



Webjet Limited

Modern Slavery & Human Trafficking Statement

www.webjetlimited.com

Introduction

The Board of Directors (Board) of Webjet Limited is responsible for addressing Modern Slavery & Human Trafficking risk across the Company and its controlled entities. Webjet Limited is committed to ensuring high standards of Modern Slavery governance and its governance practices have demonstrably supported the business and its growth by facilitating effective board and management decision making, providing clear lines of responsibility and accountability and commitment to transparent communications with shareholders and other stakeholders.

This Statement describes the steps that Webjet Limited has taken in the 9-month period from 1 July 2020 to 31 March 2021 to address Modern Slavery & Human Trafficking risks across the Group and our global supply chains and also sets out our plans for future improvements.



John Guscic
Managing Director
Webjet Limited

All Webjet Limited's Corporate Governance documents and policies and its Corporate Social Responsibility Statement are accessible in the Corporate Governance section on Webjet Limited's investor website:

www.webjetlimited.com/corporate-governance

This Modern Slavery & Human Trafficking Statement is current as of **24 August 2021** and has been approved by the Board of Directors of Webjet Limited on **31 August 2021**.



- Parent/Holding Company
- Trading Company
- Services Company
- Property Company
- Branch

About Us

Webjet Limited (“Webjet”) is a digital travel business spanning both consumer (through the Webjet Online Travel Agency (OTA) and Online Republic B2C businesses) and wholesale markets (through the WebBeds B2B business). It is primarily an on-line seller of products and services of third parties – namely flights, hotel rooms, car and motorhome rentals and travel insurance. Webjet operates a geographically diverse business with operations in Australia, New Zealand, Asia Pacific, Europe, Middle East, Africa, and the Americas and Webjet has a responsibility to operate in a sustainable manner in each region in which it operates.

Changes From Prior Iterations of the Modern Slavery Statement

In accordance with the adopted approach to Modern Slavery Reporting, Webjet has placed an emphasis on enhancing the coverage of this Modern Slavery Statement. As such, there are additional disclosures and topics covered in this statement that have not previously been reported. These sections are:

- Group Structure
- Where We Operate
- Modern Slavery Risk Factors
- Impact of the Global Pandemic (COVID-19)
- Risk Identification Process
- Effectiveness of Actions

Group Structure

Appendix A identifies all entities covered under this Modern Slavery Statement. Webjet’s Governance Framework is

centralised and Policies and Procedures encompass all owned and controlled entities. Key stakeholders throughout Webjet have been advised and consulted during the preparation of this statement through the use of frequent interactive modern slavery workshops.

Where We Operate

Webjet is a global digital travel business which has trading, services, property and branches across the following main entities:

- **WebBeds** - the 2nd largest B2B provider in the world, providing access to more than 365,000 hotels around the world, selling around 200+ destination countries through customers in more than 145 markets;
- **Webjet OTA** – mainly focussed on Australia and New Zealand, predominantly servicing the leisure market; and
- **Online Republic** - a market leading specialist in the provision of rental car and motorhome bookings in its key markets of Australia, New Zealand, the USA, and Europe.

More information around Webjet’s operations is included in its annual report which is available at <https://www.webjetlimited.com/annual-reports>

Webjet believes that the overseas operations, and its extensive supply chain, will make its business model stronger and more effective and recognises that overseas operations can create a perception of elevated risk of modern slavery.

However, the next sections will describe how we have identified and remediate/ eliminate these risks across our operations and supply chain.

Our position on modern slavery

Webjet's Modern Slavery & Human Trafficking Statement, issued under the Modern Slavery Act, outlines the steps we take, as a business, to prevent Modern Slavery & Human Trafficking in our own operations and supply chains.

We recognise that Modern Slavery & Human Trafficking is a growing global issue, and we 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. Wherever we operate, we respect the human rights of our 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 & 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](#).

