



SEEK Limited ACN 080 075 314

## Code of Conduct

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### INTRODUCTION: CODE OF CONDUCT

SEEK's purpose is to help people live more fulfilling and productive working lives and help organisations succeed. Underpinning this is respecting each other, and always doing the right thing for SEEK's customers and the communities it serves. SEEK is committed to conducting business in an honest, ethical and accountable way. As an Australian listed and headquartered company, this includes SEEK's respect for all Aboriginal and Torres Strait Islander peoples, and all Indigenous people on the lands from which SEEK operates.

This document outlines the behaviours expected of all team members, in performing their duties and interacting in the workplace. It is the responsibility of everyone to follow this Code of Conduct and to encourage each other to do the same. The Code of Conduct operates in parallel, and in conjunction with, SEEK's policies which are accessible to all employees. While this Code of Conduct provides high level guidance, SEEK's policies should be referenced for specific detail about behavioural expectations and compliance.

This Code of Conduct has been approved by the SEEK Board and will be periodically reviewed to ensure it is operating effectively.

### SCOPE

This Code of Conduct applies to all SEEK employees (including permanent, fixed-term and casual employees), directors and contingent workers, irrespective of country location. This includes the SEEK businesses across Asia-Pacific (APAC), Brazil and Mexico, as well as controlled entities.

To see a list of SEEK businesses and entities, visit the [SEEK website](#).

## BEHAVIOUR EXPECTATIONS

### A. Our SEEK and ways of working

For the APAC business, **Our SEEK** summarises the company purpose, operating principles and the behaviours which define SEEK's culture and guide ways of working. The Brazil and Mexico businesses have their own values that are expressed in local language, and these are aligned with Our SEEK principles and behaviours.

**Our SEEK** comprises four key principles:

- **Passion:** We are passionate about our purpose, our customers and the community.
- **Team:** We care about each other and collaborate to achieve together.
- **Delivery:** We execute with excellence and achieve great results.
- **Future:** We think and act for the long-term.

These are supported by a range of expected behaviours, linked to the principles.

#### **Passion**

Our people:

- Create the best experiences and solutions for our customers
- Are bold and challenge the status quo
- Are energised about making SEEK and our communities even better

#### **Team**

Our people:

- Show empathy, respect and care in all interactions
- Build trust and support each other to succeed
- Actively contribute to teamwork and to the SEEK community

#### **Delivery**

Our people:

- Take ownership as individuals and together
- Encourage pace and progress over perfection
- Overcome obstacles to deliver great outcomes

#### **Future**

Our people:

- Do the right amount of thinking upfront
- Prioritise and stay focused on the most important stuff
- Are curious and continue to adapt and grow

Collectively, these principles and behaviours guide SEEK's approach to the workplace and interactions with SEEK's customers and communities.

### B. How we act

#### **Respectful workplace**

SEEK believes in treating all people with dignity and respect, and its workplaces are inclusive and value the diversity of employees and the communities it serves. As such, SEEK will not tolerate any form of bullying and harassment, victimisation, or vilification toward any person or group of people within the workplace or as part of any broader interactions while conducting business on behalf of SEEK.

The commitment of SEEK to its people, including both the physical and psychological health and wellbeing of its employees, is as important as its commitment to other business objectives.

### **Workplace health and safety**

SEEK is committed to ensuring health, wellbeing and safety in the workplace through effective leadership, safe behaviour and continuous improvement of safety management systems.

All SEEK employees, directors and contingent workers are responsible for promoting a healthy and safe working environment. To achieve this everyone is required to:

- Comply with relevant workplace health and safety legislation
- Treat health and safety as the highest priority and report hazards immediately
- Complete all company-provided Occupational Health and Safety training
- Continue to value and promote work life balance for all employees

### **Reputation and conflicts of interest**

All SEEK employees, directors and contingent workers are expected to act honestly, with high standards of personal integrity and in a way that protects and promotes SEEK's best interests.

Employees, directors and contingent workers must not enter into any relationship or arrangement, or participate in any activity, which could give rise to an actual, potential or perceived conflict with SEEK's best interests, or which would negatively affect SEEK's reputation by bringing the company into disrepute.

Conflicts of interests should be avoided wherever possible. Conflicts of interest can include any personal interests, relationships or activities that may influence (or be seen to influence) a person's professional judgement or actions or to act in a way that is not in SEEK's best interests.

SEEK acknowledges that conflicts of interest depend on the situation. The test of the existence of a conflict of interest is whether an independent observer would reasonably believe the actions or decisions of an employee, contingent worker or director could at any time be affected by considerations of personal gain, other external commitments or a close personal relationship in conflict with the person's duties and obligations to SEEK.

Employees, directors and contingent workers are expected to disclose any actual, potential or perceived conflict of interest to their people leader without delay so that this may be dealt with appropriately.

### **Use of SEEK's property**

All SEEK employees, directors and contingent workers are expected to use SEEK's property responsibly, in the best interests of the company and in accordance with SEEK policies.

