



CODE OF CONDUCT AND ETHICS

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1. Purpose, Key Principles and Applicability

Purpose

- 1.1 This Code of Conduct and Ethics (Code) is the Qantas Group's principal corporate governance policy.
- 1.2 The Code governs the conduct of the Qantas Group and its Employees.

Key Principles

- 1.3 The key principle underpinning the Code is compliance with laws, regulations and ethical standards.

Applicability

- 1.4 The Code applies to all Employees.

2. The Non-Negotiable Business Principles

Non-Negotiable Business Principles

- 2.1 The Qantas Group's Non-Negotiable Business Principles are:
 - (a) we are committed to safety as our first priority;
 - (b) we comply with laws and regulations;
 - (c) we treat people with respect;
 - (d) we act with honesty and integrity, upholding ethical standards;
 - (e) we are committed to true and fair financial reporting;
 - (f) we are committed to environmental sustainability;
 - (g) we have a responsibility to safeguard the Qantas Group's reputation, brands, property, assets and information; and
 - (h) we proactively manage risk.

Qantas Group Policies

- 2.2 Together with the Qantas Group Policies referred to in section 8.1, the Code outlines the minimum requirements and responsibilities necessary to achieve the Non-Negotiable Business Principles.
- 2.3 The Code is to be read in conjunction with Qantas Group Policies.

3. Requirements

Compliance with laws, regulations and ethical standards

- 3.1 The Qantas Group's operations in Australia and overseas must, at all times, be conducted in accordance with all laws and regulations applicable in Australia as well as in the jurisdiction in which any Qantas Group operations and activities are being undertaken.
- 3.2 Compliance with the law means observing the letter and spirit of the law as well as managing the business of the Qantas Group so that the Group and its Employees are recognised as "good corporate citizens" at all times in the way they conduct business and in connection with their employment.
- 3.3 The Qantas Group supports a "zero tolerance" approach to crime and corruption in relation to the Group's operations.
- 3.4 It is recognised that, in some cases, there may be uncertainty about which laws and regulations apply and there may be difficulties in interpretation. In such circumstances, Employees must seek advice from their Manager and Qantas Legal to ensure compliance.
- 3.5 Employees must conduct the business of the Qantas Group with the highest level of ethics and integrity, in accordance with the Qantas Group beliefs and values and in the best interests of the Qantas Group. This obligation applies to dealings with shareholders, customers, suppliers, competitors, governments, regulators, other Employees and all other stakeholders.

Government Engagement and Political donations

- 3.6 The Qantas Group will engage with government on public policy and legislative issues that affect our business, however it does not favour any political party, group or individual. Political donations (either in cash or in-kind) must not be made (including to any government official, political party, political party official, election committee or political candidate) directly or indirectly on behalf of the Qantas Group.
- 3.7 Employees must ensure that any cash or in-kind support given to community organisations or through our partnership arrangements cannot be construed as a political donation.
- 3.8 Employees may attend political party conferences and political functions in their capacity as an Employee only with the approval of a relevant Group Management Committee member (or the Board Chair if a Director) for commercial reasons and where the price charged is not in excess of the commercial value of the conference or function.
- 3.9 Employees have an individual right to support political parties, candidates or campaigns in their own time and with their own money, however, must ensure that their association or monies cannot be construed as being connected with the Qantas Group.

Anti-Bribery and Corruption Policy

- 3.10 Employees, must, regardless of position or location comply with all applicable anti-bribery and corruption laws.
- 3.11 Failing to comply with anti-bribery and corruption laws is a criminal offence. The penalties for breaching anti-bribery laws are significant for both individuals and the Qantas Group, including possible imprisonment, large fines and reputational damage.
- 3.12 Employees must not:

- (a) offer, give or receive bribes, in any form, to or from any person including government officials or a family member (or friend of such official), customers or suppliers, or authorise any of those actions, in order to improperly influence an outcome, or to improperly secure or retain business. Any conduct that creates the perception of bribery should also be avoided.

Bribes are anything of value given, offered, promised, accepted or authorised (either directly or indirectly) to influence a person's actions or decisions to gain or retain a business advantage. This does not include situations where a person is under duress (provided it has been reported to Qantas Legal before, or as soon as possible following, the incident).