Modern Slavery Risk Factors

The key Modern Slavery risk factors for Webjet are categorised as follows:

- Vulnerable populations - groups of people more likely to be exposed to harm, or unable to advocate for themselves in exploitative situations. The level of worker vulnerability, and risk of poor labour practices and exploitation are recognised to be higher in contexts where base skill labour is relied upon.
- High risk categories - products and services regarded as having more significant inherent modern slavery risk- including industries that rely heavily on low-skilled labour and/or involve dirty, dangerous, and difficult work.
- High risk geographies - countries or regions which are known to have higher human rights (and modern slavery) risks. High risk geographies include countries and regions vulnerable to bribery and corruption, or without strong labour laws and governance
- High risk business models - business models that rely on third parties for the provision of services - often labour hire. Outsourcing reduces company visibility over third-party recruitment practices and provision of worker entitlements.

Webjet acknowledges that these risk factors are especially applicable to Webjet's business and is committed to assessing and addressing modern slavery practices in our operations and supply chain.

Impact of the Global Pandemic (COVID-19)

As this statement is released, in August 2021, the world and especially Australia deals with COVID-19 and all organisational units are challenged with potential vulnerability in this new context. This has influenced our approach and review across our organisational units and suppliers, creating further awareness of particular worker vulnerability (e.g. mental health) and breaches of human rights that might further develop in modern slavery practices.

Governance

The Managing Directors of each of the digital travel businesses is responsible for Modern Slavery & Human Trafficking activity within their operations. Overall accountability is held by the Risk Committee, and the Board have final sign off.

Our Workplace

We are committed to dealing honestly and fairly with our employees, directors, and senior executive, as with our customers, and effectively managing the risk of unfair outcomes and negative impacts on the integrity of the travel industry, wherever we operate.

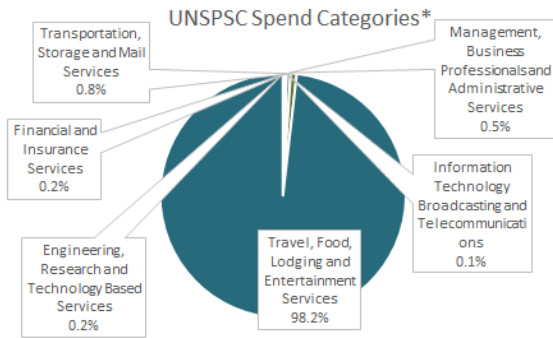
We are committed to complying with relevant local and national laws, community expectations and ethical standards related to modern slavery and human rights in respect to our employees, our customers, and our business operations. As part of Webjet's commitment to treating people with respect and dignity as individuals, we do not tolerate any form of discrimination or harassment and we strive to be an equal opportunity employer in all locations. We are committed to ensuring our employment conditions meet at least minimum wages, appropriate hours of work and leave provisions, as well as the ability to sustain the health, safety and wellbeing of our employees, contractors, and visitors. We are also committed to creating and maintaining both a diverse workforce and an inclusive and safe workplace for all.

Our employees are encouraged to report genuine concerns about any conduct or activity they believe is unethical, illegal, fraudulent, undesirable, corrupt and we offer a number of channels for them to do so. We have an anonymous whistleblowing reporting tool: <https://webjet.whispli.com/SpeakUp> and its availability reflects our commitment to develop a "speak up" culture, allow anonymous reports and ensure disclosures made by our employees, directors and executive managers are taken seriously and employees feel protected to speak up.

Our Global Supply Chain

Webjet has a global supply chain made up of more than 1,500 first tier (direct and indirect) suppliers. This is extended by more than 56,000 hotels. Our supply chain relationships include travel related suppliers, incl. car rental, hotels, etc. – majority of the suppliers and partners – complemented by IT service providers, digital and marketing, consultancy, and other professional service firms.

Supplier spend categories breakdown



* United Nations Standard Products and Services Code (UNSPSC) is a global, multi-sector standard for accurately classifying goods and services

We acknowledge and recognise the potential for Modern Slavery & Human Trafficking to occur within our global supply chains, regardless of location. Our suppliers are expected to manage their business and their supply chain in a manner that respects human rights as set out in the [UN Universal Declaration of Human Rights](#) and the [UN Guiding Principles on Business and Human Rights](#).

