



webjet limited

Webjet 2023 Modern Slavery Statement.

www.webjetlimited.com

Acknowledgment of Country.

We recognise and acknowledge the existing, ancient and continuing connection the Aboriginal and Torres Strait Islander peoples have to the land, place, waters, skies and community across the Australian continent. We pay our respects to their cultures, country, and elders past, present, and emerging.

Managing Director Statement.

Welcome to Webjet's fourth Modern Slavery Statement. As our business starts to re-accelerate, following the incredibly difficult impact of covid over the last few years, we are acutely aware of our responsibility to play our part in eliminating modern slavery and influencing others to do the same. We are now able to refocus and expand on our modern slavery and human rights efforts.

Our FY23 Modern Slavery Statement demonstrates our growing understanding of modern slavery risks in our operational and supply chains. Building on the knowledge we have gained over the last four years and the strong foundational compliance base we have set, we are now aiming to work towards resolving some of the key challenges we have faced in using our leverage across a very large volume of geographically diverse operational partners and suppliers.

Some highlights of our FY23 key actions include:

- Delivering modern slavery awareness training to our global workforce and our Board of Directors. A total of 1,886 staff (representing 86% of our global workforce) completed the training, along with all our Board members.
- Conducting and improving our due diligence assessments of our suppliers identified as 'high-risk' in our FY22 modern slavery risk assessment.
- Updating our governance frameworks to formally recognise our Risk Committee's responsibility for the oversight, development and review of human rights, modern slavery and ethical sourcing policies and initiatives.
- Collaborating across our business units via our Modern Slavery Working Group.

Webjet recognises that modern slavery is a complex global issue, and we remain committed to playing our part to raise awareness and protect and respect human rights in every place we operate.

A handwritten signature in black ink, appearing to read 'John Guscic'.

John Guscic
Managing Director,
Webjet Limited

About this Statement.

This Modern Slavery Statement (**Statement**) has been prepared in accordance with the requirements of the Australian Modern Slavery Act 2018 (Cth) (**Act**).

This Statement is a joint statement made on behalf of both Webjet Limited ABN 68 002 013 612 (**Webjet**) and Webjet Marketing Pty Ltd ABN 84 063 430 848 (**Webjet Marketing** or **Webjet OTA**), each of which qualify as reporting entities under the Act. Webjet is a public company listed on the Australian Securities Exchange (ASX:WEB), headquartered in Melbourne, Australia. It is a member of IATA (International Air Transport Association) and ATIA (Australian Travel Industry Association). Webjet Marketing Pty Ltd is a wholly owned Webjet company incorporated in Australia. Webjet Marketing is the number one online travel agency in Australia and New Zealand. Other than Webjet and Webjet Marketing Pty Ltd, no Webjet Group controlled entity meets the reporting entity criteria under the Act.

While no other Webjet controlled entity is a reporting entity for the purposes of the Act, Webjet is committed to ensuring that our approach to modern slavery is standardised across each of our businesses, including WebBeds, GoSee and TripNinja.

This is Webjet's fourth Statement and describes our approach and actions to manage modern slavery risks in our global operations and supply chains during the financial year ending 31 March 2023 (**Reporting Period**), as well as our plans for future improvements.

Progress since last statement

Webjet is committed to continually improving not only our modern slavery risk management processes but also the quality of our modern slavery reporting. We have taken the following steps to improve on our previous statement:

- Delivered modern slavery awareness training to our global workforce and our Board of Directors. A total of 1,886 staff (representing 86% of our global workforce) completed the training, along with all our Board members.
- Included a case study to show how the effectiveness of our modern slavery risk training was assessed.
- Redesigned our supplier self-assessment questionnaire to yield more meaningful responses.
- Conducted follow-up due diligence assessments of our suppliers identified as 'high-risk' in our FY22 modern slavery risk assessment. While this work remains ongoing, to date we have not identified any issues requiring remediation.
- Updated our Risk Committee Charter to formally recognise the Committee's responsibility for the oversight, development and review of human rights, modern slavery and ethical sourcing policies and initiatives.
- Prepared a modern slavery action plan.
- Conducted and improving our due diligence assessments of our suppliers identified as 'high-risk' in our FY22 modern slavery risk assessment.
- Collaborated across our business units via our Modern Slavery Working Group to coordinate and track progress of modern slavery initiatives.
- Incorporated modern slavery compliance provisions into additional supplier contracts where relevant and applicable.

