

# [ THE CODE ]

—  
Flight Centre Travel Group  
*Code of Conduct*





## A Note from Skroo

*Hi everyone,*

*Welcome to our global Flight Centre Travel Group Code of Conduct ("The Code").*

As one of the world's largest travel retailers and corporate travel managers, Flight Centre Travel Group ("FCTG") is committed to conducting business with honesty, integrity, and respect, to the highest standards of personal and professional ethical behaviour.

While aspects of our customer, supplier, and other stakeholder relationships will vary by country, industry, customer, and business, these principles will apply throughout the Flight Centre Travel Group.

Flight Centre Travel Group's people and our reputation are our two most valuable assets. We preserve these through the following:

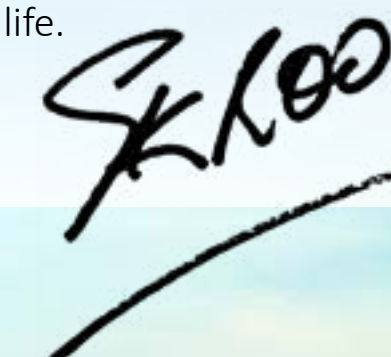
- **Sharing a commitment to maintaining the highest standards of personal and professional ethics**, to comply with all relevant laws and regulations, and to personify and represent Flight Centre Travel Group's core values in everything we do.
- **Acting ethically and responsibly**, going well beyond basic compliance with our legal obligations. This involves acting with honesty, integrity, respect and in a manner that is consistent with the expectations of our customers, suppliers, shareholders, other external stakeholders, our Board and executive team, and the broader community. It also includes acting in accordance with the spirit and the letter of the law.

As a publicly traded company we need to deliver sustainable profit to ensure success and prosperity and a long future for our people and customers. We reward and incentivise our people to help us achieve profit we are proud of.

However, in doing so, we should never depart from the principles set out in this Code. If you see something that departs from our Code, speak up and seek guidance from the resources listed in this document generally and at 8.1 Reporting of Concerns.

Our Code provides an overview of the standards of behaviour Flight Centre Travel Group's Board and executive team expects of our people. Please take the time to read it and use it to help guide you in protecting our company, our brands, and our reputation.

Thank you for your ongoing efforts in bringing our core values and philosophies to life.





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## OUR LEGACY

Flight Centre Travel Group traces its roots back to 1973, when two young adventurers, Graham “Skroo” Turner and Geoff “Spy” Lomas, bought a double-decker bus in London and founded Top Deck, offering budget overland trips across Europe. That single bus was the start of something big.

With a passion for travel and a knack for entrepreneurship, Skroo and Spy transformed their small venture into a thriving business. In 1982 they took their next bold step, founding Flight Centre in Sydney, Australia. What started as a single shop quickly expanded into a global powerhouse, revolutionising the way people travel.

Over the decades, FCTG has grown into one of the world’s largest travel companies, spanning multiple continents. From leisure and corporate travel to specialist services, we’ve never stopped innovating and expanding our horizons. Our commitment to customer service and a passion for adventure remain at the heart of everything we do.

As we continue to evolve, our story is one of relentless drive, bold decisions, and a belief that travel changes lives. We’re immensely proud of our past, and perpetually excited by what the future holds.



## OUR VISION

*To be the world’s most exciting and profitable travel retailer, personally delivering amazing experiences to our people, our customers, and our partners.*





*For FCTG to survive, grow, and prosper, for generations, we need to live by our Company Purpose, our Core Values and our Philosophies.*

*Our culture should be celebrated and protected, whilst being robust and independent, with the ability to outlive our current and future leaders.*



OUR **1** PURPOSE – **3** CORE VALUES – **10** PHILOSOPHIES

## OUR **1** PURPOSE

***To open up the world for those who want to see.***

For our people, this means opening up their world of opportunities for personal and professional development as well as personal growth through working, leading, socialising and travelling with the FCTG organisation.

For our customers, both leisure and corporate, this is opening up their world of exploring and experiencing the world of travel with the services and products they want.

For our Supplier Partners, it is opening up the world of collaborative business and supply opportunities.

## OUR **3** CORE VALUES

***Irreverence***

We take our business seriously but not ourselves.  
We respect each other, our customers and our suppliers.

***Ownership***

We take full responsibility for our business and treat it as our own.

***Egalitarianism***

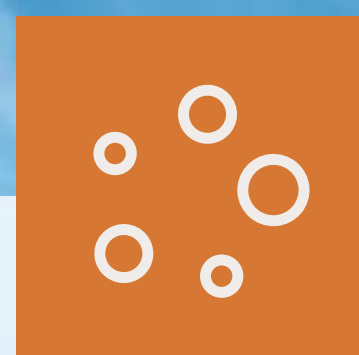
Everyone has the same opportunities, rights and privileges.  
Self-important people don't fit in.



# OUR 10 PHILOSOPHIES

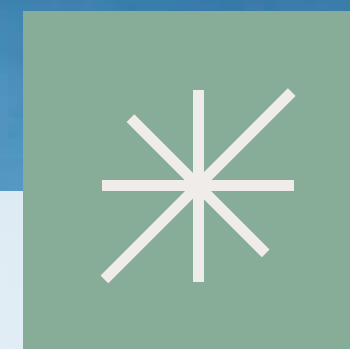
## OUR PEOPLE

Our company is our people. We care for our people's health and wellbeing, their personal and professional development, and their financial security. We believe that work should be challenging and fun for everyone.



## BRIGHTNESS OF FUTURE

Our FCTG business and community provides an inspiring, personally rewarding and challenging career pathway for our people. Promotion and transfers from within will always be our first choice and will give people the opportunity to move within our company, locally and globally.



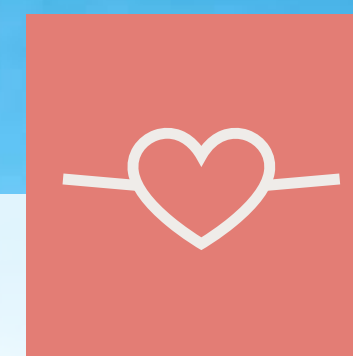
## TAKING RESPONSIBILITY

We take full responsibility for our own successes or failures. We do not externalise. We accept that we have total ownership and responsibility but not always control.



## OUR CUSTOMER

Our customers always have a choice, and we are committed to personally delivering exceptional, unbeatable and sustainable travel experiences to them, whatever it takes.



## EGALITARIANISM & UNITY

In our company we believe that every individual is equally important and has access to the same opportunities, rights, benefits and privileges. There is no them and us. Work from work (with some flexibility) is our default company position as most frontline people don't have any choice. We work as a unified community and embrace diverse cultures, backgrounds and perspectives. We have an irreverent and fun culture of taking our business seriously but not ourselves.





# OUR 10 PHILOSOPHIES

## OWNERSHIP

We treat the FCTG businesses as our own, and all of our people have the opportunity to share in our company's financial success with access to share programs, outcome and output-based incentives, BOS Schemes and profit share.



## REWARD & RECOGNITION

We recognise and celebrate our individual and collective successes with recognition and rewards which are based on measurable outcomes and output based quantitative KPIs. What gets rewarded gets done is our basic principle and we financially reward outcomes, not just behaviour.



## OUR STRUCTURE

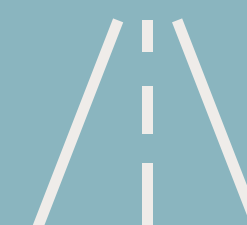
Our structure of Teams (Families), Areas (Villages) and Nations/Countries (Tribes) is simple and transparent – with accessible leaders and minimal layers between the Customer, the Frontliners and Senior Leadership.

Everyone belongs to a Team, the most important group at FCTG. 5-25 teams form an Area. 5-20 Areas form a Nation/Country. Each team is also part of a Division (Leisure, Corporate, Supply and GBS) and/or an FCTG Global Brand.



## ONE BEST WAY

In each of our businesses there is 'one best way' to operate globally. We value common sense over conventional wisdom in the way we run our business. At FCTG we encourage entrepreneurial thinking to foster ownership and focus on ongoing innovation and improvement. In Global Brands we Globalise, Standardise and/or localise our OBW systems as is appropriate.



## PROFIT WE ARE PROUD OF

A fair margin resulting in a business profit we can be proud of, is the key measure of whether we are providing our travelling customers and travel partners with unbeatable quality and value travel experiences and travel products, as well as a caring and respectful service – an experience customer and partners genuinely value.





# Introduction to our Code of Conduct

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*At Flight Centre Travel Group we are proud of our company, our conduct, and the fact that we take responsibility for our actions.*

*Together with our group and regional company policies, including those referred to in this document, this Code sets out the minimum requirements and responsibilities necessary to achieve our key principles.*

This Code applies globally to all Flight Centre Travel Group employees, contractors, consultants, directors and officers (referred to as “we”, “you”, or “our people”). It applies during all work activities and all work-related activities, travel and events. This includes during buzz nights, on team trips, at Global Gathering, while on sponsored work trips or conferences, in the air, in transit, at airports or elsewhere. It applies to conduct on video meetings, email, instant chat and messaging apps, text messaging and social media. It applies where any of our people interact with each other, our customers, our suppliers, other external stakeholders, or the community at large.

Throughout this Code, there will be references to FCTG Group policies and FCTG Group training and/or compliance modules. Local extensions of these policies and/or modules may exist and should be reviewed in conjunction with the information in this document. Our people must complete all required compliance training relevant to their role and position in the provided training platforms to ensure these standards are upheld.

To protect our reputation and credibility, it is important that our people act ethically, honestly, and in compliance with applicable laws, regulations, company policies and procedures at all times, in all countries and regions in which we conduct our business. This Code does not cover all FCTG policies or all local laws across these areas. If a local law conflicts with this Code of Conduct, we follow the law. If a local custom or practice (which is not determined to be a local law) conflicts with this Code, we follow this Code. Any breaches of this Code of Conduct, FCTG policies, and/or the law are to be reported as per the resources listed in this document generally and at 8.1 Reporting of Concerns.