Suppliers are also expected to ensure that all employees and contractors are legally entitled to work and that no bonded, forced, or involuntary labour, child labour, human trafficking or other forms of slavery is employed in the delivery of their products or services to Webjet.

Risk Identification Process

Having regard to the scale of the operations of Webjet, cross-organisational business teams, consisting of operations, human resources, legal, contracting, sales and finance were established to conduct an in-depth operational and supply chain risk identification process.

This cross-functional team worked closely together and consulted each other to deliver a coherent and effective approach to assess Webjet's operations and supply chain partners.

Following the establishment of the first Modern Slavery Statement in March 2021, a more detailed and comprehensive internal review of Webjet's policies, procedures and processes was undertaken to identify and assess Modern Slavery & Human Trafficking risks within Webjet's global operations and supply chain.

Operational Risk Assessment

The review considered the broader scope of human rights issues connected to or indicative of modern slavery risk,

including employee and contractor rights to fair pay and entitlements, safe working conditions and equality and diversity.

This was further supplemented by a risk identification process across all our ANZ and International policies, procedures, and guidelines. This review was undertaken by our business teams, with the assistance of an external Modern Slavery & Human Trafficking and impact advisor.

Supply Chain Risk Assessment

A detailed and comprehensive supply chain risk assessment model was used to identify potential modern slavery risks associated with its supply chain. This model used a number of different indicators across countries, supplier taxonomy and other criteria to identify which suppliers could be a potential modern slavery risk. Webjet identified the following main industry risk categories within its supply chain:

- Food and beverage
- Cleaning and security services
- Textiles (incl uniforms, linen, etc.)
- Transport services

Modern Slavery Risk Assessment Model

Webjet used an externally developed leading data analytics tool to identify high risk onboarded suppliers based on the following eight risk factors:

- Supplier importance
- Customer interaction
- Spend/ leverage
- People risk impact
- Country/region
- Industry/sector
- Business models
- Vulnerable populations

The data analytics tool provides a severity and likelihood rating, which allows the various business team members to identify medium and high-risk suppliers – between a 1 to 5 rating – and follow up to conduct further assessments through a Supplier Assessment Questionnaire (SAQ), and subsequent follow up "audits" and engagement sessions

In the last 6 months, Webjet has also introduced a Supplier Code of Conduct, which it's currently distributing across its supplier base to ensure alignment between Webjet's Code of Conduct for All Employees, and Code of Conduct for Directors and Senior Executives.

Based on the feedback from the suppliers, changes/ amendments were made to the various policies, procedures and guidelines and the interactions across Webjet's supply chain.

Policies & Contractual Controls

Webjet is committed to high standards of corporate governance. The Board and its Committees provide the necessary leadership to implement strong corporate governance across the Group so that our decisions and actions are based on transparency, integrity, responsibility, and performance, which promotes the long-term sustainability and ongoing success of our business.

Webjet has introduced the following group policies in key areas, including:

- Corporate Social Responsibility Statement,
- Information Security Policy,
- Sustainability Statement,
- Whistleblowing Policy,
- Code of Conduct for All Employees,
- Code of Conduct for Directors and Senior Executives,
- Supplier Code of Conduct,
- Diversity Policy, and
- Health and safety Policy (WHS)

Webjet has taken a central approach, through which group policies have been established and continuously evaluated to ensure that the relevant Modern Slavery Act requirements are captured, reducing the risk of Modern Slavery & Human Trafficking in its business. We recognise that our employees (including our contractors and directors) are key to maintaining a compliant and ethical approach to our business practice.

