



Modern Slavery Statement 2025

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 Statement

This past year has been a period of significant change for our organisation, marked by the demerger from Webjet Limited and the establishment of Webjet Group Limited as an independent entity. This new chapter has provided us with a unique opportunity to reaffirm our core values and strengthen our commitment to our responsibilities as a responsible and ethical business. As such, I am proud to present our Modern Slavery Statement, which details the steps we are taking to combat modern slavery risks within our operations and supply chains.

At Webjet Group, our commitment to good corporate citizenship is fundamental to who we are. It is not simply about complying with legislation but about doing what is right. We believe that a sustainable and successful business must be built on a foundation of integrity, respect for human rights, and a zero-tolerance approach to exploitation.

Our position within the travel and tourism sector presents a unique set of challenges and complexities. The very nature of our business—connecting customers with a vast, global network of travel products and services—means our value chain extends across numerous jurisdictions and involves a diverse range of suppliers, from major airlines and hotel chains to local operators and technology providers. We recognise the inherent risks that can exist in such a complex and fragmented environment. Our strategy is therefore designed to be diligent and thorough, ensuring we have a comprehensive understanding of the modern slavery risks that may exist across our global network.

Since the demerger, there have been no material changes in terms of where our staff and business are situated which last reporting period was assessed as low. During the reporting period, we focused on our supply chain and have made progress in strengthening our approach to assessing our supply chain for modern slavery risks. With the help of an external advisory firm,

we conducted a comprehensive risk assessment to identify areas of potential modern slavery prevalence. The insights gained from this exercise will inform our future supplier engagement and serve as a key part of our continuous journey to embed ethical practices into our business.

Looking forward, we will continue to foster a culture where everyone feels empowered to share modern slavery concerns. Transparency and collaboration, both internally and with our external partners, are key to our success. By working together, we can drive positive change and ensure that our value chain operates with the highest standards of human dignity and ethical conduct.

On behalf of the Board, I endorse this statement and reaffirm Webjet Group's commitment to the eradication of modern slavery.

Yours sincerely



Katrina Barry
Group CEO and Managing Director,
Webjet Group Limited

About this Statement

This Modern Slavery Statement (**Statement**) is made pursuant to the **Australian Modern Slavery Act 2018 (Cth) (the Act)** and covers the reporting period **1 April 2024 to 31 March 2025**. This Statement is a joint statement made on behalf of **Webjet Group Limited** (ABN 85 679 116 762) (**Webjet Group**) and **Webjet Marketing Pty Ltd** (ABN 84 063 430 848) (**Webjet Marketing**), each of which qualifies as a reporting entity under the Act.

- Webjet Group is a public company listed on the Australian Securities Exchange (ASX: WJL), headquartered in Melbourne, Australia. Webjet Group was established in July 2024 as a wholly owned subsidiary of Webjet Limited (now Web Travel Group Limited). Following approval of the demerger by Webjet Limited shareholders in September 2024, Webjet Group became a separate listed entity in its own right on 1 October 2024.
- Webjet Marketing is a wholly owned Australian subsidiary of Webjet Group Limited. 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).

Together, these entities are referred to in this statement as **Webjet** or **the Group**. Other than Webjet Group and Webjet Marketing, no other Webjet Group controlled subsidiary is a reporting entity for the purposes of the Act.

This statement continues Webjet's commitment to transparency in its modern slavery reporting. For the reporting period, the Group reports as a standalone reporting entity under the Act, following previous disclosures made through the Group's consolidated modern slavery reporting processes prior to its demerger from the now separate Web Travel Group. This statement has been approved by the Board of Webjet Group Limited, in accordance with section 13 of the Act, and is signed by a Director on behalf of the Board.

In preparing this statement, Webjet has consulted with relevant stakeholders across Webjet Group and Webjet Marketing, including representatives from human resources, finance, legal, risk and compliance teams as well as senior executives. Consultation occurred through a structured questionnaire process, supplemented by management input, ensuring alignment across entities and business functions.

The statement sets out Webjet's structure, operations, and supply chains; identifies the modern slavery risks to which the Group may be exposed; and describes the actions taken to assess and address those risks during FY25. It also explains how the Group assesses the effectiveness of these actions and outlines future priorities.

