webjet group

Modern Slavery Statement

2026



Making travel better, for everyone

Travel is made possible by people. From the anticipation of discovering somewhere new to the journey itself, it's people who shape the experiences that we cherish.

Making travel better for everyone means recognising our responsibility to the people across our business, partners and supply chain. As demand for travel grows, so too does the importance of protecting the people whose work makes those journeys possible.

For Webjet Group Limited, that means looking closely at how we operate, the services we rely on and where we can use our influence to support fair and responsible practices, from our own offices to the many businesses and communities connected to the journeys we help create.

Managing modern slavery risks is an important part of the responsibility. It means strengthening our governance, understanding where risks may be hidden and continuing to improve how we support the people across our operations and supply chain.

Because making travel better is about more than the experience itself. It's also about respecting and protecting the people who help make it possible.

Webjet Group Limited
ACN 679 116 762

Modern Slavery Statement 2026

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Acknowledgment of Country
Webjet Group acknowledges the Traditional Owners of Country throughout Australia and recognises their continuing connection to lands, waters and communities. We pay our respects to Aboriginal and Torres Strait Islander peoples, cultures and Elders past and present. We recognise the deep knowledge systems, custodianship and cultural connection that have shaped care for Country over thousands of generations, and the importance of these perspectives in building a more sustainable future.

CEO and Managing Director Message

At Webjet, we believe in the inherent dignity, equality, and worth of every individual. We are committed to upholding and promoting human rights in all aspects of our operations and supply chain.

Following the demerger of the Webjet Group in FY25, we have continued to strengthen the governance, systems and oversight that underpin our approach to modern slavery risk. During this reporting period, our focus has been on greater consistency in our approach and strengthening the governance, training and risk assessment processes that support it.

I am pleased to present Webjet's Modern Slavery Statement, which sets out the actions we have taken during the year to address risks of modern slavery within our operations and supply chain.

Our business connects customers with a broad global network of travel products and services across multiple jurisdictions and through a diverse supplier base, including airlines, hotel groups, local operators and technology providers. This can create challenges with modern slavery management and means our approach will evolve as our understanding of those risks develops.

During the reporting period, we strengthened our response to these challenges. A key development this year was the launch of a Global Supplier Code of Conduct. Our expectations of suppliers and business partners are an important part of this framework. We expect those we work with to respect human rights and to take appropriate steps to identify and address modern slavery risks within their own operations and supply chains. Our new Global Supplier Code of Conduct helps to guide decision-making across the business, communicates our expectations to suppliers and business partners, and supports the integration of human rights considerations into our risk management and procurement processes. All new suppliers are requested to agree to this Code during onboarding. Our FY27 priority is to extend the Code to existing suppliers and drive broader adoption across the supplier base. We also embedded insights from the supply chain work undertaken in FY25 into our ongoing risk assessment approach.

During the year we rolled out refresher modern slavery training to employees across Australia, New Zealand and Canada, leveraging the baseline training introduced in FY25, to support a culture of responsibility across the business. We also overhauled the modern slavery training that our team members are required to complete on induction.

We recognise that addressing modern slavery risks requires ongoing attention and continuous improvement. In the year ahead, we will focus on advancing our modern slavery risk management framework through targeted supplier engagement, enhanced grievance mechanisms and improving the quality of information available to support our assessment of modern slavery risk across the supply chain. Addressing our supply chain risks remains a priority as we mature our approach.

Our operations span Australia, New Zealand and Canada, and we monitor developments in the regulatory environment across these jurisdictions. This includes Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act and developments relating to New Zealand's proposed modern slavery legislation. We will assess what these developments mean for our governance, reporting and risk management practices.

On behalf of the Board, I endorse this statement and support the strengthening of Webjet Group's approach to identifying, assessing and addressing modern slavery risks.

Yours sincerely



Nicole Sheffield
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**').

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. It also covers **Locomote Holdings Pty Ltd** (ABN 42 167 850 606) (**Locomote**), which is owned and controlled by Webjet Group.

- **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 WebBeds Group Limited). Following approval of the demerger by Webjet Limited shareholders in September 2024, Webjet Group became a separate listed entity on 1 October 2024.
- **Webjet Marketing** is a wholly owned Australian subsidiary of Webjet Group. Webjet Marketing runs the Webjet online travel agency (**OTA**) business – one of the leading online travel agencies in Australia and New Zealand. It is a member of IATA (International Air Transport Association) and ATIA (Australian Travel Industry Association).
- **Locomote** is a wholly owned Australian subsidiary of Webjet Group and was acquired by Webjet Group on 1 October 2025. Locomote is the holding company for two subsidiaries, Webjet Business Travel Australia Pty Ltd (ABN 30 679 069 562) and Webjet Business Travel Technologies Pty Ltd (ABN 97 655 645 435) which together operate the **Webjet Business Travel** business.

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. Webjet Group also has operations in New Zealand, through its Cars & Motorhomes businesses (Airport Rentals and Motorhome Republic), and in Canada, through its Trip Ninja business.

This statement demonstrates 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. This statement has been approved by the Board of Webjet Group Limited, in accordance with section 14 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 the Group, including representatives from people and culture, finance and technology teams as well as senior executives. Consultation occurred through structured interviews and regular meetings supplemented by management input, ensuring alignment across entities and business functions and entities.

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 FY26. It also explains how the Group assesses the effectiveness of these actions and outlines future priorities. To understand how we are in accordance with the Australian modern slavery criterion, see Appendix A for further guidance.

Approval
This statement was approved by the Board of Directors of Webjet Group Limited on 23 September 2026.



Nicole Sheffield
Group CEO and Managing Director,
Webjet Group Limited

FY26 Highlights

Supporting our people

Engagement and development

- Provided flexible and remote working arrangements and a range of employee benefits

Diversity and inclusion

- Launched new employee values 'Our Ways' across the Group
- Delivered Respect@Work refresher training
- Introduced Group DEI reporting in gender, tenure, turnover, promotions, and parental leave
- Delivered gender diversity across the workforce, management and Board, above our 40% female representation target

Team wellbeing

- Launched Sonder, a holistic wellbeing partner
- Introduced a Risk Incident Management Portal
- Expanded our grievance and whistleblower reporting channels, providing individuals with accessible pathways to report concerns, including those relating to modern slavery

Governance in action

Modern slavery

- Delivered Modern Slavery Awareness refresher training
- Established a cross-functional multi-entity Modern Slavery Working Group
- Developed and published a Global Supplier Code of Conduct
- Conducted Modern Slavery Risk Assessments across our direct supply chain (Tier 1 suppliers)

About Webjet Group

Our Business

	Webjet Group
Countries	Australia, New Zealand, Canada
FTE employees (number)	301

	Webjet Group	Webjet OTA	Cars & Motorhomes	Webjet Business Travel	Trip Ninja
Bookings (number)	**1,431 thousand**	1,147 thousand	260 thousand	24 thousand	
Total transaction value (TTV)	**$1,457 million**	$1,241 million	$189 million	$27 million	
Consolidated revenues	**$136.4 million**	$115.3 million	$19.5 million	$1.2 million	$0.4 million
Underlying EBITDA	**$28.1 million**(i)	$38.7 million	$4.3 million	($0.6 million)	($3.1 million)

All $ amounts in AUD.
(i) Group Underlying EBITDA includes $11.2m of corporate overhead costs.

Webjet Group operates

- **Webjet OTA** (online travel agency),
- **Cars & Motorhomes**, operating the Airport Rentals and Motorhome Republic business;
- **Trip Ninja**, providing specialised travel technology, and
- **Webjet Business Travel**, a recently launched separate business travel offering.

During FY26, the Group's operations were delivered through a portfolio of businesses as described above. 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 hire and travel insurance.

