

webjet limited



# Modern Slavery Statement.

## 2024

### Acknowledgment of Country

We 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's Statement.

Welcome to Webjet Limited's fifth Modern Slavery Statement. As we continued our strong recovery in FY24, with key metrics showing a significant uplift over the prior year, we also recognise the growing interest from stakeholders in understanding how we manage the key environmental, social and governance drivers of our business.

We have continued to make progress towards our modern slavery and human rights initiatives during FY24.

### Some key highlights from FY24 include:

- Introducing a new Human Rights Policy applicable to all individuals associated with Webjet Limited and its controlled subsidiaries across the globe.
- Continuing to deliver modern slavery awareness training to our global workforce and embedding it into our new starter commencement process.
- Incorporating modern slavery as a standing discussion item into regular meetings held by the Risk Committees of both Webjet Limited and our largest business division, WebBeds.
- Collaborating across our business units via our Modern Slavery Working Group.

Webjet Limited 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 dark ink, appearing to read 'John Guscic', written in a cursive style.

**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 Webjet Limited ABN 68 002 013 612 (**Webjet**) and Webjet Marketing Pty Ltd ABN 84 063 430 848 (**Webjet Marketing**), each of which qualifies as a reporting entity under the Act.

- **Webjet** is a public company listed on the Australian Securities Exchange (ASX: WEB), headquartered in Melbourne, Australia.
- **Webjet Marketing** is a wholly owned Australian subsidiary of Webjet. Webjet Marketing runs the Webjet OTA business – the number one online travel agency in Australia and New Zealand. It is a member of IATA (International Air Transport Association) and ATIA (Australian Travel Industry Association).

Other than Webjet and Webjet Marketing, no other Webjet controlled subsidiary is a reporting entity for the purposes of the Act. Nevertheless, Webjet is committed to ensuring that our approach to modern slavery is standardised across each of our businesses, including WebBeds, Webjet OTA, GoSee and Trip Ninja.

This is Webjet's fifth 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 2024 (**Reporting Period**), as well as our plans for future years.

## 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. For our FY24 statement, we have disclosed additional data relating to our global workforce, including gender statistics, and included new heat maps for the key locations of our global workforce showing their prevalence and vulnerability to modern slavery based on the Global Slavery Index.



# Our Operations.



# Snapshot.

## About Webjet Limited.

### Enabling travel for more than 25 years.

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

### FY24 Group performance

#### Bookings

**8.7**  
million

↑ **21%** on FY23

#### TTV

**\$5.6**  
billion

↑ **29%** on FY23

#### Revenue

**\$471.5**  
million

↑ **29%** on FY23

#### EBITDA

UNDERLYING

**\$188.1**  
million

↑ **40%** on FY23

**“Strategy delivering outperformance.”**

All Group metrics at record levels, materially ahead of both FY23 & pre-pandemic.

#### Cash Position

**\$630 million**

Cash & Cash Equivalents as at 31 March 2024

#### Our business in FY24...



**2,250+** People

across



**50+** Countries serving



**1.1m+** Customers

# Our brands.

## Our travel & travel tech businesses.

Our wholly owned digital travel brands sell travel all over the world, and the smart technology we develop makes booking and transacting travel better.

### WebBeds

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

 visit: [www.webbeds.com](http://www.webbeds.com)

All key metrics at record levels, significantly ahead of FY23 & pre-pandemic levels.

### TTV

**\$4.0 billion**

↑ **42%** on FY23



[webjet.com.au](http://webjet.com.au)

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

 visit: [www.webjet.com.au](http://www.webjet.com.au)

Strong growth on all key metrics, with significant growth in international market share.

### Total GDS Market Share

**8.2%**

↑ **46%** on pre-pandemic levels

### GoSee

A leading online global motorhome & car rental website

 visit: [www.goseetravel.com](http://www.goseetravel.com)

Improvement over FY23, profitability impacted as inbound tourism & supply chain challenges continue.

### EBITDA

**\$1.7 million**

↑ **6%** on FY23

### tripninja

Complex travel itinerary automation for digital travel businesses

 visit: [www.tripninja.io](http://www.tripninja.io)

Helping Webjet OTA realise significant uplift in revenue per search & increase conversions.