In line with the legacy Webjet Limited's (now Web Travel Group Limited)'s FY24 disclosure, this report continues to balance compliance with the Act's mandatory criteria with a broader commitment to transparency and continuous improvement. While this is the Group's first standalone statement, it builds on the maturity and lessons of previous reporting periods.

Approval

This statement was approved by the Board of Directors of Webjet Group Limited on 29 September 2025.



Katrina Barry

Group CEO and Managing Director,
as a responsible member of
Webjet Group Limited

Our Business

Following the demerger of Webjet Group from Web Travel Group on 30 September 2024, Webjet Group now operates the business to consumer (B2C) businesses that were part of Web Travel Group. This includes Webjet OTA (online travel agency), Cars & Motorhomes (formerly GoSee) and the technology investment business, Trip Ninja. Through its subsidiary, Webjet Marketing, the Group provides customers with a digitally led travel solutions with access to a wide range of travel products through online sales and distribution, including flights, hotel accommodation, holiday packages, car and travel insurance. In addition, Webjet Group subsidiary Motorhome Republic Limited based in New Zealand supports OTA operations and provides sales, service and commercial support for the Cars and Motorhomes brands while Trip Ninja Inc. based in Canada supports OTA technology.

During FY25, the Group's operations were delivered through a portfolio of recognised brands as described above. In the newly demerged Group, Webjet OTA contributes the largest share of Group total transaction value (TTV). Cars and Motorhomes (formerly GoSee) offers specialist booking services for car rentals and motorhomes.

During FY25, the Group facilitated 1.5 million bookings with a total transaction value of \$1.5 billion and generated consolidated revenues of \$139.7 million. Webjet OTA facilitated 1.3 million bookings, and generated revenue of \$119.9 million.

Operations for Webjet Group and all its controlled subsidiaries, operations are supported by 299 full-time equivalent employees, with 157.2 FTE based in Australia and the remaining in either Canada or New Zealand. In addition, there are 25 personnel providing call center and customer service support in the Philippines. These personnel are employed by a subsidiary of Webjet's former related entity Web Travel Group.

Staff are distributed across its brands and functional areas, with teams supporting finance, technology, customer service, contracting, and marketing. A breakdown of staff geographic composition is provided below.

Webjet places strong emphasis on diversity, equity, and inclusion, with a particular focus on gender equity across its workforce. In FY25, women represented 52% of the total workforce, including 50% of management roles and 60% of the Board of Directors. The Group undertakes regular pay equity reviews and continues to expand initiatives designed to support career progression for women, including leadership development programs, mentoring, and flexible working arrangements. These measures form part of Webjet's broader sustainability priorities and reflect its commitment to fostering a culture of fairness, inclusivity, and responsible business.

Webjet's operations are primarily digital, with customer engagement occurring through online platforms. This digital-first model enables scalable global reach and is supported by continuous investment in technology, cybersecurity, and platform innovation. At the same time, it creates dependencies on third-party technology providers, digital services, and a complex network of travel and hospitality partners.

Webjet Group

Employees

299

full-time equivalent

Bookings

1.5
million

TTV

\$1.5
billion

Revenue

\$139.7
million

Webjet OTA

Bookings

1.3
million

TTV

\$1.3
billion

Revenue

\$119.9
million

Workforce by country

Webjet Group
(headquartered in Australia)



■ Australia 52%
■ Rest of World 48%

Workforce breakdown by gender

Webjet Group
(% of total workforce)



■ Female 52%
■ Male 48%

Our Supply Chain

Webjet's supply chain reflects its role as a global travel intermediary, connecting customers with a large and diverse network of service providers. In FY25, Webjet engaged with 183 distinct suppliers, with total procurement spend \$47.5 million.

Suppliers support both **direct travel services**—including airlines, accommodation providers, and ground transport operators—and **indirect operations** such as information technology, professional services, and facilities management. A significant share of indirect spend is concentrated in technology and digital platform providers, reflecting the Group's digital-first operating model and reliance on resilient IT infrastructure.¹

The Group's procurement exposure spans multiple geographies:

- **Australia and New Zealand** – corporate services, professional suppliers, and the largest share of total spend.
- **India and the United Arab Emirates** – offshore IT, customer support, and back-office processing.
- **North America, Ireland, and Sweden** – information technology, media, and professional services.
- **Europe, Asia Pacific, and the Middle East** – through Web Travel Group's global contracting offices, supporting ground service distribution.