About Webjet Limited.

Webjet Limited is a global travel organisation that enables travel the world over through market leading travel brands supported by innovative technology.

Our travel brands.

Our digital travel businesses, spanning both wholesale and retail markets, sell travel all over the world.

WebBeds

A **global B2B travel marketplace** serving the world's travel trade.

visit: www.webbeds.com



webjet.com.au

The **#1 online travel agent** (OTA) in Australia & New Zealand.

visit: www.webjet.com.au

GoSee

A leading **online global motorhome & car rental** website

visit: www.goseetravel.com

tripninja

Provides complex travel itinerary automation to digital travel businesses.

visit: www.tripninja.io

ROOMDEX¹

Simplifies & super-charges online travel upselling.

49% share, with option to acquire the remaining 51%.

LOCKTrip

Blockchain based B2C travel marketplace.

25% share.



For further information about Webjet, please see **Webjet's FY23 Annual Report**.

Our business in FY23.

In FY23 we had...



2,150+
People

across



50+
Countries

servicing



1.1m+
Customers

who made



7.4m
Bookings

About Webjet Limited.

(continued)

Our Culture, Our People, Our Values.

In 1998, **Webjet** began as a small start-up seeking to disrupt traditional norms in the highly competitive online travel industry. In just over 10 years, Webjet became the #1 OTA in the Australian and New Zealand market. Our success was fuelled by a culture founded on customer focus, innovation, and creativity. We took this culture overseas in 2013 when we established **WebBeds** in Dubai, and again sought to disrupt the industry, although this time in B2B distribution. In just over six years, WebBeds had become the #2 global B2B provider. Then in 2016, we acquired **GoSee** (then Online Republic) as we saw a company with great potential, with a culture that was extremely similar to ours and with established leadership positions in its B2C travel verticals.

All of these successes and growth have been made possible by our culture, embodied by each of our team, which is underpinned by these **five key values**:

Respect.

Our people are our greatest asset. They bring passion, commitment, dedication, and pride in what they do. We respect each other, we value collaboration, we are prepared to have robust debate and we have fun in what we do.

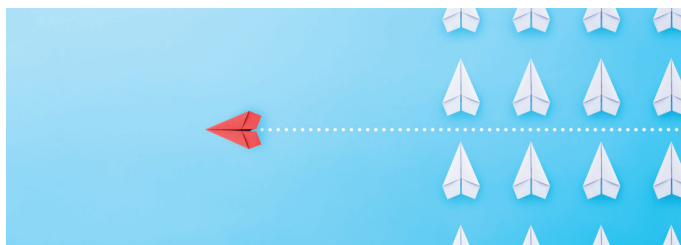


Integrity.

We are focused on delivering superior outcomes. We always seek to do the right thing and value integrity, accountability and delivering quality in everything we do.

Delivering value.

We are focused on delivering high quality products, excellence in customer service, maintaining strong relationships with our supply partners, providing an engaging and supportive work environment for our employees, and delivering value for our shareholders and the broader community.



Agility.

Unafraid to disrupt traditional norms, we constantly challenge ourselves to look for new ways to win and deliver value. Our people are agile and nimble and we empower them to effect change.

Hunger to win.

As we grow, we remember our humble roots and always strive to retain the spirit that comes with being the challenger brand. We constantly seek to challenge ourselves to find new growth opportunities, innovations and creative ways to deliver value across all aspects of our business. We value curiosity, being brave and having confidence to try new things.



About Webjet Limited.

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Our organisational structure

As a travel company we are proud to operate a geographically diverse workforce. As at 31 March 2023, Webjet had 47 subsidiaries located in various countries around the world, including Australia, New Zealand, United Arab Emirates, Spain, United Kingdom, the Philippines, Romania, the Americas and Singapore. A full list of Webjet’s controlled entities is set out in Annexure 2.

Location of our people

In FY23, our global workforce comprised of people from over 50 different countries and 55 different nationalities, with the majority of people (approximately 2,186) directly employed or engaged by us. Our indirect workforce are engaged through reputable third-party agencies or professional services firms.

