



web travel group



Modern Slavery Statement.

2025

Acknowledgment of Country

We acknowledge the existing, ancient and continuing connection the Aboriginal and Torres Strait Islander peoples have to the land, place, waters, skies and community across the Australian continent. We pay our respects to their cultures, country, and elders past, present, and emerging.



Managing Director's Statement.

Welcome to Web Travel Group Limited's FY25 Modern Slavery Statement. FY25 marked the demerger of our business-to-consumer (B2C) division into Webjet Group Limited, enabling Web Travel Group Limited (previously called 'Webjet Limited') to focus on and build WebBeds, our global business-to-business (B2B) travel distribution division.

This is our first Modern Slavery Statement following the demerger.

Some key highlights from FY25 include:

- Engaging an independent consultant to conduct a new modern slavery risk assessment of our post-demerger business. The assessment was comprehensive and included the use of externally developed data and analytics.
- Continuing to include modern slavery as a standing discussion item at regular Risk Committee meetings.
- Collaborating across our global offices via our Modern Slavery Working Group.

Web Travel Group Limited recognises that modern slavery is a complex global issue, and we remain committed to playing our part to raise awareness and protect and respect human rights in every place we operate.

A handwritten signature in dark ink, appearing to read 'John Guscic'.

John Guscic

Managing Director
Web Travel Group Limited

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 Web Travel Group Limited ABN 68 002 013 612 (**Web Travel Group**), which qualifies as a reporting entity under the Act. Web Travel Group is a public company listed on the Australian Securities Exchange (ASX:WEB), headquartered in Melbourne, Australia.

Other than Web Travel Group, no other Web Travel Group controlled subsidiary is a reporting entity for the purposes of the Act. Nevertheless, Web Travel Group is committed to ensuring that our approach to modern slavery is standardised across each of our global office locations.

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 2025 (**Reporting Period**), as well as our plans for future years.

Progress since last statement.

Web Travel Group is committed to continually improving not only our modern slavery risk management processes, but also the quality of our modern slavery reporting.

For our FY25 statement, we have continued to disclose data relating to our global workforce, including gender statistics, and included heat maps for the key locations of our global workforce showing their prevalence and vulnerability to modern slavery based on the Global Slavery Index.

We have also engaged an independent consultant to conduct a new modern slavery risk assessment of our post-demerger business to help us gain an up-to-date understanding of our modern slavery risk profile.



Company FY25 snapshot.

Demerger summary.

Demerger of Webjet Group Limited.

The Demerger of Webjet Group Limited from Web Travel Group Limited was implemented on 30 September 2024.

In September 2024, Webjet Limited shareholders approved the Demerger of **Webjet Group Limited** (ASX:WJL) from **Webjet Limited** (ASX:WEB), along with the change of name of Webjet Limited to **Web Travel Group Limited** (ASX:WEB).

The Demerger created two independent and simplified businesses with increased focus, improving the ability of each business to pursue its own strategic priorities and growth agenda, and adopt capital structures and financial policies appropriate for its own unique characteristics.

The Demerger took effect during FY25.

For comparative purposes FY24 performance has been restated to reflect the WebBeds B2B business only.

Web Travel Group Limited (ASX:WEB)
operates the WebBeds B2B business.



web travel group

WebBeds

Webjet Group Limited (ASX:WJL)
operates the B2C businesses Webjet OTA,
Cars & Motorhomes (formerly GoSee) and Trip Ninja.



WebBeds performance.

TTV up 22%.

Driven by strong growth in all regions.

BOOKINGS

8.4

million

⬆️ **20%** on FY24

TTV

\$4.9

billion

⬆️ **22%** on FY24

REVENUE

\$328.4

million

⬆️ **1%** on FY24

EBITDA

\$138.8

million

⬆️ **14%** on FY24

The WebBeds Global Marketplace business in FY25.



1.9k+
WebBeds
People

across



50+
Countries

servicing



50k+
Travel
Buyers

in



140+
Source
Markets

buying our



500k+
Hotels

in more than



190+
Destination
Countries

Group performance.

Strong cash position post Demerger.

Group performance reflects the WebBeds business and Corporate function.

Underlying
EBITDA

\$120.6m

Underlying
NPAT

\$79.2m

31-MAR-25
CASH

\$363.6m



Our culture, our people, our values.

