Webjet Limited
Sustainability Report
2021

The information presented in this report reflects Webjet Limited's management and performance on key environmental, social and governance (ESG) topics identified as material to the business and our stakeholders. The aim of this report is to communicate our understanding of the impacts associated with our operations, how we are working to manage and mitigate those impacts and to articulate the value we create for the communities that we serve.

For a more complete understanding of the business context, we recommend this report be read in tandem with the Webjet Limited Annual Report and Corporate Governance Statement. This report covers the FY21 reporting period (commencing 1 July 2020 to 31 March 2021).

This is the first Webjet Sustainability Report to be published and updates will be released on an annual basis. The information reflects the operations over which Webjet Limited has control and the processes we use to run our business.

This Report has been prepared in accordance with the Global Reporting Initiative (GRI) reporting Standards (Core option) and the Sustainability Accounting Standards Board (SASB). The contents have not been externally assured. For further information or feedback on any aspect of this report, please contact Carolyn Mole, Investor Relations.

Webjet Limited
Level 2, 509 St Kilda Road
Melbourne VIC 3004
Australia

investor@webjetlimited.com

Message from our Managing Director

Welcome to Webjet Limited's inaugural Sustainability Report.

Our business is committed to creating sustainable earnings and capital growth for our Shareholders, and to support all our stakeholders, including employees, suppliers, customers and the communities that we serve.

This report summarises the initiatives Webjet is currently undertaking at a strategic and operational level to make better choices for our business, our communities, and the environment. Our approach focuses on enhancing our existing systems to better support these objectives. By communicating our goals to the market and working towards formalising a meaningful sustainability framework, we hope to embed sustainability across our whole business.

This year we have undertaken a process to understand where our key ESG risks and opportunities are and have identified the topics that are most material to our business. We've done this because we want to focus on the issues that matter most to our stakeholders and the communities that we serve. We are in the early stages of our sustainability journey and look forward to advancing this over the coming years.

Regards

John Guscic

Managing Director
Webjet Limited

About Webjet Limited

Webjet Limited ("Webjet" or "Company") is a digital travel business spanning both wholesale markets (through B2B) and consumer (through B2C).

Webjet's principal activity is the online sale of travel products, including flights and hotel rooms. The Webjet business consists of a B2B and a B2C division.

- The B2B division comprises WebBeds, the world's #2 and fastest growing accommodation supplier to the wholesale travel industry.
- The B2C division comprises the Webjet OTA, the #1 online travel agent (OTA) in Australia and New Zealand, and Online Republic, a market leading specialist in the provision of rental car and motorhome bookings.

Our businesses

A B2B travel intermediary or 'bedbank', providing accommodation and ground services to the travel industry.

Webjet is the #1 Online Travel Agency in Australia and New Zealand.

Online Republic specialises in online bookings of rental cars and motorhomes.

WebBeds is a B2B travel intermediary or 'bedbank', providing accommodation and ground services to the travel industry. It sources content from travel suppliers, aggregates and merchandises that content then distributes it to its clients (travel enablers), who then sell to the travelling public, the 'end user'. Since its launch in 2013, WebBeds has built a significant global distribution network. Today, our staff of around 1,300 travel professionals, located in 26 offices in 21 countries, sell to over 200 destination countries through a portfolio of clients in more than 145 source markets worldwide.

Based in Melbourne Australia, Webjet OTA was established in 1998 as one of the first OTAs in the Australian market and its focus has always been on offering customers the greatest convenience and choice when booking travel. A market leader in online flight bookings, Webjet OTA also offers a broad range of ancillary products such as holiday packages, hotels, car hire and travel insurance.

Based in Auckland, New Zealand, Online Republic operates the #1 global online motorhome rental site and the #2 car rental site in Australia and New Zealand.

- Headquartered in Melbourne, Australia
- Webjet is a public company listed on the Australian Stock Exchange
- Webjet is a member of IATA (International Air Transport Association)

About Webjet Limited
(continued)

Our values

In 1998, Webjet began as a small start-up seeking to disrupt traditional norms in the highly competitive travel industry.

Our focus on offering customers the greatest convenience and choice in online travel has enabled Webjet OTA to be the #1 OTA in the Australian and New Zealand market since 2010, driven by a culture based on agility, innovation and creativity. This spirit has continued into WebBeds. Beginning as a small start-up in 2013, a willingness to challenge and disrupt industry norms enabled WebBeds to become the #2 global B2B player in just over 6 years. We have done this through a culture underpinned by 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 approach to sustainability

We understand the importance of delivering environmental and social value to our stakeholders and conducting our business with good ethics and corporate governance principles.

We have begun a process to formalise a sustainability framework that considers the expectations of all of our stakeholders. Our first sustainability framework will include the key risks that our business units face, articulate our unique value proposition, and communicate to stakeholders an understanding of our commitment to be a trusted partner for years to come. This process will enable us to focus on delivering sustainability initiatives across all aspects of our operations and focus on the initiatives that matter most.

