2022 Sustainability Report.
The information presented in this report reflects Webjet Limited’s (Webjet or Company) management and performance on key environmental, social and governance (ESG) topics identified as material to the business and our stakeholders. The aim of this report is to communicate our understanding of the impacts associated with our operations, how we are working to manage and mitigate those impacts and to articulate the value we create for the communities that we serve.

This report covers the FY22 reporting period (commencing 1 April 2021 to 31 March 2022). For a more complete understanding of the business context, we recommend this report be read in tandem with the Webjet Limited Annual Report, Corporate Governance Statement, Modern Slavery Statement and the various Board Charters and corporate policies all of which are available on our investor website (www.webjetlimited.com).

This is Webjet’s second Sustainability Report and the information reflects the operations over which Webjet Limited has control and the processes we use to run our business.

This Report has been prepared in accordance with the Global Reporting Initiative (GRI) reporting Standards (Core option) and the Sustainability Accounting Standards Board (SASB). All disclosures in this Report have been reviewed and approved by the Senior Leadership Team and the Board as appropriate. For further information or feedback on any aspect of this report, please contact Carolyn Mole, Investor Relations.

Webjet Limited
Level 2, 509 St Kilda Road
Melbourne VIC 3004
Australia
investor@webjetlimited.com
Message from our Managing Director

Welcome to Webjet Limited’s FY22 Sustainability Report

Our business is committed to creating sustainable earnings and capital growth for our Shareholders, and to support all our stakeholders, including employees, suppliers, customers, and the communities that we serve.

By formalising a meaningful sustainability framework and communicating our goals to the market, we aim to embed sustainability across our whole business. This report identifies the topics that are most material to our business and summarises the initiatives Webjet is currently undertaking at a strategic and operational level to make better choices for our business, our communities, and the environment. We’ve done this because we want to focus on the issues that matter most to our stakeholders and the communities that we serve.

We are still in the early stages of our sustainability journey and look forward to advancing this over the coming years.

Regards

John Guscic
Managing Director
Webjet Limited
About Webjet Limited

Our digital travel businesses, spanning both wholesale and retail markets, sell travel all over the world.

WebBeds

The 2nd largest B2B travel wholesaler in the world.1

WebBeds is a global digital travel wholesaler specialising in hotel room distribution. WebBeds connects travel sellers to hotels, and their room inventory, through innovative market leading technology.

Visit: www.webbeds.com

Webjet OTA leads the way in delivering innovative retail travel solutions allowing customers to compare, combine and book the best domestic and international travel flight deals, hotel accommodation, packages, travel insurance and car hire worldwide.

Visit: www.webjet.com.au

GoSee

A leading online global motorhome and car rental site in New Zealand and Australia.

GoSee is an online travel retailer specialising in global bookings of rental cars and campers, providing choice and expertise that makes it easier for travellers to compare and save on one easy-to-use website.

Visit: www.goseetravel.com

Supported by smart technology that differentiates our offerings and makes booking and transacting travel better.

Trip Ninja technology automates the highly manual process of selling complex multi-stop travel itineraries. Trip Ninja was acquired in FY22 to enhance the Webjet OTA offering by allowing us to offer unique, highly competitive content to our customers.

Visit: www.tripninja.io

Rezchain is the hotel distribution industry’s first blockchain-based booking verification solution allowing companies to share booking data to address mismatched information. Rezchain is implemented across the WebBeds businesses and has played a key role in reducing operating costs.

Visit: www.rezchain.com

Investments

Investments to help build out our core businesses:

LockTrip.com is a blockchain based B2C travel marketplace. Locktrip is helping expand Webjet’s blockchain knowledge and being integrated into the Webjet OTA for its B2C hotel offering. Webjet holds a 25% share, with an option to increase to 51%.

ROOMDEX automates the process for hotels to provide upsell offers on room upgrades, stay extensions and guest services. Webjet plans to offer the ROOMDEX product through the WebBeds business to further differentiate its offering and provide added value to its hotel partners. Webjet holds a 49% share, with an option to acquire the remaining 51%.

Webjet is a public company listed on the Australian Stock Exchange, headquartered in Melbourne, Australia. It is a member of IATA (International Air Transport Association) and AFTA (Australian Federation of Travel Agents). For further information about the Company, please see Webjet’s FY22 Annual Report.

1. Based on TTV
2. Based on percentage share of OTA flights market.
About Webjet Limited

Our Values

In 1998, Webjet began as a small start-up seeking to disrupt traditional norms in the highly competitive travel industry.

Our focus on offering customers the greatest convenience and choice in online travel has enabled Webjet Online Travel Agency (OTA) to be the #1 OTA in the Australian and New Zealand market since 2010, driven by a culture based on agility, innovation and creativity. This spirit has continued into WebBeds. Beginning as a small start-up in 2013, a willingness to challenge and disrupt industry norms enabled WebBeds to become the #2 global Business to Business (B2B) player in just over six years. We have done this through a culture underpinned by key values:

Respect
Our people are our greatest asset. They bring passion, commitment, dedication, and pride in what they do. We respect each other, we value collaboration, we are prepared to have robust debate and we have fun in what we do.

Agility
Unafraid to disrupt traditional norms, we constantly challenge ourselves to look for new ways to win and deliver value. Our people are agile and nimble and we empower them to effect change.

Integrity
We are focused on delivering superior outcomes. We always seek to do the right thing and value integrity, accountability and delivering quality in everything we do.

Delivering value
We are focused on delivering high quality products, excellence in customer service, maintaining strong relationships with our supply partners, providing an engaging and supportive work environment for our employees, and delivering value for our shareholders and the broader community.

Hunger to win
As we grow, we remember our humble roots and always strive to retain the spirit that comes with being the challenger brand. We constantly seek to challenge ourselves to find new growth opportunities, innovations and creative ways to deliver value across all aspects of our business. We value curiosity, being brave and having confidence to try new things.
Our approach to sustainability

Webjet accepts that, as part of doing business in both Australia and internationally our customers, shareholders, employees and the community expect that we will operate our businesses in an environmentally responsible and socially sustainable manner. We understand the importance of delivering environmental and social value to our stakeholders and conducting our business with good ethics and corporate governance principles. In developing a sustainability framework, we have looked to consider the expectations of all of our stakeholders.

