Webjet Limited

Modern Slavery Statement 2022

Introduction

Webjet recognises 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.

Webjet is a global travel business that enables travel the world over through our market leading travel brands supported by travel technology. Webjet's digital travel businesses span both wholesale and retail markets globally, with operations in over 50 different countries.

Wherever we operate, we respect the human rights of our people, our customers and those of our suppliers and business partners. We reject all forms of modern slavery, and we are committed to implementing and enforcing effective systems and controls to ensure it does not occur in our business or supply chains.

We are continually 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.

About this Statement.

This Modern Slavery Statement (**Statement**) has been prepared in accordance with the requirements of the Australian *Modern Slavery Act 2018* (Cth) (**Act**).

This Statement is made on behalf of Webjet Limited ABN 68 002 013 612 (**Webjet**), which qualifies as a reporting entity under the Act. Webjet is a public company listed on the Australian Securities Exchange (ASX:WEB), headquartered in Melbourne, Australia. It is a member of IATA (International Air Transport Association) and AFTA (Australian Federation of Travel Agents).

This is Webjet's third Statement, following the release of our second modern slavery statement on a voluntary basis in 2021. This Statement describes our approach and actions to manage modern slavery risks in our global operations and supply chains during the financial year ending 31 March 2022 (**Reporting Period**), as well as our plans for future improvements.

Progress since last statement

Webjet is committed to continually improving not only our modern slavery risk management processes but also the quality of our modern slavery reporting. We have taken the following steps to improve on our previous statement:

- Disclosure of additional data relating to our suppliers, which was achieved through the expansion of our modern slavery risk identification and assessment to include our global supply chain (whereas previous assessments were focused on the evaluation of modern slavery risks in our Australian and New Zealand supply chains only).
- Disclosure of additional data relating to our workforce, including number of direct vs. indirect hires and breakdown by country.
- Disclosure of specific modern slavery risks within our global supply chain.
- Assessment and disclosure of modern slavery risks by supplier tier.
- Improved disclosure of the effectiveness of our actions.

About Webjet Limited.

Our operations

Webjet operates a geographically diverse business with operations in Australia, New Zealand, Asia, Europe, Middle East, Africa, and the Americas. A breakdown of our workforce by country can be found on page 5.

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



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



The **#1 online travel** agent (OTA) in Australia and New Zealand.⁽²⁾

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



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

CoSee 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.

tripninja

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.

Booking Verification Technology

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%.

For further information about Webjet, please see Webjet's FY22 Annual Report.

- 1. Based on TTV
- 2. Based on percentage share of OTA flights market.

About Webjet Limited

(continued)

Our values

Our culture is underpinned by five 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.



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.



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.



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. (continued)

Our organisational structure

Webjet has 54 subsidiaries which are located in various countries around the world, including Australia, New Zealand, United Arab Emirates, Spain, United Kingdom and Singapore. A full list of Webjet's controlled entities can be found in Note 4.2 to the consolidated financial statements on page 76 of **Webjet's FY22 Annual Report**.

Webjet's governance framework encompasses both centralised policies that apply to Webjet and its controlled entities, as well as localised policies, procedures and guidelines that are tailored to meet country-specific requirements.

Our workforce

We are proud to have a diverse workforce as a result of being a global online travel business. Our global workforce comprises 1,810 people from over 50 different countries, of which 1,766 people are directly employed or engaged by us, and 44 people are indirectly engaged through reputable third-party agencies or professional services firms.