## OUR KEY CONDUCT PRINCIPLES

*Our people are expected to uphold the following key principles in all activities and interactions:*

- Act honestly and with integrity, maintaining the highest standards of personal and professional ethical behaviour.
- Deal fairly with, and be courteous and respectful to, our people, customers and suppliers.
- Act in the best interests of the Flight Centre Travel Group, in a manner which upholds our values and reputation.
- Create and support a safe, inclusive, and respectful work environment, where diversity, equity, and inclusion are embraced, mental health and human rights are valued, and any form of harassment (including sexual harassment, bullying, victimisation, or discrimination) is not tolerated.
- Do not take advantage of any information about FCTG, our customers, or our suppliers for personal gain, the gain of another person, or to cause harm.
- Use technology, AI, and data responsibly, ensuring integrity and ethical considerations in their application and complying with all policies that protect unauthorised access, misuse or breaches of data.
- Engage in responsible environmental and sustainability practices, reducing environmental impact and supporting sustainable business operations.
- Only deal with suppliers who demonstrate ethical and responsible business practices which are consistent with this Code and our Supplier Code of Conduct.
- Comply with all laws and regulations that apply to FCTG and do not participate in any unlawful or unethical activity.
- Do not enter into any arrangement or engage in any personal business or financial activity that would conflict with the best interests of FCTG.
- Be mindful of public statements and social media use, ensuring communication aligns with company values and does not misrepresent or harm FCTG’s reputation.
- Notify a direct leader, Area Leader, local Risk or Legal Services team, People & Culture representative or our confidential Whistleblower Service about any breach or suspected breach of this Code.



A photograph of a man and a woman in red Flight Centre shirts. The man, Dylan Horne, is bald with a beard and is smiling while talking to the woman. He has a name tag that says "Dylan Horne BACKROADS & TORRECK". The woman is blonde and is laughing. They are both wearing red shirts with the "FLIGHT CENTRE" logo. The background is blurred, showing what appears to be a social gathering.

2/

## WE'RE FAMILY

*We support each other, creating a safe, inclusive, and respectful workplace where everyone feels valued, recognised and inspired.*



2. WE'RE FAMILY

# 2.1 Leading the Way

## THE WHAT

At FCTG our culture has been built over four decades through the dedication and integrity of our leaders. We know that leaders play a vital role in shaping our environment, and we hold them to the highest standards.

Our leaders understand the importance of living our core values and philosophies. They actively demonstrate them in their decisions and interactions, fostering a culture of open communication and trust. They set the tone for the entire team, inspiring others to do the same.

Openness and transparency are not just encouraged but ingrained in daily practices. Our leaders seek out diverse perspectives and ensure that every team member feels heard and valued. If disagreements arise, they encourage employees to work together to find mutually beneficial solutions where appropriate. At times, certain matters may need to be escalated to Employee Relations/Human Resources for further support in achieving a sustainable resolution. Leaders respect sensitive matters and ensure confidentiality, impartiality and procedural fairness for grievances.

## THE WHY

By fostering a culture of trust and psychological safety, leaders empower team members to voice their ideas, concerns, and challenges without fear of retribution.

Our commitment to openness and accountability strengthens our resolve to uphold shared values, allowing us to maintain the positive and collaborative atmosphere that shapes FCTG. We believe that healthy, constructive challenge is a natural part of any workplace, and when handled effectively, can lead to growth and innovation.



## EXAMPLE SCENARIO

*A team leader consistently dismisses the concerns of a new team member about the way the team are treating them and making them feel unwelcome. The leader believes the team member is not making the effort to get to know the team and that the concerns are unfounded.*

### Why is this not ok?

By dismissing the concerns, the leader breaks the trust crucial for teamwork. Ignoring feedback stifles open communication, affects well-being, and lowers team morale by discouraging an inclusive environment. As a result, team members may refrain from reporting issues and speaking up, which does not support a strong learning culture.

### What should you have done?

The leader should have listened to the concerns with empathy and encouraged open dialogue. Collaborative problem-solving and follow-up would have shown genuine support and ensured any remaining issues were addressed. If required and necessary, any material issues or concerns should have been appropriately escalated with a view to resolution.

## OUR EXPECTATIONS

### YOU SHOULD:

- Actively demonstrate FCTG's values and philosophies in all decisions and interactions, taking responsibility for actions and inspiring others to do the same.
- Create an environment where team members feel comfortable voicing ideas, concerns, and feedback without fear.
- Proactively invite different viewpoints to promote inclusive decision-making and build stronger, well-rounded teams.
- Take advantage of the conflict resolution training offered to build your skills.
- Be transparent in your communications and keep others informed about decisions and changes that may affect them.
- Regularly acknowledge individual and team achievements.

### YOU SHOULD NOT:

- Dismiss team member concerns, feedback or opinions. Failing to address issues undermines trust and stifles innovation whilst discouraging diverse perspectives.
- Allow favouritism that can erode team morale and trust or interact in anything but a fair and impartial manner.
- Avoid or ignore complaints as this impacts team morale, productivity and our legal and ethical obligations.
- Ignore your impact – the standard you walk past is the standard you accept.



2. WE'RE FAMILY

# 2.2 Diversity, Equity & Inclusion (“DEI”)

EXAMPLE SCENARIO

## THE WHAT

At FCTG, we are proud of the diverse backgrounds, cultures, and beliefs of our people, and are committed to fostering a workplace where everyone feels valued, respected, and has equal opportunities to contribute and succeed. Our inclusive culture is one of our strengths, built on mutual respect, diversity, and a shared passion for our work. Compliance with our Diversity Policy (or any applicable local equivalent) is essential. Conduct that contravenes these standards is unacceptable and will be considered a breach of this Code.

Every member of our team shares the responsibility to contribute to a respectful and inclusive workplace. We foster an environment where open dialogue, feedback, and the reporting of any concerns are encouraged and valued.

We are committed to providing and continuously improving our training and resources to meet the DEI objectives of FCTG.

## THE WHY

We prioritise ongoing training and development opportunities to deepen our people’s understanding of DEI, ensuring that learning is an integral part of our culture.

We promote open communication and have established clear channels for reporting concerns. We actively support the formation and growth of Employee Resource Groups (“ERGs”) to cultivate a sense of belonging and community amongst our talented and diverse workforce. Our ERGs are voluntary, employee-led groups that foster a diverse and inclusive workplace by providing support, career development, and a safe space for employees to connect based on shared characteristics, interests, or backgrounds.

## OUR EXPECTATIONS

### YOU SHOULD:

- Show respect and appreciation for the diverse backgrounds, cultures, and beliefs of colleagues and customers.
- Engage in the diversity and inclusion training provided by FCTG to enhance your understanding and foster a more inclusive environment.
- Ensure that everyone on your team has fair access to growth and development opportunities, regardless of their background.
- Report any concerns promptly and responsibly to your leader, Employee Relations/Human Resources, or through the appropriate reporting channels.
- Support ERGs and other initiatives that promote inclusion and belonging.

### YOU SHOULD NOT:

- Engage in actions or decisions that could reflect unconscious bias.
- Exclude others from opportunities, activities, or discussions due to their personal attributes or beliefs.
- Retaliate against anyone who raises concerns about diversity or inclusion in good faith.



+ QUICK LINK +

[Diversity Policy](#)

*You are hiring for a new role and, without realising it, lean toward candidates who share similar backgrounds, experiences, or interests with the existing team.*

*Although a highly qualified candidate from a different background applies, you unconsciously perceive them as less of a "culture fit" and choose a candidate who feels more familiar, despite their qualifications being less aligned with the role.*

### Why is this not ok?

Unconscious bias can limit diversity and equity, leading to missed opportunities for underrepresented groups and a lack of fresh perspectives. Prioritising familiarity over merit can also weaken innovation and business outcomes.

### What should you have done?

Hiring decisions should be structured and objective, focusing on skills, experience, and potential rather than personal preferences. Using diverse interview panels and standardised evaluation criteria can help reduce bias and create a fair, inclusive hiring process.

*Our inclusive culture is one of our strengths, built on mutual respect, diversity, and a shared passion for our work.*



2. WE'RE FAMILY

# 2.3 Harassment – Sexual Harassment/Bullying/Discrimination

EXAMPLE SCENARIO

*During a work event, a leader repeatedly makes inappropriate comments of a sexual nature about a team member's appearance, despite visibly uncomfortable reactions. Later, the leader touches the team member's shoulder and jokes about "loosening up" to enjoy the event. The team member feels embarrassed and intimidated but does not report the incident.*

*Why is this not ok?*

This behaviour constitutes sexual harassment, which is unacceptable and unlawful. It violates the employee's right to a workplace free from harassment, making the employee feel unsafe and disrespected. It undermines FCTG's values, erodes trust, and contributes to a hostile work environment, potentially affecting morale and productivity.

*What should you have done?*

The leader should have maintained professional boundaries, treating all team members with respect and refraining from inappropriate comments and physical contact. As the team member felt uncomfortable, the behaviour should have been reported to another leader, Employee Relations/Human Resources, or through the confidential Whistleblower service. Other employees witnessing such behaviour should have intervened, offering support and reporting the incident. Creating a workplace where everyone feels safe requires accountability and a commitment to addressing such issues promptly and appropriately.

THE WHAT

We are committed to fostering a workplace where everyone is treated fairly and with respect. Any form of harassment including sexual harassment, bullying, victimisation, or discrimination- whether intentional or not- is unacceptable and will not be tolerated. This commitment applies to all interactions, including work events & whilst travelling, whether in person or via email, text message, chat apps, or social media. It extends to our people, customers, suppliers, and the broader community. We respect the dignity and worth of every individual through the creation of a positive, inclusive environment where everyone feels safe, valued, and empowered to contribute.

We adhere to all applicable local, national and international laws and regulations related to harassment including sexual harassment, sex-based harassment, bullying and discrimination. We are dedicated to proactive prevention by implementing comprehensive training and awareness programs.

We take appropriate disciplinary action against individuals found to have violated our Code and our policies, reinforcing our commitment to a safe and respectful workplace. All formal complaints are investigated promptly, thoroughly, and impartially, ensuring a fair and confidential process for all involved. We are committed to providing ongoing support and remediation to anyone affected by harassment, sexual harassment, sex-based harassment, bullying, or discrimination, helping them to heal and thrive.

THE WHY

A workplace free from such behaviours fosters a positive and productive environment, where everyone feels safe. By upholding a culture of respect, we protect the well-being of our people and maintain our reputation as a responsible organisation. Violating these principles not only damages morale but may also breach our legal and regulatory obligations. Reporting incidents promptly and taking preventative action ensures we maintain a safe, respectful, and compliant workplace for all.

