



Plan2goTM

CODE OF CONDUCT

No matter where you are or Plan2go, we're already there.

A message from the Captain in Charge

Dear GoTo Crew Member,

Plan2go is the place 2go for clients who expect efficient service, expert advice and flexible solutions to all travel and event needs. As members of the Plan2go team, each of us has a responsibility to maintain and enhance the strong reputation of the Plan2go brand. This reputation has developed over time by successfully serving customers and is a reflection of the innovative products and the high standards of service we offer.

Plan2go has a strong, positive culture, built on fundamental values of professionalism and integrity. Regardless of which department you work for, we share common values and have common standards about the way we behave at work. These standards exist to ensure that we:

- always act in the best interests of our customers and fellow Crew members
- meet the highest standards of ethical behaviour and conduct
- protect Plan2go assets, information and reputation
- are respectful, friendly and safe in our work environment
- conduct business fairly, truthfully and honestly.

I am personally committed to demonstrating the spirit, intent and actions within the Code of conduct. I simply ask that you join me in this commitment. With your help I am confident that Plan2go will continue to be seen as the company that 'acts with professionalism around the globe'. Thank you for joining me in this effort.

Sincerely,



Ellen Foster
Captain in Charge

// Why do we need a Code of conduct?

A Code of conduct is an official document which defines how employees should conduct themselves as representatives of Plan2go. The Code guides the behaviour of all employees and addresses our responsibilities to the Company, to each other, and to clients, suppliers, governments and other stakeholders.

All employees are required to follow the Code of conduct, and act with integrity and honesty as a condition of employment. A breach of the Code of conduct may lead to disciplinary action, including dismissal.

// Obligations

All employees have an obligation and duty of care to:

- Comply with the laws, rules and regulations regarding the Company's reputation
- Perform duties in a responsible and professional manner, with due regard for company policies and other legal requirements and obligations
- Be responsible of company resources
- Promote and protect the company's reputation in the global community
- Act appropriately when a conflict arises between our self-interest and our duty to the company.

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1. Your responsibilities

1.1 Personal conduct

All employees are expected to:

- treat everyone with courtesy, respect, kindness, consideration, and sensitivity to their rights
- refrain from all forms of harassment and discrimination based on gender, race, religious belief, political affiliation, pregnancy, disability, sexual orientation or illness
- always act honestly, in good faith, and respectful of the trust placed in us
- respect each individual's rights to privacy and keep personal information in confidence
- consider the impact of our decisions and behaviour on the well-being of others
- refrain from acting in any way that would unfairly harm the reputation and career prospects of other employees
- refrain from allowing personal relationships to affect professional relationships
- seek advice from an appropriate manager where a colleague's behaviour is perceived to be in breach of the Code
- report any suspected corrupt, criminal or unethical conduct to their line manager or human resource representative.

1.2 Professional conduct

All employees are expected to:

- perform duties diligently, impartially, conscientiously, with integrity, and to the best of their ability
- take responsibility for the health and safety of themselves and others when carrying out duties
- keep up to date with advances and changes in the body of knowledge and the professional and ethical standards relevant to their area of expertise
- strive to always achieve the highest product, service and professional standards
- comply with any relevant legislative, industrial or administrative requirements including observance and application of anti-discrimination policy
- comply with the principles of environmental responsibility



- foster teamwork and collegiality among all employees, and always give due credit to the contributions of others
- maintain adequate documentation to support any decisions made
- take no improper advantage of any official information gained in the course of our employment
- refrain from allowing personal political views and/or affiliations or other personal interests to influence the performance of duties or exercise of responsibilities.

1.3 Responsibility for company resources

All employees are expected to:

- use company technical and physical resources properly, responsibly and for legitimate purposes only
- seek permission before using company property for personal purposes
- not engage in personal activities during work hours that interfere with or prevent you from fulfilling your job responsibilities
- use resources in a manner that causes no harm to the community or environment
- not use company computers and equipment for outside business or for illegal or unethical activities such as gambling, pornography or other offensive subject matter
- strive to always obtain value for company money spent and avoid waste and extravagance in the use of company resources
- secure all company property against theft or fraud
- maintain the integrity and security of all company intellectual property
- maintain the security, integrity and confidentiality of all relevant company commercial and other information.

1.4 Responsibility to the community

Plan2go aims to be socially responsible in all its business activities in order to protect the health, wellbeing and lifestyle of the communities in which it operates.

Plan2go is committed to acting in ways which minimises adverse environmental impacts from the operation of the business. As employees of Plan2go we each have a role to play in this by ensuring our actions are consistent with the Company's community commitment and that we leave "our space in good condition for those that come after us."