Workforce breakdown by country

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Webjet OTA (headquartered in Australia)
Australia: 99%
Rest of World: 1%



GoSee (headquartered in New Zealand)

- New Zealand: 79%Philippines: 18%
- Rest of World: 3%



WebBeds (headquartered in the United Arab Emirates)

- Philippines: 21%
 - Romania: 17%

- Spain: 13%
- UK: 9%
- Egypt: 8%
- United Arab Emirates: 7%
 Dest of World: 25%
- Rest of World: 25%

Our global supply chain

Our global supply chain comprises the following:

- **175 airlines,** the top 4⁽¹⁾ of which represent 83% of our aggregate FY22 flight TTV (total transaction value) and have published their own modern slavery statements;
- **195 car and motorhome rental providers**, which are based predominantly in Australia, New Zealand, North America, Europe and South Africa;
- 365,000+ hotels and accommodation providers around the world, of which approximately 15,100 are Tier 1⁽²⁾ suppliers and the rest are paid via third-party aggregators such as Expedia and Agoda; and
- 656 other Tier 1 suppliers globally, which include affiliate partners, advertising and marketing services, software and IT services, insurance, office expenses, utilities, and professional services.

Webjet is currently focused on identifying and addressing modern slavery risks in its Tier 1 suppliers. We intend to expand our assessment to include secondary supplier tiers in the future.

Modern slavery governance and reporting

Webjet takes a group-level approach to modern slavery governance. The CEO of each business unit is responsible for managing modern slavery risks within their own operations, with oversight from the Global Chief Operating Officer.

The Global Chief Operating Officer is also responsible for overseeing modern slavery reporting, with input from Webjet's designated Modern Slavery Working Group and relevant finance, human resources and supply chain teams across each of our business units and regions. An independent consultant has assisted us with the due diligence process, including the identification and assessment of modern slavery risks within our business and supply chains.

1. By TTV.

2. Not paid via a third-party aggregator or agent.

Webjet's modern slavery risks.

With the help of an independent consultant, we conducted a risk assessment of our operations and supply chains to identify areas which were more at risk of modern slavery practices for the Reporting Period. Our previous two modern slavery statements focused on the assessment of modern slavery risks in our Australian and New Zealand supply chains only. For the first time, for this Statement, we have not only identified the Tier 1 suppliers within our global supply chains but also conducted a modern slavery risk assessment of these suppliers.

Modern slavery risks within our operations

Our business-to-consumer (**B2C**) businesses, Webjet OTA and GoSee, and our technology businesses, Trip Ninja and Rezchain, are low risk for modern slavery. These businesses have operations predominantly based in Australia, New Zealand and Canada, which are countries with low inherent modern slavery risk.

In comparison, our business-to-business (**B2B**) business, WebBeds, has a higher modern slavery risk profile due to its geographically diverse operations, including operations in countries with moderate to high inherent modern slavery risks, such as the Philippines, Romania, the United Arab Emirates and Egypt.

All Webjet employees are employed in accordance with the applicable labour laws of the country in which they are employed, including in respect of minimum wages, hours of work, leave entitlements and safe working conditions. In countries with high inherent modern slavery risks, such as Egypt, we have also engaged the services of third-party specialists to help us ensure labour compliance. The main categories of activities undertaken by our global workforce include customer operations, sales and marketing, software development, supply chain coordination and professional and office support functions.

Our indirect workforce – the majority of which is based in the Philippines (61%), followed by Australia and New Zealand (20%) – is hired through reputable third-party agencies and professional services firms. Our indirect workforce in the Philippines comprises customer service representatives and marketing/search engine optimisation (SEO) executives.

Overall, we consider that there is a low risk of Webjet directly causing or contributing to modern slavery practices within our own operations, but a moderate to high risk of Webjet being directly linked to modern slavery practices through our suppliers. These risks are discussed in the following section of this Statement.

Webjet's modern slavery risks

(continued)

Modern slavery risks within our supply chains

During the Reporting Period, Webjet worked directly with suppliers from over 180 countries. Based on our modern slavery risk assessment, 57 suppliers have been identified as high risk, and 2,835 suppliers have been identified as medium risk. These numbers represent approximately 0.35% (high risk) and 17.6% (medium risk) of the total number of our Tier 1 suppliers.

Our high-risk suppliers include hotels and accommodation providers based in Iraq, Cameroon, Saudi Arabia, Egypt and Algeria.

