



**Webjet** Limited

# Modern Slavery & Human Trafficking Statement

[www.webjetlimited.com](http://www.webjetlimited.com)

## Introduction

The Board of Directors (Board) of Webjet Limited is responsible for addressing Modern Slavery and 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 during the financial year ended 31 March 2021 to address modern slavery and

human trafficking risks across the Group and our global supply chains and also sets out our plans for future improvements.

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](http://www.webjetlimited.com/corporate-governance)

This Modern Slavery and Human Trafficking Statement is current as of 19 March 2020 and has been approved by the Board on this date.

## The About Us

Webjet Limited (“Webjet” or “Company”) is a digital travel business spanning both consumer (through the Webjet 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 Australasia, Asia Pacific, Europe, Middle East, Africa and the Americas and the Company has a responsibility to operate in a sustainable manner in each region in which it operates.

## Our position on modern slavery

This is Webjet’s first Modern Slavery and Human Trafficking statement issued under the Modern Slavery Act. It outlines the steps we take as a business to prevent slavery and human trafficking in our own operations and supply chains.

We recognise that Modern Slavery 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 and 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](#).

## Governance

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

## Policies & Contractual Controls

Webjet is committed to high standards of corporate governance. Our Board and its Committees provides 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 group policies in key areas, including:

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

Our Group approach in key areas recognises that our employees (including our contractors and directors) are key to maintaining a compliant and ethical approach to our business practice.

## Webjet Modern Slavery & Human Trafficking Approach

Webjet takes Modern Slavery and Human Trafficking (MS&HT) seriously, and is taking the following steps to identify, assess and remediate/ eliminate MS&HT in their global supply chains. The first stage of our assessment required us to assess our own organisation, ensuring that all relevant policies, procedures, and guidelines are established and adhered to. As required, training will be provided to guide our employees, directors and senior executives in the identification and elimination of potential human rights issues.

The second stage focuses on our first-tier suppliers across our ANZ business and includes the development of a defined Modern Slavery Risk Assessment model, using industry criteria and metrics from multiple sources to identify potential MS&HT risks. Medium and high-risk suppliers would be further evaluated, and programs are put in place to ensure that we are able to monitor progress towards a slave-free supply chain.

The next phase will use the learnings of stage one and two, and expand this across our international business, further removing Modern Slavery & Human Trafficking risks from our global supply chains. Our approach will also include working with relevant non-government organisations to ensure we are ready and able to respond to, and manage, issues effectively as they emerge.

## 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.

## 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 performance indicators – across the Webjet supplier community.

Training & Awareness	Functional Areas
Australia & New Zealand	Legal teams, Company secretaries and the Chief Operating Officer
Suppliers (ANZ)	In Progress

## Our Global Supply Chain

Webjet ANZ business' supply chain is made up of more than 850 first tier (direct and indirect) suppliers, with the majority of our suppliers based in the UK, New Zealand, USA and Australia. Our supply chain relationships include Travel related suppliers (car rental, hotels, etc.), IT service providers, consultancy, and other professional service firms. 74% of our ANZ suppliers account for approximately 99.9% of our total supplier spend.

We acknowledge and recognise the potential for Modern Slavery and 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.

## Supplier 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 aim to create a comprehensive understanding of 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 and procedures 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,
- Commence a review and assessment of Webjet's international offices, first-tier suppliers, and determine risk assessment levels,
- Develop and introduce a set of key performance indicators (KPI's) to identify and measure how effective we have been in ensuring that Modern Slavery & Human Trafficking is not taking place across our business or supply chains, and
- Identify and use opportunities for collaboration 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
  - Modern Slavery & Human Trafficking Statement

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