We have undertaken desktop assessments of leading ESG frameworks, reviewed initiatives adopted by our industry peers and held workshops with members of the board and senior management in order to finalise a framework that will enable us to focus on delivering sustainability initiatives across all aspects of our operations on the initiatives that matter most.

Social – making a positive social impact

We believe we can best make a positive social impact and create value by maintaining a highly engaged workforce, protecting human rights and mitigating modern slavery, maintaining high customer engagement and supporting communities. We acknowledge our responsibility goes beyond risk management and the importance of creating value for our team, our customers and our communities.

Current priorities
- Maintaining a highly engaged, diverse and inclusive workforce
- Maintaining high customer engagement
- Protecting human rights and mitigating modern slavery

Environment – reducing our operational impact on the environment

We accept that our customers, shareholders, employees and the community expect that we will operate our businesses in an environmentally responsible manner, and recognise the importance of doing so. We are focused on minimising our own environmental impact and looking for ways to reduce our footprint. We also recognise we can play an important role in educating our customers and the travelling public on the economic, social and environmental impacts of their travel.

Current priorities
- Understanding our global emissions footprint and looking at ways to deliver carbon neutrality in our business
- Reducing our environmental impact by looking at ways to reduce waste and improve energy and water efficiencies
- Looking for ways to promote environmentally responsible and sustainable travel where appropriate

Governance – maintaining ethical corporate governance processes

We are committed to an ethical and transparent approach to business. We realise running an ethical business goes beyond managing just the behaviour of our team. It extends to complying with regulations and maintaining best practice corporate governance, particularly when it comes to data privacy and security, and maintaining high standards of business ethics.

Current priorities
- Transparent and accountable oversight
- Continuous enhancement of data privacy and security measures
- Continuing to expand our Modern Slavery Statement

Next steps

We will continue to advance our sustainability approach in the coming years. Over the next year we will review our key priorities and look to set meaningful short and medium term targets that will enable us to enhance our sustainability initiatives.
Aligning with the Sustainable Development Goals

Webjet acknowledges the importance of the Sustainable Development Goals (SDG) and understands the pivotal role they play in guiding all institutions towards a more equitable and environmentally positive future.

We believe the SDG listed below are those most likely to be relevant to us. We continue to review the relevance of these goals to our business and align our efforts towards contributing to their achievement.

<table>
<thead>
<tr>
<th>#</th>
<th>Goal</th>
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<tbody>
<tr>
<td>8</td>
<td>• Decent work and economic growth</td>
</tr>
<tr>
<td>9</td>
<td>• Industry, innovation and infrastructure</td>
</tr>
<tr>
<td>13</td>
<td>• Climate action</td>
</tr>
<tr>
<td>16</td>
<td>• Peace, justice and strong institutions</td>
</tr>
<tr>
<td>17</td>
<td>• Partnerships for the goals</td>
</tr>
</tbody>
</table>
Performance highlights

Our approach to sustainability is aligned with both the GRI and the SASB standards.

The below table outlines our progress with respect to our key focus area initiatives. Full GRI (Core) and SASB indices can be found in the appendix of this report.

Social

• 25% women in Senior Management; committed to increasing this to 40% by 2030
• New employment benefits introduced in each business
• Employee engagement improved over FY21
• Strong focus on wellbeing, with particular emphasis on mental health

• Customer Service awards
  – Business Innovation Award for Webjet OTA’s new self-service cancellation feature (2021 Australian Business Awards);
  – GoSee awarded Industry Award for Online Service Support (2021 CRM Awards)

Environment

• Audit underway to measure carbon emissions with a view to becoming carbon neutral
• Energy, water and waste efficiency initiatives in place across the Company
• Webjet OTA’s Sustainable Traveller program offsetting an average of 1,780 tonnes of carbon per month

Governance

• Board comprises 33% women and 100% independent non-executive directors
• Improved modern slavery risk identification and assessment processes to include our global supply chain
• No reportable data privacy or data security breaches under any relevant legislation
• Initiated work to achieve ISO 27001 certification (information security management)
Engaging with stakeholders

In order to make our services accessible for everyone, we need to ensure we consider the expectations of each of our stakeholders; employees, customers, communities, suppliers and shareholders.

Our understanding of these stakeholders influences how we deliver on our goal to be a leading digital global travel business, whilst providing sustainable returns to our shareholders.

Employees
Webjet understands that our employees are crucial to ensuring we are able to deliver on our goal. We engage with our employees at multiple points throughout the year, including through engagement surveys, annual performance reviews, business policy compliance and our health and wellness programs, which encourage the total wellbeing of our people.

Customers and supply partners
We engage with our retail and wholesale supply partners and customers in similar fashions. We engage with them through various platforms, which include our website, social media, our app, our customer service centers, online chat rooms and through face to face visits. We aim to communicate in a way that shows we respect them and that we value transparency in our relationship. We also welcome feedback and constantly seek it through surveys, both over the phone and online, and well as through partnership reviews.

External service providers
Our service suppliers are engaged after a competitive tender process during which we assess their ability to perform a defined scope of work and their high-level approach to sustainability. We undertake risk assessments and reference checks as part of our routine due diligence and once a service supplier is engaged, we conduct regular business reviews for suppliers identified as higher risk in terms of their access to sensitive data to ensure adequate protection measures are in place. We are committed to ensuring that all necessary laws, regulations, rules and agreements are complied with when engaging suppliers.

Shareholders
We engage with our shareholders through our half-yearly and annual financial results, Annual General Meeting, and updates to the market. Our Investor Relations team maintains relationships with our key shareholders and maintains our Corporate website (www.webjetlimited.com) which contains documents such as the Annual Report, the Sustainability Report, Investor presentations, and various governance statements, policies and procedures.
How we manage our risk

The Board is responsible for ensuring the effectiveness of the risk management framework which outlines Webjet’s governance processes and accountability for risk management.