Our medium-risk suppliers include hotel and accommodation providers, freight transport

providers, catering services and tour operators based in Thailand, Bangladesh, Ethiopia, Russia, India, China, Vietnam, Turkey and Egypt, amongst others.

We also consider it likely that our hotel and accommodation providers, car and motorhome rental providers and airline partners engage with one or more of the following suppliers (which are Tier 2 or Tier 3 suppliers of Webjet), which are at higher risk of modern slavery practices:

- catering providers;
- cleaning, security and support service providers; and
- providers of textiles, including uniforms and linen.

As a geographically diverse business, Webjet acknowledges the risks of being linked to the following modern slavery practices through Tier 1, Tier 2 or Tier 3 suppliers in our global supply chains:

Types of modern slavery	Supplier tier	Comments
 Forced labour Debt bondage Deceptive recruiting for labour services 	Tier 1	One or more of these types of modern slavery may exist in the direct employment of cleaners, hospitality staff, luggage handling staff and other support staff by our hotel and accommodation providers who have been identified as high or medium risk.
 Forced labour Debt bondage Deceptive recruiting for labour services 	Tier 2 or Tier 3	 One or more of these types of modern slavery may exist in: the manufacturing of uniforms and linen used by airlines, hotels and accommodation providers and the sourcing of raw materials used to make them (such as cotton);
The worst forms of child labour		 the outsourced cleaning, catering, security and support services by airlines, hotels and accommodation providers; and
		 the cleaning and support services sourced by car and motorhome rental providers.
Trafficking in personsForced marriage	Tier 2 or Tier 3	There is a known risk that airports, which are used by our airline partners, are used by criminals to facilitate human trafficking or forced marriage.
		Webjet is a member of IATA (International Air Transport Association), which has passed a resolution at its Annual General Meeting denouncing human trafficking and reaffirming the commitment of airlines to fight human trafficking through various actions.
• Servitude	N/A	Servitude, while considered a form of modern slavery, was not identified as a material risk to our operations or supply chain.

We have not identified specific Tier 2 and Tier 3 suppliers for the Reporting Period, as our current focus is on identifying and addressing modern slavery risks in our Tier 1 suppliers. We also acknowledge that other hotels and accommodation providers that we work with but pay via a third-party aggregator or agent and therefore not included in our Tier 1 supplier count, may be exposed to the same modern slavery risks as those identified for our Tier 1 accommodation providers above. As we progressively work towards addressing secondary supply chain risks in the future, we will start by incorporating these accommodation providers in our risk assessments.

Actions to assess and address modern slavery risks.

Assessing our modern slavery risks

We engaged an independent consultant to assist with our modern slavery risk assessment for the Reporting Period. The assessment looked at both our supplier spend data and global workforce metrics for the Reporting Period.

Supply chain risk assessment

In respect of our supply chain, a comprehensive, externally developed data analytics tool was utilised to identify high risk suppliers based on the following risk factors:

- supplier importance;
- customer interaction/impact;
- spend/leverage;
- salient people risks;
- country/region;
- industry/sector; and
- good/service provided.

In particular, two of the above risk factors were identified as salient risk factors for Webjet:

- vulnerable industry sectors, due to their characteristics, processes and use of low-skilled labour and/or reliance on outsourced providers; and
- high risk countries or regions, which are known to have higher modern slavery and human rights risks due to poor governance and rule of law, conflict, migration flows and socio-economic factors.

The data analytics tool, which uses 28 indexes with industry aligned weighting criteria, provides a severity and likelihood risk rating (from 1 to 5), allowing our Modern Slavery Working Group to identify medium and high-risk suppliers which may warrant further assessments using a supplier assessment questionnaire, subsequent follow-up audits, engagement sessions and supplier training in the future.

Operational risk assessment

In respect of our own operations, we reviewed our global workforce with a focus on our indirect workforce. Our review looked at our own employment practices and their compliance with applicable labour laws, as well as the recruitment policies and practices of our third-party labour providers. Our assessment also took into account the nature of the roles being performed by our global workforce.