Our global supply chain

Our global supply chain comprises the following:

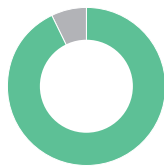
- **175 airlines**, the top 4⁽¹⁾ of which represent 69% of our aggregate FY23 flight TTV (total transaction value) and have published their own modern slavery statements;
- **224 car and motorhome rental providers**, which are based predominantly in Australia, New Zealand, North America, Europe and South Africa;
- **430,000+ hotels and accommodation providers** around the world, most of which are paid via third-party aggregators such as Expedia and Agoda; and
- **Approximately 800 Tier 1 suppliers** globally, which include affiliate partners, advertising and marketing services, software and IT services, insurance, office expenses, utilities, and professional services.

Business unit workforce breakdown by country



Webjet OTA (headquartered in Australia)

■ Australia: 92%
■ Rest of World: 8%



GoSee (headquartered in New Zealand)

■ New Zealand: 93%
■ Rest of World: 7%



WebBeds (headquartered in the United Arab Emirates)

■ Philippines: 28%
■ Romania: 17%
■ Spain: 13%
■ UK: 7%
■ Egypt: 7%
■ United Arab Emirates: 6%
■ Rest of World: 29%



Trip Ninja (headquartered in Canada)

■ Canada : 88%
■ South America: 8%
■ USA: 4%

(1) By TTV.

About Webjet Limited.

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Modern slavery governance and reporting

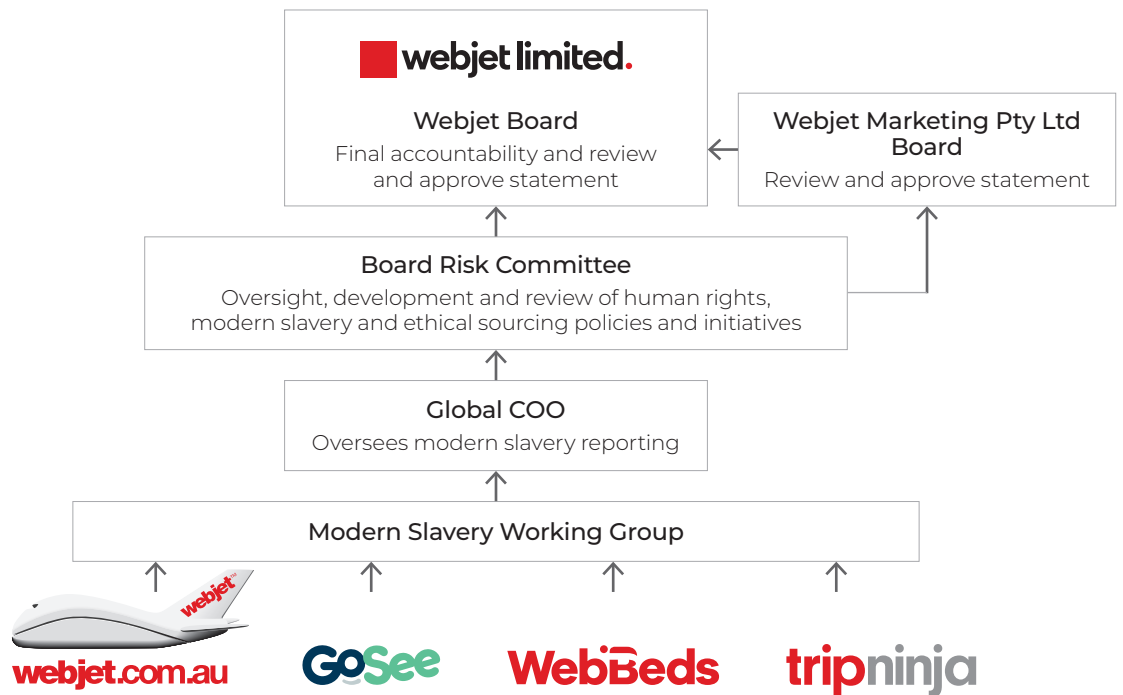
Active engagement, consultation and collaboration with our controlled entities is a key component of our modern slavery governance. During the reporting period, each business unit had a representative on our Modern Slavery Working Group and each business unit took part in implementing our modern slavery action plan. Each reporting entity contributed to and was involved in the preparation of this joint statement, noting that all Webjet controlled entities are overseen by the Webjet leadership team and have common policies.

The CEO of each business unit is responsible for managing modern slavery risks within their own operations, with oversight from the Global Chief Operating Officer.

The Global Chief Operating Officer is also responsible for overseeing modern slavery reporting, with input from Webjet’s designated Modern Slavery Working Group and relevant finance, human resources and supply chain teams across each of our controlled entity groups, business units and regions.

