FLIGHT CENTRE TRAVEL GROUP™

SUPPLIER CODE OF CONDUCT

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OUR PHILOSOPHIES

For FCTG to survive, grow, and prosper, for generations, we must live by our Company Purpose, Vision and our Philosophies. Our culture must be celebrated and protected, while being robust and independent, with the ability to outlive our current and future leaders.

Our Values

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.

Our Customers

Our customers always have a choice, and we care about personally delivering amazing travel experiences to them, whatever it takes.

Brightness of future

Our supportive work community provides an inspiring and challenging career path for committed people. Promotion and transfers from within will always be our first choice and will give people the exciting opportunity to move globally across our company.

Taking responsibility

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

Egalitarianism & Unity

We believe that every individual is equally important and has access to the same opportunities and rights. We work as a community with accessible leaders and we embrace diverse cultures, backgrounds and perspectives. We have an irreverent culture of taking our business seriously but not ourselves.

Our Vision: To become the world's most exciting and profitable travel retailer, personally delivering amazing experiences to our people, our customers and our partners.

Our Purpose: To open up the world for those who want to see.

Our Business Model

Ownership

We treat the business as our own and have the opportunity to share in our company's financial success with access to shares programs, outcome based incentives and profit share.

Reward & Recognition

We recognise and celebrate our individual and collective successes with recognition and rewards which are based on measurable outcome based quantitative KPI's. What gets rewarded gets done is our basic principle and we reward outcomes not behaviour.

One best way

In each of our businesses there is 'one best way' to operate globally. We value common sense over conventional wisdom in running our business. We foster entrepreneurial thinking to continuously find better ways to innovate and improve.

Family, village, tribe

Our structure is simple, lean, flat and transparent, with accessible leaders and minimal layers between the customer and the CEO. Everyone belongs to a family (team), which is the most important group at FCTG, who are supported by a 'self-help' village and a tribe.

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 really are providing our customers with an amazing experience, amazing product and a caring and respectful service - an experience customers genuinely value.

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1. DEFINITIONS

Bribe or Bribery: the giving, offering, promising, requesting, agreeing to receive or, receipt or acceptance of any advantage, which need not be financial, including any payment, gift, loan, fee, or reward, to or from any person to influence them to act corruptly or improperly in the exercise of their duty.

Code: means this Supplier Code of Conduct issued by Flight Centre Travel Group Limited ACN 003 377 188.

Corruption: the misuse or abuse of public or private office or power for personal gain.

FCTG: all references to FCTG in this Code comprises of, either individually or collectively: (a) Flight Centre Travel Group Limited ACN 003 377 188; and (b) any subsidiary, related body corporate, franchisee, licensee, associated entity, sub-agent or joint venture interest which is directly or indirectly, wholly or majority owned, managed or otherwise controlled by Flight Centre Travel Group Limited in all countries in which we operate.

Supplier: comprises of all third parties supplying goods or services to FCTG, including their respective employees, agents and contractors, regardless of their location, country, industry or business.

2. INTRODUCTION, PURPOSE AND APPLICATION

As a world-class travel retailer and values-led company, FCTG is committed to reflecting our core values in everything we do. We seek to maintain the highest standards of business conduct, ethical integrity and compliance with all relevant laws and regulations. When you partner with us as a supplier, you become an extension of our business and we expect you to respect and uphold these values.

FCTG's Supplier Code of Conduct (the '**Code'**) sets out the principles, standards, and practices that FCTG requires of you when doing business with us. It formalises the important commitments that we expect from you as our Supplier and partner in relation to topics such as anti-bribery and corruption, sanctions and trade regulations, industry regulatory bodies, insider trading, privacy and security, human rights and labour standards, health and safety, sustainability, competition and anti-trust laws, and modern slavery. The Code is applicable to all Suppliers engaged by FCTG (regardless of the Supplier's location, industry or business) and is in addition to your legal and contractual obligations to comply with applicable local laws, rules and regulations. Our expectation is that Suppliers apply the same level of integrity, ethics and compliance standards as FCTG and its employees. Following this Code ensures you are aware of and can meet these expectations.

