be involved in bribery and corruption, or make facilitation payments;
- immediately report any request for payment or offer of any item of value which may be constructed as potential bribe (however minor) to the Qantas Group Legal Department;
- immediately seek advice from the Qantas Group Legal Department upon identifying a potential risk that could lead to bribery and corruption, or an opportunity that could eventuate in bribery and corruption;
- maintain accurate financial records; and
- undertake mandatory anti-bribery law compliance training, where relevant.

Gifts, Benefits and Hospitality

Our people must only give or receive gifts, benefits (including expenses and/or entertainment) or hospitality (GBH), unless it:
- is not cash;
- is associated with a legitimate business purpose, is legal under local law, reasonable and proportionate in the circumstances, and does not go beyond professional courtesies or customary offerings;
- creates no obligation or expectation of anything in return;
- does not constitute a bribe or appear as being intended to improperly influence any person or reward an action;
- does not create an actual, potential or perceived conflict of interest or be capable of causing reputational damage to the Qantas Group.

Any GBH valued at more than the equivalent of the amount outlined in Qantas’ GBH Guidelines must be recorded on the appropriate GBH Register.

No GBH may be given or received to or from a public official unless approved by Qantas’ Business Integrity and Compliance department.

Charitable Donations

Charitable donations must not be made on behalf of the Qantas Group, where the donation:
- is used to secure the improper performance or misuse of a person’s position;
- would provide the donor with any improper advantage or create an expectation of anything in return;
- would create a conflict of interest; or
- could cause reputational harm to the Qantas Group.

Charitable donations over A$200 require manager approval and the conduct of appropriate due diligence checks.

To understand their obligations, our people must read:
- Qantas Group Code of Conduct and Ethics
- Qantas Group Legal Matters Policy
- Guidelines for Giving and Receiving Gifts, Benefits and Hospitality
- Human resources policies and procedures (applicable to them)
Respecting Human Rights

We are committed to respecting all internationally recognised human rights, as well as complying with national and certain international laws, and voluntarily commits to upholding the standards of the UN Guiding Principles on Business and Human Rights (UNGPs). The Group rejects forced, bonded or compulsory labour and other forms of modern slavery, and we condemn all forms of exploitation of children and support the elimination of exploitative child labour.

This means our people must:
- consider the risk of our involvement in potential or actual negative impacts on human rights within our direct operations, supply chains and through our business relationships and decisions;
- where potential risk is identified, promptly report such instances to Group Business Integrity and Compliance; and
- take appropriate action to mitigate or address based on our level of involvement.

Managing conflicts of interest

We will not allow our people to obtain any undeclared personal benefit through their position or role within Qantas Group. Conflicts of interest arise when a person’s personal, financial, commercial or other affiliations or interests could affect or are perceived to affect the way they perform their role or their ability to act in the best interest of the Qantas Group.

Disclosing all actual, potential and/or perceived conflicts of interest, and managing them transparently and effectively when they arise, is integral to fostering a culture of trust, integrity and openness, and ensuring sustainable business practices and delivering value to our shareholders.

Our people must:
- identify and promptly declare any actual, potential or perceived conflict of interest, so that steps can be taken to assess, manage and record the conflict;
- avoid situations where there may be, or could be perceived by others to be, a conflict of interest;
- ensure that where a conflict cannot be avoided, it is effectively and transparently managed; and
- adhere to any conflict of interest risk management plan to safeguard the best interests and reputation of the Qantas Group.

To understand their obligations, our people must read:
- Qantas Group Code of Conduct and Ethics
- Qantas Group Human Rights Policy Statement
- Standards of Conduct Policy (applicable to them)
- Supplier Code of Conduct
- Supplier Requirements
- Inclusion & Diversity Policy
- Qantas Group Whistleblower Policy

To understand their obligations, our people must read:
- Qantas Group Code of Conduct and Ethics
- Qantas Group Conflict of Interest Guidelines
Anti-Money Laundering, Sanctions and Trade Control Laws
We will comply with all applicable laws relating to the prevention of money laundering and terrorism financing, and will not knowingly engage with a third party who is involved in money laundering or terrorist financing. If our people are in any doubt as to whether a transaction or activity might breach Anti-Money Laundering, Sanctions or Trade Control laws, they must contact Business Integrity and Compliance prior to proceeding.