Anything of value is defined widely and includes (but is not limited to) cash, commissions, gifts, meals, entertainment, business opportunities, flights, upgrades, lounge access and offers of employment. There is no monetary threshold; any amount could be construed as a bribe.

Government officials include public servants, employees of enterprises where the government has more than a 50% stake, Members of Parliament, Judges or Magistrates and individuals who are contracted service providers for a government contract;

- (b) pay facilitation payments.

Facilitation payments are payments made to low-level government officials to expedite the performance of routine, non-discretionary government actions; or

- (c) make any charitable donations or sponsorship arrangements at the request, suggestion or inference of a government official unless approved by Qantas Legal.

- 3.13 Employees must:

- (a) ensure that all third parties (such as agents and consultants) acting on behalf of the Qantas Group are aware of the Group's Anti-Bribery and Corruption Policy set out in paragraphs 3.10 to 3.15 of the Code (the ABC Policy) and understand that they are required to comply with it;
- (b) ensure that all contractual arrangements with these third parties include a clause requiring compliance with all applicable anti-bribery and corruption laws;
- (c) report any suspected, attempted or actual non-compliance with the ABC Policy (however minor) to Qantas Legal immediately;
- (d) complete mandatory anti-bribery and corruption law training every two years if in contact with competitors, customers, suppliers or government officials; and
- (e) contact Qantas Legal with any questions or concerns relating to the ABC Policy.

- 3.14 Employees will not suffer adverse consequences for refusing to pay a bribe, even if doing so negatively affects Qantas Group operations.
- 3.15 Managers and People/HR Representatives of each Business Unit are responsible for monitoring and enforcing compliance with the ABC Policy.

Gifts, Entertainment and Hospitality (GEH) Policy

- 3.16 Employees may give or receive gifts, entertainment and/or hospitality (GEH) to/from any person (except government officials) where:
- (a) doing so does not influence, or raise a perception of influence of, that person's objective business judgment;
 - (b) doing so does not allow others to reasonably allege favouritism, discrimination, collusion or similarly unacceptable practices; and
 - (c) the GEH is reasonable, proportionate and does not go beyond common courtesies associated with general commercial practice.
- 3.17 In relation to GEH provided to, or received from, any person (excluding government officials), Employees must record on the GEH Register when:
- (a) gifts (given or received) are valued at greater than A\$200; or
 - (b) hospitality and entertainment (given or received) are valued at greater than A\$200 per head, except in circumstances where Qantas Legal has approved in writing an alternative recording system.
- 3.18 The Qantas Group requires the exercise of a high degree of caution in relation to the giving and receiving of GEH to/from government officials. On that basis, Employees must:
- (a) never offer, give or receive cash to/from a government official;
 - (b) contact Qantas Legal for approval before providing or receiving any GEH to/from a government official; and
 - (c) record all GEH provided to or received from a government official (once approved by Qantas Legal) on the GEH Register.
- 3.19 The GEH Register can be accessed via the Terminal on the Group Secretariat Workspace.

Conflicts of interest

- 3.20 Employees are not permitted to obtain any undeclared personal benefit through their position or role within Qantas Group and must report any actual, potential or perceived conflict of interest (conflict).
- 3.21 All reported conflicts must be assessed and will not be permitted without the documented approval of the Employee's relevant Executive Manager, Group Management Committee member, or the Group CEO (or his/her nominee), as appropriate. Following assessment, Employees must take all reasonable steps necessary to effectively manage and/or avoid the conflict.
- 3.22 Further guidance is provided in the Group's Conflicts of Interest Guidelines and the Standards of Conduct.

Accounting records

- 3.23 Employees must ensure that all Qantas Group accounting records accurately and fairly reflect, in reasonable detail, the underlying transactions and all Qantas Group assets, liabilities and any disposal of Qantas Group assets.
- 3.24 Accounting records must be maintained in accordance with the Corporations Act, all applicable accounting standards and Qantas Finance Policies.

Retention and Storage of Data Policy

- 3.25 Qantas Group Data must be retained in compliance with legal, regulatory and Qantas Group requirements.
- 3.26 Employees are responsible for identifying legal, regulatory and Qantas Group requirements relevant to their Data and for ensuring retention and storage is conducted in accordance with those requirements. Where there are multiple retention requirements for the same Data, the longer retention period will apply.
- 3.27 When Data is no longer required by the business, and any legal or regulatory retention requirements have been met, the Data should be Purged in a secure manner.
- 3.28 Further guidance is available in the Group's Retention and Storage of Data Procedure.