Webjet's supply chain profile indicates concentration among a relatively small group of high-value suppliers, while maintaining relationships across diverse regions.

Webjet Group FY25

Distinct
suppliers

183

Procurement
spend

\$47.5m

1. 75% of spend was on professional services and IT services.

Governance and Accountability

Governance Framework

Oversight of modern slavery risks rests with the Board of the Group, which is the Group's governing body. The Board Audit and Risk Committee is responsible for monitoring material risks, including modern slavery and broader human rights issues.

Accountability for implementation sits with senior management, supported by staff involved in compliance, and operations.

Policies and Standards

Webjet has in place the following policies that address modern slavery and related human rights concerns:

- **Code of Conduct** – requires ethical behaviour and compliance with laws.
- **Human Rights Policy** – outlines the Group's commitment to respecting internationally recognised human rights, including the prohibition of modern slavery.
- **Whistleblower Policy** – provides a confidential reporting channel for employees and stakeholders to raise concerns, including modern slavery issues.

These policies are reviewed periodically and are explicitly intended to cover modern slavery risks.

Webjet does not maintain a standalone Procurement Policy. Supplier compliance with modern slavery laws is governed by the Group's **Human Rights Policy** and implemented through procurement procedures, supplier onboarding controls, standard contractual clauses, risk management and ongoing supplier engagement. Accountability for these controls sits with the relevant business owners, with oversight from Legal.

Accountability and Escalation

Where risks are identified, issues will be raised with senior management, escalated to the Board Audit and Risk Committee, and or reported through the Whistleblower mechanism.

Modern Slavery Risks

Understanding Modern Slavery Risks

Modern slavery is specifically defined in Section 4 of the Modern Slavery Act, drawing from internationally accepted frameworks and guidance including the UN Guiding Principles on Business and Human Rights. It refers to situations where individuals are exploited and cannot refuse or leave because of threats, violence, coercion, deception, or abuse of power. It encompasses practices such as forced labour, debt bondage, human trafficking, forced marriage, and child labour. Victims often face severe restrictions on their freedom, are paid little or nothing, and endure unsafe or inhumane working and living conditions. Modern slavery can occur across various industries and supply chains worldwide, often targeting vulnerable populations in regions where legal protections are weak or non-existent.

The UN Guiding Principles on Business and Human Rights set out below provide a key framework for understanding how our operations and supply chain may be involved in modern slavery practices.

Type of Involvement	Description of Involvement	Mitigation Actions
Cause	The business own operations directly result in modern slavery.	<ul style="list-style-type: none">• Conduct internal due diligence to ensure all operations comply with labour laws.• Establish robust internal policies and practices to uphold human rights.• Regularly audit internal operations.
Contribute	The business contributes to modern slavery through its actions or omissions, typically in collaboration with or through its influence on another entity.	<ul style="list-style-type: none">• Engage suppliers in fair contracts and set realistic production demands.• Implement ethical recruitment policies and ban recruitment fees.• Support supplier capacity-building programs.
Directly Linked	The business products, services, or operations are directly linked to modern slavery through a business relationship, such as with suppliers or subcontractors.	<ul style="list-style-type: none">• Map the supply chain to identify high-risk suppliers.• Require suppliers to adhere to a code of conduct and conduct regular audits.• Terminate relationships with non-compliant suppliers.

Modern Slavery Risks

Sector Risk Issues

The nature of Webjet's operations as a global travel intermediary means that modern slavery risks arise primarily through its supply chains. These risks vary across different tiers of suppliers, from direct service providers to indirect subcontractors and upstream product supply chains.

The table below summarises the types of risks identified as most prevalent in the travel and tourism sector.