The Board’s Risk Committee is engaged in assessing and addressing modern slavery, while final accountability sits with the Board. During the year we updated our Risk Committee Charter to formally recognise the Risk Committee’s responsibility for the oversight, development and review of human rights, modern slavery and ethical sourcing policies and initiatives. The Risk Committee regularly reports to the Board and reviews and recommends the approval of this statement to the Board. The Webjet and Webjet Marketing Boards each review and approve this statement.

Our annual Modern Slavery Statements are available on our investor website (in addition to the online Modern Slavery Register). Our Global Code of Conduct, Global Whistleblowing Policy and Global Sanctions Policy also support our modern slavery mitigation program.



Webjet's modern slavery risks.

Identifying and assessing risk

In FY22 Webjet engaged an independent consultant to assist with our modern slavery risk assessment. The assessment was comprehensive and included the use of externally developed data and analytics.

We consider the overall modern slavery risk profile of our business, operations and supply chain remains unchanged since the independent risk assessment we conducted in FY22. Further detail on the identified risks is set out below.

Modern slavery risks within our operations

We consider that there is a low risk of Webjet being directly linked, causing or contributing to modern slavery practices within our own operations.

Our assessment of modern slavery risk within our operations remains as reported in FY22 and is summarised below:

	Industry risk	Country risk
Webjet OTA	Low	Low
GoSee	Low	Low
TripNinja	Low	Low
WebBeds	Low	Moderate to High

Our business-to-business (B2B) business, WebBeds, has more complex and geographically diverse operations than our business to consumer businesses (B2C). Its operations in countries with moderate to high inherent modern slavery risks, such as the Philippines, Romania and Egypt, mean that it has a higher risk of modern slavery in its operations than our other businesses.

Our business-to-consumer (B2C) businesses, Webjet OTA and GoSee are based in Australian and New Zealand respectively, and our technology business, Trip Ninja, is predominantly based in Canada, which are countries with low inherent modern slavery risk.

The majority of our workforce are employed directly and we have direct visibility of their terms of employment, training, leave entitlements and working conditions. We consider the risk of modern slavery in our direct workforce is low. The main activities of our global workforce are customer operations, sales and marketing, software development, supply chain coordination and professional and office support functions. We have strong policies, labour law compliance procedures, training and accessible grievance processes available to all employees to mitigate any risk of modern slavery. In countries with high inherent modern slavery risks, such as Egypt, we have also engaged the services of third-party specialists to help us ensure labour compliance.

Reputable third-party agencies and professional services firms are used to engage our indirect workforce.

Webjet's modern slavery risks.

(continued)

Modern slavery risks within our supply chains

As identified in our FY22 Modern Slavery Statement, our high-risk suppliers include hotels and accommodation providers based in Iraq, Cameroon, Saudi Arabia, Egypt and Algeria. These high risk suppliers were a focus of our FY23 efforts and remain a focus for FY24.

Our medium-risk suppliers include hotel and accommodation providers, freight transport providers, catering services and tour operators based in Thailand, Bangladesh, Ethiopia, Russia, India, China, Vietnam, Turkey and Egypt, amongst others.

We also consider it likely that our hotel and accommodation providers, car and motorhome rental providers and airline partners engage with one or more of the following suppliers (which are Tier 2 or Tier 3 suppliers of Webjet), which are at higher risk of modern slavery practices:

- catering providers;
- cleaning, security and support service providers; and
- providers of textiles, including uniforms and linen.

The following are the known risks most relevant to Webjet being linked modern slavery practices through Tier 1, Tier 2 or Tier 3 suppliers in our global supply chains:

Types of modern slavery	Supplier tier	Comments
<ul style="list-style-type: none">• Forced labour• Debt bondage• Deceptive recruiting for labour services	Tier 1	One or more of these types of modern slavery may exist in the direct employment of cleaners, hospitality staff, luggage handling staff and other support staff by our hotel and accommodation providers who have been identified as high or medium risk.
<ul style="list-style-type: none">• Forced labour• Debt bondage• Deceptive recruiting for labour services• The worst forms of child labour	Tier 2 or Tier 3	One or more of these types of modern slavery may exist in: <ul style="list-style-type: none">• the manufacturing of uniforms and linen used by airlines, hotels and accommodation providers and the sourcing of raw materials used to make them (such as cotton);• the outsourced cleaning, catering, security and support services by airlines, hotels and accommodation providers; and• the cleaning and support services sourced by car and motorhome rental providers.
<ul style="list-style-type: none">• Trafficking in persons• Forced marriage	Tier 2 or Tier 3	There is a known risk that airports, which are used by our airline partners, are used by criminals to facilitate human trafficking or forced marriage. Webjet is a member of IATA (International Air Transport Association), which has passed a resolution at its Annual General Meeting denouncing human trafficking and reaffirming the commitment of airlines to fight human trafficking through various actions.
<ul style="list-style-type: none">• Servitude	N/A	Servitude, while considered a form of modern slavery, was not identified as a material risk to our operations or supply chain.