Our successes and growth have been made possible by our culture, embodied in each of our people, which is underpinned by these 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.



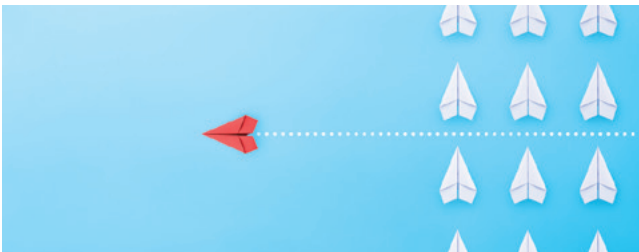
Integrity.

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.



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.



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.

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.



Ensuring we remain true to our values will be a key driver for delivering on future successes.

Our organisational structure.

As a global online travel business, we are proud to operate a geographically diverse workforce. As at 31 March 2025, Web Travel Group had 42 subsidiaries located in various countries around the world, including Australia, United Arab Emirates, Spain, UK, US, Philippines, Romania and Singapore. A full list of Web Travel Group's subsidiaries is set out in Annexure 2.

Web Travel Group's governance framework encompasses both centralised policies that apply to Web Travel Group and its subsidiaries, as well as localised policies, procedures and guidelines that are tailored to meet country-specific requirements.

Our workforce.

As at 8 September 2025, our global workforce comprised **1,937 people** from **49 different countries**, of which 1,844 people were directly employed or engaged by us. Our indirect workforce is engaged through reputable third-party agencies or professional services firms.

Workforce breakdown by country

Country	% of total	Modern Slavery Prevalence	Modern Slavery Vulnerability
Philippines	28%	7.8	66
Romania	17%	7.5	26
Spain	12%	2.3	10
UAE	7%	13.4	40
Indonesia	6%	6.7	49
Egypt	5%	4.3	59
UK	4%	1.8	14
USA	3%	3.3	25
India	2%	8	56
Australia	2%	1.6	7
China	2%	4	46
Other	12%		



(1) **Prevalence:** estimated proportion of population living in modern slavery per thousand people, according to Global Slavery Index published by www.walkfree.org.

(2) **Vulnerability:** vulnerability to modern slavery, out of 100, according to Global Slavery Index published by www.walkfree.org. A higher score reflects greater vulnerability.

Workforce breakdown by gender

All employees	
Total	1,937
Female	55%
Male	45%

Our global supply chain.

Post-demerger, **our global supply chain** comprises the following:



500,000+
hotels of which approximately
51,000 are directly contracted
and the rest are indirectly
contracted via third-party
wholesalers such as Expedia,
Agoda and Hotelbeds.



Approximately **5,800**
other Tier 1 suppliers globally,
which include affiliate partners,
advertising and marketing services,
software and IT services, insurance,
office expenses, utilities and
professional services.

Modern slavery governance and reporting.

Web Travel Group takes a collaborative approach to modern slavery governance. During the Reporting Period, our Modern Slavery Working Group collaborated with various business functions in implementing our modern slavery action plan.

All Web Travel Group controlled entities are overseen by the Web Travel Group leadership team and have common policies.