We realise we are well placed to support an equitable and diverse value chain, encourage the wellbeing of our employees and the communities that we work alongside, and to help reduce the environmental impact of our industry. Over the coming year we aim to set meaningful short and medium-term targets that will enable us to enhance our sustainability initiatives.

The three pillars underpinning our approach to sustainability are:
(i) a commitment to reduce our operational impact on the environment
(ii) ensuring we have an equitable value chain
(iii) maintaining ethical corporate governance processes.

- Responsible travel
- Carbon neutrality
- Waste reduction
- Water efficiency
- Energy efficiency

- Supporting communities
- Modern slavery and human rights
- Workforce

- Data privacy and security
- Business ethics
- Product governance

Performance Highlights

Our approach to sustainability is aligned with both the Global Reporting Initiative (GRI) and the Sustainability Accounting Standards Board (SASB).

The below table outlines our progress against key performance indicators. A full GRI Core and SASB index can be found in the appendix of this report.

Environment
- **Carbon offsets** offered for all customers booking flights through the Webjet OTA
- **WebBeds Europe working towards carbon neutrality**
- **Improving the efficiency of our offices** by implementing efficient appliances to reduce our water, waste and electricity consumption

Social
- **Zero work-related injuries**
- **55% female workforce**
- **Increased female representation across all management levels**

Governance
- **Zero incidents of non-compliance** with laws and regulations
- Released **first Modern Slavery Statement**
- **No reportable data security breaches** in any of the Webjet businesses

Our approach to sustainability
(continued)

Aligning with the sustainable development goals.

Webjet acknowledges the importance of the Sustainable Development Goals and understands the pivotal role they play in guiding all institutions towards a more equitable and environmentally positive future.

We are reviewing the goals and believe the below are those most likely to be relevant to us. These goals will guide our approach to target setting in the long, medium and short term.

#	Goal
8	Decent work and economic growth
9	Industry, innovation and infrastructure
13	Climate action
16	Peace, justice and strong institutions
17	Partnerships for the goals

Responding to COVID-19

COVID-19 continued to have a devastating impact on the global travel industry during FY21, with ongoing lockdowns and travel restrictions in many parts of the world. We are hopeful the global rollout of vaccines will enable travel to return to historical levels and Webjet is well placed to capture demand when travel markets return. Our key focus during the year has been on ensuring the Company survives and that our staff are safe.

The outlook for travel recovery is strong – we believe there is substantial pent up demand for travel – and in particular leisure travel. We believe people will want to travel as soon as they are able and we are doing everything we can to ensure Webjet is there to capture demand when it happens. All our business are critical distribution channels that will support the recovery of the travel industry.

Webjet is a global travel business and while international travel is subdued, is well placed to benefit as domestic leisure markets open up – leisure and domestic travel are expected to lead the recovery and all our businesses are highly leveraged to domestic and international leisure markets.

The structural shift from offline to online continues to accelerate with all businesses positioned to capture demand. Globally we continue to see a structural move to online businesses as consumers get more comfortable transacting online. Webjet OTA has brand strength as the #1 OTA in Australia and New Zealand, Online Republic has global presence, broad content and strong online marketing capabilities, and WebBeds currently sells to the top 5 online travel companies globally.

Our strong capital position provides financial and strategic flexibility – throughout FY21 we continued to focus on maintaining a strong capital position to ensure we are well placed to compete as travel markets reopen. To the end we recently issued a new low coupon $250 million Convertible Note, converting our existing €100 million Convertible Note to equity, paid down a large portion of term debt and worked closely with our banks to extend all remaining debt maturity to November 2023. Cost savings initiated across all businesses helped reduce monthly cash burn.

Strategies are in place to pursue leadership in all our businesses. Further details on these and how we are responding to the impact of COVID-19 are set out in the Company's FY21 Annual Report.

Our people remain our greatest priority – COVID-19 has had an enormous impact on our staff and our immediate focus remains on their safety, health and well-being. As we ready ourselves for travel markets reopening, we are focused on ensuring we have the right structures in place to retain, motivate and engage our team all around the world.

Engaging with our stakeholders

In order to make our services accessible for everyone, we need to ensure we consider the expectations of each of our stakeholders; employees, customers, communities, suppliers, securityholders and governments. Our understanding of these stakeholders influences how we deliver on our goal to be a leading digital global travel business, whilst providing sustainable returns to our shareholders.

Employees

Webjet understands that our employees are crucial in ensuring we are able to collaborate effectively with industry to deliver on our goal. We engage with our employees at multiple points throughout the year, including through engagement surveys, annual performance reviews, business policy compliance and our health and wellbeing program, which encourages the total wellbeing of our people.

Customers and supply partners

We engage with our B2C and B2B supply partners in the same way that we engage with our purchasing customers. We engage through various platforms, which include our website, social media, our app, through our customer service centers, online chat rooms and through face to face visits. We aim to communicate in a way that shows we respect them and that we value transparency in the relationship. We also welcome feedback and constantly seek it through surveys, both over the phone and online.