As our work in assessing our Tier 1 suppliers is ongoing, our current focus continues to be on identifying and addressing modern slavery risks in these suppliers by redesigning our approach, which remains our highest priority.

In the future, we intend to revisit our assessment and approach to the risk in our secondary supply chain, being other hotels and accommodation providers that we work with but pay via a third-party aggregator or agent who may be exposed to the same modern slavery risks as those identified for our Tier 1 accommodation providers above.

Our assessment did not identify any actual or suspected instances of modern slavery in our operations or supply chain requiring remedial action. No whistleblower reports relating to human rights or modern slavery were received during the Reporting Period.

Actions to address modern slavery risks.

Governance and policy

We introduced our refreshed Whistleblower Policy across our global offices during the reporting period, including training our staff on the policy and raising awareness of our independent third-party reporting hotline. We also implemented a process to ensure that any whistleblower reports relating to modern slavery or human rights are notified to the Chair of our Modern Slavery and Human Rights Working Group and reported to our Risk Committee. No modern slavery or human rights grievances were raised in the reporting period. We track the number and types of complaints (including complaints relating to modern slavery) received through our whistleblowing reports, including tracking trends to identify if particular grievance topics are increasing or decreasing.

Our Modern Slavery Group held regular meetings to track the progress of our modern slavery actions against our plan. The representatives on our Modern Slavery Group each collaborate with their respective business units and act as an escalation point for any issues identified, reporting on action, progress and providing input to the preparation of this statement.

During the year we also updated our Risk Committee Charter to formally recognise the Committee's responsibility for the oversight, development and review of human rights, modern slavery and ethical sourcing policies and initiatives. The Risk Committee regularly reports to the Board and each of the Risk Committee and Board review and approve this statement.

Our people

All Webjet employees are employed in accordance with the applicable labour laws of the country in which they are employed, including in respect of minimum wages, hours of work, leave entitlements and safe working conditions. In addition, all employees have access to our Employee Assistance Program which provides employees with paid access to confidential third-party counselling, which may be utilised for support on various personal and workplace issues.

The modern slavery training (outlined under "Training and awareness" below) that was delivered to over 86% of our global workforce received very positive feedback and helped to raise awareness of our human rights and modern slavery expectations – both internally and externally.

All of our employees have access to grievance avenues both via an independent hotline as part of our Whistleblower policy or via our HR grievance processes.

Our suppliers

As part of our commitment to continuously improve our actions and supplier risk assessment, in FY23 we redesigned our supplier self assessment questionnaire to improve the meaningfulness of responses. Our redesigned questionnaire was distributed to those suppliers identified as 'high risk' in our FY22 modern slavery risk assessment and follow up phone calls were made. While we have faced some challenges in obtaining responses (or meaningful response), we are continuing to conduct follow ups. To date we have not identified any issues requiring remediation. Continuing to engage with our high risk suppliers on our self assessment questionnaire has assisted in increasing the awareness of modern slavery risk amongst those suppliers.

Although we faced challenges in obtaining responses from our suppliers and business partners, this action was effective in assisting us to reassess and improve our approach to raising supplier awareness.

Actions to address modern slavery risks.

(continued)

We also extended our supplier contractual compliance efforts in FY23 by incorporating modern slavery compliance provisions into additional and non-standard supplier contracts where relevant and applicable. These provisions require our suppliers to:

- warrant that no modern slavery (in all its forms) is occurring within the supplier's business or supply chain;
- conduct regular modern slavery risk assessments within their supply chains;
- implement appropriate controls to mitigate modern slavery risks; and
- immediately notify Webjet of any instance of modern slavery occurring within their business or supply chain.

Training and awareness

Our people are key to identifying and addressing modern slavery within our business and across our supply chain.

