

# Sustainability Report.

2025



# Sustainability Report. 2025

This report reflects Web Travel Group Limited's (**Web Travel Group** or **Company**) (formerly Webjet Limited) management and performance on key environmental, social and governance (**ESG**) topics identified as material to the business and our stakeholders for the **FY25** reporting period (1 April 2024 to 31 March 2025). For a more complete understanding of the business context, we recommend this report be read in conjunction with Web Travel Group's 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.webtravelgroup.com**).

In September 2024, the Company's B2C businesses (Webjet OTA, Cars & Motorhomes (formerly GoSee) and Trip Ninja) were demerged and are now part of Webjet Group Limited. This Sustainability Report relates only to the Company's ongoing businesses, namely the WebBeds B2B business. Following the demerger, the Company changed its name from Webjet Limited to Web Travel Group Limited. Data included in this report has been rebased to the FY25 year to reflect the changed profile of the Company. Where relevant and comparable, prior trend data has been referenced in the reporting text.

This Report has been prepared in reference to Global Reporting Initiative (**GRI**) reporting Standards, the Sustainability Accounting Standards Board (**SASB**),

and the Australian Sustainability Reporting Standards (ASRS). All disclosures in this Report have been reviewed and approved by the Executive Leadership Team and the Board as appropriate. Carbon emissions data preparation was externally supported.

For further information or feedback on any aspect of this report, please contact Carolyn Mole, Investor Relations.

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# Managing Director's Message.

FY25 was a historical year for the Company. Since the demerger of the B2C businesses in September 2024, Web Travel Group is now solely focused on driving profitable growth in the WebBeds B2B business.

As set out in the Company's FY25 Annual Report, WebBeds again saw significant TTV growth during the year, up 22% on last year, continuing on its path as one of the fastest growing travel companies in the world. The first half of the year was challenging as a confluence of factors impacted TTV margins all at the same time. Despite these challenges, post demerger the business is repurposed and reinvigorated and we are confident we will continue our TTV growth trajectory and deliver significant earnings growth to FY30.

In a challenging year, staff engagement remained strong and above peer average, a testament to the ongoing attention to engagement across the business. We also saw our commitment to the 40:40 vision reflected in the percentage of women on our Board and management team.

We continued to invest in our customers and partners, launching a Customer Self-Service Portal in APAC, MEA and Europe, and establishing a new global Operational Account Management function to better support engagement with customers, suppliers and commercial teams.

As a Group 1 entity, Web Travel Group will release its first mandatory climate reporting as part of FY26 annual financial reporting. In preparation, this year we refreshed our emissions baseline to reflect the post-demerger entity and are developing an emissions reduction pathway to inform target setting. This Sustainability Report includes the new baseline and an ASRS aligned climate section as a dry run ahead of our first mandatory report next year.

We also remain focused on ensuring responsible governance and prioritising the security of our websites, booking platforms and financial and data management systems.

We remain committed to creating sustainable earnings and capital growth for our shareholders and supporting our stakeholders including employees, suppliers, customers and communities that we serve. We thank all our stakeholders for their ongoing support as we continue on our sustainability journey.

John Guscic

Managing Director, Web Travel Group Limited

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### FY25 Sustainability highlights.



# Engaging our People

- High employee engagement at 78%
- 40% women on the Board
- 51% women in senior management
- 51% women managers
- More than 70 nationalities across our workforce
- Zero lost time injuries



## Servicing our Customers

- 5.6 million customer service interactions
- Launched a Customer Self-Service Portal in APAC, MEA and Europe
- Established new global Operational Account Management function to better support engagement with customers, suppliers and commercial teams
- WebBeds was a Best CX Platform Innovator finalist in the Five9 New Era of CX Awards
- WebBeds was a finalist in the Digital Revolution Awards as a joint award with IT partner Robiguity in Digital Transformation



- Re-baselined carbon footprint post Demerger
- Refreshed climate risks and opportunities assessment post Demerger
- Continued to prepare for introduction of mandatory climate reporting



## Responsible Governance

- **Zero** reportable cyber security incidents
- **Zero** reportable data privacy breaches
- Artificial intelligence policy established
- Maintained PCI-DSS and ISO27001 certification
- No whistleblowing allegations during the year



### 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.



**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

1 20% on FY24

TTV

\$4.9

billion

1 22% on FY24

**REVENUE** 

\$328.4

million

**1**%

**EBITDA** 

\$138.8

million

**↓ 14**% on FY24

The WebBeds Global Marketplace business in FY25.



