



FAIRFAX MEDIA CODE OF CONDUCT

Dated	March 2017
Next review	Two years from the date of release
This is the 2017 version of this policy and replaces any prior versions	

1. INTRODUCTION

Fairfax Media is a trusted voice, informing, engaging and entertaining audiences and communities throughout Australia and New Zealand. Everyday, we empower and enrich the lives of millions of people with our independent, quality content and great experiences.

Our digitally-driven media network of leading information, marketplaces and entertainment brands provides powerful connections between advertisers and our large, diversified audiences.

Honesty, trust and integrity are defining characteristics of the way we work. In all our dealings, with our colleagues and external parties, we maintain transparency and take accountability.

In this Code we set out the minimum standards of behaviour, aligned to our culture and values, across all Fairfax Media brands, assets and operations.

Application

The Code applies to all Fairfax Media employees, contractors, contributors, volunteers and interns in Australia ("Workers").

Editorial Code of Ethics for our mastheads may also apply to you depending on your role, along with other Fairfax Media policies and guidelines.

General principles

Sometimes we may be faced with situations that are not directly addressed by this Code. When faced with such a situation, consider your actions in light of the following questions:

- Is it legal?
- Is it ethical?
- Is it consistent with Fairfax Media's values?
- What would be the impact if your actions were reported in the media or your peers and family were to find out?
- Is it in the best interests of Fairfax Media?
- Would you be proud of your actions?

If you are still unsure about a specific situation, seek guidance from your Manager or your HR representative.



2. HOW WE INTERACT WITH OTHERS

Respect and fairness

We respect our colleagues, customers and business partners. We strive to work collaboratively and value the contributions of others. We respect differences of opinion. We treat people fairly to build a trusting work environment.

Honesty and integrity

We perform our duties in an honest and transparent manner to maintain a good reputation, personally and for Fairfax Media. We are responsible, honest and accountable in our dealings with each other, our customers and audiences.

3. ACTING IN FAIRFAX MEDIA'S BEST INTERESTS

Secondary employment – approval required

We all contribute to Fairfax Media's success by doing the best work we can. An employee's contribution or capacity to perform duties may be affected by engaging in secondary employment or undertaking unpaid work for another organisation. Our integrity and ability to act in the best interests of Fairfax Media may also be compromised by outside work and activities.

You must seek and obtain permission from your Manager and HR representative (for your business unit) before undertaking any paid secondary employment. Permission will not be unreasonably withheld.

If outside activities (such as voluntary work or business activities) interfere with your usual Fairfax Media duties, or create a conflict of interest, you must discuss these activities with your Manager. Your Manager may determine that these outside activities are not consistent with the role you perform for Fairfax Media.

Declaring conflicts of interest

You must avoid situations which give rise to a conflict, or a perceived conflict, between the interests of Fairfax Media and your personal interests. You must declare any potential or actual conflicts of interest to your Manager and follow management direction to eliminate or address such conflicts.

Examples of conflicts of interests include:

- Commercial relationships or dealings with friends or relatives
- Secondary employment
- Outside activities, including voluntary work and business activities
- External board memberships
- Personal relationships with Fairfax Media clients, customers, partners or suppliers
- Associations with, or interests in, other entities, including Fairfax competitors.

The best way to manage a potential conflict of interest is to be up front and discuss it with your Manager and/or HR representative.

Gifts and benefits

You must not use your position at Fairfax Media to solicit an advantage or gift/benefit from a third party in connection with your employment.

Gifts in the form of any cash are not acceptable under any circumstances.



You should follow all business unit guidelines that apply to you relating to the declaration and approval of gifts/benefits from third parties.

Examples of such gifts/benefits may include: discounts, priority bookings, travel and accommodation, access to venues, retail or wholesale sales, restaurant bookings, real estate queues and upgrading of goods or services.

You must comply with any requests from your Manager or Corporate Risk and Assurance for details and supporting documentation relating to any gifts/benefits you may be offered.

4. HEALTH AND SAFETY

We are all responsible for maintaining a safe and healthy work environment for Fairfax Media employees, contractors, volunteers and visitors at our work sites.

Fairfax Media does not tolerate the use of illegal drugs at work or at work related functions.

You must be familiar with and abide by Fairfax Media policies and guidelines relating to health and safety, such as the:

- Occupational Health and Safety Policy
- Workplace Behaviour Policy: Harassment, Discrimination and Bullying
- Drugs and Alcohol within the Workplace Guideline
- Environmental Policy

You must also participate in relevant health and safety training to ensure you carry out your work activities in a safe manner.

If you become aware of any safety risks or safety incidents, these must be reported to your Manager and recorded in the company's injury and risk management system.

5. EXTERNAL COMMUNICATION AND SOCIAL MEDIA

External communications shape and influence Fairfax Media's valuable brand, reputation and overall commercial position. The company actively manages its brand and reputation and has established communication protocols that should be followed.

Unless authorised to do so, you must not speak publicly on behalf of Fairfax Media, publicly discuss or disclose confidential company matters, or represent your personal views as those held by Fairfax Media (especially in a public forum or on social media).

You must seek prior approval from your Manager for any speaking engagements or presentations outside of work, such as conferences and public engagements.

If you receive any inquiries from the media or any other government or non-government organisation, you must refer these to the Group Director of Communications.

Your activities on social media may reflect negatively on Fairfax's Media's brand (as well as your personal brand), and you should always be mindful of this. You must not use social media in a way that could embarrass, disparage or cause damage to Fairfax Media's reputation.

You must comply with Fairfax Media's Social Media Policy, which provides further guidance as to what are acceptable and unacceptable uses of social media.