Supplier Tier	Supplier Types	Prevalent Risk Types
Tier 1 – Direct Service Providers	<ul style="list-style-type: none"> • Airlines, hotels, accommodation providers • Ground transport operators • Corporate services (Australia/NZ) • Offshore IT service providers (India, UAE, Indonesia) 	<ul style="list-style-type: none"> • Migrant and temporary worker exploitation in outsourced roles (cleaning, housekeeping, catering, ground handling) • Excessive hours, underpayment, unsafe conditions • Debt bondage and recruitment fee exploitation (IT services) • Contract substitution and mobility restrictions (UAE – kafala system)
Tier 2 – Indirect Service Providers and Partners	<ul style="list-style-type: none"> • Hotel subcontractors (cleaning, maintenance, security) • BPO/call centre subcontractors (India, Philippines, Indonesia) • Professional services subcontractors 	<ul style="list-style-type: none"> • Hidden outsourcing chains with weak oversight • Low wages, insecure contracts, long/unpaid hours • Lack of worker benefits in subcontracted roles
Tier 3 – Upstream Supply Chains	<ul style="list-style-type: none"> • Electronics/IT hardware (servers, laptops, telecoms) • Hospitality consumables (coffee, cocoa, seafood, textiles) • Travel merchandise/uniforms 	<ul style="list-style-type: none"> • Forced and child labour in electronics supply hubs (China, Malaysia, Vietnam) • Exploitation in agricultural supply chains (coffee, cocoa, seafood) • Bonded and child labour in textile production

Recognising these tiered risks, Webjet acknowledges the importance of enhancing due diligence processes across higher-risk supplier categories and geographies, including building greater visibility into indirect and upstream supply chains where risks are often less transparent. Supplier due diligence will continue to evolve as an area of focus in FY26 and beyond, with progress to be outlined in future reporting.

Modern Slavery Risks

Risk Assessment Approach

Modern slavery risks within Webjet's operations and supply chains are an area of ongoing analysis and focus. During the reporting period, Webjet engaged an external consultant, AutomicESG, to assist with undertaking a comprehensive risk assessment using data modelling to evaluate our supplier base.

With the assistance of AutomicESG, analysis was undertaken of Webjet Group Limited and Webjet Marketing Pty Ltd direct suppliers using their advanced models and augmented external data assets. This included automating the categorisation of supplier industries and profiling supplier domicile countries. Leveraging insights and methodologies from the Walk Free Global Slavery Index 2023 (GSI 23), AutomicESG applied a novel risk-based model to assess our supply

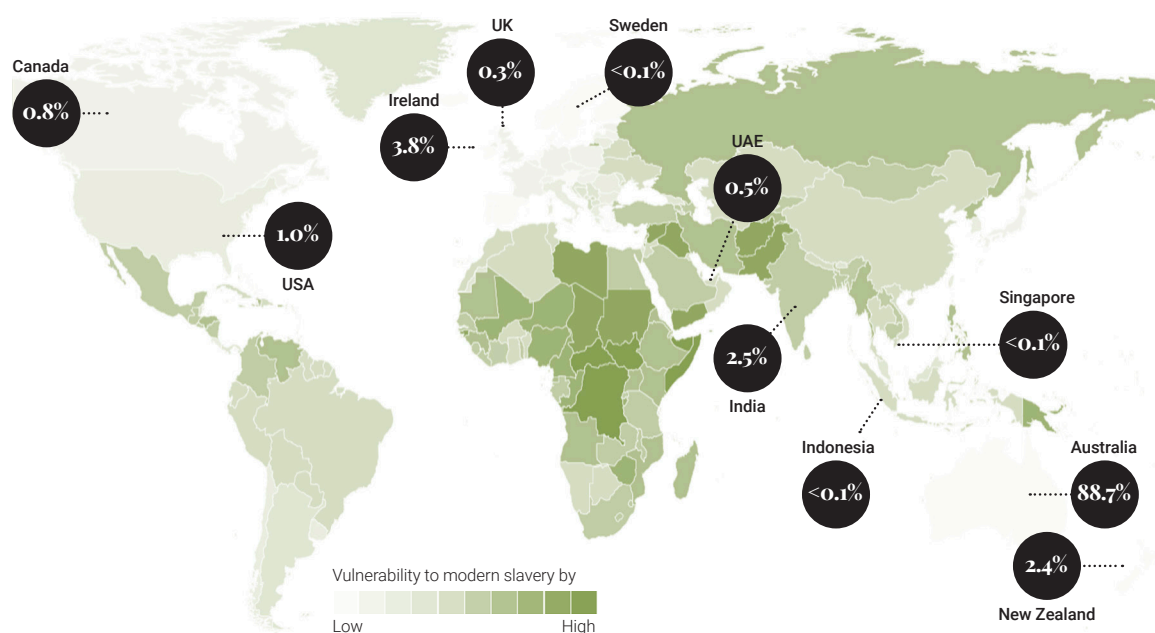
chain for FY25, integrating our financial data into their evaluation. The analysis assessed the inherent risks associated with each supplier based on factors such as industry, company size, domicile country, and business age.