If a situation arises during our business relationship that might impact your ability to adhere to the Code or if you have violated the Code, please contact our Global Procurement Team at dl.globalprocurement@flightcentre.com.

Failure to comply with this Code may result in termination of your supplier relationship with FCTG.

2.1 Anti-Bribery and Corruption Laws

FCTG has zero tolerance for any and all forms of bribery, money laundering, corruption or unethical business practices and is committed to conducting its business with honesty and integrity. FCTG

strictly prohibits bribery, corruption, kickbacks, facilitation payments, fraud, embezzlement, extortion and theft of any kind.

Suppliers must comply with all applicable anti-bribery and corruption laws and maintain accurate books and records. Suppliers must never directly or indirectly through another party authorise, offer, give or promise, request from, or agree to accept, cash or anything of value for the purpose of: (a) influencing another party in the performance of their duties; (b) persuading another party to perform their duties improperly; or (c) gaining an improper advantage related to FCTG.

Suppliers must use discretion and care to ensure that any hospitality, promotions, entertainment, or gifts are for a genuine purpose, reasonable and given in the ordinary course of business. Gifts and/or hospitality can never be given or received where there is an intention to influence, induce or reward improper performance, regardless of value. In no circumstances shall Suppliers offer to or accept from FCTG employees cash or cash equivalents. Any hospitality, gifts, entertainment or promotions provided must relate appropriately to the maintaining of good business relationships and must never be offered, received or promised during bidding, tender, contract negotiation or award.

For example, if you are a Supplier providing travel services to us, you must ensure that your representatives do not provide any benefits, whether financial or otherwise, directly or indirectly to our consultants without our agreement. Nor should you attempt to induce our consultants to promote or sell any product other than what is specified in the agreement between you and us.

You are expected to have and comply with your own policies and procedures designed to mitigate and manage bribery and corruption risk. Where you do not have a policy managing bribery and corruption risks, or if such policies are inadequate, we expect that you comply with FCTG's own Anti-Bribery & Corruption Policy, available here: https://www.fctgl.com/investors.

2.2 Sanctions and Trade Regulations

As a global travel company registered in Australia, FCTG is subject to applicable global, financial, economic trade sanctions, and export control laws and regulations that restrict doing our day-to-day business with certain designated groups, individuals, governments, businesses or countries.

Suppliers must comply with applicable sanctions regulations imposed by governments of Australia, the United States of America, the United Kingdom, the United Nations, the European Union, and any other relevant jurisdiction.

Prohibited activities may include:

- arranging travel to or from countries considered high risk or restricted by FCTG;
- allowing people or groups subject to sanctions or travel bans to book or purchase tickets;
- processing transactions to or from sanctioned parties, including indirect transactions;
- making payments to or receiving payments from sanctioned individuals, entities or countries considered high risk or restricted by FCTG.

Strictly complying with international sanctions and trade regulations is critical to preserving FCTG's ability to conduct business and protecting our reputation. For that reason, we are unable to work with Suppliers (and the relevant Supplier's suppliers, employees, or related parties) who appear on any Government or United Nations Security Council Sanctions lists.

If you are aware or become aware that you, your shareholders, directors, suppliers, employees, or related parties appear on any sanctions list, or are otherwise connected directly or indirectly to any

sanctioned person or entity, please bring this to our attention immediately at sanctions@flightcentre.com.

2.3 Industry Regulatory Bodies

Most jurisdictions and industries have regulatory bodies that govern acceptable business practices and set out industry standards and requirements. Suppliers are responsible for understanding regulatory requirements applicable to them and must conduct their business in compliance with them. Suppliers will cooperate with any regulatory audit or inspection of their premises and business practices as required. Suppliers must notify FCTG in the event of a complaint or consumer claim from a regulatory body relating to business conducted with FCTG.