Actions to address modern slavery risks

The Covid-19 pandemic has wreaked havoc on travel companies around the world. During the Reporting Period, we focused on our path to recovery amidst extended lockdowns in the first half and the Omicron outbreak in the second half of the financial year. Despite these challenges, we have continued to make important progress towards modern slavery risk mitigation initiatives.

The Covid-19 pandemic did not negatively impact on our ability to undertake a modern slavery risk assessment. Our assessment did not identify any actual or suspected instances of modern slavery in our operations or supply chain requiring remedial action. No whistleblower reports relating to human rights or modern slavery were received during the Reporting Period.

Governance and policy

During the Reporting Period, we launched a new Global Sanctions Policy (with accompanying Manual) and a refreshed Global Whistleblowing Policy and delivered training on these policies to all relevant staff.

Targeted sanctions can be an important measure in combatting modern slavery where they are imposed on entities known to be directly profiting from forced labour and other human rights abuses. Our Global Sanctions Manual includes country-specific guidance notes and a detailed checklist which must be completed and submitted to our designated Sanctions Officer to carry out a due diligence and risk assessment in respect of each proposed high-risk transaction.

At Webjet, we encourage and expect our people to speak up if they know of or genuinely suspect conduct that is improper, illegal, corrupt, fraudulent or in violation of our policies or code of conduct. Our Australian-focused whistleblowing policy was refreshed during the Reporting Period to provide a broader application to our global workforce. We facilitate the reporting of concerns through various channels, including to our designated Compliance Officer or via an anonymous external whistleblower reporting tool.

Actions to assess and address modern slavery risks

(continued)

In May 2022, we launched a new global Code of Conduct, which applies to all employees, directors, contractors and everyone working at Webjet or its subsidiaries, regardless of location. The new code embeds our values, prioritises the safety and wellbeing of our people, and highlights our commitment to creating and maintaining a diverse and inclusive workforce and ensuring that laws and ethical standards are complied with and the human rights of our people and those of our customers, suppliers and business partners are respected and upheld.

Our people

All Webjet employees are employed in accordance with the applicable labour laws of the country in which they are employed, including in respect of minimum wages, hours of work, leave entitlements and safe working conditions. In addition, all employees have access to our Employee Assistance Program which provides employees with paid access to confidential third-party counselling, which may be utilised for support on various personal and workplace issues.

During the Reporting Period, we undertook further due diligence in respect of the recruitment practices of our third-party labour providers. Based on the responses we received, we are satisfied that there is a low risk of modern slavery occurring through our third-party labour providers, all of which have established practices and procedures in place that minimise modern slavery risks. Some of these labour providers also have specific modern slavery and human trafficking policies in place.

We recently began incorporating provisions specific to modern slavery and human rights in the employment contracts of some of our overseas jurisdictions. These provisions are intended to raise awareness amongst staff as well as to highlight the importance of adhering to our global Code of Conduct and respecting human rights in our workplace.

Our suppliers

As part of the modern slavery risk assessment we undertook in FY21, which focused on our Australian and New Zealand supply chains, we identified 21 medium risk suppliers (and did not identify any high risk suppliers). These included car and motorhome rental providers based in high-risk countries. Of these 21 suppliers, three have ceased trading and two no longer have a supplier relationship with us. During the Reporting Period, we followed up on our findings by requesting the remaining 16 medium-risk suppliers to complete a modern slavery self-assessment questionnaire. While the results suggest a low level of modern slavery governance amongst some of the suppliers we contacted, the process of completing the questionnaire had the effect of raising modern slavery awareness amongst many of our suppliers. We have also identified opportunities to improve upon the supplier self-assessment process to produce more meaningful results in future assessments.