Trip Ninja technology is now being sold to other industry participants in other markets.

**GDS Market Share:** Across all GDS Bookings – Australia Travel Agency Offline & Online. Pre-pandemic = 2019

For further information about Webjet, please see Webjet's FY24 Annual Report.

# 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.

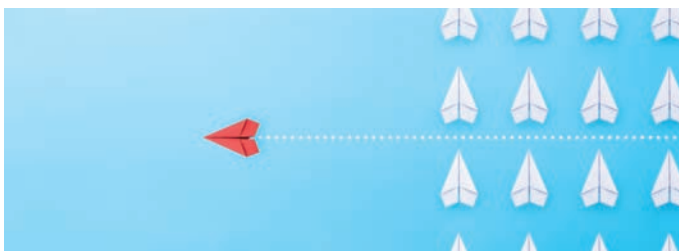


## Integrity.

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.



# Our organisational structure.

As a global online travel business, we are proud to operate a geographically diverse workforce. As at 31 March 2024, Webjet had 48 subsidiaries located in various countries around the world, including Australia, New Zealand, United Arab Emirates, Spain, UK, US, Canada, Philippines, Romania and Singapore. A full list of Webjet's subsidiaries is set out in Annexure 2.

Webjet's governance framework encompasses both centralised policies that apply to Webjet and its subsidiaries, as well as localised policies, procedures and guidelines that are tailored to meet country-specific requirements.

## Our workforce.

In FY24, our global workforce comprised **2,263 people** from **50 different countries**, of which over 2,000 people were directly employed or engaged by us. Our indirect workforce is engaged through reputable third-party agencies or professional services firms.

### Workforce breakdown by gender

All employees	FY24
<b>Total</b>	<b>2,263</b>
<b>Female</b>	<b>55%</b>
<b>Male</b>	<b>45%</b>

### Workforce breakdown by country

Country	% of total	Modern Slavery Prevalence	Modern Slavery Vulnerability
Philippines	23%	7.8	66
Romania	16%	7.5	26
Spain	11%	2.3	10
Australia	7%	1.6	7
UK	6%	1.8	14
New Zealand	6%	1.6	8
United Arab Emirates	5%	13.4	40
Indonesia	5%	6.7	49
Egypt	4%	4.3	59
USA	2%	3.3	25
Other	13%		

### Workforce breakdown by business unit

Country	% of total	Modern Slavery Prevalence	Modern Slavery Vulnerability
<b>Corporate</b> (headquartered in Australia)			
Australia	32%	1.6	7
Romania	30%	7.5	26
UK	20%	1.8	14
Spain	15%	2.3	10
Other	3%		

### WebBeds (headquartered in the United Arab Emirates)

Philippines	28%	7.8	66
Romania	17%	7.5	26
Spain	12%	2.3	10
UK	7%	1.8	14
United Arab Emirates	6%	13.4	40
Indonesia	6%	6.7	49
Egypt	5%	4.3	59
Other	18%		

### Webjet OTA (headquartered in Australia)

Australia	96%	1.6	7
Other	4%		

### GoSee (headquartered in New Zealand)

New Zealand	89%	1.6	8
Romania	11%	7.5	26

### Trip Ninja (headquartered in Canada)

Canada	92%	1.8	11
Other	8%		



(1) **Prevalence:** estimated proportion of population living in modern slavery per thousand people, according to Global Slavery Index published by [www.walkfree.org](http://www.walkfree.org).

(2) **Vulnerability:** vulnerability to modern slavery, out of 100, according to Global Slavery Index published by [www.walkfree.org](http://www.walkfree.org). A higher score reflects greater vulnerability.

## Our global supply chain.



**136** airlines,<sup>(3)</sup> the top 5<sup>(4)</sup> of which represent approximately 69% of our aggregate FY24 flight TTV (total transaction value) and have published their own modern slavery statements



**1,868** car and motorhome providers,<sup>(5)</sup> which are based predominantly in Australia, New Zealand, North America, Europe and South Africa



**500,000+** hotels of which approximately **93,000** are directly contracted and the rest are indirectly contracted via third-party wholesalers such as Expedia, Booking.com and Hotelbeds



**<1,000** other Tier 1 suppliers globally, which include affiliate partners, advertising and marketing services, software and IT services, insurance, office expenses, utilities, and professional services.

