

Global Supplier Code of Conduct

Webjet Group Limited

Version 1.0

Version Control

Document Owner/s	Head of Legal
Document Name	Global Supplier Code of Conduct
Version Control	1.0 New Policy
Material Changes	N/A
Approved by	Webjet Group Limited Board
Date Approved	March 2026
Review Period	Every two (2) years
Date of Next Review	March 2028
Regulatory Requirements	Modern Slavery Act 2018 (Cth)

Supporting Documents.

Document Name	Description
Whistleblowing Policy	Describes process for raising a whistleblowing concern and protections for whistleblowing
Code of Conduct	Webjet's Code of Conduct that sets out the organisation's values and ethical standards.
Human Rights Policy	Sets out Webjet's commitment to respect, protect and fulfil human rights

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1 Purpose.

- 1.1 Webjet Group Limited and its controlled entities (together **Webjet**) is committed to conducting our business with honesty and integrity, ensuring that our procurement practices are transparent and free of modern slavery, and we expect our suppliers to adhere to the same standards.
- 1.2 This Global Supplier Code of Conduct (**Code**) sets out Webjet's expectations of our suppliers and business partners and their supply chains in providing goods and services to Webjet.
- 1.3 Webjet expects that our suppliers and business partners align to this Code and adhere to the same standards that we uphold including compliance with modern slavery laws.

2 Scope.

- 2.1 This Code applies to all suppliers and business partners associated with Webjet Group Limited and its related bodies corporate in all jurisdictions.

3 Code review.

- 3.1 This Code will be reviewed every two (2) years or as soon as possible following any material change to the process or any relevant law.

4 What is modern slavery?

- 4.1 Modern slavery involves situations of exploitation that an individual cannot avoid due to threats, coercion, violence and/or abuses of power.
- 4.2 Modern slavery takes many forms, such as forced labour, human trafficking, forced marriage, slavery and slavery like practices, deceptive recruitment practices, child labour and debt bondage.

5 Webjet's expectations of suppliers.

- 5.1 Webjet respects the fundamental human rights as set out in the Universal Declaration of Human Rights and other relevant international conventions and standards. We take modern slavery very seriously and are committed to ensuring that no modern slavery practices occur within our supply chains. We expect all suppliers to adhere to the same human rights standards we uphold.
- 5.2 Our expectations of suppliers include (but are not limited to) the following:
 - Working hours**
 - 5.3 Working hours must be reasonable and must not exceed the maximum set by applicable laws and industry standards. Workers must have regular rest days, appropriate breaks, and access to leave in line with local requirements. Suppliers must keep clear and accurate records of hours worked.
 - Voluntary labour**
 - 5.4 All labour must be voluntary. Suppliers must not use any form of forced, bonded (including debt-bondage), involuntary or prison labour, nor engage in slavery or human trafficking. They must not recruit or control workers through threats, coercion, abduction, deception or similar means.
 - 5.5 Workers must be able to leave the workplace at the end of their shift and resign at any time with reasonable notice. Suppliers must ensure that workers do not pay fees or make any payment connected to obtaining and maintaining employment. Suppliers must not request passports or identity documents as a condition of employment.
 - Wages and benefits**
 - 5.6 Suppliers must ensure that wages and benefits paid to their workers comply with applicable labour laws, including laws relating to minimum wages, overtime and mandatory benefits.

Freedom of association

- 5.7 Suppliers must acknowledge and respect the rights of their workers to freedom of association and collective bargaining under applicable local laws. Suppliers shall respect the rights of their workers to join or not join trade unions or similar organisations and engage in collective bargaining in accordance with applicable laws.

Child labour

- 5.8 Suppliers must not employ children under the legal age of employment under any circumstances. We expect suppliers to take measures to verify the age of all workers to ensure no child labour is used. Workers under the age of 18 must not undertake hazardous work that would likely jeopardise their physical or mental health or safety.

Health and safety

- 5.9 Suppliers must provide safe and healthy work environments for their workers in compliance with all applicable work health and safety laws. Suppliers must have adequate measures in place to prevent accidents and injuries arising during work, including by way of risk assessments and hazard controls.

Respect

- 5.10 Suppliers must ensure that all workers are treated with dignity and respect, protect them from bullying and harassment (including sexual and sex-based harassment), unlawful discrimination and victimisation, and maintain a safe working environment free from physical, sexual, psychological, and verbal abuse.

Other

- 5.11 Without limiting the above, we expect our suppliers to:
- 5.11.1 **Inform us promptly** if they identify or suspect any breaches of human rights or modern slavery laws within their operations or supply chains.
 - 5.11.2 **Implement and maintain effective governance measures** including policies, controls and procedures designed to prevent, detect, assess, manage and remedy modern slavery risks and other human rights impacts across their operations and supply chains.
 - 5.11.3 **Provide reasonable access, information and documentation** when requested, to enable us to review and assess modern slavery and human rights practices within our supply chain.
 - 5.11.4 **Comply with all relevant human rights and modern slavery legislation** applicable to their business operations.

6 Supply chain management.

- 6.1 Suppliers must ensure that everyone involved in delivering their goods or services (including their employees, contractors, agents and any sub-suppliers) upholds the requirements of this Code. Webjet may review a supplier's compliance at any time, and suppliers are expected to cooperate fully with any reasonable request made for this purpose.

- 6.2 To meet these expectations, suppliers are required to:

Communicate this Code

- 6.3 Suppliers must share the requirements of this Code with all workers in a language and manner they can understand.

Ensure compliance across their supply chain

- 6.4 Hold their own workers, subcontractors and upstream suppliers to these same standards and work with them so the full supply chain aligns with the principles of the Code.

- 6.5 **Respond to information and documentation requests**

- 6.6 Provide timely, accurate and complete information, including risk assessments, due-diligence questionnaires and any supporting documents requested. Suppliers are required to grant access to information and their operational sites (eg. call centres) if Webjet requests an audit or a breach (or suspected breach) of this Code requires Webjet to investigate.

6.7 **Allow participation in reviews**

6.8 Support Webjet in undertaking assessments or other review activities when required.

Complete remediation actions

6.9 Implement and close out any agreed remediation or corrective action plans arising from reviews or identified issues.

7 **Speak Up.**

7.1 Webjet expects that suppliers will provide their workers with an ability to raise concerns to the supplier confidentially and without fear of victimisation and harassment.

7.2 Webjet also provides a grievance channel for suppliers and their workers to report concerns and complaints relating to modern slavery. Reports are confidential and can be made anonymously via the following channels:

Online	https://webjet.whispli.com/SpeakUp
Telephone	Australia: +61 3 4713 7063 New Zealand: +64 800 493 620 QC, Canada: +1 819 581 9726
QR Code	

7.3 Webjet encourages our suppliers to report instances of modern slavery through our reporting tools. Suppliers must also ensure workers are aware of our reporting tools and how to make a report.

7.4 More information can be found in our Whistleblowing Policy on our corporate website.



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