2.4 Conflict of Interest

Suppliers shall seek to report any actual or potential conflicts of interest that arise at any stage during their engagement with FCTG, whether it be at selection during a tender process or whilst the business relationship is continuing. Any conflict should be disclosed in full transparency and notified to the relevant FCTG representative.

2.5 Insider Trading

FCTG is a publicly traded company on the Australian Securities Exchange (ASX) with a variety of legal and regulatory obligations to its shareholders and government regulators. As a Supplier, you may be entrusted with information that has not yet been (or may never be) disclosed to the public. Our ethical standards (and the law) strictly forbid you from acting on such trading information. Specifically, the law prohibits people in possession of non-public price-sensitive information from dealing in securities or passing on information to others who may deal in securities. This applies not only to you and your employees directly, but to family, friends, or others who might be in a position to make investment decisions based on the information. If you have access to such information, you're expected to keep it confidential, and to handle it with the utmost care and discretion.

2.6 Privacy and Security

The security and privacy of FCTG data, including customer and employee personal information is paramount, and Suppliers must take all reasonable care when collecting, storing, processing, and transmitting confidential FCTG business data and/or personal information of FCTG personnel, customers, employees, directors or officers ("**FCTG Data**"). This includes ensuring FCTG Data is protected using technical and organisational measures to ensure a level of security appropriate to the sensitivity of the FCTG Data and the impact and likelihood of risk events. A Supplier's security controls should be designed to ensure the ongoing confidentiality, integrity, availability and resilience of the processing systems and services which store and/or process FCTG Data.

FCTG may also conduct due diligence on a Supplier at any time, whether it be during on-boarding, or throughout the duration of our commercial relationship. Upon request, Suppliers must complete our Third Party Security Questionnaire and/or Vendor Questionnaire before providing goods and/or services to FCTG, to assist us in determining if the Supplier's current security and privacy practices are appropriate and compliant with our standards. If services are to be provided on an ongoing basis, Suppliers may also be required to undertake reassessments at a regular cadence to assist FCTG in meeting its ongoing due diligence obligations.

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Suppliers should report any actual or suspected information security incident or privacy breach of FCTG Data to FCTG immediately by emailing privacy@flightcentre.com.au.

2.7 Human Rights, Employment Practices and Social Responsibility

Suppliers must respect human rights understood as the principles expressed in the International Bill of Human Rights. This means that Suppliers should not only respect their employees' and subcontractors' fundamental human rights at work, but they should also uphold their human rights duties in all business activities with FCTG including:

- providing safe, equitable and fair working conditions for employees;
- ensuring fair working hours as prescribed by law;
- ensuring fair pay;
- prohibiting child labour and forced labour;
- complying with local labour laws;
- prohibiting any harassment, abuse or inhumane treatment;
- prohibiting discrimination of employees in the screening, hiring or employment phase based on race, colour, age, sex, gender, sexual orientation, marital status, religion, political affiliation or union membership;
- promoting a diverse and inclusive workplace to support different groups of individuals, including people of different race, colour, age, sex, gender, sexual orientation, marital status or religion; and
- promoting freedom of association and collective bargaining.

2.8 Modern Slavery

FCTG strongly believes that all forms of modern slavery are a violation of fundamental human rights and we will not tolerate this in our business or within our supply chains. Accordingly, we are committed to identifying and preventing all forms of modern slavery within our domain and we advocate for responsible and sustainable travel and tourism. Our contracts with Suppliers must include an anti-slavery and anti-human trafficking provision to reflect our zero-tolerance for inaction in relation to modern slavery.

FCTG expects that Suppliers will:

- comply with relevant modern slavery laws and regulations;
- have processes in place to identify and mitigate modern slavery risks within their operations, including working with their own supply chains in the management of modern slavery risks;
- provide FCTG with information required from time to time to understand the risk of modern slavery in its supply chains; and
- work collaboratively with FCTG in combatting modern slavery risk, including where necessary the remedy of identified risks.