*We are committed  
to fostering a workplace  
where everyone is treated  
fairly and with respect.*

OUR EXPECTATIONS

YOU MUST:

- Uphold a strict zero-tolerance approach to all forms of harassment including sexual harassment, sex-based harassment, bullying, and discrimination, ensuring that such behaviours are never tolerated or ignored.
- Report any incidents or potential incidents immediately in accordance with our policies to your leader, Employee Relations/Human Resources or any member of the People & Culture team, or via our confidential Whistleblower service as detailed in Section 8.1 Reporting of Concerns.
- Promote open, honest communication at all levels of the organisation, ensuring that our people feel safe to voice concerns without fear of reprisal.

YOU MUST NOT:

- Disregard or downplay incidents of harassment including sexual harassment, sex-based harassment, bullying, or discrimination. All concerns should be taken seriously and appropriately investigated.
- Engage in any behaviour, including jokes or comments, that could be perceived as disrespectful, discriminatory, or inappropriate. This includes in relation to an individual's personal beliefs or culture.
- Use any form of communication, such as social media or messaging apps, to engage in or encourage inappropriate behaviour.
- Discuss or share details of complaints or investigations, except with those who have a legitimate need to know.
- Retaliate against someone who raises concerns or files a complaint in good faith.



2. WE'RE FAMILY

# 2.4 Workplace Health and Safety

## THE WHAT

At FCTG we love to celebrate, but our commitment to providing a safe, healthy, and supportive work environment is always priority. Workplace safety extends beyond physical spaces and includes any location where work is performed or work-related events occur, such as conferences, supplier functions, and remote work settings. This includes adherence to policies on drugs, alcohol, smoking and vaping.

## THE WHY

A safe workplace protects everyone, promotes well-being, and ensures that we meet legal and organisational obligations. By fostering a culture of safety, we prevent accidents, support employee health, and maintain a productive and positive environment. Adherence to safety measures and compliance with all occupational health & safety policies also helps protect the reputation and integrity of FCTG.



## OUR EXPECTATIONS

### YOU MUST:

- Follow all workplace safety protocols, including policies on occupational health and safety and drugs, alcohol, smoking and vaping.
- Maintain a professional and responsible demeanour at work and work-related events.
- Report any hazards, unsafe behaviours, or incidents promptly to your leader, Employee Relations/ Human Resources, Injury Management or the local equivalent.
- Seek guidance from your leader if you are required to take any prescription or medication which may impair your ability to work safely and effectively.
- Seek guidance from your leader if you are unsure about the safety implications of any work activity.

### YOU MUST NOT:

- Possess, use, distribute, sell or offer to buy illegal drugs at any FCTG premises, functions, or through FCTG communication systems.
- Attend work under the influence of illegal drugs or excessive alcohol consumption.
- Ignore safety hazards or fail to report unsafe conditions.
- Smoke or vape on or near work premises.
- Engage in behaviour that compromises the safety of yourself or others.

## EXAMPLE SCENARIO

*On your way to Global Gathering, you celebrate early by consuming excessive alcohol during your flight and layover. You become visibly intoxicated, make inappropriate comments to airline staff and fellow travellers, and engage in unprofessional behaviour. Your actions draw attention from other passengers and suppliers travelling to the event.*

### Why is this not ok?

Your behaviour compromises your own safety and professionalism, as well as that of those around you. Being visibly intoxicated whilst representing FCTG risks damaging our reputation, particularly when in front of suppliers, airline partners, and the public. It also violates FCTG's policies on responsible alcohol consumption and appropriate conduct.

### What should you have done?

You should have adhered to company policy and consumed responsibly. If unsure about the appropriate limits, you should have looked for guidance from one of the event organisers, a leader or a colleague.



2. WE'RE FAMILY

# 2.5 Mental Health

## THE WHAT

We promote a healthy, balanced lifestyle for our employees through a broad range of mental health and wellbeing initiatives. We encourage our employees to increase their knowledge and awareness of their own mental health and wellbeing to empower them to care for and nurture themselves and support their peers where appropriate. We not only meet but strive to exceed regulatory requirements regarding the mental health and wellbeing of our people.

## THE WHY

We believe that the mental health and wellbeing of our employees is key to organisational success and sustainability. As an organisation we recognise the importance of promoting and supporting activities that enhance employee mental health and wellbeing, allowing our people to be well and do well, both personally and professionally.

Mental health and wellbeing is a shared responsibility between FCTG and our people. We take a proactive and preventative approach, where risk factors are identified, and reasonably practicable action is taken to minimise any potential negative impact on an individual's mental health and wellbeing.

*We promote a healthy, balanced lifestyle for our employees through a broad range of mental health and wellbeing initiatives.*

## OUR EXPECTATIONS

### YOU SHOULD:

- Be proactive in adopting habits that support your own mental health and wellbeing.
- Promote a culture where employees are able to maintain a work/life balance.
- Take advantage of the available resources and training that can help support you.
- Be aware of the importance of early intervention in supporting mental health and wellbeing, for yourself and your peers.
- Be aware of the signs that a colleague might be struggling with their mental health and wellbeing and take advantage of available training on how best to engage in a low-risk conversation that may help your colleague.

### YOU SHOULD NOT:

- Be afraid to reach out for support if you feel that your mental health and wellbeing are being compromised.
- Avoid or ignore a colleague who you may recognise is displaying signs of struggle with their mental health and wellbeing.

## EXAMPLE SCENARIO

*You have recently noticed a colleague becoming increasingly anxious and overwhelmed. They appear to be finding it difficult to concentrate and are taking longer than normal to complete their tasks. They look tired and have become distant and disengaged with the rest of the team. This is all very unlike them. You choose not to say anything as you're sure it's not a big deal and they will be fine in a week or two.*

### Why is this not ok?

Early intervention in mental health is vital in being able to promote wellbeing strategies that might help reduce the risk of more serious issues developing. Ignoring someone who is displaying a change in appearance, mood, behaviour and/or thoughts limits the opportunity for them to get appropriate support.

### What should you have done?

You should have chosen an appropriate moment to speak with your colleague, at a time and place that suited you both, and acknowledged that they had been acting out of character. This would give them the opportunity to chat and for you to listen with an open mind and to encourage action towards appropriate support.



2. WE'RE FAMILY

# 2.6 Workers' Rights

## THE WHAT

FCTG is committed to upholding and promoting the fundamental rights of workers. We believe in fostering a workplace where everyone is treated with dignity, has access to fair opportunities, and is supported to thrive.

We recognise and respect every individual's right to work, to freely choose employment, and to fair and favourable working conditions. FCTG's approach to remuneration is fair, applied consistently, competitive and aligned with long term strategy.

## THE WHY

Workers' rights are the cornerstone of a fair, respectful, and inclusive workplace and ensure that our employees feel valued, protected, and empowered. It's not just a legal requirement, it's a moral commitment to creating a work environment where dignity, fairness, and respect prevail.

By adhering to these principles, we foster a culture of trust and collaboration, drive employee engagement, and maintain our reputation as an employer of choice. This commitment strengthens our ability to attract and retain talented individuals who are integral to our success.



## EXAMPLE SCENARIO

*An experienced employee discovers they are being paid less than their colleague for the same role and level of responsibility. When they raise the issue with their leader, they dismiss the concerns.*

### Why is this not ok?

Dismissing these concerns without investigation undermines the employee's right to equal pay for equal work and violates principles of fairness and dignity. It creates an environment where discrimination is tolerated, leaving the employee feeling undervalued and disrespected. Such behaviour damages team morale, perpetuates inequality, and directly contradicts our commitment to uphold and promote the fundamental rights of our workers.

### What should you have done?

The leader should have taken the concerns seriously, reviewed the pay structure for fairness, and addressed any discrepancies in line with the principle of equal pay for equal work. Open communication and transparency about pay policies ensure employees feel valued. If the issue required further evaluation, it should have been escalated to People & Culture.

## OUR EXPECTATIONS

### YOU MUST:

- Treat everyone with dignity and respect, providing equal opportunities without discrimination based on sex, race, gender, age, religion, disability, or other protected characteristics.
- Offer just and favourable remuneration, ensuring workers can achieve a standard of living worthy of dignity for themselves and their families.
- Respect the rights of workers to form, join, or participate in trade unions or other collective bargaining activities.
- Foster an environment where employees feel safe to voice concerns, share ideas, and report any violations of worker rights without fear of retaliation.

### YOU MUST NOT:

- Engage in any form of unequal treatment in respect to hiring, compensation, or workplace interactions.
- Permit unequal pay for equal work or practices that undermine fair compensation.
- Interfere with or restrict employees' rights to unionise or engage in collective bargaining.
- Retaliate against employees who report violations of worker rights or participate in grievance processes in good faith.



+ QUICK LINK +

[Human Rights Policy](#)



3/

## WE'RE FAIR

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*We act with honesty and fairness, ensuring ethical conduct in every decision we make.*



3. WE'RE FAIR

# 3.1 Economic and Trade Sanctions

## THE WHAT

We respect economic and trade Sanctions ("Sanctions") including travel bans, asset freezes, arms embargoes, and trade restrictions. We understand that Sanctions may be comprehensive, prohibiting commercial activity with an entire country or may be targeted, blocking transactions by and with particular businesses, groups, or individuals. Sanctions are designed to protect global stability and restrict actions that threaten peace.

## THE WHY

As an Australian listed company with global operations, FCTG must adhere to international laws in all jurisdictions in which we operate. If we are involved in transactions or business activities that breach or are inconsistent with these laws, we may expose FCTG and our employees to civil or criminal penalties (including imprisonment) and significantly damage our reputation.

## OUR EXPECTATIONS

### YOU MUST:

- Understand and comply with all applicable Sanctions laws in every jurisdiction where we operate. As an Australian listed entity, we must ensure compliance with Australian Sanctions globally.
- Adhere to the FCTG Global Sanctions policy, procedures and training.
- Know the identity of your customer and other third parties you deal with.
- Complete risk-based due diligence on customers and third parties to identify and escalate any Sanctions risks or seek guidance if unsure.
- Seek guidance where necessary. Sanctions compliance can be complex for multinational organisations such as ours. Seek advice from your local Risk team or Financial Crime Risk team.