External service providers

Our service suppliers are engaged after a competitive tender process during which we assess their ability to perform a defined scope of work and their high-level approach to sustainability. We undertake risk assessments and reference checks as part of our routine due diligence and once a service supplier is engaged, we conduct regular business reviews for suppliers identified as higher risk. We are committed to ensuring that all necessary laws, regulations, rules and agreements are complied with when engaging suppliers.

Shareholders

We engage with our shareholders through our half-yearly and annual financial results, Annual General Meeting, and updates to the market. Our Investor Relations team maintains relationships with our key shareholders and maintains our Corporate website (www.webjetlimited.com/) which contains documents such as the Annual Report, Annual Review, corporate governance statement and policies and procedures.

Our people

Our people are the bedrock of our company, and it is their talent, dedication and hard work that underpins our continued success.

While FY21 was a challenging year for the business and for our industry, we remained focused on nurturing Webjet's robust company culture, which is underpinned by a commitment to our values and to each other. Our response during the COVID-19 pandemic underscored this commitment, and while keeping our employees safe, connected and engaged was paramount, we continued to work on instilling best practice performance on issues such as gender diversity, flexibility, culture, engagement and health and safety.

Diversity

Webjet is proud of its diverse workforce. The Company believes that embracing diversity enhances work culture and drives business success. It is the diversity of experiences and perspectives that creates a culture of empowerment and fosters innovation, economic growth and new ideas. The Company employs more than 50 different nationalities and people come from a wide range of ages, experience and qualifications. All of the Company's business leadership teams have significant diversity by nationality. The Company is committed to having women comprise at least 30% of its board and senior management and is looking to increase this target.

The Board is accountable for ensuring that the Webjet workforce is diverse in every sense. This includes attracting and retaining talent that is different in gender, ethnicity, disability, age, thought, education and in experience. We are proud that Webjet already has a diverse workforce that represents that as a result of being a global online travel business. Webjet also has a wide range of policies in place to promote and ensure equal opportunities for diverse cultures, ages, race, sex and religions.

The diversity aims of the Board are to:

- Progressively increase the diversity profile (including the percentage of women) at both Board and Senior Executive level; and
- Ensure equal access (based primarily on merit and regardless of gender and ethnicity) to employment opportunities at work.

Workplace practices, benefits and flexibility

Webjet employees work in a range of countries and the Company complies with all local labour practices in the countries in which it operates. Webjet is committed to paying appropriate remuneration and complying with local standards around pay and benefits.

All employees are paid relevant statutory entitlements such as superannuation, pension and leave entitlements. Depending on location, employees receive a range of other benefits including insurance, transport and travel benefits. As a highly automated business, the majority of Webjet employees are highly skilled. As such they are engaged under individual contracts aimed at attracting and retaining high performing talent. Webjet benchmarks remuneration in order to attract, motivate and retain employees across all geographies. Employees are not restricted in their entitlement to freedom of association.

Webjet believes in investing in its people for the long term. It offers employees a range of formal and informal ways in which to learn, develop and grow. Employees are supported and encouraged to undertake personal and professional development.

With operations in many countries around the world, flexibility is critical to implementing the Company's business strategy. It is also important in attracting and retaining talented employees and in facilitating productivity across the business. Webjet believes achieving its business objectives are more important than strict formality in the way that it conducts business. Webjet seeks to be agile in the way that it works and therefore flexibility in formal and informal work practices is important, as is recognising that rigid working patterns may not always suit customers, staff and circumstances.

Our people
(continued)

Depending on the role, Webjet offers a range of flexible work options including work location and hours, job sharing, ad hoc arrangements, part time work, flexible start and finish times and different types of personal leave. Various technology advancements have been introduced to enable greater flexibility. This flexibility helped the Company quickly adjust to working from home required as a result of COVID-19. Following government imposed lockdown measures around the world, staff in 27 offices were supported in moving their operations from office to working from home, including for roles that had never previously been considered for work-from-home arrangements. In less than 2 weeks, all roles had moved to working from home, with minimal impact on customers, clients or suppliers.

Employee engagement

Webjet is focused on ensuring a motivated, engaged workforce and carries out regular employee satisfaction surveys across all its businesses. Surveys are run by external parties and results are shared with staff and changes made to work environments as required. FY21 results again indicate the Company has a high performing culture with a highly engaged employee base, with engagement in several areas increasing compared to FY20.

Excluding redundancies made due to the impact of COVID-19, voluntary turnover was again low and the same as for FY20. During FY21, the Company supported employees in all businesses to participate in a range of philanthropic initiatives.

Health and safety

Webjet is committed to ensuring the health and safety of its employees at work and conducting its business in accordance with all workplace health and safety laws, standard and codes of practice. The Company has a range of strategies, policies and practices in place to support a safe work environment. Webjet offers employees access to professional counselling services through an employee assistance program. Following the onset of COVID-19, the Company undertook a Health and Wellness survey to support employees in the transition to a work from home environment as well as understand stresses caused by the uncertainly and how to best support them. Webjet continued to maintain a strong safety record in FY21 with no reported lost time from injuries or work cover claims.