During FY23, we undertook a comprehensive modern slavery awareness training program, delivering modern slavery awareness training to our global workforce and our Board of Directors. A total of 1,886 staff (representing 86% of our global workforce) completed the training, along with all our Board members of both Webjet and Webjet Marketing. This program was very effective at raising awareness, as detailed in the case study below, and building the internal capacity of our Board.

As part of our action plan for FY24, we are working to ensure that our modern slavery awareness training is embedded as part of our new starter onboarding and that all remaining staff undertake the training.

Case Study:

Insights from employee modern slavery awareness training.

Our FY23 modern slavery awareness training was implemented on a global basis, with a total of 1886 staff completing the training. To measure the effectiveness of our training program, we also conducted a post training quiz. The average result of the post training quiz was 88%, indicating that the training was very successful at raising awareness.

Of the 1886 staff that completed the training, 1867 staff, representing 98.99%, reported that they had gained a better understanding and awareness of modern slavery issues.

In addition to our staff training program, all Webjet and Webjet Marketing Board members also completed the training. We separately received feedback via email from a number of staff and Board members advising that the training was informative, that they had learnt something new from it, and requesting additional information.

In light of the success of the awareness training Webjet is aiming to incorporate the training for all new starters.

Summary of progress.

Actions proposed in previous statements	Status
<p>Deliver modern slavery awareness training to all senior management and all staff with a procurement or recruitment element to their role.</p>	<p>Training was delivered to 1,886 of our staff, representing 86% of our total global workforce. Training was delivered to 100% of our reporting entities' board members.</p>
<p>Prepare a modern slavery action plan for FY23.</p>	<p>Completed.</p>
<p>Redesign the supplier self-assessment questionnaire so that the questions can better identify any 'red flags' in the responses.</p>	<p>Completed. The redesigned questionnaire was issued to all high-risk suppliers. While continued work to follow up on responses remains ongoing, to date we have not identified any issues requiring remediation.</p>
<p>Prepare an action plan for enhancing supplier awareness of modern slavery issues.</p>	<p>Since the follow up work on responses to the supplier self-assessment questionnaires remains ongoing, it is not yet appropriate to prepare the action plan which will be developed to address issues identified in those responses.</p>
<p>Conduct follow-up assessments of high risk suppliers, including using the improved supplier self-assessment questionnaires.</p>	<p>Self-assessment questionnaires have been sent to all suppliers identified as high risk in our FY22 modern slavery risk assessment, however only a few responses have been received to date and further follow-up will continue into FY24.</p>
<p>Design and implement a more comprehensive due diligence exercise covering the recruitment practices of all our third-party labour providers.</p>	<p>Commenced, with further work to continue into FY24.</p>
<p>Expand the incorporation of these provisions into other non-standard supplier agreements, to the extent relevant and practicable.</p>	<p>Modern slavery compliance provisions have been (and will continue to be) incorporated into additional non-standard supplier agreements where relevant and applicable.</p>
<p>Ensure each whistleblower report relating to human rights or modern slavery is promptly escalated and addressed in accordance with the procedures set out in our Whistleblowing Policy. Any whistleblower reports that relate to human rights or modern slavery will be reported on in our next modern slavery statement.</p>	<p>We introduced our refreshed Whistleblower Policy across our global offices. We have also implemented a process to ensure that any whistleblower reports relating to modern slavery or human rights are notified to the Chair of our Modern Slavery and Human Rights Working Group and reported to our Risk Committee. No modern slavery or human rights grievances were raised in the reporting period. To ensure our Whistleblower Policy provides an effective avenue for employees to safely raise concerns about modern slavery and human rights, Whistleblowing reports can be made confidentially and anonymously via a third-party reporting platform.</p>

Assessing effectiveness and looking ahead.

Assessing the effectiveness of the actions we take to address modern slavery risk is critical to ensuring that we are taking the right actions, that our actions are having the intended impact and to our continuous improvement.

To ensure we have an effective response to modern slavery we have established the following foundational components to our modern slavery risk response:

- awareness training for our staff
- clear grievance reporting mechanisms;
- collaborative internal governance and risk management frameworks;
- clear global policies and guidance;
- actionable plans to ensure continuous improvement.

As our understanding of our modern slavery risk exposure matures, we are aiming to increase the use of quantitative assessment measures.