### YOU MUST NOT:

- Try to circumvent Sanctions or the controls in place which are designed to help FCTG manage the risks.
- Forget about nexus, especially if you are a US person. It's important to understand how factors such as citizenship, currency used etc. can cause a nexus to a Sanctions regime. "Nexus" refers to any connection of a transaction, activity, or entity with a jurisdiction, person, or entity subject to international Sanctions.
- Proceed with any business activity where Sanctions red flags are present and always escalate to Financial Crime Risk, local Chief Financial Officer or Legal Services.

## EXAMPLE SCENARIO

*You receive an enquiry from a customer about a tour that they have found travelling to North Korea via China. They share that they are excited to book this once-in-a-lifetime experience tour through you.*

### *Why is this not ok?*

North Korea is on Flight Centre's 'Do Not Trade' (Embargoed) list, meaning no bookings, transactions or payments are permitted when related with this country, either directly or indirectly.

### *What should you have done?*

Politely decline the transaction.



+ QUICK LINK +

[Sanctions Policy](#)



3. WE'RE FAIR

# 3.2 Anti-Bribery & Corruption and Fraud

## THE WHAT

We are committed to conducting business with honesty and integrity. We have zero tolerance for all forms of bribery, corruption, fraud or unethical business practices. As a company, we are apolitical and do not make cash donations or contributions to political parties or at the request of Public Officials. We only make charitable donations that are legal and ethical and in accordance with our charitable objectives. Sponsorship and donations must always be approved in line with the Group Delegation of Authority Policy.

## THE WHY

We like to win, but we want to win fairly and ethically. We know that bribery, corruption and fraud erode trust and negatively impact people and economies. We value FCTG's reputation and know breaches can lead to significant reputational damage, penalties and imprisonment.



## OUR EXPECTATIONS

### YOU MUST:

- Remember that a bribe can be anything of value (e.g. gifts, hospitality, employment opportunities, charitable or political contributions, or sponsorships).
- Forward any requests for sponsorship through to your local CFO or the Flight Centre Foundation.
- Consider whether you are dealing with a Public Official or their family members.
- Manage third party relationships carefully and ethically.
- Consider any conflicts of interest, and the intent of the benefit being offered or received.
- Ensure that gifts and hospitality are transparent, documented and approved in line with the FCTG Global Anti-Bribery & Corruption Policy.
- Be aware of fraud risks and key controls designed to prevent fraud, and report any suspected fraudulent behaviour.

### YOU MUST NOT:

- Offer or accept a gift or benefit where there could be a perception that it has been offered as an inducement or an incentive to act in a certain way.
- Assume fraud, bribery and corruption risks are not relevant to you. Everyone is accountable for managing risks.
- Be afraid to say no if you are offered something that has red flags or are asked to do something that doesn't seem right. Always escalate and report any concerns.

## EXAMPLE SCENARIO

*You are involved in the Request for Proposal (RFP) process for a new supplier, a government owned company. A manager at the company asks whether FCTG could cover travel costs for their wife and child for a trip to London.*

### Why is this not ok?

There are several red flags including the manager's request coinciding with the RFP, and the company being government owned which indicates it's likely you are dealing with a Public Official. The request appears to be soliciting a personal benefit that is not transparent and could be perceived as an inducement to act in a certain way.

### What should you have done?

Politely decline. If you need any guidance or have further concerns, escalate to your local Risk team, Financial Crime Risk, local Chief Financial Officer or Legal Services. Where applicable, you could also report via our confidential Whistleblower service.



### + QUICK LINKS +

[Anti-Bribery & Corruption Policy](#)

[Anti-Fraud Policy](#)

[Delegation of Authority Policy](#)



### 3. WE'RE FAIR

## 3.3 Anti-Money Laundering and Countering Terrorism Financing

### THE WHAT

Money laundering is the deliberate concealment of money which was made by carrying out illegal activities such as scams. Terrorism financing involves the use of money raised from seemingly legitimate sources, such as charitable donations and business profits, as well as money from illegal sources to fund terrorism. We understand our obligations to safeguard our communities and have zero tolerance for knowingly allowing dirty money to contaminate our businesses.

### THE WHY

We observe our obligations to prevent and detect money laundering and terrorism financing, and ensure our regulated businesses have Board oversight, adequate resources, and appropriate controls in place to meet our obligations. We take all reasonable measures to prevent our company, products or services from being used to launder money, protecting our reputation and avoiding any potential criminal or civil liability.

### OUR EXPECTATIONS

#### YOU MUST:

- Understand and comply with all applicable anti-money laundering laws in all jurisdictions in which we operate to prevent FCTG being used by third parties to launder money or make funds available for terrorism.
- Manage regulatory change and understand when products and services may be captured under anti-money laundering laws.
- Be familiar with and adhere to additional requirements applicable to our Regulated Businesses to help manage compliance and reporting obligations.
- Know the identity of your customer and other third parties you deal with and ensure all required due diligence and approval processes have been followed.

#### YOU MUST NOT:

- Allow any form of money laundering in connection with our business activities.
- Try to circumvent the controls that help manage money laundering and terrorism financing risks.
- Ignore concerns or red flags that a cash or cash equivalent transaction may be money laundering. Speak up and report your concerns.
- Proceed with any business activity where money laundering or terrorism financing red flags are present and always escalate to Enterprise Risk, your local Chief Financial Officer or Legal Services.

#### EXAMPLE SCENARIO / 1

*A corporate client wants to use FCTG's services however advises that their payments will come from a third party located offshore. You think that sounds unusual, so you do some research and discover that the third party has no office, no employees, and was only incorporated a few months ago.*

#### Why is this not ok?

There are multiple red flags including use of an unknown third party to make payments and the third party company having no office, employees and only recently incorporated (which suggests a shell company – a company that only exists on paper). Offshore payments can be higher risk especially if originating from countries known to facilitate shell companies and opaque business structures.

#### What should you have done?

Politely decline. Escalate and report the red flags either directly to your local Risk team, Financial Crime Risk, local Chief Financial Officer, Legal Services or else via our confidential Whistleblower service.

#### EXAMPLE SCENARIO / 2

*A leisure customer pays for expensive luxury travel packages using a credit card. A day later they request that the packages are cancelled, and the money refunded as cash or onto different cards. They refuse to have the package refunded back to the original method of payment.*

#### Why is this not ok?

A request to refund as cash or onto other cards rather than back to the original method of payment is a red flag for money laundering (and fraud). The money is "cleaned" through the purchase and cancellation of a legitimate product, with the refund now appearing as clean money.

#### What should you have done?

Politely decline and advise that refunds must be made back to the original method of payment. Escalate and report the red flags either directly to your local Risk team, Financial Crime Risk, local Chief Financial Officer, Legal Services or else via our confidential Whistleblower service.



4/

# WE'RE FAST

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*We work responsibly,  
using innovation and technology  
to stay ahead of the game.*



4. WE'RE FAST

# 4.1 Use of Technology and Services

## THE WHAT

Communication is a key part of our daily tasks and interactions with each other, customers, suppliers, regulators, and external third parties, including government agencies. Our use of FCTG assets (laptops, tablets, mobile devices), email and internet is monitored to ensure compliance with FCTG policies, including the proper use of IT assets.

FCTG IT assets are critical to our business success, covering physical assets, software systems, confidential information, and intellectual property. These assets are provided for authorised business purposes, and any personal use should be incidental, not interfere with work, and comply with the Acceptable Use Policy.

## THE WHY

We are responsible for maintaining professionalism, respect, and integrity across all forms of communication, whether verbal or written (email, chat, social media). Using IT assets responsibly protects FCTG's confidential information and prevents IT security risks. Misuse can lead to serious consequences, including data breaches, regulatory issues, and damage to our reputation.



+ QUICK LINKS +

[Acceptable Use Policy](#)

[Information Security Policy](#)

## OUR EXPECTATIONS

### YOU MUST:

- Maintain professionalism and use appropriate language in all communications.
- Use email, chat, internet, and social media for official FCTG purposes only.
- Read and understand the Information Security Policy and Acceptable Use Policy and ensure third parties working with FCTG comply.
- Complete annual mandatory security and privacy training.
- Report any suspected security incidents or loss of FCTG assets to the local Service Desk.

### YOU MUST NOT:

- Use FCTG IT assets for personal purposes beyond incidental use, and never in a way that interferes with your work.
- Use FCTG email addresses to subscribe to or log into personal services.
- Attempt to access files, systems, or information you are not authorised to use.
- Deal with any material that could compromise FCTG systems, brand reputation, or relationships with clients or suppliers.
- Communicate material via any medium that could be considered offensive or damaging to any group or individual.
- Tamper with or remove any software or services implemented by FCTG to protect our systems and networks.
- Use unapproved communication channels or share any information that could expose FCTG to risk.

### EXAMPLE SCENARIO

*You need to send a very large file to a business partner. You think it might be too large to send via email, so you decide to load it into a cloud storage service you use to share photos with friends, so that the business partner can retrieve it from there.*

### Why is this not ok?

Personal technology services should not be used to upload or store work related data or information. These services do not typically come with the security controls required to protect information from unauthorised access. Additionally, files should only be sent via email if the information contained within is appropriate to be sent via email.

### What should you have done?

FCTG has approved mechanisms in place to deliver and share business data with external parties such as business partners. You should have contacted IT Security to ascertain the preferred FCTG application for sharing large files with external entities.



## 4. WE'RE FAST

# 4.2 Data Privacy/Security, Confidentiality, and Intellectual Property

### THE WHAT

In our interactions with staff, leisure customers, corporate clients, suppliers, regulators, government agencies and law enforcement agencies, we deal with personal information, sensitive information, and commercially sensitive information including our own intellectual property (IP) and that of third parties. Confidential information refers to non-public business, financial, customer, employee, or supplier information that, if disclosed without authorisation, could harm FCTG or its stakeholders.

Intellectual property is the intangible legal right in creations of the mind such as inventions, artistic works, images, designs, written materials, business and domain names, and confidential information. Legally, IP rights allow the IP owner to do certain things to the exclusion of others. Under your employment or engagement agreement, you agree that FCTG owns the IP rights in anything you create or develop while employed or engaged by FCTG, including products, services, documents, software code, content, reports or processes.

### THE WHY

We have various regulatory, contractual and industry obligations to protect and to secure personal, confidential and commercially sensitive information. We must also be sure never to engage in unauthorised use of IP, whether it be ours or that of a third party, as this is a breach of the law and may result in FCTG breaching contractual obligations. We take all reasonable measures to ensure we have appropriate controls in place to protect and secure information entrusted to us to maintain the privacy of our customers' personal and sensitive information.