Webjet is exposed to financial and non-financial risks throughout its operations and has robust risk management policies and processes in place to enable and support a high standard of governance. Webjet has implemented processes to identify risks, assess the severity and likelihood of occurrence, and determine the appropriate mitigation strategy. The risk management function is overseen by the Board’s Risk Committee and is supported by Webjet’s senior management team in executing the Company’s business strategy.

Effective risk management is fundamental to the business activities of the Company. Webjet remains committed to increasing shareholder value by growing and developing the business within a robust risk framework to the benefit of all stakeholders. We look to achieve an appropriate balance between risk and reward in the business and continue to build and refine the risk management capabilities that support the delivering of our growth plans in a controlled environment.

The Company’s risk management framework is continually evolving to reflect the changes in risks and the business’ approach to mitigation and resolution. This framework is reviewed throughout the year to ensure it continues to be relevant and addresses the key risks of the business reflecting guidance from the Board and the Risk Committee. Risk Management is a core component of the operating structure of the company. We look to limit adverse impacts by managing risk exposures within appropriate levels of risk appetite. Our approach includes minimising concentrations of exposure, limiting potential losses and ensuring continued support for our financial resources.

Responsibility and accountability for managing risk exists at all levels across the organisation. Risks are controlled at the level of individual exposures, as well as at the business level for all risk types.

To facilitate this accountability, Webjet uses the three lines of defence model:

### 1st line of defence

**Business unit Management**
- Primary responsibility for risk management.
- The process of assessing, evaluating, and measuring risk is ongoing and integrated into the day-to-day activities of the business. This process includes implementing the Company’s risk management framework, identifying issues, and executing corrective actions where needed.
- Business unit management is accountable for reporting to the Corporate function.

### 2nd line of defence

**Corporate and Senior Management**
- Corporate function is accountable for setting the Company’s risk management framework and policy, providing oversight and reporting to the Senior Management team and the Board through the Risk Committee.
- Corporate implements the Company’s risk management framework and policy across the business segments, approves risk within specific mandates and provides an independent overview of the effectiveness of risk management by the business.
- Senior Management has oversight of all risks and includes the CEO, CFO and Group COO.

### 3rd line of defence

**Assurance**
- Provides an independent assessment of the key elements of the overall risk management framework and risk governance structure and provides feedback and reporting to the Board through the Audit and Risk Committees.
Risk management approach

Strong independent oversight is in place across the Company allowing Senior Management and the Board to evaluate the risks faced by the business, as well as the effectiveness of management of these risks.

The Webjet Limited Board
- Decide nature and extent of risks the Group is prepared to take to meet Strategic objectives
- Sets risk appetite; oversight of risk management framework

Leadership team and management
- Establish risk management and manage risks within Board risk appetite
- 1st Line: Day to day ownership and management of risks and controls (Business Units)
- 2nd Line: Provides expertise, support, monitoring and challenge on risk related matters (Corporate)
- 3rd Line: Independent and objective assurance on effectiveness of controls

Accountability and reporting
- Delegation, direction, oversight
- Alignment, coordination, collaboration

The Company’s approach to risk management is based on established governance processes and relies on both individual responsibility and collective oversight, supported by various tools to facilitate comprehensive reporting. This approach balances strong corporate oversight at Corporate level allowing proactive participation by the Senior Management team in all significant risk matters, with independent risk management structures within individual business units.

Business unit leaders are primarily responsible for managing risk within each of their businesses and for ensuring that appropriate, adequately designed, and effective risk management frameworks are in place, and that these frameworks are compliant with the Company’s risk governance standards.

Independent and objective assurance includes financial auditors as well as third party security experts such as Sekuro, PCI and ISO 270001 audit attestations.

For further information on the risks impacting Webjet and how they are managed, please see the Directors Report in Webjet’s FY22 Annual Report.
Social:
Making a positive social impact

We believe we can best make a positive social impact and create value by maintaining a highly engaged, diverse and inclusive workforce, protecting human rights and mitigating modern slavery, delivering high customer engagement and supporting our communities. We acknowledge our responsibility goes beyond risk management and the importance of creating value for our communities, our team and for our customers.

Our initiatives
The key Social initiatives implemented during the year include:

<table>
<thead>
<tr>
<th>Focus area</th>
<th>Initiative</th>
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<tbody>
<tr>
<td>Gender diversity</td>
<td>• Women currently comprise:</td>
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<tr>
<td></td>
<td>– 54% total employees</td>
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<tr>
<td></td>
<td>– 25% Senior Management (defined to include direct reports to the Managing Director as well as their direct reports)</td>
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<td></td>
<td>– 51% Managers</td>
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<td></td>
<td>• Commitment to having women comprise at least 40% of Senior Management by 2030</td>
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<tr>
<td>Workplace practices, benefits and flexibility</td>
<td>• Introduced new parental leave policy</td>
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<tr>
<td></td>
<td>• LTIP Plan introduced for key employees</td>
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<td></td>
<td>• Transitioning to a hybrid workforce globally to provide flexibility for employees preferring to work from home up to two days per week.</td>
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<tr>
<td></td>
<td>• Webjet OTA and WebBeds businesses have expanded their people functions to further build out employee value propositions including training, recruiting, health and wellbeing</td>
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<tr>
<td>Employee engagement</td>
<td>• Engagement Surveys carried out by each business during the year.</td>
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<td>• Survey results showed increased engagement for employees advocating Webjet as a great place to work:</td>
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<td></td>
<td>– Webjet OTA – 87% (up 7% over FY21)</td>
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<tr>
<td></td>
<td>– GoSee – +25 employee NPS (up 28 points over FY21)</td>
</tr>
<tr>
<td></td>
<td>– WebBeds – 71% (FY22 was the first year a standard survey was carried out across all WebBeds regions)</td>
</tr>
<tr>
<td>Health, safety and wellbeing</td>
<td>• Continued strong safety record with no lost time from workplace injuries or work cover claims</td>
</tr>
<tr>
<td></td>
<td>• Strong focus on wellbeing. Wellbeing seminars and fitness classes for staff. All employees provided access to Employee Assistance Programs providing paid access to confidential counselling. Active participation in initiatives to support mental health including RUOK days, employee training through The Blackdog Institute and mental health champions.</td>
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## Social: Making a positive social impact
(continued)