Key Supply Segment Risks

Webjet recognises that its supply chains span multiple geographies and sectors, exposing the reporting entities to a range of modern slavery risks. In FY25, the Group engaged 183 distinct suppliers, with 153¹ included in the modern slavery risk assessment, representing 98.8% of procurement spend (\$47.5 million).

Supplier geographies include Australia, New Zealand, USA, Canada, Ireland, together with India, Indonesia and the United Arab Emirates.

Breakdown of Direct Supplier Spend by Country (%)



Source: Walk Free Global Slavery Index 2023

(The chart does not add up to 100% due to Sweden, Singapore and Indonesia accounting for less than 1%)

Based on the GSI 23, several of these countries are associated with heightened prevalence of modern slavery.

Supplier Countries with High Prevalence of Modern Slavery Risk

Country	Supplier Spend Share (approx.)	GSI 2023 Prevalence (/1,000)	Risk Assessment
India	2.5%	11.0	High – among the world's highest prevalence rates
United Arab Emirates	0.5%	4.3	High – significant reliance on migrant labour
Singapore	0.1%	2.9	Moderate-High – migrant/domestic worker exploitation risk
Indonesia	0.1%	7.0	High – elevated prevalence, forced labour risk

While this geographic exposure highlights potential vulnerabilities in offshore service provision, we note that this reflects a very small proportion of suppliers (<3% of total distinct suppliers, or 5 in total).

1. 30 suppliers were excluded due to having less than \$1000 spend, removal of Government Agencies Charities and Individual Sole Traders (as defined by Australian Business Registry).

Modern Slavery Risks

Identified Supplier Risk Types

Services in high prevalence territories

In the highest-risk jurisdictions within Webjet's supply chain, suppliers are primarily engaged in administrative and support services as well as professional and technical services. Based on GSI 23, these sectors are associated with heightened risks of exploitation. In India, prevalent risks include the use of third-party staffing and outsourcing arrangements that can expose workers to recruitment fee debt bondage, excessive overtime, and deceptive contract terms. In the United Arab Emirates, risks are shaped by the kafala sponsorship system, under which migrant workers in clerical and professional roles may face passport retention, contract substitution, restricted mobility, and delayed or withheld wages. These risks reflect structural vulnerabilities within service-based supply chains in high-prevalence jurisdictions.

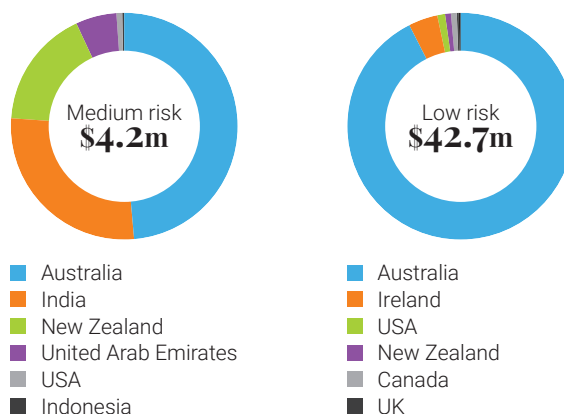
Professional, Scientific and Technical Services (64% of FY25 spend, 42% of distinct suppliers)

This sector generally carries a lower inherent risk of modern slavery compared with manufacturing or agriculture. However, the GSI 23 highlights that vulnerabilities can arise where outsourced or offshore professional functions are used, particularly in high-prevalence jurisdictions. Risks are linked to the use of third-party contractors and labour hire, where protections may be weaker and workers face job insecurity, excessive working hours, or underpayment. The sector therefore requires careful oversight when services are delivered through complex or cross-border supply arrangements.

Administrative and Support Services (15% of FY25 spend, 14% of distinct suppliers)

Administrative and support services are recognised by the Global Slavery Index as a sector with heightened structural risks, even in low-prevalence countries. This is due to the sector's heavy reliance on labour hire firms, subcontracted roles, and temporary staffing models such as cleaning, call centres, travel and hospitality services, and facilities management. Workers in these roles are more likely to face insecure contracts, restricted bargaining power, long or unpredictable hours, and exposure to underpayment or exploitative practices. These dynamics make administrative and support services a consistent potential risk area across jurisdictions.