Dealing with auditors and investigators

- 3.29 Employees must fully co-operate with the internal and external auditors and investigators of Qantas.
- 3.30 Employees must not make a false or misleading statement to the internal or external auditors and investigators of Qantas and must not conceal any relevant information from the internal or external auditors of Qantas.

Making public statements about the Qantas Group

- 3.31 Employees must not, without authority, directly or indirectly state that they are representing the Qantas Group or its public position in respect of any matter.
- 3.32 Where authorised to comment publicly about or for the Qantas Group, Employees must maintain an open and honest approach. However, given Qantas is listed on the ASX and subject to the ASX's continuous disclosure obligations, authorised Employees must ensure that only public information is provided when answering questions asked by external parties.
- 3.33 Employees must not directly or indirectly engage in any activity which could by association cause the Qantas Group public embarrassment or other damage.
- 3.34 Further guidance is provided in the Group's Social Media Guidelines.

Use of Qantas Group Confidential Information

- 3.35 Employees must not disclose Qantas Group Confidential Information 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 Qantas Legal.

Continuous Disclosure Policy

- 3.36 Qantas is listed on the ASX and must comply with the relevant continuous disclosure provisions of the Corporations Act and the ASX Listing Rules.
- 3.37 All Employees must immediately disclose full details of any Material Non-Public Information (or information that they believe may constitute Material Non-Public Information) that comes to their attention to the relevant Group Management Committee member or to the Group General Counsel.
- 3.38 Directors and Group Management Committee members must immediately disclose full details of any Material Non-Public Information (or information that they believe may constitute Material Non-Public Information) that comes to their attention to the Group General Counsel.
- 3.39 The Group General Counsel is responsible for reviewing all information provided pursuant to the Group's Continuous Disclosure Policy, set out in paragraphs 3.36 to 3.44 of the Code, and for making a recommendation to the CEO (or Board Chair as necessary) on whether it is Material Non-Public Information that must be immediately disclosed to the ASX or falls within the restricted exemptions for particular kinds of confidential information (as specified in ASX Listing Rule 3.1A).
- 3.40 Where the CEO or Board Chair are not available, and to ensure that Qantas remains compliant with its legal obligations, at least two of the Chief Financial Officer, Group General Counsel and a Company Secretary may make the decision to release the information immediately to the ASX.
- 3.41 For the purposes of paragraphs 3.36 to 3.40 above, "immediately" means promptly and without delay. Employees must promptly (ie, as quickly as possible in the circumstances) and without delay (ie, not deferring, postponing or putting off to a later time) notify the relevant Group Management Committee member or the Group General Counsel upon becoming aware of the information. If there is any delay in releasing such information, the relevant executives must consider requesting a Trading Halt for the period until the information can be released to the ASX.
- 3.42 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. No Employee is 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, subject to a confidentiality undertaking.
- 3.43 Information requiring ASX disclosure must not be provided to any external party until it is Generally Available Information.
- 3.44 Further guidance is provided in the Group's Continuous Disclosure Procedure Document.

Employee Share Trading Policy

3.45 The Corporations Act and the laws of other countries in which the Qantas Group operates contain provisions prohibiting a person in possession of Material Non-Public Information relating to a company from Dealing in any way in the Securities of that company. The Group's Employee Share Trading Policy set out in paragraphs 3.46 to 3.55 regulates dealings in Securities by Employees.

Legal Prohibition Applicable to all Employees

3.46 The principal insider trading prohibition in Australian law is contained in section 1043A of the Corporations Act. The effect of this prohibition for Employees is set out in paragraphs 3.47 to 3.55 below.

3.47 Employees must not Deal in Qantas Securities while in possession of Material Non-Public Information.

3.48 Employees in possession of Material Non-Public Information relating to other listed or unlisted entities (whether inside or outside the Qantas Group) must not Deal in the Securities of that entity.