<table>
<thead>
<tr>
<th>Focus area</th>
<th>Initiative</th>
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| Modern slavery | • Released our second Modern Slavery Statement on a voluntary basis.  
| | • Improved our modern slavery risk identification and assessment processes by expanding our analysis to include our global supply chain (previously focused on our Australian and New Zealand supply chains only). This will be reported on in our third Modern Slavery Statement to be published later this year.  
| | • Introduced modern slavery provisions into a range of template contracts and new contracts involving higher risk suppliers, requiring them to adhere to human rights standards and not to engage in practices that would facilitate modern slavery.  
| | • Requested certain higher risk suppliers to complete a new modern slavery supplier questionnaire aimed at identifying, managing and raising awareness of modern slavery risks. |
| Customer engagement | • Customer Service teams managed an enormous increase in the volume of customer interactions during FY22 due to the ongoing impact of the pandemic on travel.  
| | – Webjet OTA managed over 715,000 customer interactions, nearly 10 times pre pandemic volumes; processed more than 378,000 involuntary flight schedule changes initiated by airlines; and processed refunds on behalf of customers for more than 93,000 flight tickets worth more than $44 million  
| | – GoSee managed over 670,000 customer interactions, including processing more than 65,000 supplier invoices and credits  
| | – WebBeds managed over 1.5 million customer service tickets globally  
| | • All businesses actively track customer engagement. Webjet OTA uses customer effort scores, GoSee uses TrustPilot ratings and WebBeds uses average resolution service levels.  
| | – Webjet OTA – customer effort scores in FY22 declined compared to pre-Covid levels due to the enormous increase in volume of customer interactions. We have increased staffing levels to be significantly more than pre-pandemic levels and automated processes where possible. We are also improving technology to further streamline the customer service engagement process.  
| | – GoSee – rated 4.4 stars on Trustpilot from more than 19,000 reviews  
| | – WebBeds maintained above target average resolution service levels during FY22  
| | • We have always taken pride in seeking to deliver exceptional Customer Service and our Customer Service teams were again recognized in FY22:  
| | – Webjet OTA was awarded the Australian Business Award for Business Innovation for the introduction of a self-service booking functionality for customers  
| | – GoSee was awarded Industry Award for Online Support Services in 2021 Contact Centre CRM Awards |
| Community | • Various initiatives undertaken in all businesses including fundraising, food donations and assisting charities in need. |
Maintaining an engaged, diverse and inclusive workforce

Our people are our company’s greatest asset. Their resilience, commitment, dedication and embodiment of our corporate values help ensure the ongoing sustainability of the Company.

FY22 was another challenging year for our business and the travel industry as we continued to deal with the ongoing impact of the Covid-19 pandemic. Our primary focus remained on ensuring our employees were safe, connected and engaged and we continued to work on instilling best practice performance on issues such as diversity, benefits and flexibility, engagement and health and wellbeing.

Diversity

The Company believes that embracing diversity enhances work culture and drives business success. It is the diversity of experiences and perspectives that creates a culture of empowerment and fosters innovation, economic growth and new ideas. Webjet’s commitment and approach to diversity and inclusion are set out in its Diversity Policy and Code of Conduct.

The Board is accountable for ensuring that the Webjet workforce is diverse in every sense. This includes attracting and retaining talent that is different in gender, ethnicity, disability, age, thought, education and in experience.

The key diversity aims of the Board are to:

- Progressively increase the diversity profile (including the percentage of women) at both Board and Senior Executive levels; and
- Ensure equal access (based primarily on merit and regardless of diversity factors) to employment opportunities at work.

We are proud that Webjet already has a diverse workforce as a result of being a global online travel business. The Company employs more than 50 different nationalities and people come from a wide range of ages, experience and qualifications. Webjet has a number of policies to promote and ensure equal opportunities for diverse cultures, ages, race, sex and religions.

Webjet is a member of the 30% Club Australia Chapter, signifying its commitment to achieve gender diversity on the Board. More recently, the Company announced its commitment to having women comprise at least 40% of senior management by 2030. The value that gender diversity – and diversity in all aspects – brings to a company, its shareholders, its culture and its employees, has long been recognised by Webjet and our signing up to the 40:40 Vision initiative is testament to our dedication to continuing the progression of gender diversity in the workplace. Our FY23 focus will be to roll out global initiatives in support of the 40:40 Vision.

In previous years, we reported female Senior Management as direct reports to the Managing Director, as well as female Executive Management (direct reports to head of business) and female Managers. Given Webjet’s decentralised management structure, to make our commitment to having women comprise at least 40% of senior management by 2030 more meaningful, we have expanded our definition of Senior Management to include both direct reports to the Managing Director, as well as those peoples’ direct reports. Going forward we will now report female Senior Management (as more widely defined), as well as all women who hold managerial responsibilities within the Company. This new accounting methodology does not allow us to provide comparative figures for prior years.

However, it helps move our commitment to increasing women at senior management levels forward in a more meaningful way. Webjet is focused on bringing more women through the management talent pipeline in order to become future leaders within the business. We are currently reviewing criteria and targets to help drive this outcome.
Social: Making a positive social impact
(continued)

Benefits and flexibility
Webjet employees work in a range of countries and the Company complies with all local labour practices in the countries in which it operates. Webjet is committed to paying appropriate remuneration and complying with local standards around pay and benefits. In addition to paying competitive salaries designed to attract and retain staff, all employees are paid relevant statutory entitlements such as superannuation, pension and leave entitlements.

As a digital technology company, Webjet acknowledges the increasingly competitive market for talent and is focused on global employee engagement and retention. As a highly automated business, the majority of Webjet employees are highly skilled. As such they are engaged under individual contracts aimed at attracting and retaining high performing talent. Employees are not restricted in their entitlement to freedom of association. Webjet undertakes continuous reviews of staff performance, pay and benefits and benchmarks remuneration in order to attract, motivate and retain employees across all geographies. To further motivate and retain key employees, in FY22, Webjet introduced a long term incentive plan for key personnel.