(3) As at 31 March 2024. (4) By TTV. (5) As at August 2024.



# Modern slavery governance and reporting.

Webjet takes a collaborative approach to modern slavery governance. During the Reporting Period, each business unit was represented on our Modern Slavery Working Group, which collaborated with various business functions to ensure each business unit took part in implementing our modern slavery action plan.

Each reporting entity covered by this Statement contributed to the preparation of this 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.

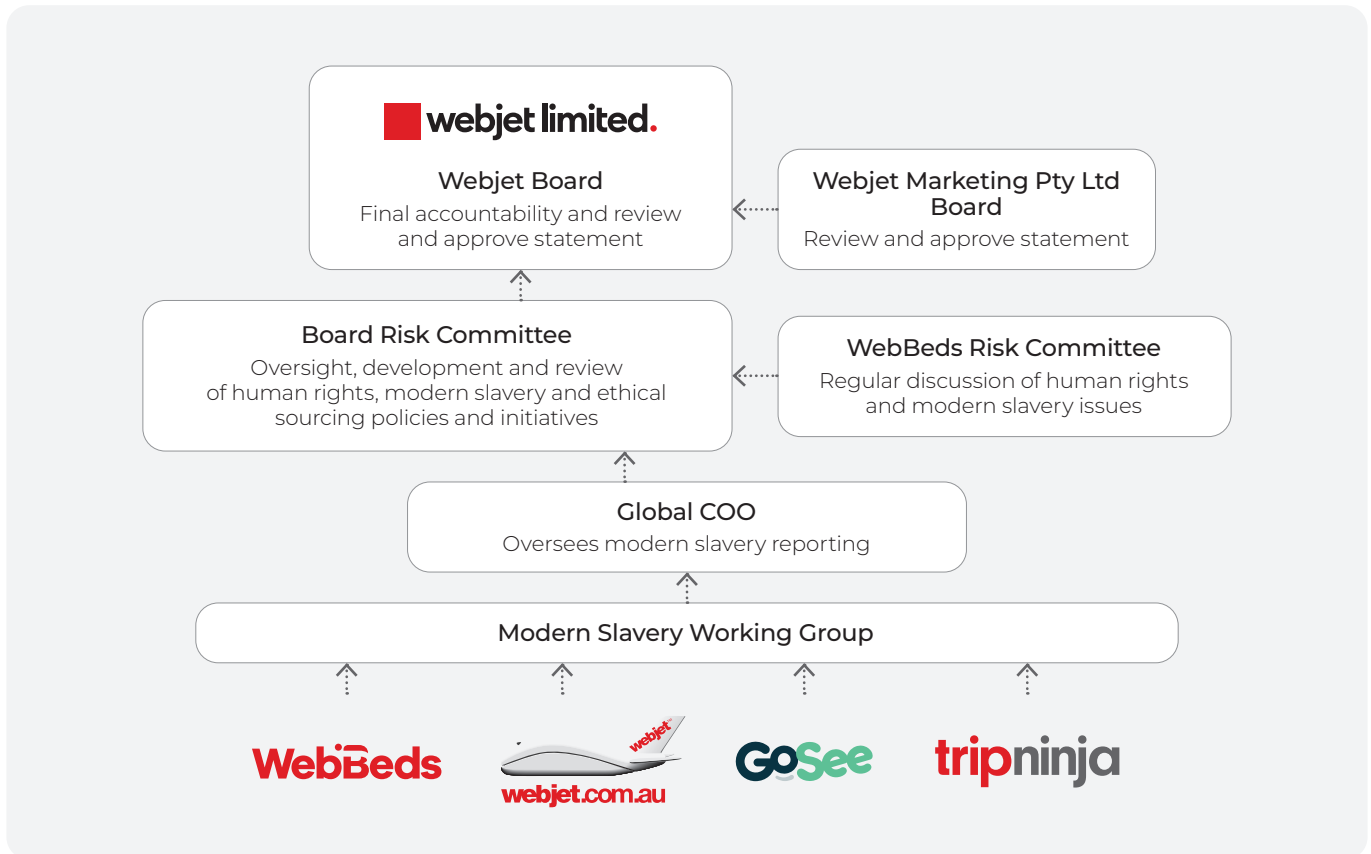
The Global Chief Operating Officer is also responsible for overseeing modern slavery reporting, with input from Webjet’s Modern Slavery Working Group and relevant finance, human resources and supply chain teams across each of our subsidiaries, business units and regions.