Employees, directors and contingent workers, must comply with applicable laws, policies and procedures relating to the use of IT equipment and electronic devices, and it is expected that any loss, damage or theft of SEEK's property will be reported promptly.

## **C. How we do business**

### **Anti-bribery and corruption**

SEEK is committed to conducting business in compliance with all applicable anti-bribery and corruption laws in every country in which it operates.

SEEK's requires that, in all aspects of business, its people act honestly, adhere to the highest ethical standards, and observe all relevant legal requirements. In this respect, SEEK employees, directors and contingent workers must not engage in bribery or any other form of corruption.

SEEK has an Anti Bribery and Corruption Policy, which is supplemented by local External Gifts & Entertainment Guidelines specific to each business. These policies, and other associated local policies, are made available on the relevant company intranet for all employees to access. Employees are required to read the policies and complete relevant training.

### **Privacy and confidentiality**

Certain types of information provided to SEEK may be considered to be private or personal. SEEK only collects personal information which is required for legitimate business purposes and maintains privacy of the information of its people and third parties. This includes protecting information from any unlawful disclosure and putting in place safeguards to prevent any such breach from occurring.

SEEK regards the protection of its confidential information as paramount to its success and reputation as a trusted business. Employees, contingent workers and directors are under the obligation not to use this information for their own personal benefit (or for the benefit of a third party), nor disclose any confidential information belonging to any SEEK entity, except as may be necessary in line with their employment.

Confidential information is any information that relates to the business affairs of any SEEK entity, which is not publicly available and includes (but is not limited to):

- Information and intellectual property related to the SEEK corporate strategy, business plans and product development
- Customer information (identity of customers; customer database; nature of SEEK customer relationships)
- Financial and commercial information

SEEK is committed to maintaining appropriate privacy and confidentiality of information and has specific standards and policies which address the security, classification, use and sharing of data. These policies are available locally to employees, directors, and contingent workers. Failure to adhere to these standards and policies is considered a serious breach of trust and may also be considered a breach of law, in some circumstances.

### **Continuous disclosure**

As a listed company, SEEK has an obligation to notify the Australian Securities Exchange as soon as becoming aware of any information that a reasonable person would expect to have an impact on the price or value of SEEK's shares. Employees, directors and contingent workers must not disclose information about SEEK that is not already in the public domain.

SEEK's Continuous Disclosure Policy describes processes for identifying potentially material information and how this is communicated to the market to ensure equal access to price sensitive information.

### **Competition and consumer laws**

SEEK is committed to the highest possible standards of ethical, moral and legal business conduct. There are strict consumer and competition laws regarding how SEEK can deal with its customers and competitors. Employees, directors and contingent workers are required to comply with such laws to ensure that consumer rights are not compromised, and market competitive activities are conducted fairly.

### **Insider trading**

SEEK employees are allowed to trade in SEEK securities except during closed periods or if they have "inside information" which is information that is not publicly available and which may materially affect the value of the securities. The restriction also applies to dealing in the securities of another entity where SEEK employees have potentially price sensitive information about that entity.

SEEK's Share Trading policy describes the insider trading laws and rules for employees in relation to dealing with SEEK securities. There are specific provisions relating to directors and employee insiders.

## **RAISING CONCERNS**

SEEK encourages all employees, directors and contingent workers to speak up if they observe something that does not seem right, including breaches of this Code of Conduct. There are a number of different ways an employee, director or contingent worker can raise concerns, depending on the circumstances and the seriousness of the issue. This includes speaking to their people leader and if necessary, raising a formal grievance with the People & Culture team.

If an employee does not feel comfortable raising their concern with their people leader or People & Culture team, they can raise a formal report through the whistleblower channel. SEEK has a Whistleblower Protection Policy to support, protect and encourage employees to report concerns of wrongdoings including illegal or unethical conduct and breaches of this Code of Conduct.

SEEK's Whistleblower channels are:

- SEEK ANZ, JobAdder: [www.SEEKWhistleblower.deloitte.com.au](http://www.SEEKWhistleblower.deloitte.com.au)
- Brazil: [www.helloethics.com/directcatho/pt/main.html](http://www.helloethics.com/directcatho/pt/main.html)
- Mexico: [lineaeticaooccmundial@kpmg.com.mx](mailto:lineaeticaooccmundial@kpmg.com.mx)
- SEEK Asia: [whistleblower@seekasia.com](mailto:whistleblower@seekasia.com)

## **MANAGING BREACHES**

Failure to comply with this Code of Conduct is considered a serious matter at SEEK. Any breaches of this Code, SEEK's policies and/or unlawful or improper conduct will be promptly and thoroughly investigated based on the method deemed most appropriate, in conjunction with People & Culture. To the extent possible, the confidentiality of all involved parties will be maintained.

Where allegations are substantiated, breaches of this Code or SEEK's policies may result in disciplinary action, up to and including termination of employment.