Employees also receive a range of other benefits. Additional benefits depend on location but can include free travel insurance, discounted transport and travel benefits, and the ability to purchase additional annual leave. Benefits are available to full time and part time employees, although more than 95% of Webjet staff are full time employees.

In FY22, the Company introduced a new parental leave policy. Each business is responsible for setting its benefits within Company guidelines. The Webjet OTA and GoSee businesses introduced three months paid parental leave for their employees, while the WebBeds business introduced a one month paid leave for its employees in addition to any statutory parental leave provisions available in their country of employment.

Webjet believes in investing in its people for the long term. Regular performance reviews are undertaken to provide feedback, as well as to understand employee career goals and opportunities for training and career progression. The Company offers employees a range of formal and informal ways in which to learn, develop and grow, and employees are supported and encouraged to undertake personal and professional development. Depending on the business, this support includes financial assistance to pursue further education, study leave and paid access to online training programs.

With operations in many countries around the world, flexibility is critical to implementing the Company’s business strategy. It is also important in attracting and retaining talented employees and in facilitating productivity across the business. Webjet believes achieving its business objectives are more important than strict formality in the way that it conducts business. Webjet seeks to be agile in the way that it works and therefore flexibility in formal and informal work practices is important, as is recognising that rigid working patterns may not always suit customers, staff and circumstances. Depending on the role, Webjet offers a range of flexible work options including work location, working hours, job sharing, ad hoc arrangements, part time work, flexible start and finish times and different types of personal leave. Various technology advancements have been introduced to enable greater flexibility. Post pandemic, the Company is transitioning to a hybrid workforce globally to provide flexibility for employees.

Employee engagement
Webjet is focused on ensuring a motivated, engaged workforce and carries out regular employee satisfaction surveys across all its businesses. Surveys are run by external parties regularly and results are shared with staff and changes made to work environments as required.

Each business tailors its engagement surveys as required however there are important common indicators used to understand engagement across the Company. A key engagement measure is the percentage of employees who agree or strongly agree with the statement “I would recommend Webjet as a great place to work”. Webjet OTA and GoSee results showed an increase in scores compared to May 2021, reflecting improved engagement notwithstanding the impact of the pandemic on the global travel industry. FY22 was the first year WebBeds has used a standard engagement survey across all regions so comparisons with FY21 are not possible.

Webjet OTA
87%
(up 7% since FY21)

GoSee
+28 employee eNPS
(up 28 points since FY21)

WebBeds
71%
(FY22 baseline as first year of standard survey)

“I would recommend Webjet as a great place to work”

Where possible the Company promotes internal candidates in an effort to retain key talent. During the year, we made a number of internal promotions, mainly within the WebBeds business following its restructure to a single dedicated CEO and four regions. The Company made several redundancies in FY21 in response to the Covid-19 pandemic. The vast majority of these roles were in the WebBeds business and WebBeds has taken the opportunity to automate the majority of those roles in an effort to deliver greater efficiencies across the business. The Company did hire a number of new people during the year primarily in customer service and IT/technology roles.

Overall Company voluntary turnover during FY22 was below 10% although increased competition for IT/technology and call centre staff resulted in higher turnover in those divisions during the year. The Company is addressing this through salary reviews and improved benefits packages.
Health, safety and wellbeing

Webjet is committed to ensuring the health and safety of its employees at work and conducting its business in accordance with all workplace health and safety laws, standard and codes of practice. The Company has a range of strategies, policies and practices in place to support a safe work environment.

Webjet continued to maintain a strong safety record in FY22 with no reported lost time from injuries or work cover claims. Some offices are currently undertaking an ergonomic audit for office equipment to ensure they are well placed as staff return to the office.

<table>
<thead>
<tr>
<th>Health and safety</th>
<th>FY22</th>
<th>FY21</th>
<th>FY20</th>
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<tbody>
<tr>
<td>Lost time from injuries</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Work cover claims</td>
<td>0</td>
<td>0</td>
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</tr>
</tbody>
</table>

Webjet is also committed to ensuring the wellbeing of its staff. Regular wellbeing seminars and fitness classes are held across the Company and all employees have access to Employee Assistance Programs which provide employees with paid access to confidential counselling. The Company actively participates in initiatives to support mental health including RUOK days, employee training through The Blackdog Institute and mental health champions. Various initiatives were undertaken during the year to support inclusion and diversity, and the businesses took time to celebrate cultural festivals with colleagues.

Protecting human rights and mitigating modern slavery

Webjet welcomes the introduction of the Modern Slavery Act 2018 (Cth) as an important measure to tackle modern slavery and other human rights abuses. We recognise that modern slavery is a growing global issue, and we are committed to ensuring high standards of governance to minimise modern slavery risks and improve ethical standards both within our business and in our supply chains.

Wherever we operate, we respect the human rights of our employees, customers and those of our suppliers and business partners. We reject all forms of slavery, and we have implemented and enforce systems and controls to ensure it does not occur in our business. We are committed to continuously reviewing, improving and maturing our processes, policies and practices to identify and mitigate modern slavery and human rights risks across our own business and through our supply chain relationships.

Further details are set out in our Modern Slavery Statement.
Social: Making a positive social impact

(continued)

Customer engagement

Webjet businesses are customer service businesses and, in part, dependent on customer satisfaction and loyalty. As well as being able to attract new customers, having strong repeat business is important. Webjet seeks and encourages feedback about its business and services, particularly from customers. The Company regularly surveys customers to ascertain if it is delivering on their expectations and if not, how the Company can improve its service. We also offer 24/7 customer service support in all our businesses through phone, online chat and email options.

Tracking customer satisfaction is a key priority for the Company. As retail businesses, Webjet OTA tracks customer satisfaction through customer effort scores while GoSee tracks customer satisfaction through Trustpilot ratings. WebBeds, as a wholesale business, tracks customer satisfaction through average resolution levels.

• During FY22, customer effort scores for the Webjet OTA declined compared to pre-Covid 19 levels due to the enormous volume of customer interactions which were nearly 10 times pre-pandemic volumes. This reflected the increased complexity of rebooking cancelled or changed travel plans post pandemic, in particular needing to cancel and rebook flights whenever borders closed, and processes involved in using and extending travel credits. In an effort to address the issue, during the year we significantly increased staffing levels in our customer service centres to more than pre pandemic levels, and automated processes where possible. We are also improving technology to further streamline the customer service engagement process.