We have introduced provisions relating to modern slavery compliance in our template accommodation provider agreement, B2B client agreement, car and motorhome rental provider agreement and standard services agreement, and have sought to incorporate these provisions into other high-risk supplier contracts, where possible. These provisions require our suppliers to:

- warrant that no modern slavery (in all its forms) is occurring within the supplier's business or supply chain;
- conduct regular modern slavery risk assessments within their supply chains;
- implement appropriate controls to mitigate modern slavery risks; and
- immediately notify Webjet of any instance of modern slavery occurring within their business or supply chain.

With respect to our airline partners, we proactively engaged with the International Air Transport Association (IATA) to better understand the actions taken by airlines in mitigating modern slavery risks and to explore opportunities for collaboration.

Training and awareness

We understand the importance of promoting modern slavery awareness amongst our people and supply chain partners. Due to the challenges faced by our global businesses arising from the Covid-19 pandemic, we did not provide modern slavery training to all staff during the Reporting Period, however members of our Modern Slavery Working Group voluntarily undertook further modern slavery training to enhance their knowledge and stay abreast of emerging issues. We plan on delivering awareness training to the broader organisation in FY23.

Actions to assess and address modern slavery risks

(continued)

Summary of progress

Actions proposed in previous statements	Status	
Enhance our supplier agreements to better capture our commitment to managing Modern Slavery and Human Rights risks	 Completed Follow-up action proposed for FY23 	see page 12
Improve relevant policies, procedures, and guidelines to include specific references to Modern Slavery and Human Trafficking	Completed	
Enhance due diligence processes for supplier selection and screening to include consideration of Modern Slavery risk	• This action has been updated for FY23 to shift the focus towards better understanding our existing suppliers first	see page 11
Introduce and deploy Modern Slavery and Human Trafficking training and awareness sessions across Webjet's business and global supply chains, to detect and mitigate modern slavery risks	 This action has been updated for FY23 to focus on a more specific section of our workforce first 	see page 11
Identify and remediate/eliminate risks regarding recruitment practices of third-party labour providers in Webjet's operations and supply chains	CompletedFollow-up action proposed for FY23	see page 12
Continuously assess the effectiveness of our actions to ensure that we learn, and incorporate improvements in detection and remediation/elimination of Modern Slavery and Human Trafficking risks	 Completed for FY22 To continue into future periods 	
Introduce a set of key performance indicators (KPI's) to continuously measure the effectiveness of our actions, ensuring that Modern Slavery and Human Trafficking is not taking place across our business or supply chains	Completed	see pages 11–12
Identify and use opportunities for collaboration with industry partners, organisations, and other third-party providers to verify and help resolve Modern Slavery and Human Trafficking risk issues	Completed	

Assessing effectiveness and looking ahead.

Since the Act was introduced, we have continued to improve our understanding of our modern slavery risk exposure which informs our approach to measuring the effectiveness of our actions. Given the nature of the actions and their intended effects, many required a qualitative rather than a quantitative assessment of effectiveness.

The due diligence and risk assessments undertaken during the Reporting Period have also helped us to uncover additional risk areas within our supply chain, which will inform our actions for future periods.

Actions undertaken	Assessment of effectiveness	New actions/KPIs proposed for FY23	
Modern slavery awareness training for specific employees (FY20, FY21 and FY22)	These training sessions were effective in enhancing the understanding of modern slavery issues by the employees who completed the training.	Deliver modern slavery awareness training to all senior management and all staff with a procurement or recruitment element to their role.	
Established a dedicated Modern Slavery Working Group (FY21)	Our Modern Slavery Working Group has been an effective forum in coordinating and tracking the progress of modern slavery initiatives, facilitating consultations and seeking input into risk assessments across our global businesses.	Prepare a modern slavery action plan for FY23.	
Engaged independent consultant to assist with modern slavery risk identification and assessment (FY21 and FY22)	This has been an effective measure in ensuring that our risk assessment is both independent and undertaken using a comprehensive, purpose-built data analytics tool. The results of these risk assessments have provided a foundation for further follow-up action with our medium to high risk suppliers.		
Modern slavery self-assessments undertaken by medium-risk suppliers (FY22)	These supplier self-assessment questionnaires have revealed a need for further supplier engagement and awareness training on modern slavery issues. The process of completing	Redesign the supplier self-assessment questionnaire so that the questions can better identify any 'red flags' in the responses.	
	the questionnaires has raised some awareness amongst our suppliers.	Prepare an action plan for enhancing supplier awareness of modern slavery issues.	
Expanded modern slavery risk assessment to include our global supply chain (FY22)	This has been effective in uncovering additional high risk and medium risk suppliers in our global supply chain.	Conduct follow-up assessments of high risk suppliers, including using the improved supplier self-assessment questionnaires.	

