

MODERN SLAVERY STATEMENT

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 2021 ("**Reporting Period**").

OUR STRUCTURE

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

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

We also have representative offices in Berlin, Manila and Bangalore.

SiteMinder employs 700+ staff across the above-mentioned offices, serving 32,000+ customers in 150+ countries.

OUR BUSINESS

SiteMinder supplies a suite of cloud software as a service (SaaS) products to hoteliers and other temporary accommodation providers ("**Platform**").

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.

SiteMinder's consolidated revenue for the Reporting Year was AUD\$100.761M.

OUR SUPPLY CHAIN

The Platform is developed in Sydney 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 the Ukraine, Philippines, and 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, we would not be able to engage any third-party contractors if we were to pay less than market rates.

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

OUR POLICIES

We 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
- Whistleblower Policy

In December 2020, we adopted a Modern Slavery Policy to strengthen existing policies and awareness and make the prevention, detection and reporting of modern slavery everyone's responsibility.

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

DUE DILIGENCE PROCESSES

Our Legal and Human Resources departments, in co-ordination with senior management, take reasonable precautions to avoid complicity in modern slavery practices. As part of the due diligence process, where appropriate (e.g. where a supplier operates in an industry or country vulnerable to 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.

ADHERENCE TO OUR 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. SiteMinder recognises that COVID-19 has increased the risks of modern slavery in many different sectors. As part of its ESG program, SiteMinder will also be exploring opportunities to educate and influence the broader hotel and travel ecosystem, including its customers, on modern slavery issues.

OUR EFFECTIVENESS IN COMBATTING MODERN SLAVERY

We manage risks to our business according to their severity, and likelihood. We do not consider there is any real risk of modern slavery occurring in our supply chain. Nevertheless, we do have contractual processes in place to require compliance by suppliers of relevant processes and standards. During the Reporting Year, there were no instances of modern slavery identified.

ASSESSING OUR EFFECTIVENESS IN COMBATTING MODERN SLAVERY

We continuously monitor the effectiveness of our approach to preventing modern slavery in both our business operations and supply chain. Our Legal and Human Resources teams work together to ensure we effectively monitor and improve our ability to mitigate any potential modern slavery risks by continuously engaging with our various business arms to ensure compliance with our Modern Slavery Policy. This includes:

- a requirement under SiteMinder's Procurement Policy that our supply chain must comply with all applicable laws relating to modern slavery; and

- where possible, implementing terms and conditions into our contracts with our suppliers that require compliance with Australian and United Kingdom modern slavery legislation and a commitment to mitigating any risks of modern slavery.

In addition to the above, we are committed to setting key performance indicators over subsequent reporting periods to assess the effectiveness of our approach to preventing modern slavery, including:

- providing mandatory training to all employees in relation to the identification and reporting of modern slavery risks;
- ensuring any potential modern slavery risks identified through our Whistleblower Policy (or otherwise) are monitored and escalated as appropriate;
- monitoring and ensuring employees complete our training regarding the identification and reporting of modern slavery risks within 1 month of beginning employment;
- reviewing our internal governance and due diligence processes to monitor for modern slavery risks; and
- reviewing our relationship with vendors in high-risk areas for any potential modern slavery risks that arise.

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 13 December 2021.

Signed on behalf of SiteMinder by:



Sankar Narayan
(CEO)

Date: 14 December 2021