In addition, Webjet Group New Zealand businesses, Airport Rentals and Motorhome Republic, bring together the Group's car and motorhome rental offering. Airport Rentals makes booking a car rental anywhere in the world quick and easy, partnering with thousands of top brands to provide trusted expertise in car rentals. Motorhome Republic specialises in comparing top motorhome rental brands to ensure customers get the best vehicle at a competitive price. Trip Ninja Inc. based in Canada supports OTA technology, while the newly acquired Webjet Business Travel is a corporate travel provider.

In FY26, operations for Webjet Group and all its controlled subsidiaries were supported by 301 full-time equivalent (FTE) employees, with 193 FTE based in Australia and the remaining in either New Zealand (93 FTE) and Canada (15 FTE). In addition, there were 73 personnel based in the Philippines, and 7 personnel based in Romania providing call centre, customer service, and sales support.

Our Operations

Our team is spread across Webjet Group's brands and functional areas, with team members supporting finance, technology, customer service, contracting, and marketing. This digital-first model enables scalable global reach and is supported by 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. While Webjet's operations are primarily digital, with customer engagement occurring through online platforms, the Group also relies on subcontracting services for facilities activities such as on-site cleaning.

Employee wellbeing

We are committed to maintaining a workplace that supports the wellbeing, safety, and inclusion of all team members. Employee wellbeing is closely linked to workforce engagement, retention, and culture, and plays an important role in supporting ethical and responsible business practices. Through ongoing investment in wellbeing initiatives, employee support programs, flexible working arrangements, learning and development opportunities, and mechanisms for employee feedback, we seek to foster a workplace where our team feel respected, supported, and empowered. Monitoring employee wellbeing also provides valuable insights into workplace culture and helps us identify opportunities to strengthen our employment practices and support the needs of our workforce.

Case Study:

Work Life Balance

We seek to provide a work environment that is safe, inclusive, and fair: free from discrimination and harassment, and respectful of employees' rights to freedom of association and collective bargaining.

In FY26, we provided a range of employee benefits to support this commitment, including paid parental leave, wellbeing leave, study leave, the option to purchase additional annual leave, and hybrid working options for our employees. We are also committed to attract, engage, and retain talent through learning and career development opportunities and flexible work arrangements, by providing five days of study leave, and incorporating a hybrid work policy across Australia and New Zealand. In New Zealand, we added two days of wellbeing leave, to further demonstrate our commitment to the wellbeing of our team.

Diversity and inclusion

We believe diversity strengthens our culture and contributes to better outcomes for our customers. The varied experiences, perspectives, and backgrounds of our people help foster an inclusive workplace where innovation, new ideas, and strong performance can thrive.

Our commitment to diversity and inclusion is set out in our Diversity Policy and Code of Conduct, and in FY26, we introduced a new Diversity, Equity and Inclusion (DEI) Statement, reflecting our focus on a gender-balanced workforce, growing our talent, and supporting both our current and emerging workforce:

> *"Build a diverse and inclusive team that reflects the travellers we serve, brings broader perspectives to our journey, and supports long-term success"*

Other DEI initiatives focused on:

- Updating the Diversity policy
- Updating the Workplace Health and Safety (WHS) policy, including psychosocial risk assessment and Respect@Work program
- Maintaining Workplace Gender Equality Agency (WGEA) Compliance
- Monthly DEI reporting (gender, tenure, turnover, promotions, parental leave)

Throughout the year, we also recognised and celebrated a range of diverse culturally significant events through a wellbeing calendar, including RUOK Day, International Women's Day, NAIDOC Week activities, Diwali, Persian New Year, and Ramadan.

Webjet places strong emphasis on diversity, equity, and inclusion, and maintains a balanced gender profile across its workforce. In FY26, women represented 51% of the total workforce, including 51% in managerial roles, 49% in Senior Manager roles, and 60% of the Board of Directors. The Group has initiatives to support career progression for women, including leadership development programs and flexible working arrangements. These measures form part of Webjet's broader sustainability priorities and reflect our commitment to an ethical culture of integrity, transparency, and accountability.

The Board is accountable for supporting a workforce that is diverse in every sense and is regularly updated on workforce data including new hires, promotions, resignations, and redundancies. Key diversity objectives are to progressively maintain our diversity profile, including the percentage of women at the Board and Senior Executive level, and to ensure equal access to employment opportunities based primarily on merit, regardless of diversity factors. We believe an organisation's culture is critically important and are committed to creating a workplace where employees at all levels are valued, have an opportunity to actively participate in the business, and progress into leadership roles. The Board and senior management are conscious of setting the tone and monitoring the drivers that shape the culture and values within the workplace.

Our Operations

Case Study:

Team Wellbeing

We are committed to protecting the health and safety of employees and supporting wellbeing across the business. Appreciating the importance of flexibility in supporting employee wellbeing, productivity and inclusion, in FY26 we introduced a Flexible Work Policy, incorporating hybrid work requirements that vary by location. Remote working arrangements are implemented in accordance with operational needs and information security requirements.

In FY26 our New Zealand team incorporated subsidised health insurance with family discount, travel insurance, public transport subsidies and an annual culture and wellbeing plan.

The team also maintains an annual wellbeing calendar, highlighting wellbeing activities, events and cultural celebrations.

Team engagement: Outsourced workforce

Webjet Group's offshore teams are highly integrated with our day-to-day operations. Rather than managing our BPO partners solely through contractual governance, we maintain regular interaction with both vendor leadership and frontline customer service staff. This provides a high level of visibility over our people, culture and working environment. Webjet OTA currently supports its Australian and New Zealand customers through a combination of external BPO partners and a captive operation. Webjet Business Travel is also supported through a captive operation alone, with its workers operating as an integrated part of Webjet Business Travel's on-shore Australian team, rather than providing an outsourced service through a BPO. Our offshore customer service staff are primarily recruited locally. Webjet OTA and Webjet Business Travel off-shore teams support English-speaking customers while our Cars & Motorhomes BPOs also support Spanish, Italian and German-speaking customers. The Group does not rely on international recruitment or visa-sponsored labour for these roles, reducing exposure to risks commonly associated with migrant labour.

Webjet OTA and Cars & Motorhomes deliberately partner with established global BPO providers rather than smaller boutique vendors. Our partners are multinational organisations with mature governance, compliance, ethics and people management frameworks. These organisations maintain their own policies and controls relating to employee wellbeing, responsible business practices, regulatory compliance and modern slavery, providing a strong governance foundation for the services they deliver. Importantly, we do not rely solely on our partners' governance frameworks. We maintain our own oversight of key operational, and people processes to ensure they meet our expectations.

Recruitment Assurance

As part of our vendor governance, Webjet OTA undertook a detailed review of an offshore workforce supplier's recruitment process. This included reviewing the end-to-end recruitment journey, interview methodology and candidate assessment process. Recruitment interview recordings were also made available to Webjet OTA via SharePoint, providing direct visibility of how candidates were assessed and selected. This review provided additional assurance that recruitment practices aligned with Webjet OTA's expectations and complemented the governance maintained by our BPO partner. The Cars & Motorhomes business has maintained a stable off-shore workforce, and has not needed to recruit new staff in the past three years.

Personal Introduction

Every new training class receives a personal video conference welcome from Training Resources and other Customer Service Team Members from both Webjet OTA and Cars & Motorhomes. This provides an opportunity to engage directly with new team members from the commencement of their employment and reinforce that they are part of the broader Webjet Group operation.

Daily communication

Off-shore customer service staff communicate directly with Webjet OTA and Cars & Motorhomes leaders and subject matter experts every day through Microsoft Teams and operational channels. This provides ongoing visibility of day-to-day operations, enables issues to be identified quickly and builds strong relationships between the Group and our offshore teams.