3.49 Employees in possession of Material Non-Public Information in relation to any listed or unlisted entity (including Qantas) must not:

- (a) cause or procure a third party to Deal in the Securities of that entity; or
- (b) directly or indirectly communicate the Material Non-Public Information to a third party when they ought reasonably to know that the third party would be likely to Deal in the Securities of that entity.

Additional Prohibition Applicable to Nominated Employees

3.50 Nominated Employees are routinely in possession of Material Non-Public Information. Therefore, Nominated Employees (or any family member or associate over whom they have influence, including specifically any person who lives in the same home as the Nominated Employee) are prohibited from Dealing in the Securities of Qantas or any Qantas Group listed entity:

- (a) during the Closed Periods; or
- (b) outside the Closed Periods, without providing the Board Chair, Board (in the case of the Board Chair), CEO or the Group General Counsel (as appropriate) with a written Request to Deal in Qantas Securities and receiving written approval permitting them to undertake the requested Dealing.

3.51 For Nominated Employees, the definition of Dealing is further extended to prohibit:

- (a) hedging or otherwise entering into a contract with the purpose of securing a profit or avoiding a loss by reference to fluctuations in the price of the Securities of Qantas or any Qantas Group listed entity; and
- (b) any margin lending or securities lending arrangement, or otherwise granting a charge, lien or other encumbrance (including a mortgage, charge, pledge, lien or title retention arrangement, right of set off or right to withhold payment of a deposit or other money, or any third party interest such as a trust or an equity) over the Securities of Qantas or any Qantas Group listed entity, where control of any sale process relating to those Securities may be lost.

3.52 The prohibition in paragraph 3.51 does not apply to:

- (a) the automatic removal of restrictions or transfer to a Nominated Employee of Qantas Securities pursuant to the terms of a Qantas employee share plan established by the Qantas Board (Restricted Securities). However, this paragraph does not permit the Nominated Employee to otherwise Deal in those Restricted Securities;
- (b) ongoing participation in a dividend reinvestment plan or an employee share purchase plan. However, electing to participate (or amend participation) in such a plan remains subject to the prohibition in paragraph 3.51;
- (c) Dealing under an offer or invitation made to all or most Qantas shareholders, such as a rights issue, security purchase plan, or equal access buy-back where the plan that determines the timing and structure of the offer has been approved by the Qantas Board; or
- (d) trading under a non-discretionary trading plan in accordance with the Group's Employee Share Trading Procedure.

3.53 It is noted that the requirements applicable to Nominated Employees impose restrictions on Dealing in the Securities of Qantas or any Qantas Group listed entity beyond those imposed by law. These restrictions have been endorsed by the Qantas Board with the aim of upholding the highest standards of corporate governance.

3.54 Under exceptional circumstances, a Nominated Employee, who is not in possession of Material Non-Public Information in relation to Qantas or any Qantas Group listed entity, may be given clearance to Deal as outlined in paragraphs 3.50 and 3.52, except in relation to Securities that are unvested. Such approval can only be granted by the Board Chair or CEO in writing

(including via electronic means). The approval is valid for one month unless another period is agreed by the Board Chair or CEO. For the purposes of this paragraph "exceptional circumstances" includes: severe financial hardship; court orders requiring the sale of the securities; a legal or regulatory requirement; or other circumstances deemed exceptional by the CEO or Board Chair.

- 3.55 Further guidance is provided in the Group's Employee Share Trading Procedure and the Group's Conflicts of Interest Guidelines.