To understand their obligations, our people must read the Qantas Group Code of Conduct and Ethics.

Insider trading prohibition
The Australian Corporations Act (as well as the laws of other countries in which we operate) contain provisions which prohibit a person in possession of Material Non-Public Information (as defined in the Qantas Group Code of Conduct and Ethics) relating to a company from dealing in any way in the securities of that company.

For our people, this legal requirement dictates that they must not (or must not cause a third party to) purchase or sell Securities (as defined in the Qantas Group Code of Conduct and Ethics) (including Qantas Securities) while in possession of Material Non-Public Information. This legal requirement applies to all listed companies, not just to Qantas and its people.

Additional requirements apply to Nominated Personnel (as defined in the Qantas Group Code of Conduct and Ethics).

To understand their obligations, our people must read the:
- Qantas Group Code of Conduct and Ethics
It is the responsibility of all our people to report matters that are of legitimate concern to them. We are committed to providing a safe reporting environment for our people.

Raising a concern

The Qantas Group highly values and promotes a speaking up culture, and our people should feel comfortable raising matters that are of legitimate concern to them.

We have grievance resolution guidelines and procedures to assist with resolving concerns in the workplace, such as interpersonal conflicts, inappropriate behaviours and the outcome of internal recruitment processes. These concerns should be reported to the relevant manager or Human Resources Representative. Additionally, if there is a breach of any legal or regulatory requirement or of any policy, it is our individual responsibility to report the matter. It is preferred that such concerns or potential breach are reported directly to managers, Executive Managers, Group Executives, business unit CEO’s, via internal reporting mechanisms such as Intelex (for Qantas) and Star Safe (for Jetstar), the Qantas Duty Security Controller (+61 2 9691 1818 or extension 21818 or security@qantas.com.au) or, the Jetstar Operations Control Centre (JOCC) on +613 8628 3552.

Whistleblower Policy

In instances where Disclosing Persons (as defined in the Qantas Group Whistleblower Policy) are fearful of any possible unfavourable repercussions as a result of raising a concern, the Qantas Group Whistleblower Policy can assist with protecting their identity.

Our Whistleblower Program is also a key aspect of our approach to managing human rights, providing a confidential and accessible channel for individuals to raise matters of legitimate concern with us, so these matters can be addressed.

The Qantas Whistleblower Hotline is independently managed on behalf of Qantas by PricewaterhouseCoopers (1800 855 212 within Australia or +61 2 8266 1453 outside Australia or qantaswhistleblower@au.pwc.com). The Qantas Group Whistleblower Policy provides certain protections to individuals who make disclosures under the Policy regarding their identity, and information that may lead to their identity, subject to relevant exceptions.

To understand their obligations, our people must read:

• Qantas Group Code of Conduct and Ethics (which references the Whistleblower Policy)
Our future success is underpinned by our people being skilled, motivated and supported to do great things.

Our People

Recruiting the right people into the right jobs
We aim to provide a fair and transparent recruitment process based on:
- sourcing, selecting and appointing the best possible candidates for available positions, based on merit;
- developing our people wherever possible;
- positively managing candidates and the selection process; and
- ensuring new employees are onboard as quickly and as smoothly as possible.

Assisting our people to achieve
Our aim is to create a work environment that supports our people and enables them to do their best work. We have an ongoing focus on managing performance both at the individual and team level. Managing performance at Qantas is a two-way process incorporating responsibilities for both individuals and their manager.

Developing our people
We support and encourage the personal and professional development of our people, through identifying talent and supporting learning and development.

Rewarding our people
We aim to ensure that all our people are appropriately remunerated and rewarded for their performance. Remuneration should be equitable and sufficiently competitive to attract, motivate and retain the best people.