Effectiveness of Actions

Supply Chain	Actions	Outcomes
Webjet ANZ – Supply Chain	Completed a full Supply Chain Assessment of first tier suppliers Submitted and received SAQ's for follow up	80% of SAQ's feedback has been received for further assessments to remediate/ eliminate Modern Slavery & Human Trafficking risks across Webjet's supply chain
International Webjet organisation – Supply Chain	Conducted a full Supply Chain Assessment of first tier suppliers to identify medium and high-risk suppliers	8% of suppliers have a medium risk profile and require further Modern Slavery & Human Trafficking risk assessments

Webjet is still to assess the effectiveness of actions taken to address modern slavery risks identified due to the fact that Webjet is in the early stages of modern slavery reporting. Webjet will implement actions to that will be assessed as sound in:

- Enhancing Webjet's capacity to identify modern slavery risks that require remediation; and
- Enabling closer supplier engagements between Webjet and ANZ-based suppliers emphasising the importance of Modern Slavery & Human Trafficking mitigation.

This is planned to be completed by early 2022 and will be reported in the 2022 Modern Slavery Statement.

Training and Awareness

There are a significant number of compliance obligations that apply across our day-to-day activities at work, whether they are laws, regulations, the code of conduct or ethical standards; and we are committed to educating our employees about them. Ensuring that our people have a good understanding of, and respect for human rights is important, which is why we continuously assess and enhance our training to assist our people to identify and evaluate risks relating to human rights, including modern slavery and how to manage these issues should they arise.

We also believe that this training and awareness needs to be extended beyond Webjet's business and into our extended supply chains, building an evolving internal and external training and awareness model that continuously shows a risk reduction across Webjet's business and affiliated suppliers.

Webjet looks to enable this through introducing a training and awareness model across our internal supply chain/ operational staff members and leadership teams who will be given increased responsibility for understanding and mitigating Modern Slavery & Human Trafficking risk, as well as continuously raising awareness – with key performance indicators – across the Webjet supplier community.

Training & Awareness	Functional Areas
Australia, New Zealand & International Ops	Legal teams, Company secretaries, and Chief Operating Officer Updated UK Modern Slavery Training Program

The following key steps to provide a strong foundation to monitor the effectiveness of our actions has been implemented:

Establish a Modern Slavery & Human Trafficking Working Group

A cross-functional Modern Slavery & Human Trafficking working group provides Webjet with a platform to assign responsibilities and accountabilities for human risk management at executive management and operational management. The Modern Slavery & Human Trafficking Working Group established a roadmap (project plan) to enhance Webjet's maturity.

Tracking and reporting of follow-up actions

On a quarterly basis, the Modern Slavery & Human Trafficking Working Group meets to assess how the various workstreams progress against a comprehensive action plan with KPI's and timelines for each action, focussed on:

- Engaging with operational managers to guide, inform them of how to identify and act on potential human rights issues
- Conducting a deep-dive assessment of Webjet's international supplier network (8%) to reduce/eliminate potential Modern Slavery & Human Trafficking risks
- Collecting data on suppliers who undertake the SAQ, and subsequently conducting further engagement risk assessments to flag potential human rights related issues.

We are also keeping abreast of industry-related trends and developments to pro-actively identify potential Modern Slavery & Human Trafficking risk areas

Implementation and Continuous Improvement

We recognise that consistency and capability building is key to the effectiveness of an implementation and continuous improvement model. If such a program is to become embedded in Business as Usual, it requires to be part of the business culture, processes, behaviours, and operating frameworks.

Webjet will continue to assess the effectiveness of actions in progress and subsequent actions to be taken in accordance with the key steps outlined.

Sustainability Principles

Webjet is cognisant that its 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.

In 2020, we have developed a Sustainability Statement, which has set out the principles for sustainable supply chain management. These principles reflect our strong commitment to conducting our operations in a responsible and sustainable manner and setting the minimum expectations that our suppliers comply with relevant local and national laws related to human rights in respect of their employees and business operations. As part of our broader approach to sustainability, we seek to engage with and encourage suppliers and partners who share this understanding and commitment.

Planning ahead

We continuously focus on assessing potential Modern Slavery and Human Rights issues within our business and our supply chains.

