



SEEK Limited ACN 080 075 314

Code of Conduct for Employees

May 2017

Introduction & Philosophy

SEEK Limited ("SEEK" or "the Company") is committed to conducting business in an honest, ethical, and accountable way. The Code of Conduct ("Code") aims to promote and strengthen the reputation of SEEK in Australia by establishing a standard of performance, behaviour, professionalism and integrity for its people and stakeholders with respect to their conduct.

Scope

The Code of Conduct applies to all SEEK employees (both permanent and fixed-term), contractors, consultants and visitors working in Australia.

Policy Statement

The Code of Conduct outlines the standard expected of all employees, contractors, and directors in the performance of their duties and interactions in the workplace.

Workplace Health & Safety

SEEK will not tolerate any form of bullying and harassment, victimisation, or vilification toward a person or group of people, including all employees, contractors, suppliers, clients, customers, and visitors.

All SEEK employees receive Equal Opportunity Employment training upon commencing at SEEK and receive refresher training throughout the course of their employment.

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

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

- Comply with relevant 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

Learning and Development

At SEEK, we want to give employees every opportunity to develop their skills and abilities to help reach their full potential. SEEK invests in the development of its employees in various ways. Induction programs are delivered at both a department and organisational level, supporting new employees to make a smooth transition into the organisation. SEEK also promotes learning that builds the core skills of all its employees, aligning learning programs to its unique competency framework. SEEK actively supports the development of its people leaders, through the delivery of customised leadership and management development initiatives. We encourage learning and development to occur both on-the-job and through more formal and structured channels.

Social Media

SEEK recognises the need to have a social media policy which ensures employees who use social media platforms as part of their role, or in a personal capacity, have appropriate guidance as to the company's expectations.

All employees attend social media training upon commencement at SEEK and receive refresher training throughout the duration of their employment. SEEK's Social Media Policy is accessible to all employees via the company intranet.

Privacy

Some information provided to SEEK by clients, customers, contractors and other third parties might be considered private or personal. We maintain the privacy of the information of our people, customers, partners, suppliers, contractors and potential employees. We protect information from any unlawful disclosure and put safeguards in place to prevent any such breach from occurring.

Confidentiality

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

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

- Information related to the SEEK Group corporate strategy, business plans and product development
- the SEEK Group client database
- the identity of SEEK Group clients
- the nature of the relationships between SEEK Group and its clients
- SEEK Group sales figures, marketing and promotional plans, future business plans, all trade secrets and all business, financial, marketing and technical information, ideas, concepts, technology (including computer software and hardware), processes and knowledge belonging to the SEEK Group which is not publicly available.

Continuous Disclosure

SEEK is committed to complying with the continuous disclosure obligations of the Australian Securities Exchange (“ASX”) Listing Rules. The ASX requires listed companies to disclose information which may have an impact on the share price and as such may be relevant or critical to an investor’s decision making.

Conflict of Interest

A conflict of interest occurs where existing loyalties are divided. It involves a set of circumstances that creates a risk that a person’s professional judgement or actions may be unduly influenced by a secondary business, private business or close personal relationship.

Conflicts of interest depend on the situation. Therefore, 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, contractor or director may have been or could be in future, affected by considerations of personal gain, other external commitments or a close personal relationship. Employees are expected to disclose any potential or actual conflict of interest to their manager without delay.

Anti-Bribery and Anti-Corruption

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

SEEK’s values require that in all aspects of business, our people act honestly, adhere to the highest ethical standards, and act in compliance with all relevant legal requirements. In this respect, SEEK employees must not engage in bribery or any other form of corruption.

The SEEK Group Anti-Bribery and Anti-Corruption Policy, supplemented by the External Gifts and Entertainment Policy and the Gifts & Entertainment Guidelines, applies to all employees and business associates of the SEEK Group and are made available on SEEK’s intranet for all employees to access. All personnel are required to read the policies and complete the relevant training.

Compliance with Consumer Laws

SEEK is committed to the highest possible standards of ethical, moral and legal business conduct. There are a number of strict consumer and competition laws regarding how SEEK can deal with its customers, and competitors, and employees are required to comply with such laws to ensure that consumer rights are not compromised. SEEK employees are provided with training with regard to compliance and consumer law.

Reputation

SEEK employees are expected to act in a way that protects and promotes SEEK’s best interests. Employees must not enter into any arrangements or participate in any activity that would conflict with SEEK’s best interests and negatively affect SEEK’s reputation by bringing the company into disrepute. This means demonstrating appropriate and acceptable standards of conduct and acting

responsibly. This also extends but is not limited to any SEEK sponsored or employment related situation such as training courses, promotional events, Christmas parties, whether outside working hours or at another site.

Breaches of this Code

Any breaches of this Code, SEEK's corporate policies and/or unlawful or improper conduct will be promptly and thoroughly investigated based on the right method deemed appropriate, in conjunction with Human Resources. To the extent possible the confidentiality of all involved parties will be maintained. Failure to comply with this Code and SEEK's corporate policies (where allegations are substantiated) may result in disciplinary action, up to and including termination of employment.

Whistleblowers Policy

To support, protect and encourage employees to properly report non-compliant, illegal or unethical conduct, SEEK has a Whistleblowers Policy which is made available on SEEK's intranet for all employees to access.