Competition and Consumer Law Compliance Policy

- 3.56 All Employees must, regardless of position or location, comply with Australian and any local competition and consumer laws (including the Australian Consumer Law). This means that all overseas employees must comply with Australian competition law even if this sets a higher standard than would otherwise apply in the local area.
- 3.57 Competition and consumer laws aim to promote competitive markets and protect consumers. These laws impact on every aspect of Qantas Group operations.
- 3.58 Qantas Group Business Units are required to monitor and report on compliance with the requirements of the Competition and Consumer Law Compliance Policy, set out in paragraphs 3.56 to 3.64 of the Code, through self-evaluation and Group corporate governance processes.
- 3.59 Managers and People/HR Representatives of each Business Unit are responsible for monitoring and enforcing compliance with the Competition and Consumer Law Compliance Policy.
- 3.60 Employees must:
- (a) understand how their obligations under competition and consumer laws affect their dealings with customers, competitors or suppliers. Employees must not, for instance, make any form of arrangement with competitors to fix price or share markets, misuse any potential market power of the Qantas Group or make any representations which are incorrect, false or misleading;
 - (b) complete mandatory competition and consumer law training if in contact with competitors, customers or suppliers;
 - (c) read the Group's Competition Law Quick Guides and comply with internal conduct guidelines and legal sign-off procedures;
 - (d) immediately report suspected, attempted or actual non-compliance (however minor) to the Group's Competition and Consumer Law Team within Qantas Legal;
 - (e) immediately refer any correspondence received from competition or consumer law regulators to the Group's Competition and Consumer Law Team; and
 - (f) immediately contact the Group's Competition and Consumer Law Team with any questions or concerns.
- 3.61 Any identified breaches of the Group's Competition and Consumer Law Compliance Policy should be reported to, and will be managed by, Qantas Legal.
- 3.62 Non-compliance with Australian or any local competition or consumer laws will not be tolerated. Ignorance of the law is no excuse.
- 3.63 For the Qantas Group, non-compliance can lead to substantial fines, compensation pay-outs, corrective orders, reputational damage and wasted management time and resources.
- 3.64 For individuals, non-compliance can lead to substantial monetary penalties, stress, bans on corporate management and, in some circumstances, imprisonment. Employees in breach can expect disciplinary action to be taken against them including (depending on the severity of the breach) reprimand, formal warning, demotion or termination. If employees breach the law, the legal requirement is that they will have to pay their own costs or fine.

Whistleblower Policy

- 3.65 The Qantas Group highly values and promotes a speaking up culture, where all Disclosing Persons feel comfortable to raise matters that are of legitimate concern to them, including in relation to a potential breach of any legal or regulatory requirement or Policy.
- 3.66 Details and requirements relating to Whistleblower disclosures, protections and investigations are provided in the Group's [Whistleblower Policy](#).

Privacy Policy

3.67 The Qantas Group and all Employees must comply with applicable privacy laws and regulations worldwide. Compliance with the law means observing the letter and spirit of the law when:

- (a) processing Personal Information; and
- (b) communicating with individuals about our Processing of their Personal Information.

This includes considering ethical Processing of Personal Information.

3.68 Employees with access to Personal Information of customers or Employees must complete mandatory Privacy Awareness training. The Qantas Group and all Employees must keep Personal Information 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. The Qantas Group and all Employees must not disclose or use Personal Information, or permit its disclosure or use, unless permitted by applicable Privacy Laws and Qantas Group policy. Any failure to comply with these requirements is likely to breach the law and may result in Employee disciplinary action.

3.69 Further guidance, including higher standards applicable to Sensitive Information, is provided in the Group's Privacy Procedure.

Inclusion and Diversity

3.70 The Qantas Group is committed to building and fostering a culture in which inclusion and diversity is valued and to providing a workplace that is safe and respectful. This means that Employees must:

- (a) treat Employees, Qantas Group customers and suppliers, and other people with trust, dignity, respect, fairness and equity and not engage in bullying, harassment, discrimination or victimisation.
- (b) be beyond reproach in matters of trust, honesty and confidentiality and never misuse any privilege, authority or status;
- (c) co-operate with other Employees for the benefit of customers;
- (d) act in the best interest of the Qantas Group at all times; and
- (e) be aware of and comply with the letter and spirit of this Code and applicable Qantas Group policies and procedures.

Human Rights

3.71 The Qantas Group supports the Universal Declaration of Human Rights and the United Nations Guiding Principles on Business and Human Rights (UNGPs) and is committed to the respect of those rights.

3.72 The Qantas Group prohibits all forms of Modern Slavery in its operations and supply chain, and is committed to operating consistently with the UNGPs.

3.73 Employees are responsible for identifying and reporting any actual or suspected instances of Modern Slavery in our operations or supply chain, and adhering to the Group Human Rights Policy Statement and other related Group policies, as defined in the [Group Human Rights Policy Statement](#).

Equal Employment Opportunity

3.74 The Qantas Group is an equal opportunity employer.

3.75 The Qantas Group, as an equal opportunity employer, aims to provide a working environment free from unlawful discrimination, harassment, bullying and victimisation. Any conduct which constitutes unlawful discrimination, harassment, bullying or victimisation is unacceptable and may be considered misconduct of a serious nature (depending on the nature of the conduct).