**WebBeds** 

**People** 

across



**Countries** 

servicing

**Travel Buyers** 

buying our

**Source** Markets



**Hotels** 

500k+ 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 approach to sustainability.

We are committed to creating sustainable earnings and capital growth for our shareholders and to support our stakeholders including employees, suppliers, customers and the communities that we serve. We regularly engage with our stakeholders to understand their perspectives and to determine the material topics that we focus on under our sustainability strategy.

#### **Engaging with our stakeholders**

In developing our material topics, we took account of the expectations of our stakeholders - employees, customers, suppliers, shareholders and the broader community. We engage with key stakeholders in a range of ways:

| Stakeholder     | How we engaged  | Topics we engaged on   |
|-----------------|---|--|
| Employees       | <ul> <li>Town Hall updates and newsletters</li> <li>Staff offsites</li> <li>Annual performance reviews</li> <li>Participation in engagement surveys</li> <li>Health and wellness programs</li> <li>Training on compliance, security, modern slavery and other key issues</li> </ul>   | <ul> <li>Workplace flexibility</li> <li>Health and Wellbeing</li> <li>Security</li> <li>Business performance</li> <li>Remuneration</li> <li>Engagement survey results</li> </ul> |
| Customers       | <ul> <li>Direct engagement through a range of platforms</li> <li>Direct face to face engagement with key wholesale customers</li> <li>Participation at business conferences, events and trade fairs</li> </ul>  | <ul> <li>Support wait times</li> <li>Pre and post travel enquiries</li> <li>Performance</li> <li>Opportunities to strengthen partnership</li> </ul>                              |
| Supply partners | <ul> <li>Direct engagement through a range of platforms</li> <li>Direct face to face engagement with key partners</li> <li>Participation in business conferences, events and trade fairs</li> </ul>   | <ul><li>Performance</li><li>Opportunities to strengthen partnership</li></ul>  |
| Shareholders    | <ul> <li>Half yearly and annual financial result webcasts and investor roadshows</li> <li>Releases through the ASX platform</li> <li>Annual General Meeting</li> <li>Direct engagement with key institutional shareholders and research analysts</li> <li>Participation in investor conferences and media interviews</li> </ul> | <ul> <li>Financial performance</li> <li>Strategy</li> <li>Competitive environment</li> <li>Remuneration</li> <li>Sustainability Reporting</li> <li>Demerger</li> </ul>           |

# Our material sustainability topics.

In FY24, Web Travel Group (as Webjet Limited) undertook an externally supported review which included reviewing global risks, industry trends, a regulatory scan and peer benchmarking. We also engaged with key shareholders and employees to understand their perspective on areas of focus. These steps allowing us to finalise a shortlist of key material topics. In FY25, following the demerger, we reviewed and reconfirmed our existing and emerging ESG focus areas.

### OUR SUSTAINABILITY FRAMEWORK IS CENTRED AROUND FOUR KEY AREAS:









#### Grouped into these four key areas, our key material topics are explained in more detail below

| Area                       | Material Topic   | What this means to Web Travel Group  | Page |
|----------------------------|--|--|------|
| Engaging our<br>People     | Employee<br>Engagement and<br>Development                  | Ensuring our people are engaged in their roles and with the Company's strategy and values. Our performance is highly dependent on our ability to attract and retain talent, particularly key personnel. High turnover and loss of key staff could impact our operating and financial performance.  | 08   |
|                            | Diversity  | We believe embracing diversity enhances work culture and drives business success. We seek to develop a culture and systems that support accessibility and diversity in hiring, promoting and managing our people.  | 10   |
|                            | Employee Health<br>and Wellbeing                           | Ensuring the safety of and supporting the wellbeing of our people. Appropriately managing current and emerging concerns in a timely manner, such as protecting physical health and mental wellbeing in an environment of remote working and its associated challenges.   | 11   |
| Servicing our<br>Customers | Customer<br>Engagement                                     | Our business relies on strong satisfaction and loyalty from our travel buyer customers. Building and maintaining relationships with our key customers ensures we are able to deliver quality products and services that meet their needs.  | 12   |
| Reducing our<br>Impact     | Climate Change<br>Risk and Disclosure                      | Identifying, disclosing, and managing climate-related risks and opportunities that impact our business and our industry partners. This includes collaborating with our supply chain and customers, as well as supporting our partners in making informed decisions that advance sustainable practices within the travel and hospitality sectors.                   | 14   |
| Responsible<br>Governance  | Business Ethics and<br>Corporate Governance                | Building and maintaining an ethical culture of integrity, transparency and accountability at all levels. Having robust policies, systems, leadership, risk management and training in place to prevent misconduct and to enable whistleblowing.  | 17   |
|                            | Cyber Security and<br>Data Privacy                         | Acting to prevent cyber security risks and to protect customer data. This includes the appropriate use of data internally, and the investment and implementation of technology and management systems to support this. The Company complies with a range of legal and regulatory obligations expected from us by bodies such as national data protection agencies. | 20   |
|                            | Responsible Supply<br>Chain Management<br>(Modern Slavery) | Understanding, disclosing and managing sustainability risks in our supply chain, including environmental and social impacts. This includes a focus on mitigating modern slavery risks.   | 23   |

All the material topics listed above are important to Web Travel Group and our stakeholders. Information about how we manage each of these areas is set out in more detail in this Sustainability Report.

# Employee Engagement and Development.



#### Why this is important to us

Our people are our greatest asset. Maintaining a highly engaged workforce is critical to being able to drive innovation, deliver high levels of customer service and deliver on our strategies. We look to provide a great place to work, pay attractive remuneration and other benefits, and invest in our people for the longer term.

#### How we manage this area

Web Travel Group has a People function reporting into the Group Chief Operating Officer. All significant people-related matters are also reported directly to the Group Chief Operating Officer, who is also the Group Whistleblowing Officer.

The Board is regularly updated on key People related information including diversity statistics, employee turnover, engagement scores and whistleblowing reports.

#### What we focus on

#### **Employee engagement**

Web Travel Group is focused on ensuring a motivated, engaged workforce and carries out regular employee satisfaction surveys across all its businesses. Surveys are run using a third-party technology platform and results are shared with staff and changes made to work environments as required.

A key engagement measure is the percentage of employees who agree or strongly agree with the statement "I would recommend Web Travel Group as a great place to work". As engagement is a reflection not only of company specific matters but also broader economic and social factors, we believe it is useful to understand employee engagement on a stand-alone basis, as well as relative to our peers. The third party technology platform used to survey staff has been implemented globally so that we have a consistent reporting format for all areas of the businesses, which ensures we have a deeper level of information on engagement.

We aim for employee engagement to be at or above peer average and to address any areas of concern or opportunity coming out of the survey results.

#### Remuneration and benefits

The Company is committed to paying attractive remuneration and other benefits with senior executive remuneration linked to shareholder outcomes. Most of our employees are highly skilled and engaged under individual contracts aimed at

attracting and retaining high performing talent. We undertake regular reviews of staff performance, pay and benefits, and benchmark remuneration in order to attract, motivate and retain employees across all geographies. In addition to paying competitive salaries, all employees are paid relevant statutory entitlements such as superannuation, pension and leave entitlements. The Company complies with all local labour practices in the countries in which it operates. All employees are entitled to parental leave and each region is responsible for setting its parental and other leave benefits within Company guidelines.

Web Travel Group uses a range of bonus incentives to reward their employees. 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.

Given the tight labour markets and global inflationary pressures, the Company is focused on retaining staff who are critical to the delivery of our strategic objectives. Initiatives include:

- Flexible Work Arrangements offering flexible working hours, the option to work from home, or a hybrid model.
- Providing Career Development Opportunities investing in our employees' growth by offering training programs, workshops, and courses; encouraging promotions from within; and providing clear career paths.
- Creating a Positive Work Culture cultivating a workplace culture that values collaboration, communication, and mutual respect; recognising and celebrating achievements and milestones, both at individual and team levels.
- Focusing on Employee Engagement actively seeking out and acting upon employee feedback.
- Health and Wellness Programs supporting our employees' physical and mental health through wellness programs, and access to counselling services.

#### Investing in our staff

We believe in investing in our 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.

# **Employee Engagement and Development.**

# Engaging our People

#### **FY25 IN REVIEW**

#### **Employee engagement**

 A key engagement measure is the percentage of employees who agree or strongly agree with the Advocacy question "I would recommend Web Travel Group as a great place to work."

| Employee engagement | FY25 | FY25 relative<br>to peer average |
|---------------------|------|----------------------------------|
| Web Travel Group    | 78%  | Above                            |

- FY25 scores reflect the broader Web Travel Group business. These were in line with previous survey results for WebBeds, reflecting a continued focus on staff engagement and learning and development opportunities.
- Employee turnover reduced during the year reflecting our People strategy driving a high performing Employer Value Proposition. Retention rate increased compared to FY24.

#### **Remuneration and benefits**

- Our approach to Executive and Board Remuneration is set out in the **FY25 Remuneration Report**.
- The Company completed market reviews for key roles to ensure retention of key personnel.
- Each region is responsible for implementing its own range
  of benefits designed to attract and retain staff in their
  respective markets. Prominent benefits received during
  the year included volunteer days, seminars, insurance
  enhancements, seasonal conferences, flexible working
  models, family events and more.

#### **Investing in staff**

- The Company continued to roll out Udemy (an online training platform) to provide employees the opportunity to enhance their skills and provided further support on professional certifications after completing skill enhancements on the Udemy platform. The SCALE coaching and leadership program in Manila continues as the foundation to a positive culture of coaching within the customer service centre.
- The Company held a number of hackathon events across the business to brainstorm innovation. Rewards included investment to run presented programs and trips to other WebBeds offices to pioneer their projects.
- Our Job Architecture program and Talent Strategy are aligned to achieve WebBed's FY30 \$10bn TTV target. We are also implementing a robust talent transformation agenda that will continue to drive positive impact on our retention and attrition rates.

#### Material sustainability topic -

### **Diversity.**

### Why this is important to us

We believe 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.

#### How we manage this area

The Board is accountable for ensuring that the Company's workforce is diverse in every sense. This includes attracting and retaining talent that is different in gender, ethnicity, disability, age, thought, education and 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 to ensure equal access (based primarily on merit and regardless of diversity factors) to employment opportunities at work. The Board is regularly updated on diversity statistics including new hires, promotions, resignations and redundancies.

Web Travel Group 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 Board regularly spends time with the senior management team and both the Board and senior management are conscious of setting the tone within the Company and monitoring the drivers that shape the culture and values within the workplace.

#### What we focus on

Our commitment and approach to diversity is set out in our **Diversity Policy** and **Code of Conduct**.

Web Travel Group has a number of policies to promote and ensure equal opportunities for diverse cultures, ages, race, sex and religions. We are proud that we have a diverse workforce as a result of being a global online travel business. The Company employs over 70 different nationalities and people come from a wide range of ages, experience and qualifications.

Web Travel Group has signed up to the 40:40 Vision initiative committing to having women comprise at least 40% of senior management by 2030. This was achieved in FY25 and we are proud of its latitude impact across our organisation.



#### **FY25 IN REVIEW.**

#### **Workforce metrics**

#### **Gender diversity**

| All employees   | FY25  |
|-----------------|-------|
| Total employees | 1,916 |
| Female          | 57%   |
| Male            | 43%   |
|                 |       |

| Board and management  | FY25 |
|---|------|
| Female board members  | 40%  |
| Female senior management<br>Includes direct reports of Managing<br>Director as well as their direct reports | 51%  |
| Female managers<br>(includes all employees with managerial<br>responsibilities)                             | 51%  |

- Post demerger the Board now comprises 40% women following the appointment of Rachel Wiseman during the year.
- The percentage of female senior management and managers reflects the concerted effort to promote women into vacancies and new roles.

#### **Diversity initiatives**

Global initiatives to support the Company's 40:40
 Vision include an ongoing mentoring program first
 launched in March 2023. We are focused on bringing
 more women through the management talent
 pipeline in order to become future leaders within
 the business.

#### **Inclusion initiatives**

 Our teams around the world took time to celebrate a wider range of cultural and other festivals with colleagues. Our employee base comprised over 70 nationalities.

#### Material sustainability topic -

# Employee Health and Wellbeing.

#### Why this is important to us

We believe looking after our employees is an important part of ensuring a motivated and engaged workforce. Not only does this mean ensuring a safe place of work, but also supporting the overall physical and mental wellbeing of our staff.

#### How we manage this area

Web Travel Group has a range of policies in place to ensure a safe place of work including the Code of Conduct, Drug and Alcohol Policy, Employee Assistance Program, Equal Employment Opportunity Policy, Bullying and Harassment Policy, Global Whistleblowing Policy, Occupational Health and Safety Policy. The Board is updated on any key occupational health and safety events.

#### What we focus on

#### Health and safety

Web Travel Group 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, standards and codes of practice. The Company has a strong safety record and has a range of strategies, policies and practices in place to support a safe work environment.

#### Wellbeing

Web Travel Group is also committed to supporting the physical and mental wellbeing of its staff. Regular wellbeing seminars and fitness classes are held across the Company and all employees have access to an Employee Assistance Program which provide employees with paid access to confidential counselling. Each business actively participates in initiatives to support both the physical and mental health of their staff.

#### **Community involvement**

As a global company, we recognise keeping communities front of mind is important to allowing our employees to feel part of, and add value to, their local communities. All our businesses are actively involved in a wide range of community initiatives.



#### **FY25 IN REVIEW.**

#### **Employee Health and Safety**

| Health and safety       | FY25 |
|-------------------------|------|
| Lost time from injuries | 0    |

Web Travel Group continues to have a strong safety record, reflecting the largely office and desk-based work undertaken by our employees.

#### **Employee wellbeing**

- We offer a range of initiatives to support the physical and mental wellbeing of our staff. Regular wellbeing seminars and fitness classes are held across the Company and all employees have access to an Employee Assistance Program which provides them with paid access to confidential counselling.
- Each region has a Wellbeing calendar setting out regular events. Initiatives include mental health awareness weeks and speakers, CPR and First Aid training, as well as various strategies and tools to support wellbeing.

#### **Community involvement**

 During the year our WebBeds employees participated in a wide range of charity and fundraising events chosen by the various businesses.
 These included charity marathons, cleaning up local rivers and station trails, adding sensory play gardens in schools, and a range of volunteer work.

# Customer Engagement.



#### Why this is important to us

WebBeds is a global B2B digital marketplace that connects travel sellers looking to fill rooms with a diverse global network of travel buyers looking to find rooms for their travelling customers. We are focused on engaging with our travel buyer customers to ensure we deliver quality products and services that meets their needs. We actively seek feedback about our business and services to gain insights to drive innovation and continuous improvement.

#### How we manage this area

WebBeds offers 24/7 Customer Service support through phone, online service portal and email channels. We actively seek and encourage feedback from our customers about our business and services at industry events and client and supplier meetings, to ascertain if we are delivering on their expectations and if not, understand how we can improve our service. During FY25, WebBeds Customer Service launched the process of integrating a conversation intelligence platform into our ticketing system, aiming to actively monitor customer satisfaction in every meaningful interaction. The Customer Service team reports to the Global Head of Operations and through to the Group Chief Operating Officer.

#### What we focus on

WebBeds Customer Service teams are distributed globally for optimum support, differentiating service based on complexity, time zones and languages for specific client needs. Our largest customer service centres are located in the Philippines, Romania, and Egypt.

Customer Service standards are tracked through a range of key performance indicators (**KPIs**) including ticket resolution rates, call abandonment rates and agent productivity. Independent Quality Assurance call sampling is conducted monthly, with feedback used for coaching and development purposes. Customer satisfaction is tracked through direct feedback from our customers, through Commercial teams, Operational Account Managers and will soon be collected directly from relevant interactions via the use of a new Al-based platform assessing engagement across the different customer service channels.

# Customer Engagement.

# Servicing our Customers

#### **FY25 IN REVIEW.**

#### **Customer service interactions**

|         | FY25        |
|---------|-------------|
| WebBeds | 5.6 million |

- Interactions were up compared to FY24, in line with increased bookings for the WebBeds business during the year.
- Ticket resolution KPIs were ahead of target levels for both 48 and 72 hours. Average speed to answer dropped and agent productivity increased compared to FY24.

### Customer service initiatives to enhance service levels

- Reorganising Customer Service teams based on complexity of tasks executed
- Transformational and efficiency-driven projects to automate routine tasks allowing agents to focus on delivering enhanced value to clients and partners in critical interactions. Key projects included
  - Upgraded Customer Self-Service Portal now launched for APAC, MEA and Europe customers;
  - First iteration Relocations application to optimise search, reducing handle time and resolution of complex cases;
  - Mass reconfirmations technology to proactively identify occupancy issues and ensure quality customer experience;
  - Global operational reporting dashboards providing actionable insights for continuous improvement initiatives across critical operational areas; and
  - integrating automation and AI technologies to optimise decision-making protocols and mitigate human error.
- Cultivating a culture and mindset centred on proactive issue resolution and problem-solving among our agents, complemented by positive employee experience within WebBeds. Employee experience includes extensive communication and regular engagement activities, a reward and recognition program to incentivise productivity and uphold quality standards, and continuous review and enhancement of employee benefits.

#### **Customer engagement and satisfaction**

- New global Operational Account Management (OAM) function with dedicated Operational Account Managers to support engagement with customers, suppliers and commercial teams.
- Regular opportunities to discuss performance with clients, as well as strengthen partnerships including:
- Regular calls with top clients and the relevant Operational Account Manager
- -Client visits by Commercial teams
- Representation and participation in tourism trade fairs: Arabian Travel Market in Dubai, WTM Europe, ITB Berlin, WTM LATAM, FITur Madrid
- -Specific reporting and tracking on custom SLAs for key clients
- Co-design and testing of new customer service tools, such as Customer Service Centre Portal
- Indirect engagement with Commercial teams to capture feedback and insights from both partners and clients
- Partnered with an external provider to deliver an Al-driven conversation intelligence platform, designed to enhance customer satisfaction monitoring through comprehensive analysis of customer interactions.

#### **Awards**

- WebBeds was a Best CX Platform Innovator finalist in the Five9 New Era of CX Awards. This category honours organizations that have taken the Five9 Intelligent CX Platform to new heights, seamlessly integrating tools and partner solutions to deliver flexible, responsive, and highly efficient customer service.
- WebBeds was a finalist for the main award for Digital Transformation Project of the year at the Microsoft sponsored UK Digital Revolution Awards 2025, for digitalisation initiatives across Customer Service in collaboration with partner Robiguity.

# Climate Change Risk and Disclosure.



#### Why this is important to us

Web Travel Group recognises the increasing risks associated with a changing climate, including to the travel industry, and believe all organisations have a role to play in helping transition to a low carbon economy.

#### How we manage this area

The Board is focused on this area and discusses the impact a changing climate could have on our business and its implications for our strategy. The Company is committed to reducing its emissions and meeting investor and regulatory climate disclosure expectations. The Board's Risk Committee has specific oversight of these targets.

#### What we focus on

#### Carbon emission measurement and reduction

In FY22, Webjet Limited began a process to assess carbon impact with a view to creating an emissions baseline from which to build a reduction pathway. This involved measuring, auditing, reducing where practical and subsequently offsetting carbon emissions. In FY24, to begin to prepare for the introduction of mandatory reporting, Webjet Limited reviewed its approach against ASRS reporting requirements and began to work to close gaps. In FY25, as part of demerging, Webjet Limited, now Web Travel Group, re-baselined its carbon footprint and took a decision to cease investing in operational carbon offsetting so that we could redirect our investment to development of an emissions reduction plan and a focus on absolute reductions.

#### Alignment with global climate disclosure standards

In FY24 Webjet Limited commenced aligning with the Task Force on Climate-related Financial Disclosures (TCFD) recommendations. The TCFD is the global standard for communicating climate-related risks and opportunities exposure and management approach to investors and other stakeholders. During FY25 Webjet Limited, now Web Travel Group, transitioned from reporting under the TCFD standard to the incoming Australian climate reporting regime (ASRS AASB S2). As a Group 1 entity, Web Travel Group will release its first mandatory climate reporting as part of FY26 annual financial reporting. We will also continue to monitor developments at the global level as international standards (ISSB) are introduced.

### Phased approach to meeting the new climate related financial disclosure regime

Web Travel Group has completed Phase 1 and we are now focused on Phase 2.

| Phase 1   | Phase 2  | Phase 3   |
|---|--|---|
| Establish baseline carbon footprint and identify high-level climate-related physical and transition risk opportunities. | Undertake more detailed climate risk assessment aligned to scenarios, design adaptation plans, integrate with existing enterprise-level risk management approach and governance. | Translate material physical and transition risks into forecasted financial impact. Include in annual financial reporting. |

# Climate Change Risk and Disclosure.



#### **FY25 IN REVIEW.**

In FY24 Webjet Limited undertook a first pass climate risk and opportunities assessment (summarised below). In FY25, as Web Travel Group, we refreshed this assessment considering the demerger and are continuing preparations for the new Australian Sustainability Reporting Standards (ASRS).

| Risks                                 | Web Travel Group lens  | Time horizon                   | Management response   |
|---------------------------------------|--|--------------------------------|---|
| Physical                              | The most likely physical risks to impact the Company include natural disaster impacts to tourism infrastructure, extreme weather events impacting operations, longer term changes to weather impacting tourism destinations and increase in infectious disease epidemics.  | Short, medium<br>and long term | As a global company Web Travel Group is well prepared to respond in the event of natural disasters andlonger-term weather change. This includes having in place force majeure procedures to support impacted customers and being geared to be able to quickly pivot marketing and operations to non-impacted regions.   |
| Transition                            | The most likely transition risks to impact the Company are market and reputational risks. Market risks include peers moving to better cater to the sustainable travel needs of customers, for example demand for sustainably certified hotels. Reputational risks are centred on continuing to meet stakeholder and market expectations of conduct, especially in relation to ESG. | Short, medium<br>and long term | The Company is monitoring peer activity and customer interest in sustainable options e.g. eco-certified hotels. Web Travel Group has the appetite, capital and technology to be able to adapt and pivot to new consumer requirements.  Web Travel Group is preparing for compliance with the new Australian Sustainability Reporting Standards (ASRS) as required by its listed market (Australia). |
|                                       |  |                                |   |
| Opportunities                         | Web Travel Group focus   |                                |   |
| Operational                           | Web Travel Group is already taking advantage of digitalisation and cloud technologies. An additional area of exploration is renewable energy procurement.  |                                |   |
| Products and services                 | Similar to peers, Web Travel Group is implementing hotel sustainability certification display for customers in the WebBeds business. The company has the appetite and capability to quickly implement additional green products and services if customer demand increases.   |                                |   |
| Industry initiatives and partnerships | The Company is monitoring for opportunities to engage on climate through industry channels.  |                                |   |