2.9 Health and Safety

FCTG is committed to providing a safe working environment for all our people, and in doing so, we expect our Suppliers to also create a work environment that prioritises the well-being of its employees and subcontractors. Suppliers are expected to integrate local health and safety laws and requirements into their operational processes, adhere to systematic identification and control of

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hazards, be ready for emergencies, and provide essential facilities such as sanitation, food, and housing. Through these measures, we strive to uphold our commitment to a healthy and safe workplace throughout our supply chains.

In the event of a Supplier visiting FCTG premises, the Supplier commits to abide by the health and safety guidelines and any other relevant policies as instructed by the relevant FCTG representative.

2.10 Environment and Sustainable Travel

FCTG is dedicated to fostering sustainability (ESG – Environment, Social & Governance) through active collaboration with Suppliers and the travel industry. The emphasis is on collectively establishing targets to shape a lower-carbon travel sector. Leveraging platforms, people, and partnerships is crucial to ensure that our actions have positive impacts on individuals, destinations, and communities.

In alignment with our sustainability commitments, Suppliers play a vital role in contributing to a responsible and sustainable travel ecosystem. This involves actively working towards developing a strong governance to ultimately reduce negative environmental and social impacts of travel, identifying opportunities to improve ESG performance, and safeguarding unique travel experiences for future generations.

FCTG expects that Suppliers will:

- comply with relevant laws and regulations regarding ESG compliance and reporting;
- have processes in place to identify and mitigate ESG risks within their operations;
- have processes in place to calculate and ultimately reduce the carbon footprint across their scope 1, 2 and 3 emissions profile;
- work with their own supply chains in the management of ESG risks in their own operations ensuring they have appropriate processes to work toward improvements across their ESG processes and commitments.
- provide FCTG with information required from time to time to understand the approach to ESG; and
- work collaboratively with FCTG in developing a more sustainable, lower carbon travel industry.

2.11 Competition / Anti-Trust Laws

FCTG is required to comply with all competition and antitrust laws and similar laws governing competition in all countries in which we operate. Accordingly, we also expect that you, as our Supplier, comply with consumer guarantees, engage in competitive conduct and provide us with transparent and honest pricing.

Suppliers must not engage in price fixing, bid rigging or participate in any form of cartel conduct, including exchanging sensitive commercial information with competitors or sharing any commercial information obtained from FCTG to third parties.

Furthermore, where you provide us with a travel product and/or service, or a product and/or service where multiple suppliers are available, we will seek to include a “most favoured nation” (**MFN**) clause in our agreement to ensure that we receive: (i) all rates that the Supplier is otherwise making available to other organisations (including other travel agencies, OTAs and onward distribution partners); and (ii) at least as competitive rates as other companies. It is important that

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you provide us with competitive pricing on your products and/or service as we seek to outperform our competitors fairly and honestly.

2.12 Whistleblower Hotline

We are committed to developing an open culture that encourages our Suppliers to raise concerns about suspected or actual misconduct or an improper state of affairs relating to FCTG. If you know or suspect genuine concerns about potential misconduct or behaviour, please report this concern to:

- Fctg.ethicspoint.com
- Group Chief Security Officer: Daniella Pittis (+61 402 834 309, daniella.pittis@flightcentre.com.au)
- Company Secretary: David Smith (+61 404 856 317, David_smith@flightcentre.com)
- Chairman of the Audit Committee: Rob Baker (rbak3698@gmail.com) (if your concern relates to senior executives, or any of the people named above in this Policy, you are encouraged to feel comfortable contacting the Chairman of the Audit and Risk Committee)

For further information, please refer to our Whistleblowing Policy here: https://www.fctgl.com/investors

DOCUMENT DETAILS

This document is effective from 27 August 2024.

Related Documents

- Anti-Bribery and Corruption Policy
- Code of Conduct
- Environmental Sustainability Policy
- Human Rights Policy
- Share Trading Policy
- Whistleblowing Policy

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