Workforce metrics

GENDER DIVERSITY ALL EMPLOYEES	FY21	FY20	FY19
Total	1,522	1753	2,256
Male	45%	47%	47%
Female	55%	53%	53%
% FEMALE	**FY21**	**FY20**	**FY19**
Board	33%	33%	33%
Senior Management (direct report to the MD)	37%	30%	30%
Executive Management (direct report to Head of Business)	34%	32%	25%
Manager	40%	37%	37%
HEALTH AND SAFETY	**FY21**	**FY20**	**FY19**
Safety incidents	0	0	0

How we manage our risk

The Board is responsible for ensuring the effectiveness of the risk management framework which outlines Webjet's governance processes, accountability for risk management and operational resilience program.

Our risk management framework is consistent with international best practice and our systems are aligned to ISO 27001 (IT Risk). The Board has charged the Executive team with the responsibility for managing risk across the Group under the direction of the Managing Director and Senior Executives.

The Risk Committee was established to deliver on this commitment and oversees the management of risks in accordance with the Risk Committee charter. The Risk Committee is responsible for managing all financial and non-financial risks that may impact on Webjet's operations which includes environmental, social and governance risks. The Risk Committee is comprised of three Independent Non-Executive Directors .

Webjet also accepts that, as part of doing business in both Australia and internationally, its customers, shareholders, employees and the community expect that it will do so in an environmentally responsible and socially sustainable manner. The Risk Committee assists the Board in overseeing the management of the Company's material exposure to environmental and social risks.

#	The role of the Risk Committee
1	The appropriateness of Webjet's strategic direction in light of the economic, social, political, cyber, environmental, legal and regulatory environments in which the Group operates;
2	The identification of material business risks and priorities (in terms of relative risk levels) and allocating resources effectively and efficiently;
3	Procedures for identifying business and operational risks (including cyber-security risks) and controlling their financial impact on Webjet and the operational effectiveness of policies and procedures relating to risk and control;
4	The operating effectiveness of the systems of internal financial control and risk management;
5	The adequacy of internal controls and allocation of responsibilities for monitoring internal business, IT and financial systems and controls;
6	The arrangements for protecting intellectual property, confidential and private customer information and other non-physical assets;
7	Procedures for ensuring compliance with relevant regulatory and legal requirements including Occupational Health and Safety laws and regulations, policies and practices for detecting, reporting and preventing fraud and serious breaches of business conduct procedures and controls;
8	A risk assessment (risk identification, risk analysis – including likelihood and impact assessment and risk evaluation) for material risk issues;
9	The design, implementation, operation and assessment of controls to ensure residual risks are tolerable;
10	That resources are acquired economically, used efficiently and adequately protected;
11	The adequacy of the coverage and quantum of insurance arrangements of Webjet; and
12	Other matters requiring the approval of the Committee under its Charter or as referred by the Board from time to time.

Things that are shaping our World

Webjet acknowledges that there are various macrotrends and events that have the ability to significantly shape the way we conduct our business. The below table highlights the key risks monitored by Webjet, however while every effort is made to identify and manage material risks, additional risks not currently known or listed may also adversely affect future performance.

Economic risks

Risk	Detail
Economic conditions	Economic downturns, both domestically and internationally, may have an adverse impact on the Company's performance. Webjet understands that travel, like all businesses, is subject to key economic risks such as GDP growth, recession, consumer confidence, interest rate and currency movements.
Changes in specific markets in which we operate	Changes within the specific travel markets in which Webjet operates, whether the result of changes in or to key markets, changes in product availability or methods of distribution and/or payment, changes in consumer demand or otherwise, and a failure of Webjet to predict or respond to any such changes, may impact the financial results of Webjet. Changes in the on-line booking market, which includes on-line search costs, may result in significant increase in marketing costs, which may in turn materially and adversely impact Webjet's financial performance.
Changes in consumer preferences	Changes in consumer sentiment and/or preferences towards Webjet and/or travel generally (or in key markets), and a failure of Webjet to predict or respond to any such changes, may impact demand for the products that Webjet sells. Extreme weather events, if repeated regularly, may change travel preferences and/ or consumer habits over the medium term.
Increased competition	The actions of established or potential competitors, the introduction of new business models, the release of new online technologies and/or the transition to new mobile booking apps, or existing competitors simply becoming more effective in competing with Webjet, may have a material and adverse negative impact on the Webjet's business and financial performance.
Financial risks	The Company operates in several international markets and is subject to movements in foreign exchange markets and interest rates and to changes across multiple tax regimes / policies, accounting standards and banking practices, any of which may have a material and adverse negative impact on Webjet's business and financial performance.
Impact of war, terrorism, pandemic and other external events	International hostilities, terrorism, pandemics, epidemics or outbreaks of disease, political or social instability, natural disasters and weather effects can and often do affect airline, accommodation and other travel sales, which may have an adverse impact on Webjet's operating and financial performance.
Changes to Government policies and regulations	Unfavourable changes to government regulation or legislation, regulatory rules and/or policies / procedures (including changes to consumer credit laws, consumer financing, trade practices and competition laws, regulation of travel agents etc.) may adversely affect Webjet's business model and profitability.
Technology disruption	Technological innovation can be highly disruptive to established markets such as travel.
Technology/IT system failure	Webjet is heavily reliant on its IT systems to ensure that our employees can effectively deliver their work, that we can protect the privacy of company data and to manage the constant evolution of the industry. Termination or non-renewal of licences, failure to update and upgrade IT systems, system errors and/or performance failures, system availability and loss of systems and/or corruption of data (including through cyber attack) could impact customer satisfaction and ability to complete transactions