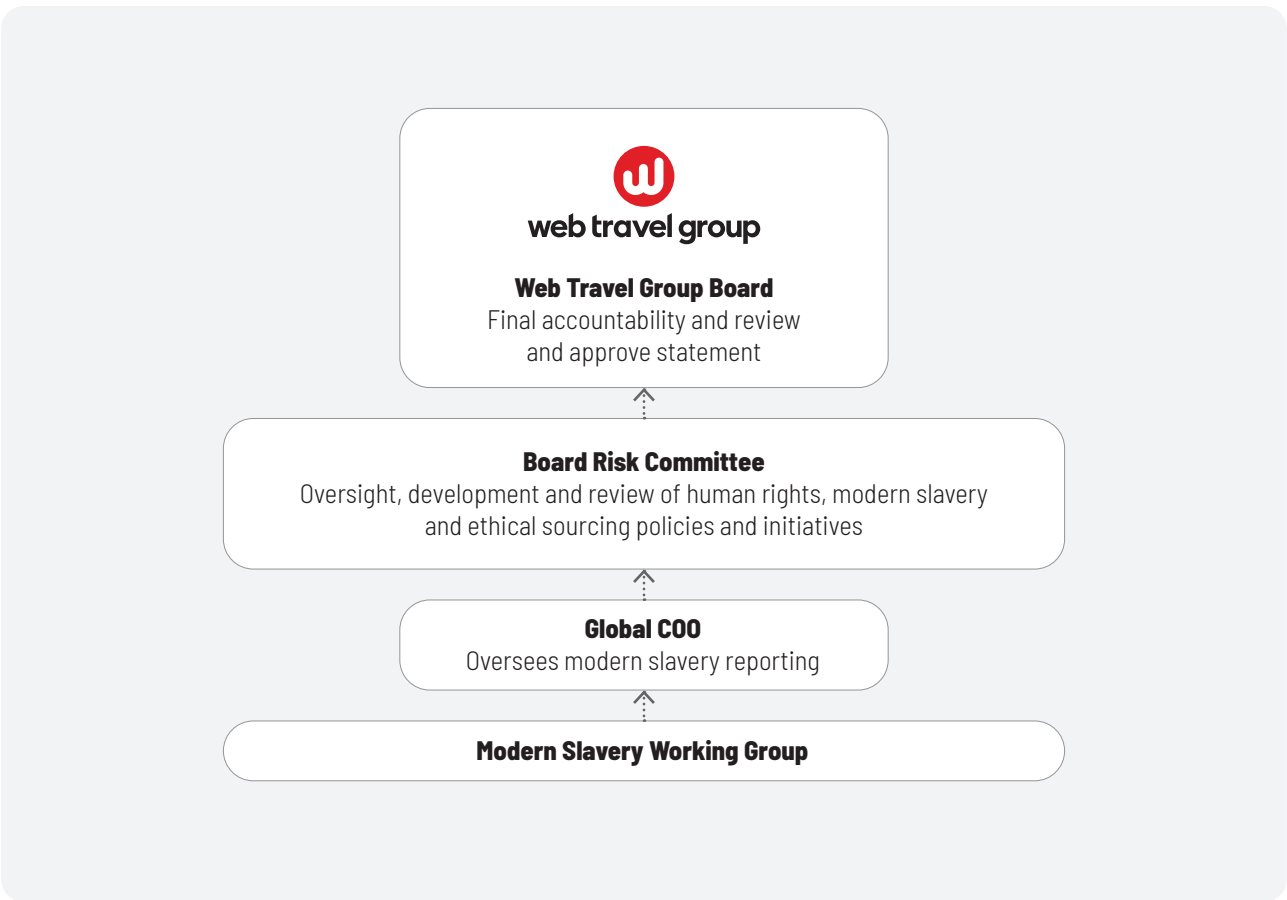
The Global Chief Operating Officer oversees the management of modern slavery risks within our business operations and is responsible for overseeing modern slavery reporting, with input from the Modern Slavery Working Group and relevant finance, human resources and commercial teams across each of our subsidiaries and regions.

The Board's Risk Committee is responsible for the oversight, development and review of human rights, modern slavery and ethical sourcing policies and initiatives, as reflected

in its Committee Charter, while final accountability sits with the Board. The Risk Committee regularly reports to the Board and reviews and recommends to the Board the approval of each year's modern slavery statement. The statement is then reviewed and given final approval by the Web Travel Group Board and where relevant, the board of each subsidiary that is a reporting entity for the relevant reporting period.

In FY24, we incorporated modern slavery as a standing discussion item into all Risk Committee meetings.

Our annual modern slavery statements are available on our corporate website (in addition to the Australian Government's online Modern Slavery Statements Register). Our Global Code of Conduct, Global Whistleblowing Policy and Global Sanctions Policy, which support our modern slavery mitigation program, are also available on our corporate website.



Web Travel Group’s modern slavery risks.

Identifying and assessing risk.

Following the demerger, Web Travel Group engaged an independent consultant to assist with conducting a risk assessment of our operations and supply chain to identify areas which were more at risk of modern slavery practices for the post-demerger business. The risk assessment included the use of externally developed data and analytics and covered all Tier 1 suppliers within our global supply chain.

The 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.

Modern slavery risks within our operations.

Our assessment of modern slavery risk within our operations is as follows:

Industry risk	Country risk
Low	Moderate to High

WebBeds operates in certain countries with moderate to high inherent modern slavery risk, such as the Philippines, Romania, the UAE and Egypt.