Assessing effectiveness and looking ahead

(continued)

Actions undertaken	Assessment of effectiveness	New actions/KPIs proposed for FY23
Due diligence on recruitment practices of third-party labour providers (FY22)	The due diligence exercise has confirmed that Webjet is not directly causing or contributing to modern slavery practices within our own operations. The process of participating in the due diligence exercise has also raised awareness amongst our third-party labour providers.	Design and implement a more comprehensive due diligence exercise covering the recruitment practices of all our third-party labour providers.
Incorporation of modern slavery compliance provisions in standard contracts (FY22)	The introduction of these contractual provisions have raised awareness of modern slavery issues amongst our contract counterparties. Other impacts of this action remain to be assessed.	Expand the incorporation of these provisions into other non-standard supplier agreements, to the extent relevant and practicable.
Launch of global Whistleblowing Policy (FY22)	The effectiveness of this action remains to be assessed.	Ensure each whistleblower report relating to human rights or modern slavery is promptly escalated and addressed in accordance with the procedures set out in our Whistleblowing Policy.
		Any whistleblower reports that relate to human rights or modern slavery will be reported on in our next modern slavery statement.
Engagement with the International Air Transport Association (IATA) (FY22)	This has made us better informed on the actions that our airline partners are taking to mitigate the risks of human trafficking and forced marriage – risks that are not inherent in our Tier 1 supply chain.	
Launch of revised Code of Conduct (FY23)	The effectiveness of this action remains to be assessed, but we believe it will – together with training – enhance modern slavery awareness and understanding amongst our staff.	

We recognise the challenges with tracking the effectiveness of actions in a modern slavery context in a way that is meaningful. We are committed to making progressive improvements to our risk management approach, continually refining our approach to measuring effectiveness, and providing transparent disclosures regarding our overall progress, including against the actions/KPIs proposed above.

Consultation and approval.

This Statement has been prepared in consultation with each of Webjet's business units and approved by the Risk Committee and the Board of Webjet Limited. The consultation process involved a combination of interactive online workshops, telephone discussions and written correspondence between members of our Modern Slavery Working Group and key stakeholders from our global finance, human resources and supply chain teams.

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John Guscic Managing Director Webjet Limited 19 September 2022

Annexure Compliance with mandatory reporting criteria.

Mandatory reporting criteria	Topic heading	Location
Identify the reporting entity	About this Statement	page 2
Describe the reporting entity's structure,	Our operations	page 3
operations, and supply chains	Our organisational structure	page 5
	Our workforce	page 5
	Our global supply chain	page 5
Describe the risks of modern slavery practices in the operations and supply chains	Modern slavery risks within our operations	page 6
of the reporting entity and any entities it owns or controls	Modern slavery risks within our supply chains	page 7
Describe the actions taken by the reporting entity and any entities it owns or controls	Assessing our modern slavery risks	page 8
to assess and address these risks, including due diligence and remediation processes	Actions to address modern slavery risks	pages 8–9
	Summary of progress	page 10
Describe how the reporting entity assesses the effectiveness of these actions	Assessing effectiveness and looking ahead	pages 11-12
Describe the process of consultation with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity giving the statement)	Consultation and approval	page 13
Provide any other relevant information	Progress since last statement	page 2
	Our values	page 4
	Modern slavery governance and reporting	page 5
	New actions proposed for FY23	pages 11–12



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