Things that are shaping our World
(continued)

Social risks

Risk	Detail
Data security	As with all e-commerce businesses, the Company is reliant on the security of its website, payment and data management systems and protection of personal information of its customers. Security and privacy breaches (whether through cyber attack or otherwise) have the potential to impact customer satisfaction and confidence and to impact on the operations and financial performance of Webjet and/or its share price. The Company is focused on maintaining data security and constantly monitors and reviews its technology systems.
Retention of key personnel	The Company's operating and financial performance is largely dependent on its ability to attract and retain talent, in particular key personnel. High turnover and loss of key staff could impact operating and financial performance.
Reputation risks	The Company's brand and reputation are key factors in the success of the Webjet businesses. Any events or issues which impact either Webjet's brand or reputation (or both) could materially impact Webjet's ability to compete successfully and result in adverse effects on future business plans.
Supplier relationships	As an on-line vendor of third party products, Webjet is dependent on its relationships with its suppliers and their terms of supply. Loss of any material supplier, major change in the terms of supply or one or more major suppliers developing more effective ways to sell their products directly to the end consumers would likely have a material impact on Webjet's business model and profitability.
Customer loyalty	The Webjet businesses are 'customer service' businesses and are, in part, dependent on customer satisfaction and loyalty (i.e. repeat business). Any diminution in customer satisfaction would be likely to have an adverse impact on the financial performance and position of Webjet.
Intellectual property	Webjet's ability to leverage its innovation and expertise depends on its ability to protect its intellectual property and any improvements to it.
Strategy/M&A	Industry consolidation through M&A could change the competitive framework and increase risk. The Company undertakes M&A activity and the success of new acquisitions is dependent on its ability to effectively integrate and extract synergies.

Environment

The areas where Webjet can best mitigate its own environmental impact is through energy efficiency, water reduction, waste reduction and, in some parts of our business, working towards carbon neutrality.

Understanding our operational control

Webjet accepts that its customers, shareholders, employees and the community expect that it will operate its businesses in an environmentally responsible manner, and recognises the importance of doing so.

We are focused on minimising our own environmental impact and have taken steps to influence the choices that our customers make. We strive to operate a work environment in which sustainability is central to the way our staff work. We are serious in our efforts to become energy efficient and reduce waste, and have taken various steps to minimise our footprint, including energy-efficient lighting and air conditioning, water conservation, waste reduction and recycling, the use of electronic files and filing, appropriate disposal of old computers and cell phones, and moving to a cloud-based infrastructure for our Webjet OTA business to reduce emissions.

Webjet also recognises that it can play a role in educating its customers and the travelling public on the economic, social and environmental impacts of their travel. In this area, within our B2C businesses, Webjet seeks to promote environmentally responsible and sustainable travel where appropriate. Further, the Webjet OTA business recently became the first major Australian online travel agency to launch a carbon offset program.

Energy efficiency

Water reduction

Waste reduction

Carbon neutrality

Responsible travel

Environment

(continued)

Our Initiatives

Due to the impact of COVID-19 on our business, the majority of our staff worked from home throughout the year and most of our offices were closed. We therefore do not think it would assist to report energy consumption or emissions this year as it would not be a true representation of our environmental impact. As we continue to evolve our environmental sustainability practices, as global travel markets start to reopen and Webjet returns to sustainable profitability, we will look for ways to measure and disclose our energy consumption and emissions associated with our activities.