### OUR EXPECTATIONS

#### YOU MUST:

- Only collect, use, store, and disclose information for which we have a lawful or legitimate purpose.
- Only access customer and staff information within the scope of your role and provisioned access rights.
- Secure and protect employee personal information, customer information and commercially sensitive information by saving it in the appropriate systems with controls in place.
- Immediately report any suspected data breaches or information security incidents as soon as you become aware of them.

#### YOU MUST NOT:

- Reveal any confidential information or use that information in a way which may injure or cause loss to FCTG, our affiliates, or our people.
- Access, use or disclose employee personal information, customer information or commercially sensitive information for personal reasons.
- Engage in unauthorised use of our or a third party's IP.
- Save employee personal information, customer information, or commercially sensitive information outside of approved systems and applications.
- Copy, disclose, transfer or release employee personal information, customer information, or commercially sensitive information without consent from the individual or approval from Privacy or Legal Services.



4. WE'RE FAST

# 4.2 Data Privacy/Security, Confidentiality, and Intellectual Property Scenarios

EXAMPLE SCENARIO / 1

*You are an avid online shopper, always looking out for a great deal. You spend some of your break time hunting for bargains online and sign up for deals using your work email address to make it easier to keep everything in one place.*

*Why is this not ok?*

Using your work email address for personal use exposes the FCTG email system to various security risks such as increased spam and phishing emails that can inadvertently be clicked, introducing malware into the work environment.

Surfing the web for bargains increases the likelihood that you will come across an insecure or malicious site or pop up that when clicked will install malware into our environment or steal your credentials.

*What should you have done?*

Instead of using your work email address for personal use, you should set up a personal email account to use for online shopping. This will help you maintain a professional image whilst protecting FCTG resources. Additionally, you should limit the amount of online shopping you are doing on your work computer, whether at home or at work.

EXAMPLE SCENARIO / 2

*While working at FCTG, you develop new customer booking efficiencies. Later, after leaving the company, you start working for a competitor and implement the same process there without permission, using documents and templates you created while employed at FCTG.*

*Why is this not ok?*

Any IP you create during your employment at FCTG belongs to the company, not you. Using company-developed processes, documents, or content for another business is a breach of your employment agreement and may result in legal consequences.

*What should you have done?*

You should have respected FCTG's ownership of IP and refrained from using or sharing this work. If you were unsure about what you were legally permitted to use, you should have sought guidance from FCTG before taking any action.

EXAMPLE SCENARIO / 3

*You are generating reports of upcoming travel bookings for a number of your clients. Unfortunately, you accidentally send the report intended for client A to client B, and this report contains personal information of client A's employees. You resend the correct report to client B, telling them to ignore the first report. You do not notify your team leader/manager or your regional Privacy team, hoping that this error will just go away.*

*Why is this not ok?*

We have regulatory reporting requirements for data breaches. All breaches need to be assessed and, if required, notified to regulators within strict timeframes. Similarly, our contracts with corporate clients compel us to notify them of data breaches within pre-agreed times. Failure to notify your regional Privacy team of data breaches puts FCTG at risk of regulatory actions and puts our contracts with clients at risk.

*What should you have done?*

You should have notified your Privacy team as soon as you realised your error, either by using the 'Report a Data Breach' function within the ETS portal or by contacting your regional Privacy team directly – contact details are included within the Privacy Notice on all our websites.



+ QUICK LINKS +

[Acceptable Use Policy](#)

[Data Classification and Handling Policy](#)

[Data Protection Policy](#)

[Data Retention and Disposal Policy](#)

[External Global Privacy Notice](#)

[Information Security Policy](#)

[Internal Global Privacy Notice](#)



4. WE'RE FAST

# 4.3 AI and Machine Learning

## THE WHAT

Artificial Intelligence (AI) and machine learning (ML) are emerging technologies with a wide range of applications across FCTG. We ensure that AI and ML solutions meet the highest ethical standards and are clearly focused on driving productivity and sustainability to meet and address customer needs. FCTG has developed ethical principles for best practice use of AI and ML that are focused on trust, transparency and high quality outcomes with operational and customer benefit. AI and ML will not be used where there is not a clear use for doing so, or where it has the potential to pose significant risk in relation to data, privacy or ethics.

## THE WHY

FCTG will leverage the significant potential of AI and ML to continue to deliver best practice product and service offering to customers and streamline operations.

## OUR EXPECTATIONS

### YOU MUST:

- Ensure that the innovation, development, deployment and use of AI and ML complies with all applicable laws, regulations and best practice principles.
- Ensure the responsible, ethical, and transparent use of AI and ML.
- Minimise bias and discrimination, and promote cultural sensitivity in the use of AI and ML.

### YOU MUST NOT:

- Enter commercially sensitive or personal information into openly accessible AI solutions.
- Develop or deploy AI or ML solutions without consulting local Legal Services and Privacy teams or completing an AI impact assessment.



### + QUICK LINKS +

[AI Enablement Framework](#)

[AI Use Policy](#)

[Data Classification and Handling Policy](#)

[Data Protection Policy](#)

### EXAMPLE SCENARIO

*You are a corporate Account Manager looking to turn the rather dry travel data of one of your clients into a visually impactful report that is easily understandable by your client's Travel Manager. You upload the client's data into the online free versions of several AI tools to help create the desired report. This data is confidential information that clearly identifies the client and the sensitive personal information of several client travellers.*

### Why is this not ok?

Uploading confidential or personal information into openly accessible (public) AI solutions is in breach of the FCTG AI Use Policy. Doing so risks the data entering the public domain and is in breach of our confidentiality requirements. In addition, you have entered confidential and/or personal information into applications that have not passed the mandatory vendor due diligence FCTG is required to undertake before a third-party application can be used.

### What should you have done?

You should have used appropriate and approved FCTG AI tools to prevent the risk of the confidential and personal information of our clients entering the public domain. If you were not aware of which AI tools have been approved for use, you should have reached out to your leader and/or Procurement rather than simply using random online tools.



4. WE'RE FAST

# 4.4 Record Keeping and Information Integrity

## THE WHAT

FCTG collects and generates information and records daily to support operations and comply with operational, fiduciary, legal, and regulatory obligations. Clear, accurate, and complete records ensure accountability, transparency, and good governance. FCTG is committed to maintaining the highest standards in record-keeping practices, ensuring all information is truthful and reliable.

## THE WHY

Maintaining accurate and complete records is critical to our business and decision-making. Clear records enable FCTG to deliver services effectively, uphold fiduciary and legal obligations, and promote informed, evidence-based practices. Accurate records safeguard our integrity, support compliance, and protect our reputation. Falsifying records or mishandling information can lead to serious legal and reputational consequences.



### + QUICK LINKS +

[Anti-Fraud Policy](#)

[Data Classification and Handling Policy](#)

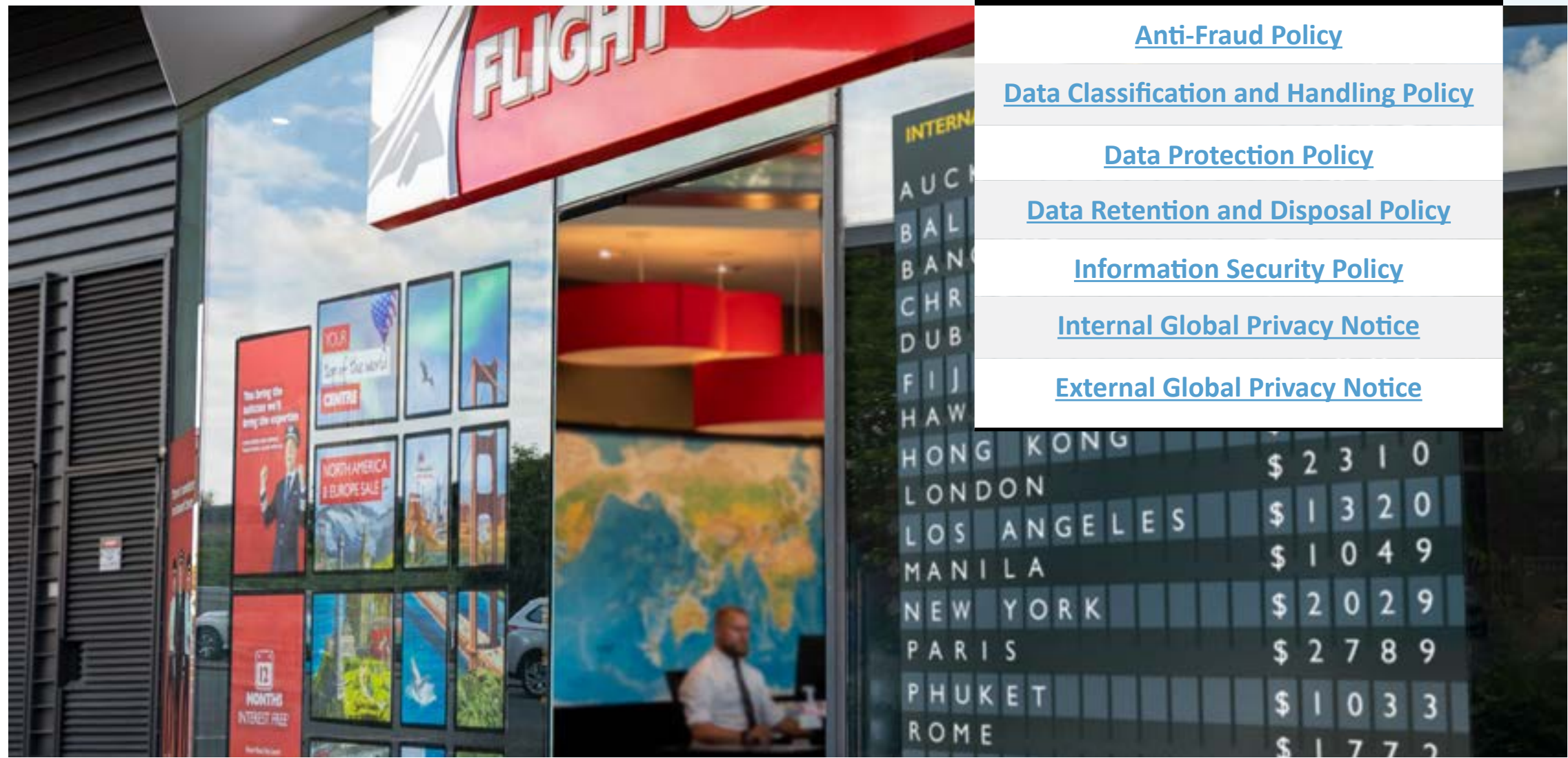
[Data Protection Policy](#)

[Data Retention and Disposal Policy](#)

[Information Security Policy](#)

[Internal Global Privacy Notice](#)

[External Global Privacy Notice](#)



## OUR EXPECTATIONS

### YOU MUST:

- Ensure all records and information are clear, truthful, accurate, and complete.
- Store FCTG records only in approved and authorised locations, devices, and applications.
- Categorise and classify records appropriately, ensuring they are easily identifiable and retrievable.
- Retain records for the duration of their assigned retention period, in accordance with applicable laws and regulations.