Leadership Presence

Webjet OTA and Cars & Motorhomes maintain a regular physical presence across its offshore operations. Our Philippines-based Training and Quality leadership regularly visits the Manila operations, while Melbourne leaders visit a couple of times each year. Team leaders from the Cars & Motorhomes off-shore operations also regularly visit New Zealand. These visits provide opportunities to engage directly with customer service staff, trainers and operational leaders, observe workplace conditions and reinforce the Group's culture and expectations.

Team Engagement

Our offshore customer service staff participate in regular engagement and recognition activities organised by our BPO partners and Webjet OTA and Cars & Motorhomes. Examples include team offsite events, top performer awards, cultural celebrations, recognition programs, and opportunities for selected team members to visit Melbourne. These initiatives strengthen engagement and reinforce that our offshore teams are an important part of the broader Webjet organisation.

Webjet OTA and Webjet Business Travel Captive Operation

Webjet OTA and Webjet Business Travel also operate their own captive operation in Manila. Staff receive remuneration and benefits positioned above the local market, together with health insurance, career development opportunities and employee engagement initiatives.

Our Supply Chain

Webjet's supply chain reflects our role as a global travel intermediary, connecting customers with a large and diverse network of service providers. 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 providers, reflecting the Group's digital-first operating model and reliance on resilient IT infrastructure. In FY26, Webjet engaged with 442 distinct suppliers, with total procurement spend of $131.1 million.

This spend was assessed against third-party data sources including Walk Free Global Slavery Index Vulnerability Model and World Bank World Development Indicators to understand the modern slavery risk of our supplier geographies.

The country's risk rating is defined in the below table:

Risk rating	Definition
Low	An environment where standard legal protections are strong, enforced, with formal and transparent labour practices.
Medium	A moderate level of vulnerability where there is a likelihood of gaps in supply chain visibility and inconsistent enforcement of labour standards.
High	A severe structural likelihood of modern slavery exploitation due to a combination of high-risk geographies, labour-intensive sectors, and a vulnerable workforce.

Webjet's supplier geographies include:

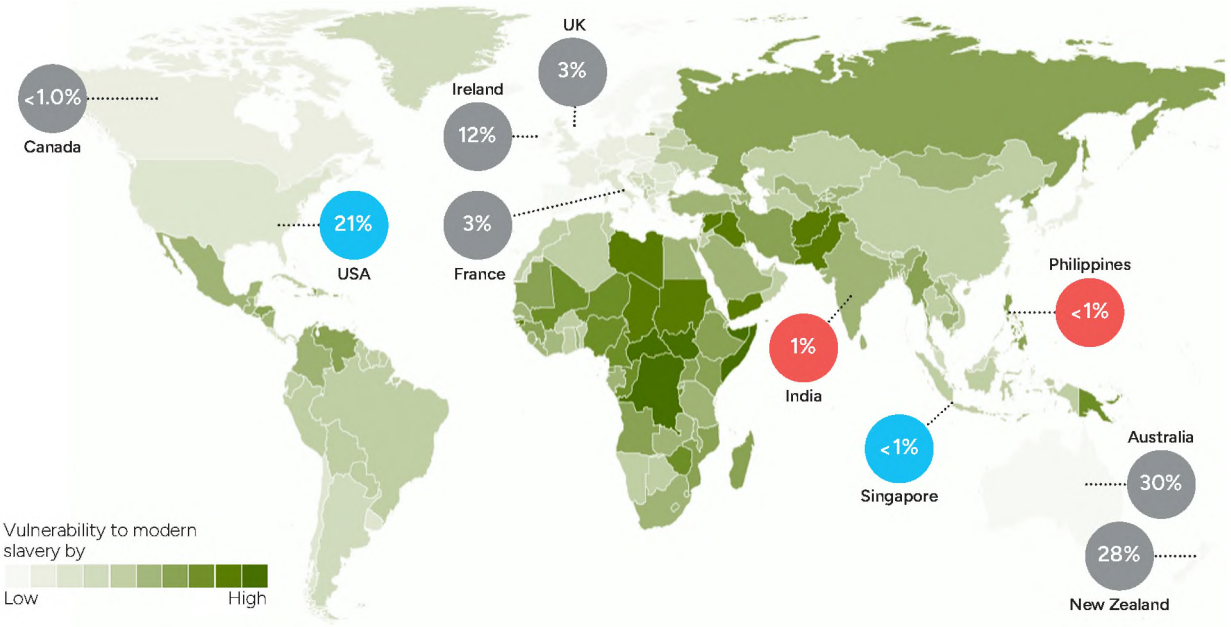
Country	Key products or services sourced
Australia	Advertising, airport, vehicle rental, legal services, software, technology
New Zealand	Vehicle rental, airport, software, employee outsourcing, marketing, legal services
United States	Advertising, software, consulting, technology, vehicle rental
Ireland	Software, advertising, marketing
United Kingdom	Consulting, insurance, vehicle rental, financial services, software
France	Advertising, marketing
India	Consulting, software, technology
Canada	Consulting, software, legal services
Singapore	Software, financial services, marketing
Philippines	Employee outsourcing

Together, the below countries make up less than 1% of spend.

Country	Key products or services sourced
China, Brazil, Hong Kong, Israel, Romania, Spain, Switzerland, Taiwan, Ukraine, Belgium, Czech Republic, Denmark, Germany, Iceland, Italy, Lithuania, Netherlands, Poland, Slovakia,	Advertising, marketing, consulting, software, financial services, merchandise, technology, vehicle rental, software

Supply Chain Map

Breakdown of Direct Supplier Spend by Country (%)



Government Agencies, Individual Sole Traders, and suppliers with less than $1000 of spend have been excluded from the supply chain overview and map.

Governance and Accountability

Governance Framework

Trust and integrity are important to our long-term success, and we are committed to maintaining high ethical standards and strong corporate governance. Management of modern slavery risk is coordinated by the Modern Slavery Working Group, which ensures implementation of our modern slavery action plan, and during the reporting period, Webjet OTA, Cars & Motorhomes, Webjet Business Travel, and Trip Ninja were all represented. All controlled entities operate under common policies, and responsibility for identifying and managing modern slavery risks within operations rests within each business, consistent with a risk-based approach to modern slavery governance.

Oversight is provided by our CEO and Managing Director, who has responsibility for modern slavery reporting and implementation, supported by the Modern Slavery Working Group and relevant finance, people, and risk and compliance functions across the Webjet Group. The Audit and Risk Committee supports the assessment and management of modern slavery risk, including oversight of the effectiveness of actions taken. The Committee reviews the annual Modern Slavery Statement and recommends it to the Board for approval. This governance framework is supported by our Code of Conduct and Whistleblowing Policy, which reinforces expectations of ethical behaviour, transparency, and escalation of concerns.

We have a range of policies and procedures that support our corporate governance framework. We also set out clear expectations for how the business, its employees, and its suppliers operate and behave, including in relation to ethics, safety, and well-being. In support of these expectations, we have developed a Global Supplier Code of Conduct and a range of policies and procedures, including a Human Rights Policy, Equal Employment Opportunity, Bullying and Harassment Policies, Workplace Health and Safety, Remote Working, Drug and Alcohol Policies.

Accountability

Ultimate accountability for modern slavery risk management rests with the Webjet Group Board. The Board provides oversight of the Group's approach to identifying, assessing, and managing modern slavery risks, and approving the annual Modern Slavery Statement. Senior management is responsible for implementing the Group's modern slavery framework, monitoring risk management activities, and reporting on key risks, incidents, and mitigation actions to the Board and relevant committees.