• Webjet OTA was awarded the Australian Business Award for Business Innovation for a new self-service booking functionality. In response to the upheaval of the travel industry and the unanticipated levels of customer contact requests, we identified an opportunity to automate the process to book cancellations and refunds. This delivered an instant outcome for customers by allowing them to cancel their own bookings, while allowing our Customer Service agents to focus on more complex changes during peak periods.

• GoSee’s customer support during the pandemic was recognised by the 2021 CRM Awards winning the Industry Sector Award for Online Support Services. Over a four-week period, a team of trained consultants ‘mystery called’ the GoSee customer support team and sent online enquires designed to evaluate the quality of call and email handling.

Supporting communities

We are proud that all our businesses around the globe have kept the community front of mind with various initiatives taking place during the year including a range of fundraising activities, food drives and donations, and supporting a wide range of local charities.

We recognise the importance of having strong customer engagement and continue to invest in customer service processes in all our businesses.

Webjet has always taken pride in delivering exceptional customer service and our retail customer service teams continued to work tirelessly to assist customers whose plans had been impacted by the pandemic. Both businesses won customer service awards during the year.
Environment:
Reducing our operational impact on the environment

The areas where Webjet can best mitigate its own environmental impact is through working towards carbon neutrality, creating a sustainable work environment by expanding energy efficiency, water and waste reduction initiatives, and promoting responsible and sustainable travel where appropriate.

Our initiatives
The key Environmental initiatives implemented during the year include:

<table>
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<th>Focus area</th>
<th>Initiative</th>
</tr>
</thead>
</table>
| Measuring carbon emissions in order to become carbon neutral | • Audit underway to measure:  
- All Scope 1 and 2 emissions  
- Material Scope 3 emissions  
• Audit expected to be completed in August 2022. During FY23 we plan to set targets to reduce emissions, track progress against these targets and offset any carbon usage in order to become carbon neutral |
| Energy efficiency initiatives | • Installation of energy efficient lighting and use of sensor lighting  
• Minimising after hours air-conditioning use  
• Installation of blinds to minimise cooling and heating costs  
• Automatic switch off devices on appliances and equipment when not in use |
| Water reduction initiatives | • Installation of low flow water fixtures  
• Use of water efficient appliances |
| Waste reduction | • Reducing paper usage and encouraging recycling  
• Moving towards being paper lite  
• Responsible disposal of old computers and cell phones |
| Responsible travel | • Delivered Sustainable Traveller program in partnership with TEM, Australia’s largest carbon offset provider. Working with TEM to identify how best to offer accommodation offsetting to our Webjet OTA customers  
• Awarded 2021 Australian Business Awards’ Business Sustainability Award for Webjet Sustainable Traveller (the first carbon offset program to be offered by an Australian OTA)  
• During FY22, Sustainable Traveller resulted in approximately 21,350 tonnes of total carbon offsets, an average of 1,780 tonnes per month. |

Webjet accepts that our customers, shareholders, employees and the community expect that we will operate our businesses in an environmentally responsible manner, and we recognise the importance of doing so. We are committed to creating an emissions reduction pathway to deliver a net zero carbon emissions target and are focused on looking for ways to minimise our footprint and own environmental impact. We also recognise we can play an important role in educating our customers and the public on the economic, social and environmental impacts of their travel.
Environment: Reducing our operational impact on the environment

(continued)

Working towards carbon neutrality
Webjet recognises the increasing risks associated with a changing climate and believes all organisations have a role to play in helping reduce carbon emissions. During FY22, we began a process to assess our carbon impact with a view to creating an emissions reduction pathway to deliver a net zero target. We have engaged a third party to undertake an audit to measure our emissions. This is expected to be completed by August 2022. Once complete, we plan to set targets to reduce emissions, track progress against these targets and offset any carbon usage.

Creating a sustainable work environment
We strive to operate a work environment in which sustainability is central to the way our staff work. We are serious in our efforts to become energy efficient and reduce waste, and have taken various steps to minimise our footprint, including energy-efficient lighting and air conditioning, water conservation, waste reduction and recycling, the use of electronic files and filing, appropriate disposal of old computers and cell phones, and moving to a more carbon efficient and carbon neutral cloud-based infrastructure for our Webjet OTA business.

Promoting environmentally responsible and sustainable travel
Webjet’s Sustainable Traveller initiative was launched in 2020 in direct response to customers’ heightened demand for eco-conscious travel with a business committed to championing sustainable practices. Sustainable Traveller made Webjet the first Australian OTA to introduce its own carbon offset program.

Our Sustainable Traveller Program offers all customers making flight bookings through the Webjet OTA the opportunity to reduce the environmental impact of their flight by purchasing carbon offsets to equalise their share of greenhouse gas emissions released into the atmosphere during the flight. By purchasing carbon offsets, travellers directly support environmental projects that remove greenhouse gas emissions from the atmosphere or prevent future emissions from occurring. 100% of contributions paid by the customer are used to source carbon offsets provided in partnership with Tasman Environmental Markets (TEM) from premium projects around the world, accredited under Gold Standard.

Webjet OTA’s Sustainable Traveller program
Carbon offsetting allows travellers to reduce their environmental impact by equalising greenhouse gas emissions released into the atmosphere during a flight.

Webjet OTA purchases the equivalent number of carbon offsets in verified carbon offset projects around the world that mitigate climate change, protect wildlife and nourish communities.

Webjet OTA customers can purchase carbon offsets to offset their share of emissions released during the flight.

Premium projects supported by Webjet’s Sustainable Traveller program
- Indigenous Fire Abatement (Australia)
- Renewable Energy (India)
- Forest Regeneration (Peru)
- Efficient Cookstoves (emerging countries)

Climate Risk
Webjet accepts that, as part of doing business in both Australia and internationally, its customers, shareholders, employees and the community expect that it will do so in an environmentally responsible and socially sustainable manner. Webjet recognises the increasing risks to travel associated with a changing climate. Over the coming years the Company intends to release a report in accordance with the Taskforce for Climate Related Financial Disclosures (TCFD) showing how climate related risks and their control are embedded throughout the business and quantified.