The majority of our workforce are employed or engaged directly, and we have direct visibility of their terms of employment, training, leave entitlements and working conditions. We consider the risk of modern slavery in our direct workforce is low. The main activities of our global workforce include customer operations, sales and marketing, software development, supply chain coordination and professional and office support functions. We have strong policies, labour law compliance procedures, training and accessible employee assistance and grievance avenues available to all employees to mitigate any risk of modern slavery. In countries with high inherent modern slavery risk, such as Egypt, we have also engaged the services of third-party specialists to help us ensure labour compliance.

Reputable third-party agencies and professional services firms are used to engage our indirect workforce.

As a result, we consider that there is, overall, a low risk of Web Travel Group being directly linked to, causing or contributing to modern slavery practices within our own operations.

Web Travel Group's modern slavery risks (continued)

Modern slavery risks within our supply chains.

During the Reporting Period, Web Travel Group worked directly with suppliers from over 160 countries. Based on our modern slavery risk assessment, 115 suppliers have been identified as medium-to-high risk, and 1,383 suppliers have been identified as medium risk. These numbers represent approximately: **0.2%** (medium-to-high risk) and **2.4%** (medium risk) of the total number of our Tier 1 suppliers.

No high-risk suppliers were identified as part of the risk assessment.

Our medium-to-high risk suppliers include hotels and accommodation providers based in Saudi Arabia.

Our medium-risk suppliers include hotel and accommodation providers based predominantly in Saudi Arabia and Turkey.

We also consider it likely that our hotel and accommodation providers engage with one or more of the following suppliers (which are Tier 2 or Tier 3 suppliers of Web Travel Group), 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 result of the above, there are risks of Web Travel Group potentially 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 medium or medium-to-high risk.
• Forced labour • Debt bondage • Deceptive recruiting for labour services • The worst forms of child labour	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 hotels and accommodation providers and the sourcing of raw materials used to make them (such as cotton); and • the outsourced cleaning, catering, security and support services by hotels and accommodation providers.

Our current focus continues to be on raising awareness, identifying and addressing modern slavery risks in our Tier 1 suppliers, which remain our highest priority.

Actions to address modern slavery risks.

Governance and policy.

Our Human Rights Policy, Code of Conduct, Whistleblowing Policy and Sanctions Policy together ensure any modern slavery or human rights issues are appropriately reported and escalated. Our internal reporting processes ensure all whistleblower reports relating to modern slavery or human rights are notified to the Chair of our Modern Slavery Working Group and reported to the Risk Committee. During the Reporting Period, we did not receive any modern slavery or human rights complaints through any of our available grievance reporting channels.

Prior to the demerger, our Modern Slavery Working Group held regular meetings to track progress against the modern slavery action plan. The members of the working group collaborate with other functional divisions and act as an escalation point for any issues identified. The working group also provides input into and oversees the preparation of this Statement. Following the demerger, we are in the process of re-constituting our Modern Slavery Working Group to ensure there is appropriate representation from a range of relevant functional divisions.

As noted above, we have incorporated modern slavery as a standing discussion item into all Risk Committee meetings since FY24. The Risk Committee reports regularly to the Board. Each of the Risk Committee and the Board review and approve this Statement.

Our people.

All Web Travel Group 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.

All our employees have access to grievance avenues both via an independent third-party platform as part of our Global Whistleblowing Policy (which allows issues to be reported anonymously) and via our internal HR grievance processes.

Our suppliers.

As part of the prior independent risk assessment undertaken in FY22, it was identified that all our high-risk suppliers related to our WebBeds business. They comprised hotels and accommodation providers in certain countries with high inherent modern slavery risk. Throughout the course of FY23 and FY24, we attempted further due diligence on these suppliers, with varying degrees of success. Some of these suppliers completed our tailored self-assessment questionnaire to our satisfaction, with no

further actions required. Numerous follow-up attempts were made in respect of other suppliers, who did not respond to our requests to engage on this topic. Hotels which were part of larger global chains declined to participate in our due diligence process on the basis that their parent company had its own policies relating to human rights and published its own modern slavery statements.