Remediation

We are committed to identifying, responding to, and remediating instances of misconduct and non-compliance or potential human rights concerns in a timely and appropriate manner. Incidents, breaches, and remediation actions are recorded, monitored, and reported through established governance processes, with material matters escalated to senior management, the Board or the Audit and Risk Committee where appropriate. The lessons learned from incidents and investigations are used to inform continuous improvement activities across the organisation. This may include enhancing policies and procedures, strengthening internal controls, implementing corrective actions, or providing targeted training to address identified gaps or emerging risks. By taking a proactive approach to remediation, we aim not only to address issues when they arise, but also to reduce the likelihood of similar incidents occurring in the future.

Escalation

Where actual or potential modern slavery risks, incidents, or concerns are identified, they are raised with senior management for assessment and appropriate action. Depending on the nature and severity of the issue, matters may be escalated to the Board Audit and Risk Committee. Escalation pathways are designed to ensure that risks are addressed promptly, investigated where necessary, and managed in accordance with the Group's governance and risk management frameworks. No modern slavery risks or incidents were escalated to the Board Audit and Risk Committee during FY26.

Modern Slavery Risks

Modern slavery is specifically defined in Section 4 of the *Modern Slavery Act 2018* (Cth), drawing from internationally accepted frameworks and guidance including the UN Guiding Principles on Business and Human Rights. The term 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.

Understanding our modern slavery risks

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

Where we may identify modern slavery issues in our supply chain, we will work with our suppliers to remediate the issues for workers and uplift capability where required. In identifying and assessing concerns raised in our supply chain, we use the UN Guiding Principles on Business and Human Rights continuum of involvement to determine whether we may cause, contribute to, or be directly linked to harm.

The table below outlines examples of how we may be connected to potential harm.

Type of Involvement	Description of Involvement	Example
Cause	The business own operations directly result in modern slavery	We may cause adverse impacts where inadequate oversight of on-site cleaning service subcontracting arrangements results in workers being exposed to unfair employment conditions.
Contribute	The business contributes to modern slavery through its actions or omissions, typically in collaboration with or through its influence on another entity	We may contribute to risks where purchasing practices, pricing expectations, or delivery deadlines for merchandise products create pressure on suppliers and manufacturers to reduce labour costs or increase production capacity in ways that could adversely affect workers.
Directly linked	The business products, services, or operations are directly linked to modern slavery through a business relationship, such as with suppliers or subcontractors.	We may be directly linked to modern slavery risks through our business relationships with outsourced workforce providers, including where workers are recruited through third-party agencies or labour hire arrangements that expose workers to recruitment fees, debt bondage, excessive working hours or other exploitative labour practices.

Modern Slavery Risks in our Operations

Risks of modern slavery can arise within our operations through the way workers are engaged, managed, or supported across our workforce. While we consider the overall risk within our directly controlled operations to be lower than in some areas of our supply chain, certain workforce arrangements may present elevated risks due to the use of outsourced service providers, offshore workforce models, and contracted labour. Factors such as recruitment practices, wage and entitlement compliance, working hours, and labour hire arrangements are considered when assessing potential modern slavery risks.

Key Risks in our Operations

Risk area	Country	Modern slavery risk
Outsourced/Offshored workforce	Philippines New Zealand India Romania	Forced labour Underpayment Excessive hours Debt bondage
On-site subcontractors	Australia New Zealand Canada	Excessive hours Debt bondage Deceptive recruitment

Outsourced Workforce

Modern slavery risks may arise within outsourced workforce arrangements, particularly where workers are employed by third-party providers rather than directly by our organisation. In the Philippines, India and Romania, potential risks include forced labour, underpayment of wages, excessive working hours and debt bondage. These risks may be heightened where workers are recruited through labour hire agencies, face barriers to raising workplace concerns, or are subject to performance and workload expectations that could result in excessive overtime. As our outsourced workforce supports the delivery of business operations, we may **contribute** to these risks through our commercial relationships and service delivery requirements, making ongoing oversight and supplier engagement important risk management measures.

On-Site Subcontractors

Modern slavery risks may exist within the cleaning and maintenance sectors, which commonly rely on subcontracting arrangements, labour hire providers, and migrant worker populations. In Australia, New Zealand, and Canada, key risks include excessive working hours, debt bondage, and deceptive recruitment practices. These risks may arise where workers are engaged through multiple layers of contracting, have limited visibility of their employment rights, or incur recruitment-related costs that increase their vulnerability to exploitation. As these workers are typically employed by third-party contractors rather than directly by our organisation, we may be **directly linked** to these risks through our business relationships with service providers and their subcontracting networks.

Emerging Risk

AI use in recruitment

As a technology-led travel business, Webjet Group recognises that the increasing adoption of AI-driven recruitment and workforce management technologies may present emerging modern slavery and broader human rights risks, both within our own operations and across the recruitment and labour hire providers we engage if these tools are deployed without appropriate human oversight. Automated screening and recruitment processes may obscure unfair labour practices, reduce visibility of worker vulnerability indicators, or inadvertently exclude workers from reporting concerns. There is also a risk that AI systems may replicate or amplify existing biases present in historical data, resulting in discriminatory outcomes for certain groups of applicants, including women, older workers, people with disabilities, culturally and linguistically diverse candidates, and other underrepresented groups. This may reduce access to employment opportunities and increase barriers to fair and equitable recruitment.

Where recruitment services are provided by third parties, technology-enabled decision making may also mask deceptive recruitment practices, recruitment fee arrangements, or other indicators of worker vulnerability that would ordinarily be identified through human review. Where Webjet Group uses AI-enabled tools in recruitment, decisions affecting candidates remain subject to human review, and these tools are not used to make final hiring decisions. We will continue to monitor developments in this area and will keep our policies and oversight arrangements under review as the technology and regulatory expectations evolve.

Modern Slavery Risks in our Supply Chain

Modern slavery risks are generally higher within supply chains due to their complex structure, geographic spread, and the limited visibility that organisations may have beyond their direct suppliers. Our supply chain includes a range of goods and services, including office administration support, cleaning and maintenance services, merchandise and uniforms, office supplies, and technology and IT hardware. The risk profile of these categories may be influenced by factors such as supplier practices, the use of subcontractors, the employment of vulnerable workers, and sourcing activities occurring in higher-risk industries or jurisdictions.

Key Risks in our Supply Chain

Risk area	Modern slavery risk	Country
Office administration support	Forced labour Underpayment Excessive hours	India China Romania
Merchandise, uniforms, and gift card manufacturing	Forced labour Child labour Underpayment	China
Office supplies and services including technology and IT hardware	Risks beyond tier 1 including: Forced labour Child labour	United States New Zealand Italy

Office Administration Support

Modern slavery risks may arise in the provision of office administration and business support services, particularly where services are delivered through third-party providers operating across multiple jurisdictions. In India, Romania and China, potential risks include forced labour, underpayment of wages, and excessive working hours. These risks may be influenced by factors such as the use of temporary or outsourced workers, varying labour standards and oversight practices, or workforce models that rely on vulnerable or migrant workers. As these services are provided by independent suppliers, we may be directly linked to these risks through our business relationships and procurement activities.

Merchandise, Uniforms and Gift Card Manufacturing

Merchandise, uniforms, and promotional product manufacturing can present heightened modern slavery risks due to the labour-intensive nature of production and the complexity of manufacturing supply chains. In China, key risks include forced labour, child labour, or underpayment of wages. These risks can arise within manufacturing facilities or through subcontracted production arrangements where oversight of labour practices may be limited. While we do not directly control these manufacturing operations, our purchasing decisions and supplier relationships may **contribute** to labour-related risks if appropriate due diligence and responsible sourcing practices are not maintained. We therefore seek to work with suppliers who share our commitment to ethical labour standards and responsible conduct.