3 All TEM carbon projects are accredited under different internationally recognised standards depending on the project, for further details refer to ‘Types of carbon offsets’ section in TEM’s carbon offset website. (https://www.tasmanenvironmental.com.au/carbon-offsets/)
We realise running an ethical business goes beyond managing the behaviour of our team. It extends to complying with regulations and maintaining best practice corporate governance, particularly when it comes to data privacy and security and maintaining high standards of business ethics.

Webjet manages its corporate governance in alignment with the ASX Corporate Governance Principles and Recommendations (4th edition). The strategic direction and corporate governance of Webjet is led by the Board of Directors and the core objective of the Board is to maximise returns to shareholders while considering key risks that may impact the business. Please refer to the Corporate Governance Statement for a complete overview of how we govern our business.

### Our initiatives

The key Environmental initiatives implemented during the year include:

<table>
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<tr>
<th>Focus area</th>
<th>Initiative</th>
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</thead>
</table>
| **Board composition** | • Board comprises 33% women  
• Board has reviewed the independence of the directors and determined that all current non-executive directors are independent (see Corporate Governance Statement)  
• Strong balance of director skills and experience (see Corporate Governance Statement) |
| **Business ethics** | • All staff undertake training regarding anti-bullying, harassment and discrimination  
• External training was provided to key personnel to assist in understanding the Company’s obligations under whistleblower protection laws  
• Improved our modern slavery risk identification and assessment processes by expanding our analysis to include our global supply chain  
• All breaches of Code of Conduct were thoroughly investigated, actioned and closed  
• Code of Conduct updated to embed corporate values |
| **Data privacy**     | • No reportable breaches regarding customer privacy under any relevant legislation  
• Undertook full review of data privacy policies to ensure they are as robust as possible  
• All staff are trained in applicable privacy policy relevant to their business and undertook security awareness training which includes privacy management  
• Undertook formal Privacy Impact Assessment for Webjet OTA and found no issues for concern  
• The WebBeds business transitioned to become a Data Controller and all processes were reviewed to ensure it is able to meet requirements of that role |
| **Data security**    | • Initiated work to achieve ISO27001 certification  
• No reportable data security breaches under any relevant legislation in any of the Webjet businesses  
• Conducted red teaming and threat hunting exercise to highlight exploitable vulnerabilities  
• Conducted significant phishing simulations  
• Enhanced email security controls to mitigate related risks associated with phishing, spoofing and malware attacks  
• All staff undertake training in cybersecurity and privacy. We continue to increase training across the Company through regular updates, alerts and tailored information sessions. |
Governance:
Maintaining ethical corporate governance processes
(continued)

Business Ethics
Webjet believes an organisation’s culture is critically important and we are committed to creating a workplace where employees at all levels are valued, have an opportunity to actively participate in the business and take on leadership roles. The creation of a culture where everyone is welcome and treated with respect is key to business success. Webjet’s Board and senior management team are very conscious of setting the tone within the Company and monitoring the drivers that shape the culture and values within the Webjet workplace.

Webjet has established various policies and procedures that set out its values and expectations as to how the Company and its employees will work and behave towards each other. Webjet’s corporate governance is underpinned by policies that guide employees and management to operate responsibly. Our Corporate Governance policies are available at www.webjetlimited.com

Code of Conduct
Webjet is committed to an ethical and transparent approach to business. Underpinning this is the Webjet Code of Conduct, which outlines the principles and behaviours required of all team members, including employees, directors, contractors and everyone working at Webjet, to maintain and achieve these standards.

The Code of Conduct reinforces Webjet’s values and is required to be signed by all employees prior to commencing work. The key principles within the Code include honest and ethical behaviour, respect for people and property, and legal compliance. In addition, the Code covers topics such as safety and wellbeing, human rights and modern slavery, conflicts of interest, trading in Webjet securities, anti-bribery, fraud and corruption, gifts, entertainment and hospitality, competition and consumer law, confidentiality and privacy, continuous disclosure, internet, email and social media, working with external parties, political engagement, record keeping and speaking up. The Company has adopted policies which commit it to meeting its responsibilities in areas where ethical or legal issues arise, including policies covering Anti-Fraud and Corruption, Internet, Email and Social Media, Equal Employment Opportunity, Bullying and Harassment and Occupational Health and Safety.

Whistleblowing Policy
Webjet encourages all employees, directors, contractors and others working at Webjet to report any allegations of misconduct by any team member and/or failures by Webjet to honour its obligations, both legal and ethical, or to comply with its values. The Whistleblowing Policy reflects Webjet’s commitment to the highest standards of ethical conduct on all its activities by promoting a culture of honesty, ethical behaviour and corporate compliance and encouraging the reporting of any instances of suspected misconduct without fear or threat of victimisation or detriment. Webjet team members are able to use a separate third-party website to ensure anonymity and confidentiality of reporting. External training was provided to key personnel during the reporting period to assist in understanding Company obligations. Further training is planned for all staff for 1H23, including how to use the reporting tool.

All allegations of misconduct are taken seriously by the Board and senior management. During the year, the Company had three allegations of misconduct which were reviewed and closed. The resulting actions included formal warnings and training, with one person leaving the Company.

Tax transparency
Webjet is committed to being a responsible corporate taxpayer. As a business which operates in many countries, tax is an important and increasingly complex issue for Webjet. Webjet’s policies on taxation are set by the Board (with oversight from the Audit Committee). The policies are consistent with Webjet’s global tax obligations and with the Australian Taxation Office (ATO) recommendations for tax risk management and governance. These policies are reviewed regularly.

Webjet’s tax policies are premised on the maintenance of a co-operative and transparent relationship in respect of all dealings with the ATO (and the relevant taxation authorities of other countries). Within that framework, the basic philosophy underpinning Webjet’s tax policies is a commitment to:

- fully comply with the taxation and reporting laws of each jurisdiction in which Webjet operates;
- fully and fairly disclose all information relevant to its financial affairs and taxation in all jurisdictions in which it is required to lodge taxation returns; and
- promptly pay all taxes (direct and indirect) which the Webjet Group is legally obliged to pay in any jurisdiction.