2. Conducting ourselves with care and diligence

2.1 Confidentiality

It is important that we all understand and adhere to the confidentiality agreement set out by Plan2go. During your employment with Plan2go you may obtain confidential information about operational or financial aspects of the business. This information is confidential and must be treated sensitively.

Confidential information is all information disclosed, provided or otherwise made available during your employment, work you have contributed to or made in the course of your employment, which may include but is not limited to the business and affairs of the Plan2go.

As an employee of Plan2go you must:

- Acknowledge the need for confidentiality as part of your contract of employment (refer to letter of offer, signed upon commencement of employment)
- Not breach plan2go's confidentiality or make use of confidential information obtained from plan2go for personal gain or in a manner which would be detrimental to plan2go
- Treat confidential information belonging to third parties (such as suppliers and clients) with the same levels of respect and care that you treat information relating specifically to plan2go
- Only use confidential information in ways which are authorised by Plan2go.

Similarly, Plan2go will respect the confidentiality of personal information supplied to the Company by its employees.

During your employment, you will become aware of, and have access to, personal information about clients, employees and other individuals and Plan2go's commercially sensitive information. This may include the types of policies a client holds, client contact details, supplier details and arrangements. You must keep this information confidential and only use it for Plan2go business purposes.

Your obligation to protect Plan2go's confidential information continues after your employment ceases.

For more information, you should refer to your contract of employment signed at the beginning of your employment and to the Plan2go Confidentiality policy.



2.2 Privacy

Compliance with the *Privacy Act 1988* and associated 13 Australian Privacy Principles (APPs) is mandatory. You have an obligation and personal responsibility to respect our customers, other employees' and individuals, right to privacy. This means doing everything reasonably within your power to protect the security of any personal information you handle in the course of doing your job. Personal information about clients, employees and other individuals should only be used in the course of your employment.

Plan2go is committed to safeguarding the privacy of its clients, employees and directors. The Company's Privacy policy regulates the handling of any personal information that Plan2go collects. Refer to the Plan2go Privacy policy for additional information.

2.3 A safe and healthy workplace

Plan2go is committed to ensuring a healthy and safe environment for our people, clients, contractors and visitors, and to fostering a positive safety culture in our workplace and at work related events.

As detailed in the Work health and safety management system all employees play a vital and responsible role in helping to maintain a safe and healthy workplace through their obligation to take all reasonable care for the health and safety of themselves and other persons at work, and those who may be affected by their actions or inaction.

All employees are required to follow any reasonable instructions given in relation to:

- Health and safety at work
- Controlling risks in the workplace within the constraints of their role
- Reporting incidents and unsafe conditions to their managers immediately

Refer to the Plan2go Work health and safety management system for additional information and guidance.

2.4 Equal opportunity, discrimination, harassment, bullying

Plan2go is committed to:

- Equal employment opportunity
- Compliance with the letter and spirit of a full range of fair employment practices
- Anti-discrimination laws



- A workplace free from any kind of discrimination, harassment or intimidation of employees the principle of equal opportunity for all employees without regard to race, religion, age, gender, disability, sexual preference or other matters unrelated to work performance. We are vigorously committed to recruiting, training and promoting employees according to competence and capability.

Differences between individuals are not only tolerated, but valued. As an employee of Plan2go, you can expect to be treated in a fair and professional manner. The following behaviours are unacceptable under the Plan2go terms of employment:

2.4.1 HARASSMENT

Harassment involves subjecting people to unwelcome or uninvited attention that intimidates, humiliates or offends them.

2.4.2 DISCRIMINATION

Discrimination involves treating people differently due to race, religion, age, gender, disability, sexual preference or any other perceived “difference”.

2.4.3 BULLYING

Bullying is any form of unwelcome or uninvited behaviour that intimidates, humiliates or offends an employee and generally takes the form of one or more of these overtly aggressive behaviours:

- Abusive, insulting or offensive language
- Criticism delivered by yelling and screaming
- Inappropriate comments about a person’s appearance, lifestyle or family
- Teasing or regularly making someone the brunt of practical and oral jokes
- Interfering with personal effects and or work equipment
- Overloading a person with work and setting unreasonable or difficult time lines

If you believe you have been experiencing discrimination, harassment or bullying, you are encouraged to make a complaint to your line manager. Plan2go will promptly investigate all allegations of harassment, bullying, victimisation or discrimination and will take appropriate corrective action. All cases will be handled confidentially and professionally. Retaliation against individuals for raising claims of harassment, discrimination or bullying will not be tolerated.

Refer to the Plan2go Discrimination, harassment and workplace bullying policy for additional information and guidance.



2.5 Alcohol and other drugs

The use of alcohol and other drugs may impair an employee's capacity to perform their job safely, efficiently and with respect for work colleagues and clients. No employee is to commence work, or return to work whilst under the influence of alcohol or other drugs if that influence impairs the employees work performance. Employees found to be under the influence of illegal or illicit drugs or alcohol whilst at work may be subject to disciplinary action which may result in the termination of their employment.