The Board’s Risk Committee is responsible for the oversight, development and review of human rights, modern slavery and ethical sourcing policies and initiatives, as reflected in its Committee Charter, while final accountability sits with the Board.

The Risk Committee regularly reports to the Board and reviews and recommends to the Board the approval of each year’s modern slavery statement. The statement is then reviewed and given final approval by the Webjet Board and the board of each subsidiary that is a reporting entity for the relevant reporting period.

During the Reporting Period, we took the additional step of incorporating modern slavery as a standing discussion item into regular meetings held by the Risk Committees of both Webjet and our largest business division, WebBeds. The WebBeds Risk Committee comprises business representatives from a wide range of functions and geographic regions. As WebBeds has the largest workforce with the greatest level of geographic diversity amongst all our business units, regular discussion of modern slavery issues in this forum promotes further awareness and ensures any potential issues are identified and addressed effectively.

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



# 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.

In FY24, we conducted an internal modern slavery risk assessment and concluded that the overall modern slavery risk profile of our business, operations and supply chain remains unchanged since the independent risk assessment conducted in FY22. Further detail of the identified risks is set out below.

Our FY24 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.

## Modern slavery risks within our operations.

We consider that there is a low risk of Webjet being directly linked to, 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 (**B2C**) businesses. WebBeds' operations in certain countries with moderate to high inherent modern slavery risk, 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 B2C businesses, Webjet OTA and GoSee are based in Australia and New Zealand respectively, and our technology business, Trip Ninja, is predominantly based in Canada, all of which are countries with low inherent modern slavery risk.

The majority of our workforce are employed or engaged 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 include 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 avenues available to all employees to mitigate any risk of modern slavery. In countries with high inherent modern slavery risk, 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.

Our high-risk suppliers include hotels and accommodation providers based in Iraq, Cameroon, Saudi Arabia, Egypt and Algeria.

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.

As a result of the above, there are risks of Webjet potentially being linked to the following 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"> <li>• Forced labour</li> <li>• Debt bondage</li> <li>• Deceptive recruiting for labour services</li> </ul>	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"> <li>• Forced labour</li> <li>• Debt bondage</li> <li>• Deceptive recruiting for labour services</li> <li>• The worst forms of child labour</li> </ul>	Tier 2 or Tier 3	One or more of these types of modern slavery may exist in: <ul style="list-style-type: none"> <li>• 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);</li> <li>• the outsourced cleaning, catering, security and support services by airlines, hotels and accommodation providers; and</li> <li>• the cleaning and support services sourced by car and motorhome rental providers.</li> </ul>
<ul style="list-style-type: none"> <li>• Trafficking in persons</li> <li>• Forced marriage</li> </ul>	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 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"> <li>• Servitude</li> </ul>	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 raising awareness, identifying and addressing modern slavery risks in these suppliers, which remain our highest priority.

# Actions to address modern slavery risks.

## Governance and policy.

During the Reporting Period, we introduced a new Human Rights Policy applicable to all individuals associated with Webjet Limited and its controlled subsidiaries across the globe, including employees, contractors, suppliers, operational partners and customers. The policy reinforces our commitment to upholding and promoting human rights in all aspects of our operations. A copy of the policy is available on our corporate website at [www.webjetlimited.com](http://www.webjetlimited.com).

Our Human Rights Policy supplements our existing policies, including our Global Code of Conduct, Global Whistleblowing Policy and Global Sanctions Policy to ensure any modern slavery or human rights issues are appropriately reported and escalated. Our internal reporting processes ensure all whistleblower reports relating to modern slavery or human rights are notified to the Chair of our Modern Slavery Working Group and reported to the Risk Committee. During the Reporting Period, we did not receive any modern slavery or human rights complaints through any of our available grievance reporting channels.