The key initiatives implemented during the year include:

Focus area	Initiative
Energy efficiency initiatives	■ Installation of energy efficient lighting and use of sensor lighting ■ Minimising after hours air-conditioning use ■ Installation of blinds to minimise cooling and heating costs ■ Automatic switch off devices on appliances and equipment when not in use
Water reduction initiatives	■ Installation of low flow water fixtures ■ Use of water efficient appliances
Waste reduction	■ Reducing paper usage and encouraging recycling ■ Moving towards being paper lite ■ Responsible disposal of old computers and cell phones
Carbon neutrality	■ WebBeds Europe continues to work towards carbon neutrality, and is seeking opportunities to expand this program in the daily conduct of its business.
Responsible travel	■ Webjet promotes environmentally responsible and sustainable travel to its customers. Since August 2020, the Company has offered carbon offsets for all customers booking flights through the Webjet OTA.
Climate risk	■ Webjet is cognisant that its product suppliers and other participants in the travel industry face the prospect, whether now or in the future, of climate related financial risks. These risks may lead to changes in consumers' travel habits and preferences. While Webjet's financial performance to date has not been materially (if at all) affected by climate-related risks, the Webjet Board is conscious of the need to regularly review such risks, where appropriate to take action to address them, and to report accordingly to the market.

Social

The areas where Webjet can best mitigate its social impact and create value is through protecting human rights and mitigating modern slavery, supporting communities, maintaining a highly engaged workforce, and maintaining high customer engagement.

Focus Areas

Human rights

Community

Workforce

Customer engagement

Understanding our Operational Control

The nature of Webjet's business is predominantly online, and we believe our exposure to social risk, human rights abuses and modern slavery is minimal. We also acknowledge however that we continue to have a responsibility to go beyond risk management and create value for our communities, our team and for our customers.

Wherever we operate, we respect the human rights of employees, customers and those of our suppliers and business partners. We aim to identify and manage any risks related to human rights across our own business and through our supply chain relationships. Webjet adopts a continuous improvement approach to its performance in this area. As a business it continues to review, develop, and promote its policies and practices to identify and mitigate risk areas for modern slavery and human trafficking in its business and supply chains. Information regarding Webjet's commitment to human rights is set out in the Webjet Corporate Social Responsibility (CSR) Statement.

We recognise that Modern Slavery is a growing global issue, and understand our responsibility to prevent, mitigate and remediate where necessary. We reject any form of modern slavery, such as slavery, servitude, forced labour, and human trafficking and are committed to implementing and enforcing effective systems and controls to ensure it does not take place in our own business or our supply chains.

Webjet businesses are customer service businesses and are, in part, dependent on customer satisfaction and loyalty. As well as being able to attract new customers, having strong repeat business is important. Tracking customer satisfaction is therefore a key priority for the Company. Webjet seeks and encourages feedback about its business and services, particularly from customers. The Company regularly surveys customers to ascertain if it is delivering on their expectations and if not, how the Company can improve its service.

We are also proud that our businesses around the globe have kept the community at front of mind, with various initiatives taking place including Christmas initiatives, bicycle creation, and supporting various charities around the world.

Data privacy

Webjet is reliant on the security of its website, payment and data management systems and is committed to protecting the privacy and confidentiality of customer information. The Company takes great care to protect all customer personal information from unauthorised access, modification and disclosure. Webjet uses a range of methods to protect the privacy and security of customer information, including provisions governing the storage, security, access, transmission and use of customer personal information. Staff are trained on data privacy and the Company has steps in place to ensure all organisations and persons who may receive the information understand its confidentiality and have similar protection and security measures in place.

Customers can access and control their personal information by following the steps set out in the Company's privacy policy. The privacy policy also sets out how the Company shares personal information with third parties to help the Company operate, provide, improve, integrate, customize, support and market its services. The Company does not sell or rent any customer personal information to a third party.

While protection of the privacy and confidentiality of sensitive personal data is vital, security breaches and/or loss of confidential or sensitive personal information can occur. If any event such as a security breach or loss of confidential or sensitive information does occur, Webjet will comply fully with its obligations under applicable privacy legislation including, as appropriate, the notification of all people affected by the breach. It is also committed to taking such action as appropriate to limit the impact on any customer of a security breach or unauthorised access to that customer's personal non-public information.

The Company has in place a robust incident response plan in the event of a suspected privacy breach, which is regularly tested. During the reporting period, Webjet did not have any reportable breaches regarding customer privacy under any relevant legislation.

Social
(continued)

Our Initiatives

The key initiatives implemented during the year include:

Focus area	Initiative
Modern slavery	■ Released our inaugural Modern Slavery Statement ■ Conducted Modern Slavery awareness training for legal teams, company secretaries and the Chief Commercial Officer ■ Conducted an analysis on the structure of our supply chain, uncovering that 74% of suppliers within Australia and New Zealand make up approximately 99.9% of total supplier spend. Our supply chain consists of more than 85- first tier suppliers, which include IT service providers, consultancy, and other professional services firms. ■ Established eight priority steps to continue to develop a comprehensive understanding of modern slavery and human rights issues within our business and supply chains.
Community	■ Delivered Christmas initiatives around the world. ■ Coordinated volunteer days to support the creation of 16 bikes for the Back2Bikes organisation ■ Supported St John and Mercy Hospice through the Starlight Fund. Through this the team donated an ambulance and fundraising helped provide consumable supplies. Donations to Mercy Hospice have also provided things like luxury pillows to dozens of cancer sufferers. ■ Donated more than 40 computers and laptops to the "PESA MONINGA SOURIRE" organisation based in the Democratic Republic of the Congo. Their mission is to give a smile to those in need by supporting them through education, donations, food supplies, clothes and shelter for women, children, victims of war and people who have a disability. The IT equipment will be used for education to support students to learn basic IT skills.
Workforce	■ Exceeded target to have 25% female representation on both the Board and in senior management. ■ Delivered employee engagement surveys across the business which demonstrated a highly engaged team that felt supported by the Company. Opportunities for improvement have been identified and are being actioned. ■ Provided access to free counselling, mental health support, mental health champions, and increased 1:1 catchups with managers to help manage the impact of COVID-19 on our staff ■ Webjet continued to maintain a strong safety record with no reported lost time from injuries or work cover claims during the reporting period.
Customer engagement	■ Continued to track our Net Promoter Score ■ Maintained high Trust Pilot ratings for Online Republic, despite COVID-19. ■ New customer numbers for B2C businesses continued to increase. While many B2B customers are in hibernation due to Covid-19, focused on maintaining relationships through various support initiatives.
Customer data privacy	■ Introduced data protection agreements to be used across all business units when entering into an agreement with a third party, to ensure we are taking measures to protect customers' data. ■ Continued to actively monitor where sensitive information is being stored and have put processes in place to ensure the data is moved or removed if it is not secure. ■ No reportable breaches regarding customer privacy under any relevant legislation.

Governance

We realise that running an ethical business goes beyond managing just the behaviour of our team. It extends to complying with regulation and maintaining best practice corporate governance, particularly when it comes to data privacy and security and maintaining high standards of business ethics.

Webjet manages its corporate governance in alignment with the ASX Corporate Governance Principles and Recommendations (4th edition). The strategic direction and corporate governance of Webjet is led by the Board of Directors and the core objective of the Board is to maximise returns to shareholders while considering key risks that may impact the business. Please refer to the Corporate Governance Statement for a complete overview of how we manage our business.

Webjet is committed to an ethical and transparent approach to business. Underpinning this is the Webjet Code of Conduct, which outlines the principles and behaviours required of team members to maintain and achieve these standards. The key principles within the Code include honest and ethical behaviour, respect for people and property, and legal compliance.

The corporate governance of Webjet is underpinned by publicly available policies that guide employees and management to operate responsibly. These include share trading, diversity, market disclosure and whistleblower policies which have been implemented by the Board.

Focus Areas

Data Privacy and Security

Business Ethics

Governance
(continued)

Understanding our Operational Control

Webjet is reliant on the security of its website, payment and data management systems and is committed to the protection of personal information of its customers. Security and privacy breaches (whether through cyber attack or otherwise) have the potential to impact customer satisfaction and confidence. Webjet is highly focused on maintaining data security and constantly monitors and reviews its technology systems. The Company takes great care to secure its systems and all information from unauthorised use, viruses, data breaches and others risks. It uses highly sophisticated software applications and/or hardware to prevent unauthorised access to its network and databases.

For all information stored electronically (for example databases), Webjet maintains strict computer and network security. It uses firewalls and other security measures such as identification codes and passwords to control access to its network and systems. It continually maintains and monitors its online security systems to ensure they are secure and that customer personal information is appropriately protected.

The Company Board's Risk Committee has oversight of data security and Cyber Security is a standing Risk Committee agenda item. Webjet's Global Program Manager for Security is focused on ensuring security is a consistent and measured priority across all businesses.

During the reporting period we focused on ensuring that our IT and security processes were strong enough to support an entirely remote workforce. This involved tightening email security, internal training and implementing appropriate measures such as a BYOD (Bring Your Own Device) policy for personal devices.

Finally, we have continued to work closely with threat intel groups to understand emerging risks and threats that may impact our business. We actively looked at preparing for key cyber events by running attack simulations and testing our incident response plan. We have also created playbooks for specific events such as 'a ransomware attack', which allows the business to understand the impact an event like this would have on our business operationally, as well as the impact on our customers, the cost and what our rebuild and recovery process would be.

During the reporting period, Webjet did not have any reportable data security breaches in any of its businesses.

Our Initiatives

The key initiatives implemented during the year include:

Focus area	Initiative
Data security	■ Worked closely with threat intel groups to understand emerging risks and threats that may impact our business
	■ Embedded security and privacy into business processes through implementing a security by design and privacy by design approach
	■ Enhanced email security controls to mitigate related risks associated with phishing, spoofing and malware attacks.
	■ Increased training on cybersecurity and privacy within the business through regular updates, alerts and tailored information sessions.
	■ Introduced a BYOD policy when personal devices were used. End point protection allows us to monitor suspicious activity across remote working solutions and secure remote access solutions ensured we remained secure when employees transitioned to work remotely.
	■ We have begun the process to ensure we achieve compliance for OLR this year, which will ensure all B2C business units are PCI compliant by the end of the calendar year.
	■ No reportable data security breaches in any of the Webjet businesses
Business ethics	■ All staff trained on Webjet Code of Conduct
	■ Released first Modern Slavery Statement