The possession of illicit drugs or equipment related to the use, manufacture, or purchase/sale of illicit drugs at the workplace, a work sponsored or related function, while on company premises, or while in command of a company vehicle or vehicle rented by the company will be grounds for disciplinary action and may include immediate dismissal. Any concerns should be raised with your line manager or HR representative, immediately. Refer to the Plan2go Alcohol and other drug policy for additional information and guidance.

2.6 Dealing with the media

It is essential that media or public comment regarding Plan2go, our clients, employees and projects is only made by employees authorised to do so. You must inform the Leader Marketing and Promotions as soon as:

- any media enquiries are received
- if you have any doubt about who is authorised to speak to the media.

Media and communication take many forms including for example, newsprint, radio, television, and social media such as Facebook, YouTube LinkedIn and Twitter (see 2.7 - Social media). Text, email, presentations, statements, comments at an industry or professional seminar, including via a professional journal or other publication, are also forms of communication.

The lines between professional and personal communication interactions can be blurry. Employees need to follow the same principles, ethical standards, copyright and confidentiality requirements in all their communications, regardless of the medium.

This means you must exercise great care in making any statements, presentations, comments, personal views, distributing any video, link, webcam or other footage through any media or any other form used to communicate now and in the future.

Think carefully before communicating or publishing content in a public domain.



2.7 Social media

Social media refers to a large group of online applications including social networking sites, wikis, message boards, forums, blogs, video and audio sharing sites, all of which are immediately accessible by others.

You must be authorised by the Leader Marketing and Promotions to respond on behalf of Plan2go on social media channels. Dealing with social media feedback, including complaints, in the public domain requires great skill and experience.

Outside of work, you still have a responsibility to conduct yourself appropriately on social media. At all times you must:

- Separate your personal views from those of the company
- Ensure you do not misrepresent any personal comments as Plan2go authorised comments
- Ensure you do not link Plan2go with any opinions, links, etc. you express or share on social media
- Refrain from making derogatory comments about Plan2go, any Crew Members of Plan2go, clients or competitors
- Ensure you do not make discriminatory, defamatory, derogatory comments or statements regarding individual employees, any suppliers of Plan2go, clients or competitors
- Follow this code of conduct
- Be polite and considerate

Again, think carefully before communicating or publishing content in a public domain.

If you have any questions about what is appropriate or inappropriate use, speak with your line manager. Refer to the Plan2go Social media policy for additional information and guidance.



3. The importance of ethical behaviour

Ethics are guidelines or principles that help us make decisions when the correct action is unclear. Ethics go a step beyond the standards set by law, regulations and policies to include moral behaviour that protects our beliefs, our reputation and the ethical standards of our society.

In deciding whether a particular action is ethical, we need to ask ourselves the following questions:

- Is it consistent with the standards set by Plan2go?
- Is there authority for the action or decision?
- Is the action consistent with policy, Plan2go's objectives and this code?
- What are the consequences for me and for Plan2go?
- Am I happy to have my actions scrutinised or made public?
- Can I justify my behaviour if called upon to do so?
- Is there a conflict of interest?

Ethical questions often demand sensitive and sometimes difficult judgments. It might be helpful to discuss the issue with a colleague to get a more objective view.

The ethical standards set out by Plan2go ask that employees:

- Maintain fairness in dealings with all stakeholders
- Avoid conflicts of interest
- Do not accept gifts from third parties on behalf of Plan2go
- Do not steal, or misuse, property belonging to Plan2go

3.1 Fair dealing

In maintaining and enhancing the reputation of Plan2go as a leader in corporate travel, we have a responsibility to ensure that we conduct our business in ways that benefit our major stakeholders – shareholders, clients, employees, suppliers and the communities in which we operate.

Therefore, Plan2go and its employees will, in all business dealings:

- Compete vigorously and equitably
- Treat all customers and suppliers honestly, fairly and objectively
- Avoid any practice which may be seen as deceptive or unfair



- Make clear to all suppliers and potential suppliers that we expect them to compete honestly and fairly
- Make clear to all suppliers and other relevant bodies that we do not expect, nor will we accept, gifts and other unauthorised benefits in exchange for Plan2go's custom – we select our suppliers strictly on merit.

Any employee, supplier or other organisation failing to adhere to these principles should be reported to your line manager or the Leader People and Culture.

3.2 Conflict of interest

A conflict of interest arises when your personal activities and relationships interfere, or appear to interfere, (real or perceived) with your ability to act in the best interest of the Plan2go. Some level of personal gain that could potentially result from your actions and might affect your ability to make decisions in the interest of the Plan2go usually identifies conflicts of interest.