### YOU MUST NOT:

- Falsify, alter, or misrepresent any company record or information (including financial records or statements and tax invoices).
- Ignore errors or omissions in records – always report and correct inaccuracies immediately.
- Store FCTG information or records in non-approved or unauthorised locations, devices, or applications.
- Knowingly or unknowingly delete or destroy information or records which must be retained for a prescribed period in accordance with relevant laws and regulations (as per your approved and published local Data Retention Schedule).

### EXAMPLE SCENARIO

*You are preparing a financial report for a quarterly review. To meet the deadline, you decide to extrapolate certain figures with limited records, data or accurate information to better reflect trading. Additionally, you omit a significant expense incurred, thinking it will reflect better in the next reporting period.*

### Why is this not ok?

Your actions compromise the accuracy and integrity of our records. Failing to verify, validate and substantiate key figures and omitting key information leads to incomplete and misleading records, which may affect decision-making and compliance with legal and fiduciary obligations. These actions undermine trust, transparency, and FCTG's commitment to clear and accurate reporting in line with good corporate governance.

### What should you have done?

You should not have speculated or altered records without substantiation, even if you believed it was more reflective of the business position. Accuracy and transparency are critical, so the expense should have been included in the current report to maintain accurate and complete records.



5/

# WE'RE FUTURE FOCUSED

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*We plan for tomorrow by taking  
sustainable action today.*



5. WE'RE FUTURE FOCUSED

# 5.1 Sustainability

## THE WHAT

Our company purpose is “to open up the world for those who want to see”. As one of the world’s largest travel retailers and corporate travel managers, we recognise our responsibility to help preserve the places we love while enriching our people, destinations and communities.

## THE WHY

The world is changing, and our industry is changing with it. This means focusing on reducing the environmental impacts of travel while continuing to deliver unique travel experiences for generations to come. We leverage our people and partnerships to facilitate informed choices, helping customers reduce their impact and working towards actions that benefit the people and places we work with.

We work with our suppliers and industry partners to set relevant targets and influence a more responsible travel industry.

## OUR EXPECTATIONS

YOU SHOULD:

- Consider sustainability in all business decisions.
- Familiarise yourself with FCTG's sustainability strategy and journey to net zero.

- Familiarise yourself with the sustainability preferences and objectives of our customers, where appropriate.
- Utilise available resources to reduce your own carbon footprint, such as recycling programs on our premises, or when commuting to work.
- Take advantage of volunteer leave to give back to your local communities.
- Follow our responsible traveller tips when travelling.
- Implement sustainable tourism practices that minimise negative impacts on the environment and local resources.
- Seek guidance from the sustainability team if you are uncertain about any situation.

YOU SHOULD NOT:

- Ignore environmental policy in place.
- Overlook sustainability strategy when making decisions.
- Ignore local laws and regulations, instead ensure compliance with legal requirements in all community interactions.
- Overlook community needs, instead prioritise the needs and well-being of the community over profit or convenience.
- "Greenwash" – when speaking about FCTG's sustainability initiatives, be open and transparent.

### EXAMPLE SCENARIO 1

*A customer specifically requests a sustainable travel option for their upcoming trip. Instead of offering the requested option, you book them on a package with a preferred supplier which is more commercially advantageous for FCTG. You falsely assure the customer that it meets their sustainability preferences.*

Why is this not ok?

Misleading customers about sustainability violates their trust and undermines FCTG’s commitment to transparency and environmental responsibility. This behaviour compromises the integrity of our sustainability strategy, damages our reputation, and erodes customer confidence. It could also constitute misleading conduct and have serious legal and regulatory impacts.

What should you have done?

You should have informed the customer of all truly sustainable options that matched their request. If you were uncertain, you should have requested guidance from the Sustainability team. Prioritising the customer’s values and offering accurate information aligns with our commitment to fostering trust and reducing environmental impacts.

### EXAMPLE SCENARIO 2

*While discussing FCTG’s sustainability initiatives with a corporate client, you exaggerate the environmental benefits of our travel offerings, suggesting that all travel products meet rigorous sustainability standards, even though this is not the case.*

Why is this not ok?

Greenwashing misleads stakeholders and damages our credibility. It creates false expectations, diminishes trust, and undermines genuine efforts to achieve sustainability goals. Such actions may also expose FCTG to reputational and legal risks.

What should you have done?

You should have provided an honest account of FCTG’s sustainability practices, highlighting genuine achievements and ongoing efforts and directing the customer to the sustainability reports available on our investor website. Transparency and accuracy are critical in maintaining trust and credibility. If unsure, you should have reviewed the reports or consulted the Sustainability team to ensure your statements would be reflective of our commitments.



+ QUICK LINKS +

[FCTG Environmental Sustainability Policy](#)

[Sustainability Report](#)



5. WE'RE FUTURE FOCUSED

# 5.2 Modern Slavery

## THE WHAT

FCTG is committed to not knowingly conducting business with anyone engaged in modern slavery or human trafficking, or knowingly permitting such conduct to be carried out within our supply chains.

## THE WHY

FCTG is committed to identifying and remediating modern slavery risks in our supply chains and operations. We will continue to review, develop and promote our policies and practices to identify and mitigate risk areas for modern slavery and human rights abuse in our business and supply chains as part of our ongoing commitment to continuous improvement.



+ QUICK LINKS +

[Modern Slavery Policy](#)

[Modern Slavery Statement](#)

## OUR EXPECTATIONS

### YOU MUST:

- Complete the Modern Slavery training provided.
- Follow our procurement policies, including undertaking appropriate due diligence.
- Familiarise yourself with where modern slavery risks may present within your operations and how to mitigate them.
- Notify your leader, Enterprise Risk, Sustainability, or our confidential Whistleblower service of any modern slavery concerns.

### YOU MUST NOT:

- Engage with suppliers where known instances of modern slavery have occurred.
- Ignore your instincts – if you feel something is not right, please report it. No country has completely eradicated the problem, and even countries more advanced in mitigating modern slavery are at risk of consuming products manufactured via slave labour.

## EXAMPLE SCENARIO

*A customer returns from a trip and mentions in an offhand comment to you that they thought the treatment of staff in a hotel we had booked didn't seem quite right. You think it's a shame but don't take the information any further.*

### Why is this not ok?

As a company, we are committed to ethical business and will not knowingly conduct business with anyone who mistreats their staff.

### What should you have done?

You should always notify a leader, Enterprise Risk, Sustainability, or our confidential Whistleblower service of any modern slavery concerns, even where the information is limited.





# FLIGHT CENTRE

6/

## WE'RE FIERCE

*We compete fairly and ethically,  
never compromising our integrity.*

FLIGHT CENTRE	
DOMESTIC FLIGHTS	ONE WAY FROM
ADELAIDE	\$ 53
BRISBANE	\$ 85
CAIRNS	\$106
CANBERRA	\$ 80
DARWIN	\$193
GOLD COAST	\$ 75
HAMILTON ISLAND	\$205
HOBART	\$ 41
NEWCASTLE	\$ 86

Prices are from Melbourne and subject to availability.

**0% HOLIDAYS INTEREST FREE**

**BOOK NOW PAY LATER**

\*Conditions, fees and charges apply.



6. WE'RE FIERCE

# 6.1 Competition and Consumer Laws

## THE WHAT

We are fierce competitors and take pride in our growth story as well as the size and scale of our businesses and supply relationships. It is truly part of our DNA. However, it is important that we always compete fairly and in line with the relevant competition and antitrust laws in the countries we operate. These laws have been designed to ensure competitive and fair markets for our customers and to protect their best interests.

## THE WHY?

If we fail to compete fairly and breach these laws, it could cause negative impacts to our business, our people and our reputation. This would jeopardise the competitive advantage we have worked so hard to achieve. Plus, isn't victory so much sweeter when competing on a level playing field?

## OUR EXPECTATIONS

### YOU MUST:

- Understand the competition, consumer and antitrust laws that apply to your role, business and country of operation.
- Complete any online training modules.
- Maintain appropriate independence in dealings with suppliers, third parties and/or competitors.
- Consider the appropriateness of interactions in both business and personal settings with competitors and the potential implications of doing so.
- Seek guidance from Enterprise Risk and/or Legal Services if you are uncertain about any situation.

### YOU MUST NOT:

- Discuss pricing, marketing and sales strategies or approaches with competitors.
- Engage in any arrangement, understanding, or communication with competitors – whether formal or informal – that involves coordinating, fixing, lowering, increasing, or otherwise influencing the pricing or pricing strategies of products or services.

### EXAMPLE SCENARIO

*You notice a drop in airfare sales as customers increasingly book directly through airline websites, as pricing is lower than yours. You want to be proactive and meet with airline partners to propose that they refrain from offering airfares at these lower prices. Some airlines are concerned that you will reduce efforts to sell their product and adjust pricing strategies as requested.*

### *Why is this not ok?*

This behaviour violates competition laws by engaging in price-fixing and restricting consumer choice.

### *What should you have done?*

We always aim to win our business fairly and squarely. We engage in fair and transparent negotiations, avoiding any attempts to influence pricing strategies in ways that restrict market competition.



6. WE'RE FIERCE

# 6.2 Conflicts of Interest

EXAMPLE SCENARIO

*You are responsible for selecting a new supplier for a large contract. During the review process, your spouse tells you that their company is one of the contenders. You believe their company provides excellent services and include them in the final recommendation without disclosing the connection to your leader.*

Why is this not ok?

By failing to disclose your spouse's connection to the potential supplier, you've created a potential conflict of interest. Even if their company is the best option, your involvement could be viewed as biased or unethical, which could damage FCTG's reputation and trust in the procurement process. Transparency is critical to ensure decisions are made objectively and in the best interests of our company.

What should you have done?

You should have immediately disclosed the potential conflict to your leader and removed yourself from the decision-making process. Allowing an independent team to evaluate and select the supplier ensures transparency and fairness. Always prioritise FCTG's interests and maintain your professional integrity by proactively managing conflicts of interest.

## THE WHAT

Our people are entrepreneurial, resourceful, well connected and extremely successful. These qualities are positive as long as they do not lead to conflicts with FCTG's interests. Conflicts of interests occur when your interests or activities affect, or have the appearance of affecting, your ability to maintain objectivity in ensuring decisions are always in the best interests of FCTG.

CONFLICTS CAN ARISE IN MANY WAYS, WHETHER THEY BE REAL OR PERCEIVED. SOME EXAMPLES COULD INCLUDE:

- Holding outside jobs or affiliations including acting as a Director for other organisations.
- Pursuing or accepting business opportunities for personal gain that would typically belong to FCTG.
- Owning or investing into a company that competes, does business or wants to do business with FCTG.
- Receiving anything of value from third parties and/or suppliers doing business or proposing to do business with FCTG.
- Holding a close personal relationship with someone within your reporting line, including friends/family or a close romantic or intimate partner.

## THE WHY

Managing conflicts ensures that FCTG's interests are preserved and maintained. Through this, we can ensure that our reputation is not undermined, and that our ethical and responsible approach to business delivers best outcomes for our company.



## OUR EXPECTATIONS

YOU MUST:

- Disclose any conflict that you suspect or know of, whether it be real or perceived, to your CFO or local risk team and record it on the conflicts of interest register.
- Remove yourself from the decision-making process of any situation where your objectivity and impartiality are compromised or could be perceived as such.
- Always act in the best interest of FCTG and maintain your professional integrity.
- Be aware of situations where conflicts can exist or appear to exist and ensure that you do not put yourself in a compromising position.

YOU MUST NOT:

- Appoint or award any business to parties which would enable personal gain.
- Abuse FCTG resources by using them to influence or assist external parties.
- Hire a family member or someone with whom you have a close personal relationship without formal review and approval.



6. WE'RE FIERCE

# 6.3 Inside Information and Insider Trading

## THE WHAT

Inside information is information about our company, or any other company, that is not generally available; and if it were generally available, a reasonable person would expect it to have a material effect on the price of FCTG securities or securities of another entity. This includes information you might learn through your work, such as FCTG's financial performance, a possible acquisition or sale of assets, senior executive changes, a proposed dividend and so on. We never trade based on this information or share it with others who might.

## THE WHY

Insider trading isn't just unfair- it's illegal. It undermines the integrity of financial markets and can harm the reputation of FCTG, as well as the companies we work with. By keeping inside information confidential and using it responsibly, we maintain trust with our stakeholders and ensure a level playing field for everyone.

## OUR EXPECTATIONS

### YOU MUST:

- Comply with FCTG's Share Trading Policy.
- Always protect inside information, whether it concerns FCTG or any other company. If it's not public or generally available, it's not to be shared.
- Be cautious- if you're unsure whether information is considered inside information, err on the side of caution and seek advice.
- Report concerns immediately if you suspect insider trading or improper handling of price sensitive and/or confidential information.
- Abide by the fact that Restricted Persons (this includes employees, amongst others, and is defined fully in the Share Trading Policy) are only permitted to deal in Flight Centre Securities during the share trading windows.

### YOU MUST NOT:

- Buy or sell securities based on inside information or tip others off to do so.
- Discuss inside information with anyone, unless it's absolutely necessary and they are authorised to know. This includes family and friends.
- Ignore your instincts- if something feels wrong, it probably is. Take action by reporting your concerns.

### EXAMPLE SCENARIO

*You are at a company function, chatting to a senior leader. She is privy to confidential information about a major upcoming acquisition, which is expected to significantly boost FCTG's revenue and share price. The next morning, you mention it to your brother who frequently trades shares. He buys a substantial number of FCTG shares. A week later, FCTG officially announces the acquisition and the share price jumps.*

### Why is this not ok?

You have breached insider trading laws by sharing non-public, material information. Both parties face serious legal consequences. FCTG also suffers reputational damage and is at risk of penalties from regulatory authorities.

### What should you have done?

You should always keep confidential company information to yourself, which means not discussing it with anyone, including family and friends. If unsure about what is considered inside information, Legal Services is available for advice.



+ QUICK LINK +

[Share Trading Policy](#)



6. WE'RE FIERCE

# 6.4 Continuous Disclosure

EXAMPLE SCENARIO

## THE WHAT

FCTG is committed to complying with its continuous disclosure obligations by ensuring that shareholders and the market are provided with full and timely information about the company. We are committed to promptly sharing any material information (through approved and authorised channels) that could influence investor decisions or affect the market's perception of FCTG. Our disclosures are timely, accurate, and balanced, ensuring the market has access to all significant updates about our business. This promotes good corporate governance, emphasising the need for clear and balanced communication.

## THE WHY

Timely and balanced disclosure is more than a legal and regulatory requirement – it's fundamental to maintaining trust with our investors, customers, and the broader public. By keeping the market informed with accurate and complete information, we foster an environment of transparency, accountability, and fairness, ensuring that all stakeholders are on equal footing.

## OUR EXPECTATIONS

### YOU MUST:

- Ensure price sensitive information and/or material information is disclosed through approved and authorised channels as soon as possible.
- Provide balanced information, including both positive and negative aspects, to ensure transparency.
- Follow FCTG's disclosure policies and procedures to comply with legal and governance standards.

### YOU MUST NOT:

- Delay the approved and authorised disclosure of price sensitive information and/or material information that may impact the market's view of our company.
- Share price sensitive information and/or material information informally, through unauthorised channels, or in a way that could lead to misinformation.
- Overlook small but potentially significant details- accuracy and completeness are essential.
- Withhold unfavourable information or misrepresent material facts, as this could breach our legal obligations and breaches our commitment to balanced disclosure.



+ QUICK LINK +

[Communications & Continuous Disclosure Policy](#)

*FCTG experiences a cyber incident that results in unauthorised access to sensitive customer data. You become aware of the breach but delay reporting it to senior leadership or Legal Services because you believe the issue can be resolved internally. Meanwhile, customers and investors remain unaware of the potential risk.*

### Why is this not ok?

Delaying the disclosure of a material cyber incident breaches the principle of timely and balanced disclosure. It deprives stakeholders of critical information they need to make informed decisions and exposes us to reputational damage, legal consequences, and a loss of trust.

### What should you have done?

You should have immediately reported the incident to senior leadership and Legal Services to assess its materiality and determine the appropriate communication strategy. Following FCTG's disclosure procedures ensures that the market and stakeholders are informed in a timely, accurate, and balanced manner, protecting our reputation and upholding governance standards.



7/

# WE'RE FORTUNATE

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*We value our partnerships, working  
together to achieve mutual success.*



## 7. WE'RE FORTUNATE

# 7.1 Supplier Relations

### THE WHAT

We value long-lasting, strong and ethical relationships with all suppliers. We seek out partners who align with our principles of fair treatment, transparency, and mutual respect. Working with suppliers who share our values ensures long-term, sustainable and rewarding relationships. It's important to us that they uphold the same values as we do.

### THE WHY

Maintaining ethical and collaborative relationships with our suppliers allows us to deliver high-quality services to our customers and as such enhance our reputation and credibility in the market. Strong partnerships contribute to the long-term sustainability of our business and make adherence to our high ethical standards an easy task.

### OUR EXPECTATIONS

#### YOU MUST:

- Treat all suppliers with fairness and respect, fostering a positive and collaborative working relationship.
- Maintain open, honest, and transparent communication with suppliers regarding expectations, agreements, and changes.
- Verify that suppliers adhere to all relevant legal and regulatory standards, including labour laws and environmental regulations.
- Encourage suppliers to adopt sustainable practices and consider the environmental impact of their operations.
- Regularly assess supplier performance to ensure they meet our quality and ethical standards.
- Familiarise yourself with the FCTG Supplier Code of Conduct and ensure suppliers are aware of our Code.

#### YOU MUST NOT:

- Ignore unethical behaviour or violations of legal and regulatory standards by suppliers.
- Engage in or tolerate any form of bribery, corruption, or unethical conduct in supplier relationships.
- Neglect the importance of supplier compliance with all relevant laws and regulations.
- Accept substandard products or services from suppliers that could negatively impact our customers or business.

#### EXAMPLE SCENARIO

*A new supplier offers to lower their prices significantly if you bypass the standard procurement process and give them an exclusive contract. The offer seems attractive because it could save costs and speed up your project.*

#### *Why is this not ok?*

Accepting this deal undermines the fair treatment, transparency, and mutual respect that we value in supplier relationships. It compromises our procurement integrity and risks damaging long-term partnerships.

#### *What should you have done?*

You should decline such an offer, stressing the importance of following our procurement process and encouraging the supplier to participate in the formal bidding process which ensures fairness and transparency for all. We always prioritise ethical, long-term relationships over short-term gains.

• Supplier Code of Conduct



+ QUICK LINK +

[Supplier Code of Conduct](#)



7. WE'RE FORTUNATE

# 7.2 Public Statements – Mainstream Media

EXAMPLE SCENARIO

*You are checking your Facebook feed during your lunch break and notice a news article about FCTG. The article makes some wildly inaccurate claims about a recent FCTG press release. You post a comment below the article to set the record straight. You also respond to a couple of other comments, defending FCTG.*

*Why is this not ok?*

Engaging directly with the media or the public on behalf of FCTG without authorisation can lead to unintended consequences. Your comments, even if well-intentioned, might escalate the situation, spread misinformation, or contradict the official company stance. You can also expose FCTG to reputational risks and legal liabilities.

*What should you have done?*

Always refrain from responding to any media claims, instead report inaccurate information to our local PR team/representative or the appropriate parties as outlined in the Communications and Continuous Disclosure Policy. By letting the appropriate party handle the situation through official channels, we ensure that any public statements align with FCTG's strategy and messaging.