Supplier risk country by spend¹



Information Media and Telecommunications (11% of FY25 spend, 13% of distinct suppliers)

Information media and telecommunications services are generally assessed as carrying low direct modern slavery risk in low-prevalence jurisdictions. However, the GSI 23 highlights indirect risks in this sector due to its reliance on global technology supply chains. Computers, servers, and telecommunications equipment are often manufactured in higher-prevalence regions of Asia, where risks of forced labour, exploitative recruitment practices, and poor working conditions in electronics manufacturing are well documented. For this sector, the primary concern is therefore embedded within upstream product supply chains rather than the direct provision of services.

Notably, when viewed across sectors and territories, the analysis indicates no suppliers that present a high risk of modern slavery and less than 10% of spend for the review year considered to be medium risk.

1. 30 suppliers were excluded due to having less than \$1000 spend, removal of Government Agencies Charities and Individual Sole Traders (as defined by Australian Business Registry).

Actions and Due Diligence

Supplier Base Review

As noted in the previous section, Webjet conducted a comprehensive modern slavery risk screening of Australian business direct suppliers. This covered 153 suppliers, representing 98.8% of procurement spend (\$47.5 million) in FY25. This level of coverage demonstrates that modern slavery considerations are embedded across the vast majority of Webjet's procurement base. The resulting risk registry of Webjet's supplier base will inform future supplier engagement.

Training and Capability Building

Recognising the role of staff in identifying and addressing risks, since the demerger all new employees that have been inducted in the organisation have been required to complete modern slavery induction training. This training provides staff with the tools to recognise indicators of modern slavery, understand supplier engagement protocols, and escalate concerns through established channels. This initiative marks the establishment of a baseline training program that will be expanded across the workforce in future reporting periods.

Whistleblower and Reporting Mechanisms

Webjet has a Whistleblower Policy which ensures staff and stakeholders have a safe, confidential channel to raise concerns, including those relating to modern slavery. Together with the Group's Human Rights Policy and Code of Conduct, this provides a multi-layered framework for escalation and remediation, ensuring concerns can be raised and addressed through several pathways.

Contractual standards

modern slavery clauses for inclusion into supplier contracts. These clauses clearly set out expectations regarding ethical practices and provide contractual avenues to address potential breaches. During the reporting period, Webjet sought to include these clauses into all new and renewed contracts. This creates a foundation for progressive extension to all material suppliers.

Building a Culture of Responsibility

The combined measures described above demonstrate a clear trajectory toward continuing to build a stronger culture of responsibility and transparency across Webjet's operations and supply chains. These initiatives lay the groundwork for more mature supplier engagement and monitoring in subsequent years.

Assessing Effectiveness

Measuring Progress

Effectiveness was assessed against three core measures:

- **Supplier coverage** – Webjet conducted risk assessments for 153 suppliers, representing 98.8% of Australian procurement spend (\$47.5 million). This sustained high level of coverage ensures that modern slavery risks are being considered across nearly all material suppliers. 21% of those suppliers have their own Modern Slavery Statements.
- **Contractual protections** – template contracts and modern slavery clauses were developed for inclusion into supplier contracts. The modern slavery clauses require suppliers to, among other things, comply with modern slavery laws and promptly notify Webjet if supplier becomes aware of any failure to comply with modern slavery laws. This provides a basis for monitoring progress in future years.
- **Training and capability** – the program of modern slavery training initiated in prior years was further embedded in FY25, with employees in Australia and New Zealand completing baseline training as part of their induction. This training equips staff to identify indicators of modern slavery and to use established escalation pathways.

Incident Reporting and Escalation

No incidents of modern slavery were reported through the Group's Whistleblower Policy or other grievance channels during FY25.

Challenges

Challenges Encountered in FY25

Through its internal assessments and governance processes, Webjet identified a number of challenges in strengthening its approach to modern slavery risk management:

- Operationalising modern slavery expectations without a standalone Procurement Policy requires disciplined use of procedures, templates, and supplier onboarding controls across business units.
- Resource limitations – expanding training beyond induction training for Australia and New Zealand and engaging consistently with suppliers across multiple geographies has proven challenging given existing resources.

