

MODERN SLAVERY STATEMENT 2023

INTRODUCTION

SiteMinder prides itself on acting ethically, transparently and with integrity in everything that it does. This includes upholding human rights and contributing to the global effort to end all forms of modern slavery.

The Modern Slavery Act 2018 (Cth) (“**AU Act**”) and the Modern Slavery Act 2015 (UK) (“**UK Act**”) require reporting entities to publish an annual statement outlining the steps taken to identify, manage and mitigate the risks of modern slavery and human trafficking in the entity’s operations and supply chain (“**Statement**”).

This Statement is published by SiteMinder Limited ACN 121 931 744 registered at Bond Store 3, 30 Windmill Street, Millers Point NSW 2000 (“**SiteMinder**”, “**we**”, “**our**”) in relation to our business activities during the financial year ending 30 June 2023 (“**Reporting Period**”). SiteMinder is listed on the ASX with the code “SDR”.

STRUCTURE

SiteMinder Limited is the group’s parent company located in Sydney, Australia. The group includes the following wholly-owned subsidiaries that manage SiteMinder’s operations in EMEA, the Americas and Asia-Pacific:

- London – SiteMinder Distribution Limited
- Dallas – SiteMinder Hospitality Corporation
- Bangkok – Online Ventures (Thailand) Limited

We also have offices in Estonia, Galway, Berlin, Barcelona, Manila and Bangalore.

We employ 1000+ staff across the above-mentioned offices, serving 39,000+ customers in 150+ countries.

OPERATIONS

We provide software as a service (SaaS) to hoteliers and other temporary accommodation providers.

The business was founded in Sydney in 2006 with the aim of providing hoteliers with the technology to grow reservations, increase revenue and eliminate manual processes. We have since become one of the world’s leading travel technology companies.

Our consolidated revenue for the Reporting Period was AUD\$151.4m.

SUPPLY CHAIN AND RISKS OF MODERN SLAVERY PRACTICES

Our products are developed by our in-house software developers, engineers and designers. From time to time, the product development function is supported by highly specialised third-party contractors in India.

All staff, whether employees or personnel supplied by contractors, are paid full and fair remuneration in accordance with local and international labour laws and regulations. Given the expertise required for the services contracted outside Australia, it would be difficult to engage third-party contractors on less-than-market rates.

To support our operations, we also purchase office supplies and services, merchandise and corporate travel from reputable suppliers in developed countries that are not considered to have a high risk of modern slavery according to the [Global Slavery Index](#).

Given the nature of our business, we consider our supply chain to have a very low risk of modern slavery.

POLICIES

We have a Modern Slavery Policy that makes the prevention, detection and reporting of modern slavery the responsibility of all staff.

We also maintain the following policies which, together, set out the minimum standards and expectations of all staff, and assist us in combatting modern slavery risks:

- Anti-Bribery Policy
- Code of Conduct
- Compassionate Leave Policy
- Contracts and Procurement Policy
- Equal Opportunities and Dignity at Work Policy
- Fair Treatment Policy
- Flexible Working Guidelines
- Supplier Code of Conduct
- Whistleblower Policy

In February 2022, we published a Supplier Code of Conduct that sets out our commitment to conducting business in an honest and ethical manner and adhering to national and international laws regarding the prevention of modern slavery. Our suppliers are required to meet the standards set out in the Supplier Code of Conduct.

The above-mentioned policies have the full support of our Board and senior management. Breaches of company policy result in appropriate disciplinary action.

DUE DILIGENCE

We take reasonable precautions to avoid complicity in modern slavery practices. As part of the procurement process, where appropriate (e.g. where a supplier operates in a country or industry with a high risk of modern slavery), we may request additional information and assurances relating to the supplier's business operations and supply chain. Our standard form supply agreements also require vendors to comply with all local and international laws and vendors are informed of, and asked to sign, our Supplier Code of Conduct.

VALUES

SiteMinder takes a strict **zero-tolerance** approach to modern slavery. If we identify modern slavery practices occurring within a supplier's operations, we will take appropriate action, including education, remediation, termination and/or alerting the relevant authorities.

OUR EFFECTIVENESS IN COMBATTING MODERN SLAVERY

We periodically assess the effectiveness of our approach to preventing modern slavery in our operations and supply chain and ensure that we have a solid framework for regular engagement between key stakeholders, including:

- mandatory training for all staff to assist with the identification and reporting of risks;
- a Supplier Code of Conduct that requires all suppliers to adhere to national and international laws regarding the prevention of modern slavery;
- the legal department's involvement in the procurement process to, where possible, introduce terms and conditions into the supplier's contract to mitigate modern slavery risks;
- monitoring updates and amendments to the AU Act and UK Act and other similarly applicable rules and regulations;
- having HR representation in all core offices and staying in regular contact with all offices;
- providing forums for employees to provide feedback (including on an anonymous basis); and
- encouraging travel to between our offices by our Executive and Senior Leadership Teams.

In addition to the above, we are committed to setting key performance indicators over subsequent reporting periods, including:

- all staff completing modern slavery training within their first month of employment;
- any instances of modern slavery in our operations or supply chain being reported and escalated to our Board without delay; and
- reviewing our corporate governance and procurement processes at least annually to ensure that the measures being taken to identify and prevent modern slavery occurring in our supply chain continue to be appropriate and proportionate to the risk profile.

There were no instances of modern slavery identified in our supply chain during the Reporting Year.

CONSULTATION

In preparing this statement, we consulted all entities that SiteMinder owned or controlled during the Reporting Period. We discussed details of the reporting requirements under the AU Act and the UK Act, information regarding the actions we intend to take to address these requirements and provided all entities with materials relevant to this statement.

APPROVAL

This Statement was approved by SiteMinder's Board of Directors on 7 December 2023.

Signed on behalf of SiteMinder by:



[Sankar Narayan \(Dec 22, 2023 10:47 GMT+11\)](#)

Sankar Narayan
(CEO)

Date: 7 December 2023