Our experience over the past few years highlights the challenges faced by WebBeds (and in turn, by Web Travel Group) in engaging with its supply partners on human rights and modern slavery issues. WebBeds' operating model involves it acting as an 'intermediary' that facilitates the distribution of hotel rooms to hotel partners via an online platform. As such, WebBeds has very limited ability to dictate to any individual hotel the terms and conditions on which their services are to be provided. This is further complicated by the fact that only a small portion of hotels and accommodation providers have a direct contract with us. The rest are indirectly contracted via third-party wholesale affiliates such as Expedia, Agoda, Hotelbeds and others. Some of these third-parties publish their own modern slavery statements as required under applicable law.

Our post-demerger FY25 risk assessment did not identify any high-risk suppliers, but has identified medium and medium-to-high risk suppliers which comprise hotel and accommodation providers based predominantly in Saudi Arabia and Turkey. We intend to undertake further due diligence on these suppliers during FY26.

We continued to request the incorporation of modern slavery compliance provisions into non-standard supplier contracts where possible and appropriate to do so (after having incorporated such provisions into our own standard contracts in FY22). 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 us of any instance of modern slavery occurring within their business or supply chain.

WebBeds had limited ability to negotiate the incorporation of the above provisions into contracts with larger third-party wholesale affiliates or hotel chains, which require contracts to be entered into on the affiliate's or hotel's standard terms and conditions that are enforced across all B2B businesses globally. Many of the larger third-party wholesale affiliates and hotel chains publish their own modern slavery statements as required under applicable law.

Actions to address modern slavery risks (continued)

Training and awareness.

We recognise the importance of promoting and improving modern slavery awareness amongst our people, who are key to identifying and addressing modern slavery within our business operations and across our supply chains.

In FY23, we rolled out a comprehensive modern slavery awareness training program to our global workforce and our Board of Directors. All Board members completed the training in FY23, along with over 96% of our staff throughout FY23 and FY24. The program was very effective at raising awareness and building the internal capacity of our staff and our Board. We subsequently embedded mandatory modern slavery awareness training into the new employee commencement process across most of our major offices globally.

Following the demerger, we are in the process of refreshing our modern slavery training program to ensure it remains relevant to our post-demerger business.

Summary of progress.

Actions proposed in previous statements	Status
Develop a framework to engage at a more granular level (for example by direct consultation) with a selection of our suppliers and business partners.	Ongoing
Prepare an action plan for enhancing supplier awareness of modern slavery issues.	Ongoing
Develop a process for screening new hotel partners as part of due diligence.	Ongoing
Continue to incorporate modern slavery provisions into non-standard supplier agreements.	Ongoing
Prepare a modern slavery action plan for FY25.	On hold due to demerger – a plan will be prepared for FY26
Refresh our modern slavery risk assessment.	Completed
Complete due diligence on the recruitment practices of our third-party labour providers.	To be completed in FY26
Conduct an employee voice survey asking how comfortable employees feel raising grievances and which grievance channels they trust most.	To be completed in FY26

Assessing effectiveness.

Assessing the effectiveness of the actions we take to address modern slavery risks is critical to ensuring that we are taking the right actions, that our actions are having the intended impact and that we are continuously improving our processes.

To ensure we have an effective response to modern slavery, we have established the following foundational components to our modern slavery risk response:

- awareness training for our staff;
- clear grievance reporting mechanisms;
- collaborative internal governance and risk management frameworks;
- clear global policies and guidance; and
- actionable plans to ensure continuous improvement.

As our understanding of our modern slavery risk exposure continues to mature, we are aiming to increase the use of quantitative assessment measures.

Actions undertaken	Assessment of effectiveness
Engage an independent consultant to assist with modern slavery risk identification and assessment.	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 the risk assessment have provided a foundation for further follow-up action with our medium-to-high risk suppliers.
Continue to include modern slavery as a standing discussion item in all Risk Committee meetings.	This action has been effective in ensuring any human rights or modern slavery concerns are appropriately reported and escalated within our organisation. It also provides the Risk Committee with appropriate oversight over human rights and modern slavery issues, which in turn allows the Board to adequately discharge its duties in this regard.
Continue to incorporate modern slavery provisions into non-standard supplier agreements.	Where possible, we have endeavoured to incorporate modern slavery provisions into new supplier agreements entered into during FY25. Some suppliers have questioned the need for such provisions, which provided us with the opportunity to have a conversation about modern slavery issues. We consider this action to have been effective in raising modern slavery awareness amongst our suppliers.

We recognise the challenges of 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.

Consultation with controlled entities.