We also recognise the contribution of our people who provide excellent service to, or ensure the safety of, our customers or their colleagues. We have a variety of internal recognition programs to allow our people to thank each other for a job well done.

Managing the way our people work
We understand that our people have very different work, life and family responsibilities. We aim to manage work arrangements using a flexible and efficient approach, which supports the operational needs of the business, while taking into account the work-life balance of our people.

To understand their obligations, our people must read all human resources policies which apply to them.
We are committed to building and fostering a culture in which diversity is valued, and to providing a workplace that is free from discrimination, harassment and bullying.

Promoting equal employment opportunity
We are an equal opportunity employer. ‘Equal employment opportunity’ refers to employment practices that are designed to enable existing and potential employees to compete on their merits for employment, promotions, transfers, training and other employment related benefits, without reference to irrelevant characteristics such as gender, race and disability.

Preventing harassment and bullying
We aim to foster a workplace where people respect and tolerate the rights and differences of others. Harassment threatens this by making the workplace uncomfortable and unpleasant. Harassment in the workplace is not tolerated and is a form of discrimination if it is based on an unlawful ground such as gender, race or disability.

Likewise, bullying or any form of workplace violence and aggression is not tolerated and may represent a breach of relevant occupational health and safety laws.

If any of our people feel that they are being harassed, bullied or discriminated against, they should contact their manager or Human Resources Representative.

Treating people with respect
We are committed to treating our people, customers and the wider community with dignity and respect.

To understand their obligations, our people must read:

• Qantas Group Code of Conduct and Ethics
• Standards of Conduct Policy (applicable to them)
Our people must appropriately use and secure Qantas Group assets, including property, equipment, information and financial or physical resources.

Qantas Group Assets

Protecting assets, property, equipment and information
Our people must take all reasonable steps to secure and ensure the protection of our businesses assets, premises and resources. In particular, our people should take care to minimise the possibility of damage, theft, fraud or unauthorised use or removal of business property by any person.

Information is an asset that, like other important business assets, is essential to an organisation and consequently needs to be safeguarded. This is especially important in the increasingly interconnected business environment. If our people have Qantas Group information within their care, it should always be used in a responsible manner and adequately safeguarded against damage, loss, theft, alteration and unauthorised access.

Inappropriate material is not permitted to be accessed by, nor be stored on, business assets in any form. Inappropriate material includes any information of a threatening, obscene, pornographic, discriminatory or harassing nature.

Protecting personal information
Our people must keep personal information of customers and their colleagues confidential and secure using appropriate measures. This includes protecting personal information from misuse (including unethical use), interference and loss, and unauthorised access, modification or disclosure. Our people must not disclose or use that information, or permit its disclosure or use, unless permitted by applicable privacy law and Qantas Group Policy.

Our people also have a duty to preserve the confidentiality of information within the Qantas IT environment, when removed from the Qantas IT environment and when accessed remotely.

Protecting financial resources
Prior to committing the Qantas Group to any operating or capital expenditure, necessary approvals must be obtained in accordance with the relevant financial and contract execution delegations.

To understand their obligations, our people must read:
- Qantas Group Code of Conduct and Ethics
- Standards of Conduct Policy (applicable to them)
- Qantas Group Security Policy
- Qantas Group Cyber Policy
- Qantas Group Finance Policy
We are committed to managing our risk and minimising liability when entering into contracts.

Contracts

Entering into contracts
Contracts or agreements entered into by entities in the Qantas Group must protect, so far as possible, our commercial, legal and liability position consistent with our risk management philosophy.

It is a mandatory requirement that specified contracts must be reviewed by specialists from Treasury, Insurance, Legal, Tax and Accounting.

Additionally, contracts must be executed on behalf of Qantas by a person who is properly authorised and has appropriate delegation to do so.

To understand their obligations, our people must read the Qantas Group Contract Execution Policy.

Established policies, practices and controls support us in meeting our statutory requirements in relation to preparing and maintaining financial records and retaining records and other documents.