Office Supplies and Services

Modern slavery risks may exist within the supply chains that support the provision of office supplies, technology products, and IT hardware. While direct suppliers are in the United States, New Zealand, and Italy, the production of technology products often involves complex, multi-tiered global supply chains extending beyond Tier 1 suppliers. Potential risks include forced labour and child labour associated with the extraction of raw materials, component manufacturing, and product assembly. Due to the limited visibility organisations typically have into lower-tier suppliers, these risks can be difficult to identify and monitor. As a purchaser of these goods and services, we may be **directly linked** to these risks through our supply chain relationships and therefore seek to strengthen supply chain transparency and supplier due diligence processes where appropriate.

Emerging Risk

Digital recruitment and cyber-enabled exploitation

The increasing use of digital recruitment platforms, online labour marketplaces, and technology-enabled hiring processes across global tourism and hospitality supply chains presents an emerging modern slavery risk. As businesses increasingly source and recruit workers through online channels, recruitment activities can occur across multiple jurisdictions with varying levels of regulatory oversight and transparency. This creates opportunities for deceptive recruitment practices, including fraudulent job advertisements, misleading employment conditions, unauthorised recruitment fees and the misrepresentation of wages, working conditions or visa arrangements.

Workers seeking employment opportunities in tourism, hospitality, transport and related sectors may be particularly vulnerable where recruitment is facilitated through complex networks of online platforms, labour brokers or third-party recruitment agencies. In some cases, digital channels can enable exploitative actors to rapidly target large numbers of job seekers while concealing unethical recruitment practices that may otherwise be identified through traditional recruitment processes.

The growing use of artificial intelligence, automated screening tools and digital workforce management technologies may also create additional challenges for identifying worker vulnerabilities and monitoring recruitment practices. Without appropriate governance and human oversight, technology-enabled recruitment processes may reduce visibility of potential indicators of exploitation, discrimination or coercion, particularly where workers are recruited across borders or through multiple layers of subcontracting. As tourism supply chains become increasingly complex and digitally connected, new forms of worker exploitation may emerge more rapidly than traditional due diligence processes are able to identify. While we currently assess this risk as emerging, the importance of strengthening supply chain transparency and maintaining robust supplier due diligence processes is vital in identifying and acting on risks early.

Actions to Address Risks

Webjet places particular focus on higher-risk supplier categories and geographic regions, as well as improving visibility over suppliers where labour practices and working conditions can be more difficult to assess.

In FY26, we have prioritised maintaining strong governance frameworks, responsible business practices, and effective risk management processes to minimise the risk of modern slavery occurring. We expect our suppliers, contractors, and business partners to uphold the same commitment to ethical conduct, human rights, and responsible employment practices that we apply within our own operations.

Enhancing supply chain transparency and deepening engagement with suppliers remain key priorities as we mature our approach to modern slavery.

Building a Culture of Responsibility

Effectively addressing modern slavery risks requires more than policies and processes alone, it requires a culture where ethical behaviour, accountability, and respect for human rights are embedded in everyday decision-making. We are committed to fostering a workplace culture that encourages employees to act with integrity, raise concerns without fear of retaliation, and contribute to the identification and management of modern slavery risks.

Throughout the reporting period, we strengthened the awareness of our expectations through employee training, governance frameworks, workplace policies, and leadership engagement. These initiatives are designed to ensure our team understand their responsibilities, recognise potential indicators of modern slavery, and know how to escalate concerns when identified. By growing awareness and empowering our team to speak up, we seek to create an environment where risks can be identified and addressed early. Our leaders also play an important role in setting the tone from the top and reinforcing a culture of ethical conduct. Through ongoing communication, training, and accountability mechanisms, leaders are encouraged to model behaviours consistent with our values and support informed decision-making across the organisation. Creating a culture of responsibility is an ongoing journey, and as our modern slavery program matures, we will continue to enhance awareness, strengthen capabilities, and embed human rights considerations into business practices, helping to ensure that ethical and responsible conduct remains central to the way we operate.

Modern Slavery Working Group

In FY26, we established the Modern Slavery Working Group, which ensures implementation of our modern slavery action plan, and represents all parts of Webjet Group. The Modern Slavery Working Group supports the CEO and Managing Director, who has responsibility for modern slavery reporting and implementation, and is supported by the relevant finance, people, and compliance functions across the Webjet Group.

Training and capability building

Improving awareness and capability across the workforce remains a key component of our modern slavery risk management framework. Following our demerger in 2024, all new employees joining the organisation are required to complete modern slavery awareness training as part of their onboarding and induction process. In FY26, we overhauled and refreshed this induction training to ensure employees are better equipped to understand and identify modern slavery risks. We also launched, for the first time, a refresher training module as part of our annual refresher training plan, to support broader workforce awareness. Group-wide, the completion rate for the training was 78%. The training focuses on recognising indicators of modern slavery, understanding relevant legal and regulatory obligations, identifying potential risk areas, and promoting ethical decision-making and responsible business practices. This initiative has established a foundational level of modern slavery awareness across the organisation and provides a platform for the ongoing enhancement of role-specific training in future reporting periods.

In addition to modern slavery training, employees are required to complete periodic training on a range of topics relevant to their role, responsibilities and jurisdiction. Training is delivered through a combination of online self-paced learning modules via our learning management system and instructor-led sessions facilitated by internal subject matter experts from Legal, People and Security teams, as well as external training providers where specialised expertise is required.

Certain mandatory training modules are completed annually, while others are undertaken on a biennial basis, reflecting the nature of the risk, evolving regulatory requirements and organisational priorities. Training topics include workplace conduct, information security, privacy, psychosocial safety, and diversity and inclusion. Together, these programs help foster a culture of accountability, support employees to identify and escalate potential concerns, and strengthen our ability to proactively manage risks.

The Code of Conduct details how all employees, contractors, and relevant third parties must complete mandatory Code of Conduct training upon commencement of their engagement and thereafter at regular intervals, as determined by the Company. This includes training on the Code, anti-discrimination, Respect@Work positive duty, psychosocial safety, privacy, whistleblowing and conflict of interest obligations. Completion of this training is a condition of ongoing engagement, and employees are expected to apply the principles and standards outlined in the Code to their daily work.

ACTIONS TO ADDRESS RISKS

Addressing risks in our Operations

Our risk management framework incorporates a range of measures designed to prevent, detect, and respond to these risks within our operations. Key elements of our approach include team engagement, recruitment assurance processes that support fair and transparent employment practices, policies that set clear expectations for ethical behaviour and compliance, and grievance mechanisms that enable workers and stakeholders to raise concerns confidentially and without fear of retaliation. Together, these measures support a culture of accountability and continuous improvement while helping us maintain safe and respectful workplaces.

Team engagement

Our team are fundamental to maintaining a responsible, ethical, and inclusive workplace and supporting our commitment to identifying and addressing modern slavery risks across our operations and supply chains. Through initiatives that promote diversity, equity and inclusion, employee wellbeing, professional development, and fair employment practices, we strive to create an environment where all team members are respected, supported, and empowered to contribute. This commitment extends to our offshore workforce in the Philippines, where we seek to provide meaningful employment, competitive benefits, opportunities for development, and strong engagement practices that reflect our values and uphold the rights and wellbeing of all employees.

Regular team engagement helps us understand different perspectives and improve the way we operate. We engage with our team through:

- Monthly Town Hall and CEO and Managing Director email updates
- Employee workshops and events
- Regular performance reviews
- Participation in engagement surveys
- Health and wellbeing calendar and programs
- Leadership development and online compliance training

Case study:

Team wellbeing support with Sonder

Employee wellbeing is a key component of our commitment to creating a safe, healthy and supportive workplace. We partner with Sonder to provide employees with access to a comprehensive wellbeing platform offering 24/7 support across personal safety, medical assistance, mental health and wellbeing services. The platform is designed to provide employees with immediate access to professional support whenever and wherever it is needed, helping to enhance both physical and psychological wellbeing. Since its launch, employee participation on the platform has been strong, with 33% of employees in Australia and 48% of employees in New Zealand registering on the platform.