As Webjet is obliged to act in the best interests of its shareholders, it will seek, as a matter of policy, to legitimately minimise its obligation to pay tax. It will not, however, do so if the means to achieve this involves Webjet using contrived, artificial or non-commercial structures or transactions.

Webjet has appropriate systems, processes and controls in place to identify, evaluate, mitigate, monitor and report on tax risks in respect of both its annual financial reporting and material transactions (including acquisitions and disposals of major assets).
Governance:  
Maintaining ethical corporate governance processes 
(continued)

Data privacy
Webjet is reliant on the security of its website, payment and data management systems and is committed to protecting the privacy and confidentiality of customer information. The Company takes great care to protect all customer personal information from unauthorised access, modification and disclosure. Webjet uses a range of methods to protect the privacy and security of customer information, including provisions governing the storage, security, access, transmission and use of customer personal information.

The Company has measures in place to ensure all organisations and persons who may receive the information understand its confidentiality and maintain required protection and security while handling data. We have regular training for staff on data privacy management. All staff are trained in the applicable privacy polices relevant to their business. Privacy management is also included in security awareness training sessions which all staff are required to attend.

Customers can access and control their personal information (including the ability to rectify information) by following the steps set out in the Company’s privacy policies. These polices are available on our business websites. The privacy policies also establish how the Company shares personal information with third parties to help the Company operate, provide, improve, integrate, customise, support and market its services. The Company does not sell or rent any customer personal information to a third party.

All data requests are managed by the Company’s Data Protection Officer. All requests are validated to ensure they are legitimate and legally required processes are followed prior to responding. We conduct regular legitimate interest assessments that consider interferences with rights and freedoms of individuals. Information is only shared when requested by law enforcement when investigating criminal activity. We do not receive requests from governments to access data.

While protection of the privacy and confidentiality of sensitive personal data is vital, security breaches and/or loss of confidential or sensitive personal information can occur. If any event such as a security breach or loss of confidential or sensitive information does occur, Webjet will comply fully with its obligations under applicable privacy legislation including, as appropriate, the notification of all people affected by the breach. It is also committed to taking such action as appropriate to limit the impact on any customer of a security breach or unauthorised access to that customer’s personal non-public information. The Company has in place a robust incident response plan in the event of a suspected privacy breach, which is tested annually by independent external auditors. During the reporting period, Webjet did not have any reportable breaches regarding customer privacy under any relevant legislation.

All new projects and suppliers undergo a data and privacy risk management process, regular monitoring and self-assessments to ensure supplier risk is appropriately managed.

Data Security

Webjet is reliant on the security of its website, payment and data management systems and is committed to the protection of personal information of its customers. Security and privacy breaches (whether through cyber-attack or otherwise) have the potential to impact customer satisfaction and confidence. Webjet is highly focused on maintaining data security and constantly monitors and reviews its technology systems. The Company takes great care to secure its systems and all information from unauthorised use, malware, data breaches and others risks. It uses highly sophisticated software applications and/or hardware to prevent unauthorised access to its network and databases.

For all information stored electronically (for example databases), Webjet maintains strict system and network security. It uses firewalls and other security measures such as role-based access system and multifactor authentication to control access to its network and systems. It continually maintains and monitors its robust security systems to ensure they are secure, and that customer personal information is appropriately protected.

The Board’s Risk Committee has oversight of both data privacy and data security and these are a standing Risk Committee agenda items. Security and privacy have been embedded into business processes through implementing a security by design and privacy by design approach. Webjet’s Global Program Manager for Security is focused on ensuring security is a consistent and measured priority across all businesses.

During the reporting period we focused on ensuring our IT and security processes were strong enough to support an entirely remote workforce. This involved tightening email security, enhancing endpoint security, internal training and implementing appropriate measures such as a BYOD (Bring Your Own Device) policy for personal devices.

We continue to work closely with threat intel groups to understand emerging risks and threats that may impact our business. We actively looked at preparing for key cyber events by running attack simulations and testing our incident response plan. We have also created playbooks for specific events such as ‘a ransomware attack’, which allows the business to understand the impact an event like this would have on our business operations, as well as the impact on our customers.

Our Card holder data environment is PCI-DSS certified and assessed by certified QSA on an annual basis. We run monthly vulnerability scans across all external endpoint and conduct penetration tests by qualified independent consultants on all our commercial platforms on an annual basis.

The Company has processes in place to ensure suppliers and service providers with access to our data and systems have appropriate data security measures in place. Webjet’s suppliers and service providers are obliged to handle customer data consistent with a mutual agreed Policy and according to business needs.

During the reporting period, Webjet did not have any reportable (under relevant legislations) data security breaches in any of its businesses. There was one non-reportable data breach under GDPR regulations. Relevant steps were taken to address the matter and no further issues arose from the incident.
GRI/SASB Index

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<td>To the best of our knowledge, we have complied with all environmental laws and regulations</td>
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## SASB Indicators

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<td>Service disruptions</td>
<td>We had no significant outages for our operating platforms during the year. Due to the impact of COVID-19, there were some periods of extended waiting times for customers trying to contact call centres. See pages 13 and 17.</td>
<td>19</td>
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<tr>
<td>SASB</td>
<td>Number of users whose information is used for secondary purposes</td>
<td>We do not use information for secondary purposes without pre-approval of the customer. See the privacy policies on webjet.com.au and WebBeds.com websites.</td>
<td>19</td>
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<tr>
<td>SASB</td>
<td>Number of law enforcement requests for user information</td>
<td>We comply with all law enforcement requests. We are in the early stages of our Sustainability reporting and are setting up processes to broaden the scope of future reporting.</td>
<td>19</td>
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<tr>
<td>SASB</td>
<td>Government-required monitoring, blocking, content filtering or censoring</td>
<td>We are in the early stages of our Sustainability reporting and are setting up processes to broaden the scope of future reporting.</td>
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