Records

Preparing and maintaining financial records
We are committed to preparing and presenting true and fair financial information which is:
- measured accurately and completely;
- disclosed appropriately in accordance with relevant regulatory requirements, accounting standards and the Group’s Finance and Accounting policies; where relevant, and
- prepared within an appropriately controlled environment.

Financial records must be maintained to accurately and completely record and explain the Qantas Group’s transactions, financial position and performance.

Our people must fully cooperate with our internal or external auditors and must not make a false or misleading statement or conceal any relevant information from these auditors.

Retaining records
Our people must keep records in line with relevant statutory requirements and Qantas Group standards. Each business area is responsible for identifying statutory obligations or organisational standards relevant to their records and for ensuring that retention and storage is conducted in accordance with those obligations and standards. Where multiple requirements indicate different periods, the longer period applies. When records are no longer required, they must be disposed of in a secure manner.

To understand their obligations, our people must read:
- Qantas Group Code of Conduct and Ethics
- Qantas Group Finance Policy
HOW WE MANAGE RISKS
We are committed to embedding risk management practices, including organisational resilience, capability within the business to support the achievement of business objectives and to fulfill corporate governance obligations.

Risk and Resilience

Managing risks
Risk is an inherent part of conducting business, and how we manage risk through anticipation and assessment is fundamental to achieving business objectives.

By proactively understanding and managing risk we can enhance and preserve value and provide greater certainty to our personnel, customers and stakeholders.

All people at Qantas manage risk when they make decisions and take action. Tools are provided to help them discover, understand and respond to risk in the most appropriate way.

Training and assurance of our risk management performance is important to help us all to continue to deliver on our strategy and vision.

We ensure accurate and timely risk information is captured and shared across the Qantas Group, enabling the treatment of risks, capture of lessons learned, and promotion of continuous improvement.

Responding to emergencies or crisis
While we are committed to the highest standards of safety, security and risk management, it is acknowledged that the aviation industry operates in a volatile environment subject to internal and external shocks, both known and unanticipated.

To sustain such an environment, and continuously grow our ability and agility to respond to change, we integrate organisational resilience, including continuity, capabilities into our risk management framework.

In the event of a major incident or crisis that has the potential to impact the Qantas Group, an airline partner or the broader community, organisational resilience enables us to work together and to take a leadership role in:

− ensuring the safety and welfare of our people, customers and wider community;
− protecting our brands; and
− operating critical services.

These capabilities are assured through a robust exercise program focused on building confidence and effective stakeholder co-ordination and management processes.

To understand their obligations, our people must read:

• Qantas Group Risk Management Policy
• Qantas Group Business Resilience Policy
• Qantas Group Cyber Policy
Safety is our first priority and we are dedicated to continuous improvement in the prevention of injuries, illness, accidents and incidents through effective safety management systems, quality processes and a strong safety culture.

Safety and Health

Being safe

We will achieve this through our commitment to:

- individual acceptance of accountability and responsibility for safe conditions and behaviour;
- a culture of safety leadership, collaborative effort, open communication, dissemination of safety information, consultation and involvement at all levels in the workplace;
- managers demonstrating and driving genuine safety commitment and leadership through their personal actions;
- working within a healthy and safe environment by integrating safety and health, environment, security, quality, risk and compliance management systems;
- managers explicit support of a just cultural environment, where all our people and contractors are encouraged to report errors and hazards;
- developing strategies and measurable objectives for achieving safety and health targets;
- continuous monitoring, measurement, reporting and improvement of safety management outcomes and health and safety performance;
- effective hazard identification and risk management, including the integration of human factors into safety management systems;
- providing education and training based on defined competencies;
- meeting or exceeding compliance with regulatory and legislative obligations, and company standards and policies; and
- recognising our people for demonstrating safety excellence or developing innovative safety solutions.

Through the active participation and commitment of all our people we will strive to protect the health and safety of our people, customers, suppliers, assets, operations and the wider community.