Our Modern Slavery Working Group held regular meetings to track progress against the modern slavery action plan. The members of the working group each collaborate with their respective business units and other functional divisions, and act as an escalation point for any issues identified. The working group also provides input into and oversees the preparation of this Statement.

As noted above, during the Reporting Period, we also incorporated modern slavery as a standing discussion item into regular meetings held by the Risk Committees of both Webjet and WebBeds – our largest business division. The WebBeds Risk Committee reports to the Webjet Risk Committee, which in turn reports regularly to the Board. Each of the Webjet Risk Committee and the 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.

All our employees have access to grievance avenues both via an independent third-party platform as part of our Global Whistleblowing Policy (which allows issues to be reported anonymously) and via our internal HR grievance processes.

## Training and awareness.

We recognise the importance of promoting and improving modern slavery awareness amongst our people, who are key to identifying and addressing modern slavery within our business operations and across our supply chains.

In FY23, we rolled out a comprehensive modern slavery awareness training program to our global workforce and our Board of Directors. All Board members completed the training along with 86% of our staff. As reported in our FY23 Modern Slavery Statement, the program was very effective at raising awareness and building the internal capacity of our staff and our Board.

In FY24, we embedded mandatory modern slavery awareness training into the new employee commencement process across most of our major offices globally. We also followed up on those who didn't complete training in FY23. A total of 232 employees completed modern slavery awareness training during FY24, representing more than 10% of our workforce. This is in addition to the 86% who completed training during FY23.



## **Actions to address modern slavery risks** (continued)

### **Our suppliers.**

As part of the independent risk assessment undertaken in FY22, it was identified that all our high-risk suppliers related to our WebBeds business. They comprised hotels and accommodation providers in certain countries with high inherent modern slavery risk. Throughout the course of the last two years (FY23 and FY24), we have continued to attempt further due diligence on these suppliers, with varying degrees of success. Some of these suppliers have completed our tailored self-assessment questionnaire to our satisfaction, with no further actions required. Numerous follow-up attempts have been made in respect of other suppliers, who have not responded to our requests to engage on this topic. Hotels which were part of larger global chains declined to participate in our due diligence process on the basis that their parent company had its own policies relating to human rights and published its own modern slavery statements.

Our experience over the past two years highlights the challenges faced by WebBeds (and in turn, by Webjet) in engaging with its supply partners on human rights and modern slavery issues. WebBeds' operating model involves it acting as an 'intermediary' that facilitates the distribution of hotel rooms to hotel partners via an online platform. As such, WebBeds has very limited ability to dictate to any individual hotel the terms and conditions on which their services are to be provided. This is further complicated by the fact that only a small portion of hotels and accommodation providers have a direct contract with us. The rest are indirectly contracted via third-party wholesale affiliates such as Expedia, Booking.com, Hotelbeds and others. Some of these third-parties, such as Expedia, Booking.com and Hotelbeds, publish their own modern slavery statements as required under applicable law.

During FY24, we continued to request the incorporation of modern slavery compliance provisions into non-standard supplier contracts where possible to do so (after having incorporated such provisions into our own standard contracts in FY22). 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.

WebBeds had limited ability to negotiate the incorporation of the above provisions into contracts with larger hotel chains, which require contracts to be entered into on the hotel's standard terms and conditions that are enforced across all B2B businesses globally. Many of the larger hotel chains publish their own modern slavery statements as required under applicable law.

# Summary of progress.

Actions proposed in previous statements	Status
Embed modern slavery awareness training as part of new starter onboarding process.	Completed
Deliver modern slavery awareness training to remaining 14% of global workforce who did not complete it during FY23.	Ongoing (additional 10% completed during FY24)
Prepare a modern slavery action plan for FY24.	Completed
Develop a framework to engage at a more granular level (for example by direct consultation) with a selection of our suppliers and business partners.	Ongoing
Prepare an action plan for enhancing supplier awareness of modern slavery issues.	Ongoing
Develop a process for screening new hotel partners as part of due diligence.	Ongoing
Conduct due diligence of recruitment practices of our third-party providers.	Ongoing
Continue to incorporate modern slavery provisions into non-standard supplier agreements.	Ongoing
Conduct an employee voice survey asking how comfortable employees feel raising grievances and which grievance channels they trust most.	Deferred to FY25
Develop and implement a new Human Rights Policy for our global entities.	Completed

# Assessing effectiveness.

Assessing the effectiveness of the actions we take to address modern slavery risks is critical to ensuring that we are taking the right actions, that our actions are having the intended impact and that we are continuously improving our processes.