Under the Act, Web Travel Group is required to consult with its owned and controlled entities.

The directors of Web Travel Group received modern slavery awareness training and information about Web Travel Group's obligations under the Act. Our Modern Slavery Working Group includes representation across our functional divisions from different offices globally. Web Travel Group's owned and controlled entities (who are not reporting entities) also play a critical role in our modern slavery risk assessments and initiatives, and in the preparation of this Statement. Our controlled entities have been instrumental in assisting with our modern slavery risk mitigation uplift efforts and providing key input into this Statement.

This Statement has been prepared in consultation with key stakeholders across the business and approved by the Risk Committee and the Board of Web Travel Group 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.

Annexure 1

Compliance with mandatory reporting criteria.

Mandatory reporting criteria	Topic heading	Location
Identify the reporting entity	About this Statement	Page 03
Describe the reporting entity's structure, operations, and supply chains	Our operations	Page 04
	Our organisational structure	Page 07
	Our workforce	Page 07
	Our global supply chain	Page 08
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls	Modern slavery risks within our operations	Page 10
	Modern slavery risks within our supply chains	Page 11
Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes	Identifying and assessing risk	Page 10
	Actions to address modern slavery risks	Page 12
	Summary of progress	Page 14
Describe how the reporting entity assesses the effectiveness of these actions	Assessing effectiveness	Page 15
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 with controlled entities	Page 16
Provide any other relevant information	Progress since last statement	Page 03
	Our culture, our people, our values	Page 06
	Modern slavery governance and reporting	Page 09

Annexure 2

List of subsidiaries.

The Group's subsidiaries as at 31 March 2025 are set out below. Unless otherwise stated, they are 100% owned, have share capital consisting solely of ordinary shares that are held directly by the Group, and the proportion of ownership interests held equals the voting rights held by the Group.

Australia

- Rez Group Pty Ltd⁽¹⁾
- Web Travel Group Australia Pty Ltd⁽¹⁾

United Arab Emirates

- Destinations of the World DMCC
- Destinations of the World Travel and Tourism LLC
- DOTW KSA Limited⁽²⁾
- DOTW Kuwait Limited⁽²⁾
- Umrah Holidays International FZ-LLC
- WebBeds FZ LLC

United Kingdom

- Fyrkant Ltd
- Sunhotels Ltd
- Totalstay Limited
- WebBeds Group (Holdings) Limited (formerly known as JAC Group (Holdings) Limited)
- WebBeds Limited
- WebBeds UK Services Limited (formerly known as JAC Travel Limited)

Other countries

- Bico Trip Co. Ltd
- Busy Bee SL
- Destinations of the World Holding Establishment
- Destinations of the World Istanbul Sehayat Ve Turizm Anonim Sirketi
- Destinations of the World (Malaysia) Sdn. Bhd
- Destinations of the World Saudi Arabia for Tourism LLC⁽²⁾
- Destinations of the World (Subcontinent) Private Limited
- Destinations of the World (Thailand) Co., Limited⁽²⁾
- Dominica de Turismo (Domitur) SRL
- DOTW Holdings Limited
- DOTW Kuwait for Hotels, Real Estate and Healthcare Centres Reservations WLL⁽²⁾
- JAC Travel Information Consulting (Beijing) Company Limited
- Shanghai Meihao Information Technology Co., Ltd⁽²⁾
- Sunhotels Mundo S.L.U
- Travel Tech SRL
- Umrah Holidays Travel & Tourism
- WebBeds Americas (formerly known as JAC Travel Inc)
- WebBeds APAC Pte Ltd (formerly known as Fit Ruums Pte Ltd)
- WebBeds Egypt for Management Services LLC⁽²⁾
- WebBeds Holding Co Limited
- WebBeds Italy S.R.L
- WebBeds Japan KK (formerly known as Bico T.S. Japan Co Ltd)
- WebBeds LLC
- WebBeds Services HK Limited
- WebBeds Services Inc (formerly known as DOTW Shared Services Inc.)
- WebBeds Services SRL
- WebBeds Travel & Tourism
- Webjet International Limited

(1) Member of the Australian tax-consolidated Group.

(2) The Group does not hold 100% share capital of these entities. However, based on terms of agreements under which these entities were established, the Group receives substantially all of the returns related to their operations and net assets and has the current ability to direct these entities' activities that most significantly affect these returns.

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