To understand their obligations, our people must read:

- Qantas Group Safety and Health Policy
- Qantas Group Management System Standard
- Qantas Drugs and Alcohol Management Plan (DAMP) (and/or local DAMP where appropriate)
- Standards of Conduct and human resources policy and procedures (applicable to them)
- Any related Safety and Health Standards documents (applicable to them)
We are committed to minimising the impact we have on the environment at every step — in the air and on the ground. The Qantas Group was one of the first airlines to commit to net zero emissions by 2050. We are focused on protecting the future of travel by continuing to value the planet, enabling our people, and connecting our customers and communities.

Environment and Climate Action

Protecting the future of travel

Decarbonisation and driving sustainability are at the core of our Group strategy and vital for our people, customers and shareholders.

All of our people have a responsibility to continually reduce the environmental footprint of our business. This is achieved through managing impacts and risks to the planet, while making sure we comply with all relevant laws. We also set our climate strategy and regularly review our progress towards meeting our climate targets set out in our Climate Action Plan.

Our medium to long-term strategy is based on:

- capping our net emissions at 2019 levels and reaching net zero emissions by 2050;
- committing to reducing net emissions by 25 per cent, against a 2019 baseline, by 2030;
- committing $50 million over the next 10 years towards the development of a viable sustainable aviation fuel industry in Australia;
- increasing the percentage of Sustainable Aviation Fuel in our fuel mix to 10 per cent by 2030;
- committing to an average of 1.5 per cent per year fuel efficiency improvements to 2030;
- committing to zero single-use plastics by 2027;
- committing to zero general waste to landfill by 2030; and
- investing in high quality carbon removal and avoidance projects across our network.

We need the support and engagement of our people and suppliers to build environmental awareness, capability and drive environmental performance across the Qantas Group. Importantly, our people must take responsibility for ensuring compliance with legal, regulatory and internal obligations, taking the initiative to lead environmental improvement projects as well as reporting of any environmental hazards and incidents.

We encourage all of our stakeholders to consider how they can minimise their impact on the planet.

To understand their obligations, our people must read:

* Qantas Group Environment Policy
We are committed to protecting our passengers, our people and assets and have a ‘zero tolerance’ approach to crime.

Security

Challenging and reporting
The Qantas Group Security Department maintains and continually develops a robust security system which protects our customers, people and assets.

We encourage a security culture which requires our people to challenge and report. All our people must understand that security is their responsibility. Our people understand their area better than anyone else and it is their contribution that will assist in ensuring that our environment and operations remain safe and secure.

If a person’s conversation or action, or an object, appears suspicious or out of place, it is important that it be reported to either a manager, the Qantas Duty Security Controller (+61 2 9691 1818 or extension 21818 or security@qantas.com.au), or the JOCC on +613 8628 3552.

Our people are also expected to ensure that their work area and personal belongings are secure at all times.

Eliminating crime
Crime and corruption have significant negative impacts on our brand, customers, people and assets.

We are committed to the management and control of crime and corruption, including fraud. We aim to eliminate criminal activity against our business by our people, customers, suppliers or other stakeholders. We have a ‘zero tolerance’ strategy in relation to crime and corruption.

To understand their obligations, our people must read:

• Qantas Group Security Policy
• Qantas Group Code of Conduct and Ethics
HOW WE ENGAGE WITH STAKEHOLDERS
We are committed to communicating effectively with our external stakeholders.

External Communications

Making public statements about the Qantas Group
Our people must not, without authority or approval to do so, directly or indirectly state that they are representing the Qantas Group or its public position in respect of any matter.

Where authorised to comment publicly about the Qantas Group, our people must maintain an open, honest and constructive approach. However, given Qantas is listed on the Australian Securities Exchange (ASX) and Qantas is subject to the ASX’s continuous disclosure obligations, those authorised must ensure that only public information is provided when answering questions asked by external parties.

Our people must not directly or indirectly engage in any activity which could by association cause Qantas public embarrassment or other damage.

Our people must not disclose Qantas Confidential Information (as defined in the Qantas Group Code of Conduct and Ethics) to any third party, either verbally or in written form, without the prior consent of an appropriate Group Management Committee Member, or where the disclosure is legally required, in consultation with the Qantas Group Legal Department.