6. BUSINESS INTEGRITY

Insider trading

Employees and directors of Fairfax Media have the opportunity to share in the company's growth through share equity plans as well as buying shares in their own right. Holding company shares brings a responsibility to comply with the laws governing corporations and employees who own shares.

These laws do not allow anyone with "inside information" to:

- Trade in Fairfax Media shares based on this information
- Influence another person to trade in Fairfax Media shares, such as immediate family and others living in your household
- Communicate information to someone they believe is likely to trade in Fairfax shares.

If you become aware of any material, non-public information about Fairfax Media or another company, you must refrain from trading until such information is adequately disclosed. If in doubt, refrain from trading and disclosing the information and refer the matter to Fairfax Media's Group General Counsel or Chief Finance Officer.

Accurate reporting and expenses

We recognise the importance of complete, timely and accurate business records and company data, including data relating to business expenses. You are responsible for complying with the company's employee expenses policy. This includes ensuring that business expenses you incur are reasonable, within prescribed limits, and that you follow procedures for reimbursement in a timely manner.

If you suspect or become aware of any inaccuracy or falsification of company records, contact the Legal Department and/or your Manager.

Fraud

You must not engage in dishonest activity that causes actual or potential loss to Fairfax Media and/or its customers, such as theft or misappropriation of money. You should never deliberately falsify or destroy business documents or improperly use information or your position for personal financial gain.

7. BRIBERY AND CORRUPTION

You must not offer bribes or any form of inappropriate rewards for the purpose of acquiring or retaining business, or receiving any kind of special or favoured treatment for the company. It is also not appropriate to accept any bribes or inappropriate rewards for any purpose in connection with your position.

Do not give anything of value to a government official without prior approval from your Manager. Be mindful that politicians and government officials may be subject to strict rules regarding gifts and hospitality. Avoid situations which may be perceived as attempts to influence politicians or government officials.



8. CONFIDENTIALITY AND PRIVACY

You may find yourself in a position of trust and have access to confidential information relating to our business and customers. You must not use such information for personal gain, or share it with parties outside Fairfax Media.

You must handle all customer information in accordance with the Fairfax Media Privacy policy.

You must not disclose or discuss any confidential information relating to Fairfax Media with anyone who is not authorised to receive such information (this may include other Fairfax Media personnel and external parties).

Confidential information includes (but is not limited to): financial information, strategic plans, pricing and costs, employee and personnel information, marketing initiatives, customer lists, terms of trade, internal communications (such as staff announcements and contents of staff meetings) and any information designated by the company as being confidential.

Confidentiality obligations continue to apply to employees even after they leave Fairfax Media.

9. PROPERTY AND INTELLECTUAL PROPERTY

We are responsible for taking care of company property and using it responsibly. Theft, misuse or deliberate damage to company property is not acceptable conduct.

It is important that our IT network and infrastructure remains secure and functions effectively. You must not misuse IT resources - this includes excessive personal use during work hours, breaching software licence conditions and disrupting or disabling automated security systems. For further details, please refer to the Computer Use Policy.

Fairfax Media's intellectual property is a valuable asset and must be protected at all times.

You must not misuse third party intellectual property in connection or association with Fairfax Media (this includes any misuse of company resources and technology). If you are unsure whether or not your actions may infringe the intellectual property rights of others, please contact the Legal Department.

10. DIVERSITY AND INCLUSION

Fairfax Media is committed to a fair and inclusive workplace that reflects the diversity of the communities in which we operate. We recognise that each employee brings their own unique capabilities, experiences and characteristics to Fairfax Media.

We all have a responsibility to ensure the work environment is free from unlawful discrimination, harassment and bullying.

We respect workplace diversity and engage with others in a lawful and appropriate manner at all times. We do not tolerate behaviour in the workplace that is intimidating or belittling, disrespectful, discriminatory or harassing.



11. BREACHING THE CODE AND REPORTING BREACHES

The Code sets the minimum standards of conduct expected of all Workers.

A breach of the Code by an employee may lead to disciplinary action. The company will determine the disciplinary action that is appropriate in the circumstances. The forms of disciplinary action that may be taken include (but are not limited to): counselling, warnings and termination of employment.

We support individuals in coming forward to report breaches. However, vexatious or malicious reports may result in disciplinary action.

Speak to your manager or HR

If you become aware of any behaviour that breaches the Code, raise it with your Manager or HR representative as soon as possible rather than simply ignoring it.

Reporting financial malpractice

If you suspect or become aware of a breach that involves financial malpractice or fraud, this should immediately be reported to:

1. Manager, Corporate Risk and Assurance; or
2. Group General Counsel (Legal)

Ethics and compliance hotline

If you do not feel comfortable speaking to someone at Fairfax Media, you may call the Whistleblower Hotline, a dedicated external service to report corrupt, unethical or inappropriate behaviour in the workplace. An incident report will be provided to a Fairfax Media nominated representative – you may choose to remain anonymous.

The hotline is currently managed by Davidson Trahaire Corpsych. Australian staff may phone 1800 461 116 (toll free) anytime.

12. FURTHER GUIDANCE AND RESOURCES

In addition to the Code, Workers are required to comply with the company's policies. These policies can be located on the intranet.

You are encouraged to contact the following departments if you need further guidance about compliance with the Code:

- Human Resources/HSE
- Legal Department
- Corporate Risk & Assurance
- Ethics and compliance hotline - 1800 461 116 (toll free)



Other Related Documents

- Workplace Behaviour Policy: Harassment, Discrimination and Bullying
- Diversity and Inclusion Guideline
- Occupational Health and Safety Policy
- Drugs and Alcohol within the Workplace Guideline
- Social Media Policy
- Computer Use Policy
- Privacy Policy

Greg Hywood
Chief Executive Officer, Fairfax Media Limited