Key areas of focus for Webjet include:

- Enhance our supplier agreements to better capture our commitment to managing Modern Slavery & Human Rights risks,
- Improve relevant policies, procedures, and guidelines to include specific references to Modern Slavery & Human Trafficking,
- Enhance due diligence processes for supplier selection and screening to include consideration of Modern Slavery risk,
- Introduce and deploy Modern Slavery & Human Trafficking training and awareness sessions across Webjet's business and global supply chains, to detect and mitigate modern slavery risks,
- Identify and remediate/ eliminate risks regarding recruitment practices of third-party labour providers in Webjet's operations and supply chains,
- Continuously assess the effectiveness of our actions to ensure that we learn, and incorporate improvements in detection and remediation/ elimination of Modern Slavery & Human Trafficking risks
- Introduce a set of key performance indicators (KPI's) to continuously measure the effectiveness of our actions, ensuring that Modern Slavery & Human Trafficking is not taking place across our business or supply chains, and

Identify and use opportunities for collaboration with industry partners, organisations, and other third-party providers to verify and help resolve Modern Slavery & Human Trafficking risk issues

Webjet's Milestones in its Journey

2019/ 2020

- Commenced discussion in December '18
- Webinar by the Governance institute in August '19
- Anti-slavery policy for Offshore business drafted in May '20
- Modern Slavery awareness and training sessions across Webjet's business for employees with a "governance" component in their roles
 - Modern Slavery Introduction June '20
 - Modern Slavery follow up deep dive sessions
 - July '20
 - August '20
 - December '20

2021

- Appointed Modern Slavery Specialist/ Experts
 - Supply Chain Mapping – Modern Slavery & Human Trafficking Risk Assessment ANZ
 - Introduced SAQ to follow-up on medium/ high risk suppliers
 - Modern Slavery & Human Trafficking Statement (First)
- Extended the Modern Slavery assessment across Webjet's international operations
 - Supply Chain Mapping – Modern Slavery & Human Trafficking Risk Assessment ANZ
 - Modern Slavery & Human Trafficking Statement (Second)

Appendix A

Australia

Webjet Marketing Pty Ltd *

Rez Group Pty Ltd *

Online Republic Pty Ltd *

United Arab Emirates

WebBeds FZ LLC

DOTW Kuwait Limited

Destinations of the World DMCC

DOTW Propco Limited

Destinations of the World Travel and Tourism LLC

Umrah Holidays International International FZ LLC **

United Kingdom

WebBeds Limited

JAC Travel Group Acquisitions Limited

SunHotels Ltd

JAC Group (Holdings) Limited

Fyrkant Ltd

JAC Travel Group Financing Limited

JAC Travel Limited

JAC Travel Group Investments Limited

TotalStay Limited

JAC Travel Group (Holdings) Limited

Online Republic Group Limited (UK)

Destinations of the World Limited (UK)

Other countries

Webjet International Limited

SunHotels France

Bico T. S. HK Co Ltd

SunHotels Mundo

WebBeds Holding Co Limited

Busy Bee S.L

Shanghai Mei. Gao Information and Technologies Co., Ltd

Flame S.R.L.

Earlybird (Shenzen) Limited

Travel Tech S. R. L.

JAC Travel Information Consulting (Beijing) Co Ltd

JAC Travel Inc

FitRuums Pte Ltd

Webbeds LLC

Bico Trip Co. Limited

Destinations of the World Istanbul Sehayat Ve Turizm Anonim Sirketi

Destinations of the World (Thailand) Co., Limited

DOTW KSA Limited

DOTW Shared Services Inc.

Destinations of the World Saudi Arabia for Tourism LLC

Bico Trip Co. Ltd (Japan)

DOTW Kuwait for Hotels, Real Estate and Healthcare Centres Reservations WLL

Destinations of the World (Malaysia) Sendirian Berhad

DOTW Holdings Limited

Webjet Marketing NZ Pty Limited

Destinations of the World Holding Establishment

Online Republic Group Limited

Destinations of the World (Subcontinent) Private Limited

Search Republic Limited **

Dominica de Turismo (Domitur) SRL

* Member of the Australian tax-consolidated group

** Only 51% interest held.

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