In addition to providing direct wellbeing support, Sonder forms part of our broader approach to psychosocial risk management. By promoting early intervention, increasing access to support services and encouraging help-seeking behaviours, the platform helps us foster a workplace culture where employees feel supported, connected and empowered to prioritise their wellbeing. Through initiatives such as Sonder, we are investing in a workplace environment that supports the holistic approach to health, safety and wellbeing of our people.

Recruitment Assurance

Webjet OTA reviewed its offshore workforce supplier's recruitment process, reviewing the end-to-end recruitment journey, interview methodology, and candidate assessment process. This review provided additional assurance that recruitment practices are aligned with Webjet OTA's expectations and are complemented by the governance maintained by our BPO partner.

ACTIONS TO ADDRESS RISKS

Addressing risks in our Operations

Our policies

We maintain a suite of policies accessible to all internal team members through our SharePoint intranet. These policies communicate our expectations around human rights and workplace conduct and are designed to empower our teams to help prevent exploitation.

Other policies and processes that directly address modern slavery risks in our operations include;

Policy	Description
Code of Conduct	The Code of Conduct outlines the minimum standards of conduct and behaviour we expect of all our people, including employees, directors, contractors, and everyone working at Webjet Group Limited or its controlled entities. The Code details clauses on diversity and inclusion, safety, health and wellbeing, respect in the workplace, sexual harassment, human rights, and modern slavery.
Recruitment Policy	The policy applies to all positions across the Group. The policy aims to provide a consistent, transparent, and effective recruitment process for all roles including Internal appointments, promotions, contractor and externally sourced opportunities at Webjet Group. This policy leverages Webjet's tools such as LinkedIn Recruiter, ELMO Recruit and best practice talent acquisition principles. Webjet is committed to ensuring all recruitment and selection decisions comply with Australian discrimination, equal opportunity and workplace laws. Recruitment must be merit-based and free from unlawful discrimination, harassment, victimisation, or adverse action.
Grievance Policy	The policy establishes a clear and fair process for employees to raise concerns or complaints relating to their employment. The organisation is committed to providing a safe, respectful and inclusive workplace where issues are addressed promptly, impartially and confidentially. This policy outlines: • how employees can raise a grievance • how grievances will be managed • responsibilities of all parties protections against victimisation or retaliation

ACTIONS TO ADDRESS RISKS

Addressing risks in our Supply Chain

As part of our commitment to identifying and addressing these risks, we have implemented measures to strengthen supplier oversight and encourage responsible business conduct. Our approach includes supplier due diligence, procurement processes that incorporate ethical and modern slavery considerations, and engagement with suppliers to communicate our expectations. These activities support our efforts to identify, prevent, and mitigate potential risks and contribute to the ongoing development of a more transparent and responsible supply chain.

Risk Assessment

We assessed our procurement spend in FY26 against modern slavery indicators from primary data sources such as the World Bank and Walk Free Global Slavery Index 2023. We reviewed the companies that we sourced from, by percentage of our overall spend, and assessed each supplier against the following indicators: Forced labour, freedom of association, health safety and hygiene, children and young workers, wages, working hours, discrimination, gender, regular employment and labour standards.

Using this data, we can understand where our highest risks are and inform our risk management approach going forward.

Supplier Modern Slavery Questionnaire

Following our Modern Slavery Risk Assessments, Modern Slavery Questionnaires were issued to identified suppliers to assess how they manage modern slavery risks. As part of our supplier due diligence process, Webjet Group uses a Supplier Modern Slavery Questionnaire to gather information from selected suppliers regarding their operations, workforce practices, supply chain governance, and the policies and controls they have in place to prevent and address modern slavery risks. Responses are reviewed as part of our supplier risk assessment process and help us to identify suppliers that may require further engagement, enhanced due diligence, or remediation actions. The questionnaire also provides an opportunity to increase supplier awareness of modern slavery risks and Webjet Group's expectations. The insights gained through the questionnaire support ongoing monitoring of supplier risks and inform our broader modern slavery risk management program.

Whistleblower and reporting mechanisms

We are committed to fostering a culture where team members and other stakeholders feel confident raising concerns about actual or suspected misconduct, including conduct that may be inconsistent with our values, policies, or legal obligations. Effective reporting mechanisms are an important component of our governance framework and support the early identification and management of risks, including those relating to modern slavery, human rights, and workplace conduct.

During FY26, we reviewed and updated our Global Whistleblowing Policy to ensure it supports a transparent, ethical, and accountable workplace. The Policy, together with our Code of Conduct, encourages Directors, employees, contractors, and other individuals working across Webjet Group to speak up and report concerns about suspected misconduct, unethical behaviour, or potential breaches of law and policy. The Policy is supported by a confidential reporting framework designed to protect individuals who raise concerns. This framework includes access to an independent and anonymous whistleblowing service, as well as a designated Whistleblowing Officer responsible for assessing, managing, and investigating eligible reports. Webjet is committed to protecting whistleblowers from retaliation or discrimination because of making a report and supports a process that is fair, confidential, and conducted with appropriate sensitivity.

Allegations of misconduct are taken seriously and are investigated in accordance with established procedures. Where appropriate, corrective actions are implemented to address identified issues and strengthen internal controls. Material matters reported under the Whistleblowing Policy are reported to the Audit and Risk Committee, providing Board-level oversight of significant concerns and emerging risk trends.

Trusted reporting channels play an important role in identifying issues that may otherwise remain undetected. Our independent whistleblowing service is available online and can be accessed anonymously from any location in which we operate, meaning a worker in our offshore or outsourced teams has the same access to the service as an employee in Australia. By promoting awareness of available reporting mechanisms and encouraging a speak-up culture, we seek to strengthen organisational accountability, support ethical decision-making, and provide a safe avenue for all stakeholders to raise concerns without fear of retaliation.

ACTIONS TO ADDRESS RISKS

Addressing risks in our Supply Chain

Global policies

To support our modern slavery commitments, we maintain a Global Human Rights Policy and Global Supplier Code of Conduct that articulate our expectations. These frameworks help guide decision-making across the business, communicate our expectations to suppliers and business partners, and support the integration of human rights considerations into our risk management and procurement processes.

	Global Human Rights Policy	Global Supplier Code of Conduct
Who the document applies to	This policy applies to all individuals associated with Webjet, including employees, contractors, suppliers, operational partners and customers. It covers our operations within our organisation, as well as any activities we undertake that may impact human rights in the wider community. This policy applies to all jurisdictions where Webjet operates.	This Code applies to all suppliers and business partners associated with Webjet Group Limited and its related bodies corporate in all jurisdictions. As part of supplier onboarding, Webjet asks each new supplier to agree to the Code. Our focus for the next reporting period is to work towards existing suppliers also agreeing to the Code.
What is detailed in the document	• Respect of human rights (discrimination, harassment, unfair treatment) • Equal opportunity • Freedom of association • Labour standards (working hours, wages, benefits, safe and healthy work) • Supplier and business partner relationships • Community engagement • Accountability and reporting • Training and awareness • Policy review • Interaction with related policies and the law	• Working hours • Voluntary labour • Wages and benefits • Freedom of association • Child labour • Health and safety • Respect • Supply chain management • Compliance with modern slavery legislation

Case study:

External Reporting Pathways

Webjet is committed to the health and safety of our people, supported by a robust set of policies and systems in place to prevent misconduct and to enable effective whistleblowing.

In FY26, Webjet provided multiple reporting pathways to enable staff and members of the public, contractors, chain to easily be able to report any incidents. Reporting pathways provide a safe, secure and anonymous channel for victims and concerned members to raise concerns.