The following situations are examples of conflicts of interest:

- Having a contract of employment with, or providing services to, another company which has business dealings or is in competition with Plan2go.
- Doing business with companies in which you, or members of your family, have significant interests.

Employees of Plan2go, are encouraged to protect the interests of the Company, and their own reputations, against potential accusations of inappropriate behaviour by avoiding conflicts of interest altogether. The existence of, or potential for, a conflict of interest should be brought to the attention of the employee's line manager.

You will find more information in the Conflict of interest policy.

3.2.1 OUTSIDE EMPLOYMENT

In general, an employee may be employed outside of Plan2go, as long as the outside employment does not interfere with the employee's ability to do their job with the Company.

An employee may not be employed by, or otherwise provide services for or receive payment from, any client, supplier or competitor of Plan2go without prior written approval from the Leader People and Culture. This approval must be renewed annually.

It is the responsibility of the employee to advise the Leader People and Culture of any changes in circumstances that may affect approval.



3.2.2 GIFTS AND BENEFITS

It is always in breach of the conditions of employment to ask for, or appear to expect, gifts or benefits from suppliers, colleagues, subordinates, clients or others with whom an employee may come into contact in the course of their work at Plan2go.

A gift or benefit may create, or appear to create, a conflict of interest. When gifts are offered, they should only be accepted if:

- They are provided as part of an approved incentive program
- They are of nominal value (e.g. under \$50) or have been approved by the respective line manager
- Public disclosure of the transaction would not embarrass Plan2go
- They cannot be construed as an inducement to favour the giver in any way
- To do so is consistent with all aspects of the Plan2go Code of conduct

Although it's common practice to accept gifts of low monetary value – such as calendars, diaries, lunches and invitations to sporting events – all such offers of gifts and advantages should be brought to the attention of the People and Culture Crew. A record of such offers and invitations are to be maintained and will be reviewed by management in accordance with Company policies and procedures.

3.2.3 MEALS AND ENTERTAINMENT

- Do not accept meals or entertainment in exchange for doing, or promising to do, anything for a client or supplier
- Do not ask for meals or entertainment from a client or supplier
- An employee may accept occasional meals and entertainment from clients and suppliers if the event is attended by the client or supplier, and the costs involved are in line with local custom for business-related meals and entertainment. For example, ordinary business meals and attendance at local sporting events generally are acceptable.

For more information, refer to the Conflict of interest policy.



3.3 Competitive intelligence

Employees are encouraged to collect, share and use information about our competitors, but to do so only in a legal and ethical manner. Just as the Company values and protects its own nonpublic information, we respect the nonpublic information of other companies.

3.3.1 ACCEPTABLE INTELLIGENCE GATHERING

It is acceptable to collect competitive intelligence through publicly available information or ethical inquiries. For example, you may gather and use information from sources such as:

- Publicly available filings with government agencies
- Public speeches of company executives
- Annual reports
- News and trade journal articles and publications

You also may ask third parties about our competitors, or accept competitive intelligence offered by a third party, as long as there is no reason to believe that the third party is under a contractual or legal obligation not to reveal such information.

3.3.2 PROHIBITED ACTIVITIES

Do not engage in any illegal or illicit activity to obtain competitive information. This may include theft, trespassing, eavesdropping, wiretapping, computer hacking, invasion of privacy, bribery, misrepresentation or searching through trash.

Do not accept, disclose or use competitive information that you know or have reason to believe was disclosed to you in breach of a confidentiality agreement between a third party and one of our competitors.

3.4 Property and ownership

It is important to Plan2go that all employees enjoy a safe, secure and positive working environment. Each employee has a role to play in this process by respecting property that belongs to others.



Unauthorised possession or use of property belonging to the Company, other employees, clients or suppliers will not be tolerated by Plan2go. This includes, but is not limited to:

- Money and/or gift vouchers
- Computer equipment
- Stationery

With regard to Plan2go property, the following guidelines apply:

- Company property cannot be removed from the workplace without permission from the appropriate authority
- The equipment that Plan2go provides to employees (such as computer, phone, iPad) should only be used for legitimate business purposes

For example, offensive or obscene phone calls or emails and the down-loading of pornography from the Internet would be considered misuse of Company property.



Acceptance of Code of Conduct

All company employees must comply with this Code of conduct and report any breaches to their line manager or Leader People and Culture, as appropriate. Employees whose conduct falls below the standards outlined in the Code will be counselled accordingly and/or disciplined in accordance with Plan2go disciplinary procedure.

Please sign below to acknowledge that you have read and understood this Code of Conduct.

I have received and read this Code of conduct and hereby accept the terms and conditions as outlined within.

Name: [Name]

Date:

Signature:

