

## Objective and Scope

The SeaLink Travel Group of companies (“Group”) are committed to not only complying with their legal obligations, but also acting ethically and responsibly. This Code of Conduct aligns with our values and sets out the standards of conduct that all Group employees in all businesses are required to meet when carrying out their roles or representing the organisation.

Our Values are known as our COMPASS in Australia and UK, and CITIES in Singapore and help us navigate the way we do business.

Each Group company is responsible for the effective communication of these standards to their staff, and for reporting and management of performance against these standards. Not following the Code of Conduct is a serious matter and breaches will be investigated. All material breaches will be reported to our Board. Breaches of the Code of Conduct are taken seriously and may result in disciplinary action.

Support is available if you are uncertain as to whether your or someone else’s actions align to the Code. You can raise concerns with your leader or if you would prefer not to, you can talk to a member of the People and Culture team, Legal team or your Group Executive.

## CODE OF CONDUCT

As a Group employee you are required to:

- Be fit for work and carry out your role safely in regards to yourself, your co-workers and your customers;
- Treat others with respect and dignity and not engage in bullying, harassment or discrimination;
- Be honest and act with high standards of personal integrity;
- Act in the best interests of the Group, in accordance with our Values and not do or say anything that would negatively affect our reputation;
- Deal with customers and suppliers fairly;
- Comply with the laws, regulations and contract commitments that apply to our operations;
- Comply with applicable policies, procedures and work instructions;
- Not participate in any unethical activity, including the giving or receiving of improper payments or benefits or taking advantage of your position or opportunities arising from it for personal gain;
- Maintain confidentiality of information, and not take advantage of Group property or information for personal gain or to cause detriment to Group or its customers; and
- Speak up if you become aware of conduct by anyone else that does not meet the requirements of this Code of Conduct.

## Further Information

### *What am I responsible for?*

If you are:

- An employee – you need to ensure you read and understand the Code of Conduct, follow the principles and spirit, and ask questions if anything is unclear
- A people leader – you have the additional responsibility for communicating the Code of Conduct to the people you lead and supporting them in understanding and following it.

Our Values, policies, procedures and systems also underpin the areas covered by this Code of Conduct and provide more guidance on responsibilities and specific information. You need to make sure you understand and comply with the local laws, contracts, policies and procedures relevant to you.

If you need further guidance or information please contact your Manager, a member of the People and Culture team or Legal team.

This Code will be periodically reviewed to ensure that it is operating effectively and if any changes are required.

Thank you for making the right decisions, and for your support of SeaLink Travel Group as a successful, responsible and ethical company.

**Board of Directors**  
**SeaLink Travel Group Limited**

*Last Reviewed by SeaLink Travel Group Board 23 June 2021*