Actions undertaken	Assessment of effectiveness	New Actions/KPIs proposed for FY24
<p>Deliver modern slavery awareness training to all senior management and all staff with a procurement or recruitment element to their role.</p>	<p>These training sessions were effective in enhancing the understanding and awareness of modern slavery issues by the staff, senior management and directors who completed the training. Awareness training was delivered to 1886 of our staff, representing 86% of our total global workforce. The training was delivered to all directors of our reporting entities.</p>	<p>Embed modern slavery awareness training as part of new starter onboarding process. Deliver training to remaining 14% of global workforce.</p>
<p>Prepare a modern slavery action plan for FY23.</p>	<p>This action was effective, with all actions identified in the plan being either fully or partially completed. The plan increased the involvement and collaboration of our group entities in relation to modern slavery risks and mitigation actions.</p>	<p>Prepare a modern slavery action plan for FY24.</p>
<p>Redesign the supplier self-assessment questionnaire so that the questions can better identify any 'red flags' in the responses. Prepare an action plan for enhancing supplier awareness of modern slavery issues.</p>	<p>The redesign of our supplier self-assessment was completed and the redesigned questionnaire was utilized for our follow ups with high-risk suppliers. Although we faced challenges in obtaining responses from some suppliers and business partners, this action was effective in assisting us to reassess and improve our approach to raising supplier awareness.</p>	<p>Develop a framework to engage at a more granular level (for example by direct consultation) with a selection of our suppliers and business partners. Prepare an action plan for enhancing supplier awareness of modern slavery issues.</p>

Assessing effectiveness and looking ahead.

(continued)

Actions undertaken	Assessment of effectiveness	New Actions/KPIs proposed for FY24
<p>Conduct follow-up assessments of high risk suppliers, including using the improved supplier self-assessment questionnaires.</p>	<p>Obtaining responses to the supplier self-assessment questionnaires proved challenging. This has made us more aware of the need to directly engage with high risk suppliers and operations partners at a more granular level.</p>	<p>As above, we intend to develop a framework to engage a at a more granular level (for example by direct consultation) with a selection of our suppliers and business partners. Develop a process for screening new hotel partners as part of due diligence.</p>
<p>Design and implement a more comprehensive due diligence exercise covering the recruitment practices of all our third-party labour providers.</p>	<p>This action has commenced but further work is ongoing. It is too early to assess the effectiveness of this action.</p>	<p>Continue to conduct due diligence of recruitment practices of our 3rd party providers.</p>
<p>Expand the incorporation of these provisions into other non-standard supplier agreements, to the extent relevant and practicable.</p>	<p>This action has been largely achieved and continues to be implemented. We faced challenges in some instances where we hold minimal leverage with the supplier (such as large social media platforms providers), however even in those instances, our discussions have been effective in raising awareness of modern slavery with our suppliers.</p>	<p>Continue to incorporate modern slavery provisions into non-standard supplier agreements. Prepare an action plan for enhancing supplier awareness of modern slavery issues.</p>
<p>Ensure each whistleblower report relating to human rights or modern slavery is promptly escalated and addressed in accordance with the procedures set out in our Whistleblowing Policy. Any whistleblower reports that relate to human rights or modern slavery will be reported on in our next modern slavery statement.</p>	<p>We track the number and types of complaints (including complaints relating to modern slavery) received through our whistleblowing reports, including tracking trends to identify if particular grievance topics are increasing or decreasing. No whistleblower reports relating to modern slavery or human rights were received.</p>	<p>Conduct an employee voice survey asking how comfortable employees feel raising grievances and which grievance channels they trust most. Develop and implement a new Human Rights Policy throughout our global entities.</p>

We recognise the challenges with tracking the effectiveness of actions in a modern slavery context in a way that is meaningful. We are committed to making progressive improvements to our risk management approach, continually refining our approach to measuring effectiveness, and providing transparent disclosures regarding our overall progress, including against the actions/KPIs proposed above.

Consultation across the Webjet group.

Under the Act, Webjet is required to consult with its owned and controlled entities. As another reporting entity in our group, Webjet Marketing was consulted in the preparation of this statement and its key management personnel and directors each reviewed and approved its contents. Our Global Chief Operating Officer, who is responsible for overseeing our modern slavery reporting and the Chair of our Modern Slavery Working Group, is also a director of Webjet Marketing.