Webjet is fostering a culture of safety across our operations by enabling access for Whispli for all team members. Whispli is an online whistleblowing platform that enables a secure intake channel for employees to anonymously speak up and raise concerns, across 70+ languages. In FY26, we also launched a phone hotline for employees or contractors to submit a call anonymously via a phone service. This hotline provides an additional reporting channel for whistleblower disclosures, modern slavery concerns and other matters, improving accessibility for individuals who may not have secure internet access or who prefer to speak via phone.

During FY26, two concerns were raised through our reporting channels. Although neither involved modern slavery, the reports demonstrate that individuals are aware of, and willing to utilise, the available grievance and whistleblower mechanisms. Maintaining effective and accessible reporting pathways remains a priority, and in FY27 we will continue to promote these channels and ensure individuals understand how and when to raise concerns.

ACTIONS TO ADDRESS RISKS

Addressing risks in our Supply Chain

Contractual standards

In FY25, we committed to updating our standard contract templates to strengthen modern slavery requirements and related audit and termination rights, with clauses clearly setting out our expectations regarding ethical practices and providing contractual avenues to address potential breaches. During the reporting period, Webjet sought to include these clauses into all new and renewed contracts, and we will continue to introduce the inclusion of modern slavery provisions. This will improve consistency and ensure that expectations are clearly documented across the supplier base. Webjet's Services Agreement (Australia) also states that the Supplier shall comply with the Modern Slavery Laws and manage its business and 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.

How our key policies address risks

Risk	Policy	Relevant Clause
Forced labour	• Global Human Rights Policy • Global Supplier Code of Conduct • Services Agreement (Australia) • Code of Conduct • Recruitment Policy	• Code of Conduct: Human Rights and Modern Slavery • Global Supplier Code of Conduct: Respect; Voluntary labour • Services Agreement: Modern Slavery and Human Rights • Supplier Questionnaire: Modern slavery
Child labour	• Global Human Rights Policy • Global Supplier Code of Conduct • Services Agreement (Australia) • Code of Conduct • Recruitment Policy	• Code of Conduct: Human Rights and Modern Slavery • Global Supplier Code of Conduct: Child Labour • Services Agreement: Modern Slavery and Human Rights • Supplier Questionnaire: Modern slavery
Excessive hours	• Global Human Rights Policy • Global Supplier Code of Conduct • Services Agreement (Australia) • Code of Conduct • Recruitment Policy	• Global Human Rights Policy: Reasonable working hours • Global Supplier Code of Conduct: Working hours • Recruitment Policy: Offer and onboarding
Debt bondage	• Global Human Rights Policy • Global Supplier Code of Conduct • Services Agreement (Australia) • Code of Conduct • Recruitment Policy	• Global Supplier Code of Conduct: Voluntary labour, Recruitment fees • Services Agreement: Modern Slavery and Human Rights • Recruitment Policy: Code of Conduct Compliance Obligations • Supplier Questionnaire: Modern slavery • Code of Conduct: Human rights and modern slavery
Underpayment	• Global Human Rights Policy • Global Supplier Code of Conduct • Services Agreement (Australia) • Code of Conduct • Recruitment Policy	• Global Human Rights Policy: Labour standards • Global Supplier Code of Conduct: Wages and Benefits • Services Agreement: Modern Slavery and Human Rights • Code of Conduct: Human Rights and Modern Slavery • Recruitment Policy: Code of Conduct Compliance Obligations
Deceptive recruitment	• Global Human Rights Policy • Global Supplier Code of Conduct • Services Agreement (Australia) • Code of Conduct • Recruitment Policy	• Global Supplier Code of Conduct: Voluntary labour; recruitment fee; passport retention • Global Human Rights Policy: Respect for human rights; • Services Agreement: Employees and contractors must be legally entitled to work; no subcontracting unless approved • Supplier Questionnaire: Modern slavery definition • Recruitment Policy: Advertising and sourcing; Agency engagement; Compliance and documentation

ACTIONS TO ADDRESS RISKS

Addressing risks in our Supply Chain

Case study:

Psychosocial Safety and Employee Wellbeing

During the reporting period, we strengthened our approach to psychosocial health and safety through a range of initiatives designed to promote employee wellbeing, encourage early intervention, and support a positive workplace culture. As part of our partnership with our holistic wellbeing platform Sonder, we provide employees with access to personal safety, medical, mental health, and wellbeing support services.

To further strengthen our safety culture, we introduced a new Risk Incident Management Portal to support the early identification, reporting and management of both psychosocial and physical workplace hazards. The portal is designed to improve transparency, support raising timely risk management concerns, enhance decision-making and contribute to a safer working environment for all employees.

We also engaged specialist expertise to support the identification and assessment of psychosocial risks across the organisation. This work was complemented by the implementation of psychosocial risk management tools, leadership capability building and workplace policy review. Senior leaders and employees participated in interactive workshops covering important policies, psychosocial safety training to enhance their understanding of identifying and managing workplace risks and their responsibilities in creating psychologically safe teams, and Respect@Work training to educate and set standards for our expectations around respectful behaviour and help prevent workplace harassment, discrimination and bullying.

Assessing Effectiveness

Effectively addressing modern slavery risks requires ongoing monitoring, regular reviews, and continuous improvement. We assess the effectiveness of our actions through a range of governance, risk management, and people-related initiatives designed to strengthen awareness, embed accountability and support the identification and management of modern slavery risks across our operations and supply chain. While we mature our approach, the activities described below provide important indicators of the effectiveness of our modern slavery framework and inform areas for future improvement.

Contract template review

Webjet Group has incorporated modern slavery provisions into its standard supplier contract templates to help strengthen expectations regarding ethical business practices and compliance with applicable modern slavery laws. These contractual clauses require suppliers to, among other things, comply with relevant modern slavery legislation, maintain appropriate controls to identify and address modern slavery risks within their operations and supply chains, and promptly notify Webjet Group if they become aware of any actual or suspected breach of modern slavery laws. The inclusion of these clauses provides a mechanism for communicating Webjet Group's expectations to suppliers and supports ongoing supplier engagement and risk management activities. Contract templates are reviewed periodically to ensure they remain fit for purpose, reflect evolving regulatory requirements and support effective management of modern slavery risks across our supply chain.

Training and capability

Webjet Group strengthened employee awareness and understanding of modern slavery risks through its modern slavery training program. In FY26, modern slavery refresher training was rolled out for employees in Australia, Canada and New Zealand and was incorporated into the induction process for new employees. The training provides employees with a foundation-level understanding of modern slavery, including common indicators of exploitation, higher-risk industries and supply chain activities, and the potential impacts on workers and communities. It also outlines employees' responsibilities in identifying and escalating concerns and reinforces the reporting pathways available through management channels and the Whistleblower Program. By empowering our employees' capability to identify, recognise, and appropriately respond to modern slavery indicators, the Group can better evaluate whether its policies, due diligence processes, and risk management controls are operating as intended.

Policy reviews

To support our continuous improvement commitment, policies and procedures relevant to modern slavery, human rights, ethical conduct, and whistleblower reporting are reviewed at least annually. The review process assesses whether existing controls remain effective in identifying, preventing and addressing modern slavery risks across our operations and supply chain.

Policy reviews are informed by changes in legislation, emerging risk trends, supplier due diligence outcomes, internal audits where applicable, reported incidents or concerns, and feedback from relevant stakeholders. Any material updates are approved through the appropriate governance channels and communicated to employees and other relevant parties to ensure expectations and responsibilities remain clear and understood.

Team engagement

Employee engagement is a vital way for us to understand how our purpose, values, and strategic alignment are working. We depend on the capability, engagement, and commitment of our people, and a workforce that is motivated, well supported and equipped to grow is critical to our ability to execute our strategy. We engage with our employees through surveys, regular feedback including one-on-one discussions with leaders, and regular management reports through surveys and workforce metrics including turnover data.