4. Compliance Responsibilities

General

- 4.1 Qantas Group Business Units are required to monitor and report on compliance with the requirements of the Code through self evaluation and Group corporate governance processes.
- 4.2 Managers and People/HR Representatives of each Business Unit are responsible for monitoring and enforcing compliance of the Code.
- 4.3 Any identified breaches of the Code should be reported to the relevant Business Unit People/HR Representative.

Employees

- 4.4 Employees are responsible for:
 - (a) understanding and complying with the Code;
 - (b) completing mandatory training on their obligations under the Code; and
 - (c) immediately reporting any circumstances which may involve deviation from the Code to their Business Unit People/HR Representative, Manager, Executive Manager, or to a Group Management Committee member, as appropriate.
- 4.5 Any Employee concerned about possible repercussions should make their report under the Group's Whistleblower Policy.
- 4.6 Any Employees who deal with contractors, consultants or agents who represent the Qantas Group (Qantas Group Representatives) must make them aware of the Code and that the Qantas Group expects them to conduct their business in accordance with the Code. All new or replacement contracts with Qantas Group Representatives must include a clause requiring the Qantas Group Representative to comply with the Code.

Managers

- 4.7 Managers are accountable and responsible for:
 - (a) understanding and complying with the Code;
 - (b) immediately reporting any circumstances which may involve deviation from the Code to their Executive Manager, or to a Group Management Committee member, as appropriate; and
 - (c) facilitating reasonable mechanisms to enable Employees to understand and fulfil their responsibilities in relation to the Code.

5. Breaches

- 5.1 Any breach of applicable laws, prevailing business ethics or other aspects of the Code will result in disciplinary action. Depending on the severity of the breach, such disciplinary action may include reprimand, formal warning, demotion or termination of employment.
- 5.2 Similar disciplinary action will be taken against any supervisor or manager who directly approves and/or condones such breach or has knowledge of the breach and does not immediately take appropriate remedial action.
- 5.3 Breach of applicable laws or regulations may also result in prosecution by appropriate authorities. Qantas will not pay:
 - (a) directly or indirectly, any penalties imposed on an Employee as a result of a breach of law or regulation; or
 - (b) the legal costs of an Employee convicted of breaching such law or regulation.
- 5.4 All material breaches will be reported to the Board.

6. Document Governance

Review

6.1 The Policy Owners will review the Code at a minimum annually and update it as required to maintain its relevance.

Consultation and Approval

6.2 The following stakeholders within the Qantas Group should be consulted prior to any update:

- (a) General Counsel and Group Executive, Office of the CEO;
- (b) Group Executive Strategy, People and Technology;
- (c) the Group Management Committee; and
- (d) the Board.

6.3 Changes made to the Code require approval from the Policy Owner and the Executive Sponsor.

7. Interpretation of this Code

Interpretation

7.1 Any questions in relation to the interpretation of the Code should be forwarded to the General Counsel and Group Executive, Office of the CEO.

8. Related Documents

Related Documents

8.1 Other policy documents relevant to the Code are:

- (a) all Qantas Group Policies;
- (b) the Continuous Disclosure Procedure;
- (c) the Social Media Guidelines;
- (d) the Employee Share Trading Procedure;
- (e) the Retention and Storage of Data Procedure;
- (f) the Competition Law Quick Guides;
- (g) the Whistleblower Policy;
- (h) the Privacy Procedure;
- (i) the Conflicts of Interest Guidelines; and
- (j) the Standards of Conduct.

9. Definitions

“ASX”	means the Australian Securities Exchange.
“Business Unit”	means any of the Group’s distinct business areas and entities.
“CEO”	means the Qantas Group Chief Executive Officer.
“Closed Periods”	means: <ul style="list-style-type: none">(a) in relation to any financial period ending 31 December, the period from 31 December until 24 hours after the release to the ASX of the half-year financial results for that period; and(b) in relation to any financial period ending 30 June, the period from 30 June until 24 hours after the release to the ASX of the full-year financial results for that period.
“Conflict of Interest”	means a situation where a person’s personal interests or commercial activities or affiliation outside of their employment with the Qantas Group (including the interests or activities of family members, close friends, business associates or other affiliates of the employee) compete with or influence, or could be perceived by others as competing with or influencing, their ability to act in the best interests of the Group.