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; and
- actionable plans to ensure continuous improvement.

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

Actions undertaken	Assessment of effectiveness
<p>Embed modern slavery awareness training as part of new starter onboarding process.</p> <p>Deliver modern slavery awareness training to remaining 14% of global workforce who did not complete it during FY23.</p>	<p>These actions were effective in enhancing the understanding and awareness of modern slavery issues by the staff who completed the training.</p> <p>By embedding modern slavery awareness training into our new starter onboarding process, we are bringing modern slavery issues to the forefront and setting appropriate expectations regarding human rights from day one.</p> <p>An additional 10% of our global workforce completed training in FY24, bringing our total training completion rate across FY23 and FY24 to over 96%.</p>
<p>Prepare a modern slavery action plan for FY24.</p>	<p>This action was effective in helping the Modern Slavery Working Group focus its efforts, prioritise and track the progress of various initiatives throughout FY24.</p>
<p>Develop and implement a new Human Rights Policy for our global entities.</p>	<p>This action was effective in raising further awareness of modern slavery and human rights amongst our internal and external stakeholders. The policy is publicly available on our corporate website, reinforcing our commitment to human rights.</p>
<p>Incorporate modern slavery as a standing discussion item into regular meetings held by the Risk Committees of both Webjet and WebBeds, our largest business division.</p>	<p>This action has been effective in ensuring any human rights or modern slavery concerns are appropriately reported and escalated within our organisation. It also provides Webjet's Risk Committee with appropriate oversight over human rights and modern slavery issues, which in turn allows the Board to adequately discharge its duties in this regard.</p>
<p>Continue to incorporate modern slavery provisions into non-standard supplier agreements.</p>	<p>Where possible, we have endeavoured to incorporate modern slavery provisions into new supplier agreements entered into during FY24. Some suppliers have questioned the need for such provisions, which provided us with the opportunity to have a conversation about modern slavery issues. We consider this action to have been effective in raising modern slavery awareness amongst our suppliers.</p>

We recognise the challenges of 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.

# Looking ahead.

As announced on 8 August 2024, Webjet Limited will be convening an Extraordinary General Meeting of shareholders on 17 September 2024 to consider and vote on the proposed demerger of Webjet Group Limited from Webjet Limited. If approved and implemented, the demerger will form two independent ASX-listed companies, each with its own distinct operating profile, strategies and growth opportunities:

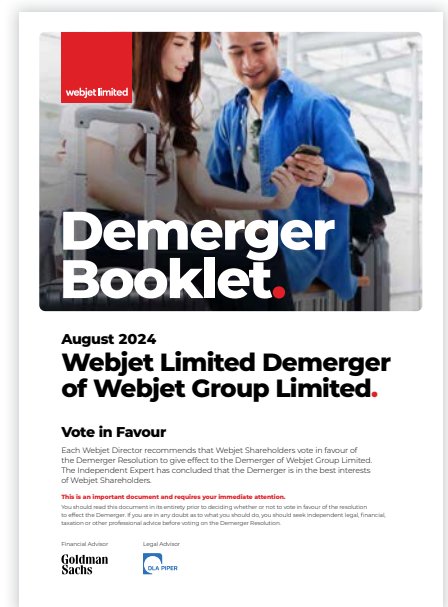
- The existing listed company, Webjet Limited, will be renamed 'WEB Travel Group' and will continue to own WebBeds, the global B2B travel distribution business.
- The demerged and newly listed company, Webjet Group Limited, will comprise our B2C businesses – Webjet OTA, GoSee and Trip Ninja.