Lessons Learned

From these challenges, Webjet has identified the importance of:

- Strengthening the application of existing governance (Human Rights Policy, standard clauses, risk management frameworks and due-diligence workflows), supported by targeted training and better documentation, is more effective than creating a separate Procurement Policy.
- Dialogue with suppliers in higher-risk jurisdictions, even where disclosure is initially limited.
- Ensuring training resources are available to extend staff awareness and capability globally.

Looking Ahead

Strengthening Procurement Governance

In FY26, Webjet will focus on enhancing existing controls rather than introducing a separate Procurement Policy. Planned actions include:

- Risk-screening to capture modern slavery indicators more consistently, including extending direct supplier analysis for overseas subsidiaries;
- Refreshing standard contract templates to reinforce modern slavery clauses and audit/termination rights;
- Rolling out training for staff involved in sourcing and contract management;
- Improving monitoring and escalation procedures under the Human Rights Policy; and
- Enhancing documentation to evidence consistent application of these controls.

Contractual Protections

Webjet will continue to introduce the inclusion of modern slavery provisions across new and renewed supplier contracts. This will improve consistency and ensure that expectations are clearly documented across the supplier base.

Broadening Training and Awareness

Following the successful rollout of baseline training in Australia and New Zealand, Webjet intends to conduct refresher training in FY26.

Developing Measurement and Assurance

Webjet has acknowledged the need to establish clearer KPIs and benchmarks to measure the effectiveness of its modern slavery program. Work in FY26 will focus on developing measurable indicators — such as the proportion of contracts containing modern slavery clauses, or the percentage of employees completing training.

Enhancing Supplier Engagement

Webjet intends to strengthen its engagement with suppliers by increasing dialogue and exploring pathways to improve transparency beyond Tier 1. This may include seeking greater subcontractor disclosure or revisiting contractual terms during renewal cycles

Consultation Process

Entity-Level Consultation

This statement has been prepared jointly by **Webjet Group Limited** and its wholly owned subsidiary **Webjet Marketing Pty Ltd**. In preparing this disclosure, Webjet consulted with subsidiary management and business units to ensure that information from across the Group was incorporated.

Method of Consultation

Consultation occurred through:

- **Structured questionnaires** distributed to subsidiaries and functional leads,
- **Management involvement** to validate responses and gather context, and
- **Board-level oversight**, including review and approval of the statement by the Board of Webjet Group Limited.

This process ensured that both entity-level risks and subsidiary-level supply chain details were captured, and that the Group presented a consistent and aligned approach in its reporting.

Board Approval

The final statement was approved by the Board of Webjet Group Limited, in accordance with the requirements of the **Modern Slavery Act 2018** (Cth) and is signed by a Director on behalf of the Board.

Appendix A

Mapping to Mandatory Criteria

The table below demonstrates where this statement addresses each mandatory reporting criterion under Section 16 of the Modern Slavery Act 2018.

Requirement	(per Act)	Where Addressed in Draft Statement	
Identify the reporting entity	s16(1)(a)	About this Statement Our Business and Operations	p.3 p.4
Describe the structure, operations and supply chains	s16(1)(b)	Our Business and Operations Our Supply Chain	p.4 p.5
Describe risks of modern slavery practices in operations and supply chains (incl. owned/controlled entities)	s16(1)(c)	Modern Slavery Risks (subsections on sector risks and supply segment risks)	p.7-10
Describe actions taken to assess and address risks, incl. due diligence and remediation	s16(1)(d)	Governance Frameworks and Governance and Standards Actions and Due Diligence + Challenges	p.6 p.11-12
Describe how effectiveness of actions is assessed	s16(1)(e)	Assessing Effectiveness (Measuring Progress, Incident Reporting) Challenges (Challenges, Lessons Learned)	p.12 p.12
Describe process of consultation with owned/controlled entities (and with joint statement entities if applicable)	s16(1)(f)	Consultation Process (Entity-Level, Method, Board Approval)	p.13
Include other relevant information considered appropriate	s16(1)(g)	Looking Ahead Appendix A – Mapping to Mandatory Criteria	p.13 p.14
Approval by governing body and signature by responsible member	s13(2)	About this Statement Board Approval section under Consultation Process	p.3 p.13