



Anti-Bribery and Corruption Policy.

Version 1.0

1 Purpose

- 1.1 Web Travel Group Limited and its subsidiaries (**Web Travel Group**) is committed to conducting business ethically, transparently, and in accordance with applicable laws and regulations.
- 1.2 This Policy outlines Web Travel Group's zero-tolerance approach to bribery and corruption and supports our values of Respect, Integrity, Delivering Value, Agility and Hunger to Win. It ensures compliance with relevant legislation and reinforces our commitment to responsible corporate governance.

2 Scope and Review

- 2.1 This Policy applies globally to all directors, officers, employees and contractors of Web Travel Group, regardless of the individual's length of service or position (**In-Scope Personnel**).
- 2.2 This Policy does not form part of any contract of employment or enterprise agreement.
- 2.3 This Policy will be reviewed and amended from time to time to ensure it is operating effectively.

3 Policy Statement

- 3.1 Web Travel Group has a zero-tolerance approach to bribery and corruption. Such conduct may lead to serious criminal and civil penalties and reputational harm. In-Scope Personnel must act in accordance with this Policy and uphold the highest standards of ethical behaviour.
- 3.2 Web Travel Group requires In-Scope Personnel to act honestly and with integrity, and to safeguard the company's resources for which they are responsible. Web Travel Group is committed to protecting its revenue, expenditure, and assets from any attempt to gain illegal financial or other benefits.
- 3.3 Bribery and corruption include dishonest activity in which In-Scope Personnel acts contrary to the interests of Web Travel Group and abuses their position of trust to achieve personal gain or advantage for themselves or another person or entity.
- 3.4 Bribery may take many forms, including cash, gifts, services, preferential treatment, or personal favours. Even where no tangible benefit is exchanged, the mere intent to improperly influence a decision or outcome may constitute bribery.
- 3.5 In-Scope Personnel must exercise heightened vigilance in high-risk scenarios, including:
 - interactions with government officials;
 - selection and appointment of subcontractors, consultants, or agents; and
 - international business dealings, particularly in jurisdictions with elevated corruption risk.
- 3.6 Examples of corrupt conduct include, but are not limited to:
 - payment or receipt of secret commissions (bribes or gratuities) in money or other forms of value to or from businesses, individuals, or public officials (including agents);
 - release of confidential information for purposes other than legitimate business use, particularly where a financial or non-financial advantage is gained;
 - manipulation of procurement or tendering processes to achieve a predetermined or improper outcome;
 - conflicts of interest where an individual acts in their own interest rather than in the best interests of Web Travel Group;
 - misappropriation of funds, securities, stock, supplies, or other assets, including use of company assets for private purposes;
 - causing financial loss or liability to Web Travel Group through deception or fraudulent conduct;
 - improper handling or reporting of financial records or monetary transactions; and
 - profiting from insider knowledge of Web Travel Group's activities.

4 Roles and Responsibilities

- 4.1 The following roles carry specific responsibilities in relation to the prevention, detection, and management of bribery and corruption risks.

Board and Senior Management

- 4.2 The Board and senior management are responsible for setting the tone at the top and ensuring that:

- an effective bribery and corruption risk management framework is in place;
- bribery and corruption risks are understood and appropriately mitigated;
- oversight is maintained over risk assessments, controls, and compliance activities; and
- reports on bribery and corruption incidents are received and appropriately managed.

Regional and Divisional Leaders

4.3 Regional and divisional leaders must:

- promote a culture of ethical conduct and compliance;
- communicate standards and procedures that deter bribery and corruption;
- ensure internal controls are in place and effective; and
- detect and report suspected breaches.

Talent and Culture

4.4 The Talent and Culture function supports this Policy by:

- implementing screening and selection procedures;
- providing targeted training to relevant personnel;
- administering disciplinary processes; and
- ensuring employment contracts and position descriptions reflect anti-bribery and corruption obligations.

5 Reporting and Whistleblowing

5.1 Suspected breaches must be reported by In-Scope Personnel in accordance with Web Travel Group's Whistleblower Policy.

5.2 Web Travel Group prohibits retaliation against anyone who reports genuine concerns relating to any suspected breaches of this Policy.

6 Investigation

6.1 Web Travel Group treats all instances of suspected bribery or corruption as serious matters. Allegations will be thoroughly investigated and treated confidentially in accordance with internal procedures and applicable laws.

6.2 The General Counsel, Chief Operating Officer, Internal Audit Director and Chief People Officer are responsible for:

- investigating bribery and corruption matters, including escalation to regulators or law enforcement where necessary; and
- ensuring risks and incidents are appropriately managed and reported to the Board and/or the Board's Risk Committee as appropriate.

6.3 Specialist advisers may be engaged to conduct independent investigations as and when necessary.

6.4 In the event of an investigation, the persons identified in sections 6.2 and 6.3 of this Policy have unrestricted access to all relevant records, systems, and premises of Web Travel Group for the purposes of conducting the investigation and are authorised to examine, copy, and remove any information within the scope of the investigation.

7 Breaches and Consequences

7.1 Any confirmed instance of bribery or corruption will be treated as a material breach of this Policy and will be reported to the Board.

7.2 Breaches of this Policy may result in:

- disciplinary action, including termination;
- civil or criminal liability under applicable Australian or foreign laws; and
- reporting to regulatory authorities (e.g. local companies regulator or local police).



Level 12, 440 Collins Street • Melbourne, Victoria 3000 • Australia
www.webtravelgroup.com • ABN 68 002 013 612