## THE WHAT

When it comes to public statements, any communication, whether it's a press release, interview, social media post, or public statement on behalf of FCTG, carries weight. Only appropriate parties may speak on behalf of FCTG. This is normal protocol for any company and ensures that what is shared is appropriate from a governance perspective, reflects FCTG's values and upholds the standards we strive for. If you are contacted by a journalist for comment, the local PR team or representative should be contacted for further advice. If necessary, the issue should be escalated as outlined in the Communications and Continuous Disclosure policy.

## THE WHY

Managing public statements and media relations is key to protecting the integrity and reputation of FCTG. By ensuring all communication is delivered by the appropriate party, we maintain consistency and accuracy and build trust with our customers, stakeholders, and the public, all whilst meeting legal and regulatory requirements. This allows us to ensure that every message shared is appropriate.

## OUR EXPECTATIONS

YOU MUST:

- Seek further advice and approval before participating in a media interview.

YOU MUST NOT:

- Express personal opinions or views that could be perceived as representing FCTG.
- Make public statements or engage with the media without proper authorisation from your local PR team/representative, or the appropriate party as outlined in the Communications and Continuous Disclosure Policy.
- Engage in arguments or contentious discussions with the media or on public forums.
- Disregard the established protocols and guidelines for media relations and public statements.



+ QUICK LINK +

[Communications & Continuous Disclosure Policy](#)





8/

# WE FACE THE FACTS

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*We act with courage and accountability  
to address issues openly and honestly.*



8. WE FACE THE FACTS

# 8.1 Reporting of Concerns and Breaches

We encourage our people to speak up and report any instances that do not meet the expectations outlined in this Code and/or the law. Typically, your instincts will be correct- if it doesn't feel right then speak up and use the channels available to report your concerns. Remember, the standards you walk past, are the standards you accept. We want to make FCTG the best working environment for all our people. All formal complaints will be investigated promptly, thoroughly, and impartially, ensuring a fair and confidential process for all involved.

We will not accept any form of retaliation against those who report possible violations of this Code, company policy and/or the law within our business. Employees who make reports in good faith will be protected from retaliatory action. Any act of retaliation will result in disciplinary measures, up to and including termination of employment.

If you suspect any breaches of this Code, you are encouraged to report them through any of the following channels:

- If comfortable, raise your concerns with your direct leader, Area Leader, local Risk or Legal Services team, People & Culture representative; or
- Our confidential Whistleblower Service operated by NAVEX Global (<http://fctg.ethicspoint.com>) – this service is operated by an independent third party and is a free service. You can report via web portal or phone from any device. Reports can be made anonymously and/or confidentially, securely, and outside of business hours; or
- Group Chief Security Officer: Daniella Pittis ([daniella.pittis@flightcentre.com.au](mailto:daniella.pittis@flightcentre.com.au)).

**+ REPORT A BREACH +**  
**<http://fctg.ethicspoint.com>**

**BREACHES OF THIS CODE ARE  
TAKEN SERIOUSLY. WE EXPECT THE  
FOLLOWING OF OUR PEOPLE:**

- As an employee you need to always demonstrate behaviours in line with this Code and/or the law whilst representing FCTG, including outside of business hours and outside the workplace.
- Always assist and be open and honest when participating in investigations or internal or external audits whilst maintaining strictest confidentiality.
- Never ask or direct anyone to undertake behaviour that would breach this Code and/or any laws.

Anyone found breaching this Code can face serious consequences up to and including termination of employment. A material breach of FCTG policy, applicable laws, business ethics, or other aspects of this Code will also be reported to the Board or a Committee. In some cases, a breach of this Code may also constitute a breach of law and amount to civil penalties and/or criminal prosecution.

By living our values and following our Code, we can achieve success in a way we're truly proud of – by delivering the best possible outcomes for our customers, our people and our trusted stakeholders. Together, we will continue to do what we're most passionate about – *to open up the world for those who want to see.*



**+ QUICK LINK +**

[Whistleblowing Policy](#)

*The standards you walk past,  
are the standards you accept.*



# Resource Hub

*We encourage our people to seek further information on the topics covered within this Code of Conduct. Please use this table to locate the best contact for your query.*

MY QUERY RELATES TO....	WHO TO CONTACT
A BREACH OF THE CODE	Your direct leader, Area Leader, local Risk or Legal Services team, People & Culture representative or FCTG’s confidential Whistleblower service at <a href="http://fctg.ethicspoint.com">http://fctg.ethicspoint.com</a>
GENERAL QUERIES RELATING TO THE CODE	Your local People & Culture representative
PEOPLE OR CULTURE	Your local People & Culture representative
ENTERPRISE RISK	Enterprise Risk Team at <a href="mailto:enterpriserisk@flightcentre.com">enterpriserisk@flightcentre.com</a>
LEGAL	Group General Counsel
PRIVACY	Privacy Team
INFORMATION SECURITY	Information Security Team
SUSTAINABILITY	Sustainability Team
MEDIA RELATIONS	Your local PR team
FINANCIAL CRIME RISK	Financial Crime Risk Team at <a href="mailto:fcr@flightcentre.com">fcr@flightcentre.com</a>
CORPORATE GOVERNANCE	Company Secretarial
SUPPLY	Supply Team



# Policy Listing

*The below listing details the FCTG Group policies that have been referred to throughout this document. Local extensions of these policies may exist and should be reviewed in conjunction with the information in this document, and the relevant Group policy.*

REFERENCE	SECTION TITLE	GROUP POLICY
2	WE'RE FAMILY	
2.1	Leading the Way	<ul style="list-style-type: none"><li>• Refer to your leader for further information on this topic</li></ul>
2.2	Diversity, Equity and Inclusion ("DEI")	<ul style="list-style-type: none"><li>• <a href="#">Diversity Policy</a></li></ul>
2.3	Harassment - Sexual Harassment/ Bullying/Discrimination	<ul style="list-style-type: none"><li>• Refer to local policy on this topic</li></ul>
2.4	Workplace Health and Safety	<ul style="list-style-type: none"><li>• Refer to local policy on this topic</li></ul>
2.5	Mental Health	<ul style="list-style-type: none"><li>• Refer to local policy on this topic</li></ul>
2.6	Workers' Rights	<ul style="list-style-type: none"><li>• <a href="#">Human Rights Policy</a></li></ul>
3	WE'RE FAIR	
3.1	Economic and Trade Sanctions	<ul style="list-style-type: none"><li>• <a href="#">Sanctions Policy</a></li></ul>
3.2	Anti-Bribery & Corruption and Fraud	<ul style="list-style-type: none"><li>• <a href="#">Anti-Bribery &amp; Corruption Policy</a></li><li>• <a href="#">Anti-Fraud Policy</a></li><li>• <a href="#">Delegation of Authority Policy</a></li></ul>
3.3	Anti-Money Laundering and Countering Terrorism Financing	<ul style="list-style-type: none"><li>• Refer to AML/CTF Programs for regulated entities or refer to your leader for further information on this topic</li></ul>



# Policy Listing

REFERENCE	SECTION TITLE	GROUP POLICY
4	WE'RE FAST	
4.1	Use of Technology and Services	<ul style="list-style-type: none"><li>• <a href="#">Acceptable Use Policy</a></li><li>• <a href="#">Information Security Policy</a></li></ul>
4.2	Data Privacy/Security, Confidentiality, and Intellectual Property	<ul style="list-style-type: none"><li>• <a href="#">Acceptable Use Policy</a></li><li>• <a href="#">Data Classification and Handling Policy</a></li><li>• <a href="#">Data Protection Policy</a></li><li>• <a href="#">Data Retention and Disposal Policy</a></li><li>• <a href="#">Information Security Policy</a></li><li>• <a href="#">External Global Privacy Notice</a></li></ul>
4.3	AI and Machine Learning	<ul style="list-style-type: none"><li>• <a href="#">AI Enablement Framework</a></li><li>• <a href="#">AI Use Policy</a></li><li>• <a href="#">Data Classification and Handling Policy</a></li><li>• <a href="#">Data Protection Policy</a></li></ul>
4.4	Record Keeping and Information Integrity	<ul style="list-style-type: none"><li>• <a href="#">Anti-Fraud Policy</a></li><li>• <a href="#">Data Classification and Handling Policy</a></li><li>• <a href="#">Data Protection Policy</a></li><li>• <a href="#">Data Retention and Disposal Policy</a></li><li>• <a href="#">Information Security Policy</a></li><li>• <a href="#">Internal Global Privacy Notice</a></li><li>• <a href="#">External Global Privacy Notice</a></li></ul>

REFERENCE	SECTION TITLE	GROUP POLICY
5	WE'RE FUTURE FOCUSED	
5.1	Sustainability	<ul style="list-style-type: none"><li>• <a href="#">FCTG Environmental Sustainability Policy</a></li><li>• <a href="#">Sustainability Report (accessed via fctgl.com)</a></li></ul>
5.2	Modern Slavery	<ul style="list-style-type: none"><li>• <a href="#">Modern Slavery Policy</a></li><li>• <a href="#">Modern Slavery Statement (accessed via fctgl.com)</a></li></ul>
6	WE'RE FIERCE	
6.1	Competition and Consumer Laws	<ul style="list-style-type: none"><li>• Refer to local policy and/or training modules</li></ul>
6.2	Conflicts of Interest	<ul style="list-style-type: none"><li>• <a href="#">Anti-Bribery &amp; Corruption Policy</a></li><li>• <a href="#">Anti-Fraud Policy</a></li><li>• <a href="#">Delegation of Authority Policy</a></li></ul>
6.3	Insider Information and Trading	<ul style="list-style-type: none"><li>• <a href="#">Share Trading Policy</a></li></ul>
6.4	Continuous Disclosure	<ul style="list-style-type: none"><li>• <a href="#">Communications &amp; Continuous Disclosure Policy</a></li></ul>
7	WE'RE FORTUNATE	
7.1	Supplier Relations	<ul style="list-style-type: none"><li>• <a href="#">Supplier Code of Conduct</a></li></ul>
7.2	Public Statements – Mainstream Media	<ul style="list-style-type: none"><li>• <a href="#">Communications &amp; Continuous Disclosure Policy</a></li></ul>
8	WE FACE THE FACTS	
8.1	Reporting of Concerns and Breaches	<ul style="list-style-type: none"><li>• <a href="#">Whistleblowing Policy</a></li></ul>





**WE ARE FLIGHTIES.  
WE ARE FLIGHT CENTRE TRAVEL GROUP.**

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**FLIGHT  
CENTRE**  
TRAVEL GROUP™