“Data”	means any electronic or physical document, record, file, image, clip or dataset that provides evidence of or information about past, current or proposed transactions, activities, customers, employees, decisions or events concerning the Qantas Group. Data includes Personal Information.
“Deal” or “Dealing”	means to apply for, acquire or dispose of relevant Securities or enter into an arrangement to apply for, acquire or dispose of relevant Securities.
“Disclosing Person”	means any current or former: <ul style="list-style-type: none"> (a) officer (including a director) or employee of any Qantas Group entity; (b) individual who supplied goods or services to any Qantas Group entity; (c) employee of a person that supplies goods or services to any Qantas Group entity; (d) individual who is an associate of any Qantas Group entity; (e) any individual who is a relative, spouse or dependant (or the dependant of a spouse) of any of the above persons.
“Employees”	means directors, employees, contractors and agents of the Qantas Group and any person or organisation that acts for it.
“Executive Manager”	means a senior executive who reports to a Group Management Committee member, with the title ‘Executive Manager’, or ‘Chief Officer’.
“Group Management Committee”	means the Qantas Group executive forum for matters impacting the Group, comprising the CEO and the CEO’s direct reports.
“Generally Available Information”	means information that has been released to the ASX and the ASX has fully disseminated that information to the market.
“Managers”	means Employees who are responsible for key activities within Business Units, including supervision of other Employees.
“Material Effect on the price or value of Securities”	means information that would, or would be likely to, influence persons who commonly invest in Securities in deciding whether or not to acquire or dispose of those Securities (for example, information that would influence a person’s decision to buy or sell Securities at the current market price).
“Material Non-Public Information”	means information relating to Qantas or any other listed entity that is not generally available but, if the information was generally available, a reasonable person would expect that information to have a Material Effect on the price or value of Securities.
“Modern Slavery”	means any activity, practice or conduct prohibited or defined as a modern slavery offence under the UK Modern Slavery Act [2015] the Modern Slavery Act 2018 (Cth), and other applicable laws concerned with anti- slavery in a relevant jurisdiction. Practices that constitute modern slavery can include but are not limited to: <ul style="list-style-type: none"> • human trafficking; • slavery; • servitude; • forced labour; • bonded labour (e.g.: debt bondage); • forced marriage; and • the worst forms of child labour.
“Nominated Employees”	means Directors, Company Secretaries, Group Management Committee members, direct reports to Group Management Committee members, and other Executives specifically notified by the CEO or his nominee from time to time.

“Non-Negotiable Business Principles”	means the principles that form the foundation for the way the Qantas Group undertakes business, and which are set out in paragraph 2.1 .
“People / HR Representative”	means a person engaged by a Qantas Group Company to perform human resource functions.
“Personal Information”	means information or an opinion about an identified individual, or an individual who is reasonably identifiable. It includes a person’s name, address, phone number, photograph, passport number, Qantas Frequent Flyer membership number, email address, travel information and booking reference number or any other information or opinion about an individual who is reasonably identifiable (either from the information itself or when the information is combined with other reasonably available information).
“Privacy Laws”	means the Australian Privacy Act 1988 (Cth), including the Australian Privacy Principles (APPs) and related guidelines, and equivalent privacy and data protection laws in other locations.
“Process” or “Processing”	means any operation or set of operations which is performed on Personal Information, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.
“Purge”	is a method of permanently erasing and removing Data from a storage space, application or system.
“Qantas”	means Qantas Airways Limited ABN 16 009 661 901.
“Qantas Group Confidential Information”	means information relating to the Qantas Group that is not publicly available, but which does not meet the definition of Material Non-Public Information.
“Qantas Group” or “Group”	means Qantas Airways Limited ABN 16 009 661 901, its subsidiaries (whether legally or beneficially owned) and related bodies corporate (individually or collectively as the context requires).
“Securities”	means shares, options or other securities or derivatives (including any structured financial product, swap, futures contract, contract for difference, spread bet, warrant or depository receipt) issued by any listed entity or issued or created over the listed entity’s securities by third parties.
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