Ensuring continuous disclosure
Qantas is listed on the ASX and must comply with the relevant continuous disclosure provisions of the Australian Corporations Act and the ASX Listing Rules.

All our people must immediately disclose full details of any Material Non-Public Information (as defined in the Qantas Group Code of Conduct and Ethics) that comes to their attention to the relevant Group Management Committee Member or to the Company Secretary.

The confidentiality of Material Non-Public Information (whether being finalised for ASX disclosure or exempt from disclosure under ASX Listing Rule 3.1A) must be strictly maintained within the Qantas Group by all persons who have access to that information, regardless of title or position. None of our people are permitted to disclose such information, except on a need-to-know basis, within the Qantas Group. Disclosure of Material Non-Public Information to consultants who have been contracted to work on a particular transaction can only be made with the approval of the relevant Group Management Committee Member.

Information requiring ASX disclosure must not be provided to any external party until it has been released to the ASX.

To understand their obligations, our people must read the Qantas Group Code of Conduct and Ethics.
We are committed to facilitating effective shareholder communication and participation at Annual General Meetings.

Communicating and participating
At all times, we are committed to making announcements and distributing communications to shareholders in accordance with the Australian Corporations Act and ASX Listing Rules. We also endorse the ASX Corporate Governance Council’s Corporate Governance Principles and Recommendations and are committed to effective communication with shareholders and effective participation at our Annual General Meetings (AGM).

We provide various means by which shareholders can access information about Qantas, including via our Investor Centre (at https://investor.qantas.com.au), email and print.

We aim to give the maximum number of Qantas shareholders the opportunity to participate in AGMs, by holding AGMs in a different Australian state each year and webcasting the AGM for those shareholders who are unable to attend in person.

To understand their obligations, our people must read:
• Shareholder Communications Policy

We seek to optimise shareholder value by engaging and managing ‘best practice’ suppliers to obtain sustainable competitive advantage.

Supplier engagement and management
Suppliers are important to our success and reputation. In engaging and managing suppliers, our people are required to comply with the relevant procurement policies and related procedures, which have been designed to ensure:
- best value-for-money outcomes that meet the business’ needs;
- fair and ethical decision making and interactions;
- consistent and clear rules of engagement;
- appropriate approval and visibility of decisions;
- compliance with relevant laws and regulations;
- appropriate management of conflicts of interest and gifts;
- communication and documentation of requirements and expectations;
- assessment and management of supply risk;
- appropriate conduct of suppliers;
- successful and sustainable relationships with suppliers; and
- continuous improvement and innovation.

Suppliers acting in the capacity of employees are also expected to uphold the Qantas Group standards outlined in this document. For further information please contact the Qantas Group Procurement Department.

To understand their obligations, our people must read:
• Qantas Group Code of Conduct and Ethics (which includes the Competition and Consumer Law Compliance Policy)
• The relevant Procurement Policy
We promote a collaborative relationship with government, while complying with all laws and upholding the highest ethical standards.

Government

Managing political donations
Political donations (either in cash or in-kind) must not be made (including to any public official, political party, political party official, election committee or political candidate) directly or indirectly on behalf of the Qantas Group.

Our people must be vigilant that any cash or in-kind support given to community organisations or through our partnership arrangements cannot be construed as a Qantas Group political donation. Any charitable donations or sponsorship arrangements at the request, suggestion or inference of a public official must not be made unless approved by the Qantas Group Legal Department.

Our people may attend political party conferences and political functions in their Qantas Group capacity, only with the approval of a relevant Group Management Committee Member (or the Chairman if a Director) for commercial reasons and where the price charged is not in excess of the commercial value of the conference or function.

Our people have an individual right to support political parties, candidates or campaigns in their own time and with their own money; however, they must ensure that this association or monies cannot be construed as being connected with the Qantas Group.

To understand their obligations, our people must read:
• Qantas Group Code of Conduct and Ethics