GRI/SASB Index

Disclosure	Disclosure title	Response	Page
GRI 102-14	Statement from senior decision-maker	Message from our Managing Director	2
GRI 102-1	Name of the organisation	About Webjet Limited	3
GRI 102-2	Activities, brands, products and services	About Webjet Limited	3
GRI 102-3	Location of headquarters	About Webjet Limited	3
GRI 102-5	Ownership and legal form	About Webjet Limited	3
GRI 102-6	Markets served	About Webjet Limited	3
GRI 102-7	Scale of the organisation	About Webjet Limited	3
GRI 102-8	Information on employees and other workers	Our People	9/10
GRI 102-9	Supply Chain	Engaging with our Stakeholders	8
GRI 102-10	Significant changes to the organisation regarding size, structure, ownership and its supply chain	See Webjet Limited FY21 Annual Report (p33)	
GRI 102-11	Precautionary Principle or Approach	Not applicable	
GRI 102-13	Membership of associations (industry) and national or international advocacy	About Webjet Limited	3
GRI 102-45	Entities included in the consolidated financial statements	See Webjet Limited FY21 Annual Report (p93)	
GRI 102-46	Defining report content and topic Boundaries	Our Approach to Sustainability	5
GRI 102-47	List of material topics	Our Approach to Sustainability	5
GRI 103-1	Explanation of the material topic and its boundary	Our Approach to Sustainability	5
GRI 102-40	List of stakeholder groups	Engaging with our Stakeholders	8
GRI 102-42	Identifying and selecting stakeholders	Engaging with our Stakeholders	8
GRI 102-43	Approach to stakeholder engagement	Engaging with our Stakeholders	8
GRI 102-44	Key topics and concerns raised	We do not comment on specific issues raised by individual stakeholders during consultation.	
GRI 102-50	Reporting period	Introduction	1
GRI 102-51	Date of most recent report	This is Webjet's inaugural sustainability report and therefore the most recent	1
GRI 102-52	Reporting cycle	Introduction	1
GRI 102-53	Contact point for questions regarding the report	Introduction	1
GRI 102-54	Claims of reporting a. in accordance with the GRI Standards b. GRI content index for chosen option	In partial accordance with the GRI Core Standards	1, 20, 21
GRI 102-56	External assurance	This report has not received external assurance.	1
GRI 102-18	Governance structure	How we Manage our Risk	11
GRI 102-16	Values, principles, standards, and norms of behaviour	About this Report	4,11
GRI 103-1 GRI 103-2 GRI 103-3	▪ Explanation of the material topic and its Boundary ▪ The management approach and its components ▪ Evaluation of the management approach	▪ Environment ▪ Social ▪ Governance	14 16 18

GRI/SASB Index
(continued)

Disclosure	Disclosure title	Response	Page
GRI 201-1	Direct economic value generated and distributed	See Webjet Limited FY21 Annual Report (p64-65)	
GRI 302-1	Energy consumption within the organisation	Environment. Not disclosed	15
GRI 303-1	Water withdrawal by source	Environment. Not disclosed	15
GRI 305-1 GRI 305-2	Direct (Scope 1) and (Scope 2) GHG emissions	Environment. Not disclosed	15
GRI 305-3	Other indirect (Scope 3) GHG emissions	Environment. Not disclosed	15
GRI 306-2	Waste by type and disposal method	Environment. Not disclosed	15
GRI 307-1	Non-compliance with environmental laws and regulations	To the best of our knowledge, we have complied with all environmental laws and regulations	
GRI 401-1	New employee hires and employee turnover	Our People	10
GRI 403-2 SASB	Types of injury and rates of injury, occupational diseases, lost days, and absenteeism, and number of work-related fatalities	Our People	10
GRI 405-1 SASB	Diversity of governance bodies and employees	Our People	10
GRI 413-1 SASB	Operations with local community engagement, impact assessments, and development programs	Social	17
GRI 419-1	Non-compliance with laws and regulations in the social and economic area	Performance highlights	5

SASB Indicators

Disclosure	Disclosure title	Response	Page
SASB	Service disruptions	We had no signficant outages for our operating platforms during the year. Due to the impact of COVID-19, there were some periods of extended waiting times for customers trying to contact call centres. See Webjet Ltd FY21 Annual report (p 19, 24)	
SASB	Number of users whose information is used for secondary purposes	We do not use information for secondary purposes without pre-approval of the customer. See the privacy policies on webjet.com.au and WebBeds.com websites.	17
SASB	Number of law enforcement requests for user information	We comply with all law enforcement requests. We are in the early stages of our Sustainability reporting and are setting up processes to broaden the scope of future reporting.	17
SASB	Government-required monitoring, blocking, content filtering or censoring	We are in the early stages of our Sustainability reporting and are setting up processes to broaden the scope of future reporting.	17