The directors of our reporting entities received modern slavery awareness training and information about Webjet's obligations under the modern slavery legislation and our reporting process. Our Modern Slavery Working Group includes a representative from all of our businesses. Our non-reporting owned and controlled entities also play a critical part of our modern slavery risk assessments and initiatives as well as the preparation of this statement. Our controlled entities have been instrumental in assisting with our modern slavery risk mitigation uplift efforts, supporting the roll-out of our awareness training and supplier self-assessments across the group.

This Statement has been prepared in consultation with each of Webjet's business units, recommended by the Risk Committee to the Board and the Boards of Webjet and Webjet Marketing have each approved it. The consultation process involved a combination of interactive online workshops, telephone discussions and written correspondence between members of our Modern Slavery Working Group and key stakeholders from our global finance, human resources and supply chain teams.

Annexure 1**Compliance with mandatory reporting criteria.**

Mandatory reporting criteria	Topic heading	Location
Identify the reporting entities	About this Statement	Page 3
Describe the reporting entity's structure, operations, and supply chains	Our operations	Page 4
	Our organisational structure	Page 6
	Our workforce	Page 6
	Our global supply chain	Page 6
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls	Modern slavery risks within our operations	Page 8
	Modern slavery risks within our supply chains	Page 9
Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes	Assessing our modern slavery risks	Page 8
	Actions to address modern slavery risks	Page 10
	Summary of progress	Page 12
Describe how the reporting entity assesses the effectiveness of these actions	Assessing effectiveness and looking ahead	Page 13, 14
Describe the process of consultation with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity giving the statement)	Consultation and approval	Page 7, 10, 15
Provide any other relevant information	Progress since last statement	Page 12
	Our values	Page 5
	Modern slavery governance and reporting	Page 7
	New actions proposed for FY24	Page 13, 14

Annexure 2

List of subsidiaries/controlled entities.

Subsidiaries

The Group's subsidiaries as at 31 March 2023 are set out below. Unless otherwise stated, they are 100% owned, have share capital consisting solely of ordinary shares that are held directly by the Group, and the proportion of ownership interests held equals the voting rights held by the Group.

Australia

- Webjet Marketing Pty Ltd⁽¹⁾
- Rez Group Pty Ltd⁽¹⁾
- GoSee Travel Pty Ltd⁽¹⁾

United Arab Emirates

- WebBeds FZ LLC
- Umrah Holidays International FZ-LLC⁽²⁾
- Destinations of the World DMCC
- DOTW KSA Ltd
- DOTW Kuwait Ltd
- Destinations of the World Travel and Tourism LLC

United Kingdom

- WebBeds Limited
- GoSee Travel Limited
- Fyrkant Ltd
- Sunhotels Ltd
- Totalstay Limited
- JAC Group (Holdings) Limited
- JAC Travel Limited

Other countries

- Webjet Marketing NZ Pty Ltd
- WebBeds LLC
- Search Republic Limited⁽³⁾
- GoSee Limited
- GoSee Travel LLC
- Trip Ninja Inc
- WebBeds Services SRL
- Busy Bee SL
- Sunhotels Mundo S.L.U
- JAC Travel Inc
- Earlybird (Shenzen) Limited
- FIT Ruums PTE Ltd
- JAC Travel Information Consulting (Beijing) Company Limited
- Webjet International Limited
- WebBeds Holding Co Limited
- WebBeds Travel & Tourism
- Umrah Holidays Travel & Tourism
- DOTW Holdings Limited (BVI)
- Destinations of the World (Thailand) Co., Limited
- Destinations of the World (Malaysia) Sdn. Bhd
- Destinations of the World Holding Establishment
- Destinations of the World (Subcontinent) Private Limited
- Travel Tech SRL
- Destinations of the World Istanbul Sehayat Ve Turizm Anonim Sirketi
- DOTW Shared Services Inc.
- Destinations of the World Saudi Arabia for Tourism LLC
- DoTW Kuwait for Hotels, Real Estate and Healthcare Centres Reservations WLL
- Dominica de Turismo (Domitur) SRL
- Shanghai Meihao Information Technology Co., Ltd.
- Bico T. S. Japan Co Ltd
- Bico Trip Co. Ltd (Korea)

(1) Member of the Australian tax-consolidated group.

(2) 71% interest held. The value of non-controlling interest is not material.

(3) 51% interest held. The value of non-controlling interest is not material.

 **webjet limited.**

Level 2, 509 St Kilda Road
Melbourne VIC 3004, Australia
ABN 68 002 013 612
www.webjetlimited.com