If the demerger proceeds, each company is expected to constitute a reporting entity under the Act and each will also have its own distinct modern slavery risk profile.

Some of our proposed actions for FY25 will depend on whether the demerger is implemented. Regardless of whether the demerger proceeds, we intend to undertake the following actions during FY25:

- Prepare a modern slavery action plan for FY25.
- Refresh our modern slavery risk assessment.
- Complete due diligence on the recruitment practices of our third party labour providers.
- Conduct an employee voice survey asking how comfortable employees feel raising grievances and which grievance channels they trust most.
- Continue to incorporate modern slavery provisions into non-standard supplier agreements.

If the demerger proceeds, each company may pursue further initiatives appropriate to its own unique modern slavery risk profile.





# Consultation across the Webjet group.

Under the Act, Webjet is required to consult with its owned and controlled entities. The key management personnel and directors of Webjet Marketing, being the other reporting entity covered by this Statement, were consulted in the preparation of this Statement and have reviewed and approved its release. Our Global Chief Operating Officer, who is responsible for overseeing our modern slavery reporting and is also 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 Act. Our Modern Slavery Working Group includes representation from each of our business units. Webjet's other owned and controlled entities (who are not reporting entities) also play a critical role in our modern slavery risk assessments and initiatives, and in 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 and approved by the Risk Committee and the Board of Webjet Limited. 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 entity	About this Statement	Page 03
Describe the reporting entity's structure, operations, and supply chains	Our operations	Page 04
	Our organisational structure	Page 07
	Our workforce	Page 07
	Our global supply chain	Page 08
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)	Modern slavery risks within our operations	Page 10
	Modern slavery risks within our supply chains	Page 11
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	Identifying and assessing risk	Page 10
	Actions to address modern slavery risks	Page 12
	Summary of progress	Page 14
Describe how the reporting entity assesses the effectiveness of these actions	Assessing effectiveness	Page 15
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 across the Webjet group	Page 17
Provide any other relevant information	Progress since last statement	Page 03
	Our culture, our people, our values	Page 06
	Modern slavery governance and reporting	Page 09
	Looking ahead	Page 16

## Annexure 2

# List of subsidiaries.

The Group's subsidiaries as at 31 March 2024 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

- GoSee Travel Pty Ltd<sup>(1)</sup>
- Rez Group Pty Ltd<sup>(1)</sup>
- Webjet Marketing Pty Ltd<sup>(1)</sup>

### United Arab Emirates

- Destinations of the World DMCC
- Destinations of the World Travel and Tourism LLC
- DOTW KSA Limited
- DOTW Kuwait Limited
- Umrah Holidays International FZ-LLC
- WebBeds FZ LLC

### United Kingdom

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

### Other countries

- Bico Trip Co. Ltd
- Bico T.S. Japan Co Ltd
- Busy Bee SL
- Destinations of the World Holding Establishment
- Destinations of the World Istanbul Sehayat Ve Turizm Anonim Sirketi
- Destinations of the World (Malaysia) Sdn. Bhd
- Destinations of the World Saudi Arabia for Tourism LLC
- Destinations of the World (Subcontinent) Private Limited
- Destinations of the World (Thailand) Co., Limited
- Dominica de Turismo (Domitur) SRL
- DOTW Holdings Limited
- DOTW Kuwait for Hotels, Real Estate and Healthcare Centres Reservations WLL
- DOTW Shared Services Inc.
- Earlybird (Shenzen) Limited
- FIT Ruums PTE Ltd
- GoSee Limited
- GoSee Travel LLC
- JAC Travel Inc
- JAC Travel Information Consulting (Beijing) Company Limited
- Search Republic Limited<sup>(2)</sup>
- Shanghai Meihao Information Technology Co., Ltd
- Sun hotels Mundo S.L.U
- Travel Tech SRL
- Trip Ninja Inc
- Umrah Holidays Travel & Tourism
- Webbeds Holding Co Limited
- WebBeds LLC
- WebBeds Services HK Limited
- WebBeds Services SRL
- WebBeds Travel & Tourism
- Webjet International Limited
- Webjet Marketing NZ Pty Ltd

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

(2) 51% interest held. The value of non-controlling interest is not material.

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