In FY26, understanding the importance of flexibility in supporting employee wellbeing, productivity and inclusion, we introduced a Flexible Work Policy, incorporating hybrid work requirements that vary by location. We also expanded ELMO, an integrated HR and payroll platform, to Trip Ninja and Webjet Business Travel and launched ELMO payroll across our New Zealand businesses. We have optimised Human Resources and Payroll processes and tools, improving the employee experience through more user-friendly functionality, and introduced enhanced self-service tools.

Grievance mechanisms

The availability and use of our available grievance mechanisms provide valuable insights into potential areas of concern within both our operations or supply chains, enabling issues to be escalated and investigated where appropriate. Information gathered through grievance reporting can assist the Group in not just identifying emerging risks, but in also understanding the effectiveness of our existing controls and governance measures and informing continuous improvement activities. More information about Webjet's Grievance policy can be found in **Actions to address risks: Whistleblower and reporting mechanisms**.

The measures outlined above assist Webjet Group in evaluating the effectiveness of our approach to identifying, preventing, and responding to modern slavery risks. Through regular policy and contract reviews, employee training and engagement, and accessible grievance and reporting mechanisms, we strengthen our capability to verify whether our actions to address risks are effective. Webjet Group remains committed to improving its modern slavery risk management framework and will continue to review and enhance its controls, processes, and monitoring activities to support meaningful and effective action against modern slavery.

ADDRESSING EFFECTIVENESS

Challenges and Lessons Learned

Challenges Encountered in FY26

While progress was made during the reporting period, including the expansion of mandatory modern slavery training across Australia, New Zealand, and Canada, resource constraints limited the pace at which some planned initiatives could be implemented. Webjet Group was unable to extend risk-screening processes to more consistently capture modern slavery indicators across its supplier base, including undertaking broader supplier risk analysis in overseas markets. Opportunities were also identified to enhance monitoring and escalation procedures under the Human Rights Policy and to strengthen documentation practices to better evidence the consistent application of modern slavery controls, risk assessments, and due diligence activities. These activities are important components of a mature supplier due diligence framework and provide greater visibility over potential modern slavery risks. As a result, these initiatives have been incorporated into the Group's FY27 commitments and continuous improvement roadmap.

Lessons Learned

The challenges identified during FY26 reinforced several key lessons regarding the effective management of modern slavery risks and the development of Webjet Group's framework. Consistent with the lessons identified in FY25, Webjet Group has observed that strengthening the implementation of existing governance mechanisms is often more effective than introducing new standalone policies or procedures. Embedding the requirements of the Human Rights Policy, standard contractual clauses, risk management frameworks, and supplier due diligence processes into day-to-day business activities, supported by targeted training, clear accountability and robust record-keeping, can deliver more meaningful outcomes and improve the effectiveness of existing controls.

Webjet Group also acknowledges the importance of maintaining ongoing dialogue with suppliers, particularly those operating in higher-risk jurisdictions or sectors. While suppliers may not always have mature modern slavery programs or extensive disclosures in place, proactive engagement can help increase awareness, encourage continuous improvement, and provide greater insight into potential risk areas over time. More broadly, FY26 reinforced that addressing modern slavery risks is an evolving process that requires sustained commitment and increasing organisational capability. Webjet Group remains focused on strengthening its controls, improving visibility over supplier risks, and enhancing the systems and processes that support the identification, prevention, and mitigation of modern slavery risks.

ADDRESSING EFFECTIVENESS

Looking Ahead: FY27 Priorities

In FY27, we will focus on developing our modern slavery risk management framework through targeted supplier engagement, enhanced grievance mechanisms, and integration of modern slavery considerations into business-as-usual processes. As our modern slavery framework evolves, we remain committed to strengthening our capability to identify emerging risks, enhancing supplier accountability and embedding human rights considerations into business decision-making. Through these efforts, we seek to contribute to the prevention of modern slavery and promote respect for human rights throughout our business relationships and value chain.

Planned actions include:

Global Supplier Code of Conduct launch	• Obtain supplier acknowledgement of our Global Supplier Code of Conduct for existing suppliers as part of the next phase of implementation
Modern Slavery Questionnaires utilisation	• Use supplier responses to inform further engagement, action plans, and ongoing monitoring where required
Recruitment fee controls	• We will continue to ensure that we are in line with the International Labour Organization's Employer Pays Principle, where no worker should be required to pay recruitment costs to secure or retain their employment.
Modern Slavery policy development	• Strengthen our Global Supplier Code of Conduct by monitoring key risks within our supply chain and any emerging risks to ensure the code stays current and effective
Supplier Onboarding Process development	• Detail who is involved when, the due diligence undertaken, the approval process, and ongoing supplier management

Looking Ahead

In July 2026, we conducted gap analysis on our existing modern slavery risk controls to understand where we could progress our modern slavery risk mitigation and management in future.

Using the results from the analysis, we will commit to the following activities:

Uplift our risk identification	• Update our risk management framework to identify modern slavery as a risk • Adopt a basic risk matrix and rate suppliers on two factors: country/sector risk and spend/relationship and establish a documented and defensible risk baseline • Introduce modern slavery risk due diligence assessments at key decision points, particularly for higher-risk procurement activities
Strengthen our procurement controls for high-risk vendors	• Request for evidence such as policies and codes of conduct, employment contract templates, sub-contractor use declaration, independent audit reports (e.g., SMETA, SA8000), worker grievance mechanism data, adverse-media and sanctions screening results, training records, and corrective action evidence from past audits. • Add child labour to the Global Supplier Code of Conduct
Monitor our risk	• Create a single map of all grievance channels, who can access them, languages available, uses, and escalation routes. Test accessibility with offshore workers such as office services staff.
Improve reporting processes	• Define a small set of practical KPIs and monitoring metrics focused on effectiveness
Uplift remediation processes	• Define clear grievance and remediation processes that suppliers/contractors engage in

Consultation Process

Entity-Level Consultation

This statement has been prepared jointly by Webjet Group Limited, Webjet Marketing Pty Ltd, and Locomote Holdings Pty Ltd (and its subsidiaries Webjet Business Travel Australia Pty Ltd and Webjet Business Travel Technologies Pty Ltd), with the support of Edge Impact. 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:

- Stakeholder interviews with business/functional leads,
- Regular meetings between Company Secretary and Edge Impact to draft the modern slavery statement, ensuring compliance with Australian and Canadian requirements,
- 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 Australian *Modern Slavery Act 2018* (Cth).

Australian *Modern Slavery Act 2018* (Cth)	Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act	Where Addressed in Statement
1. Identify the reporting entity	Information on the entity's structure, activities and supply chains	About this Statement – Page 5
2. Describe the reporting entity's structure, operations and supply chains	Information on structure, activities and supply chains	About Webjet Group – Page 7-11
3. Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls	Identification of parts of the business and supply chains that carry a risk of forced labour or child labour	Modern Slavery Risks – Page 12-14
4. Describe the actions taken to assess and address those risks, including due diligence and remediation processes	Measures taken to prevent and reduce the risk of forced labour and child labour; due diligence processes; remediation measures	Actions to Address Risks – Page 15-21
5. Describe how the reporting entity assesses the effectiveness of those actions	How the entity assesses its effectiveness in ensuring forced labour and child labour are not being used in its business and supply chains	Assessing Effectiveness – Page 22-24
6. Describe the process of consultation with entities owned or controlled by the reporting entity	Not required under the Canadian Act	Consultation Process – Page 25
7. Include any other information considered relevant	Training provided to employees; policies and any additional information relevant to the report	Our policies and how they address risks – Page 15-21
Approval requirement: Statement approved by principal governing body and signed by a responsible member	Report approved by the governing body and accompanied by an attestation	CEO and Managing Director Statement – Page 4 Consultation Process – Page 25