### **Climate Change Risk** and Disclosure.



#### FY25 IN REVIEW. (CONTINUED)

#### **Carbon emissions performance**

| Scopes                           | FY25    |
|----------------------------------|---------|
| Scope 1                          | 227.22  |
| Scope 2 (Location-based)         | 828.20  |
| Scope 2 (Market-based)           | 939.74  |
| Scope 3 (Location-based)         | 648,466 |
| Scope 3 (Market-based)           | 648,559 |
| Total Emissions (Location-based) | 649,521 |
| Total Emissions (Market-based)   | 649,726 |

- In September 2024, Webjet Limited underwent a demerger, resulting in the formation of Webjet Group Limited to manage its former B2C businesses, leaving Webjet Limited operating the WebBeds B2B business only. As a result a new emissions baseline for Webjet Limited (now Web Travel Group) has been established in FY25.
- Reporting year is 1st Apr 2024- 31st Mar 2025. Actual data was provided for half year (1st Apr 2024-30th Sep 2024) and then an uplift factor applied to project the full year emissions.
- Emissions calculated in this report have been assessed in line with the Greenhouse Gas Protocol Standard and Greenhouse Gas Scope 3 Standard methodology and prepared in line with the operational control consolidation approach.
- · Emission sources from all properties owned and leased by Web Travel Group have been included in the footprint's boundary which includes all 25 facilities leased globally.
- · Both Location-based and Market-based emissions were calculated for Scope 2 and Scope 3 Category 3 emissions for completeness.
- · Category 11: Use of Sold Products contributed 94% of emissions, followed by Category 1: Purchased Goods and Services and Category 2: Capital Goods, contributing 2.5% and 2.1%, respectively. These figures have used the Market-based approach.
- · Activity or spend data was used for the footprint calculation, where a data gap existed, an estimation was made to fill the gap.
- Scope 1 & 2 for fuel and electricity were calculated based on the actual consumption and Scope 1 refrigerants emissions were estimated based on the m2 area of sites.
- Scope 3 Categories 1, 2, 4, & 6 emissions were calculated based on
- Scope 3 Category 3 emissions were calculated based on the actual fuel and electricity consumption.
- Scope 3 Category 7 emissions were calculated based on the number of full-time equivalent (FTE) employees, the expected proportion of employees working from home, and the number of days per week working from office. The average distance for commute and modes of transport were sourced from standard industry information.
- Scope 3 Category 11 emissions were calculated per night stays in different star rated sold accommodation and per spend for sold land transport.

Data preparation was externally supported, and the Company will commence external assurance next year in line with ASRS requirements.

#### Location and market-based definitions

Location-based emissions use average emission factors for the geographic location where energy is consumed, while market-based emissions reflect a company's specific energy choices and contracts, including renewable energy purchases. Both are included for completeness in Web Travel Group's reporting, and to reflect the Company's purchase of renewable energy in Malaysia.

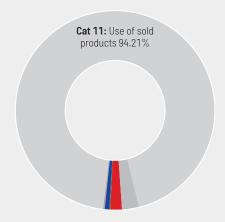
#### Breakdown of the Scopes

**Scope 1 emissions** – consist of emissions relating to mobile fuel (petrol) combustion in fleet vehicles and fugitive emissions from air conditioning within Web Travel Group properties.

Scope 2 emissions — include all electricity purchased for Web Travel Group operational locations.

**Scope 3 emissions** — are emissions associated with Web Travel Group's upstream and downstream business activities. These include indirect emissions sources such as purchased goods and services, employee commute and waste generated.

#### Breakdown of Web Travel Group's Scope 3 emissions



- Cat 1: Purchased goods and services 2.55%
- Cat 2: Capital goods
- Oat 3: Fuel- and energyrelated emissions (Market-based) 0.02%
- Cat 4: Upstream transportation and distribution 0.003%
- Cat 5: Waste generated in operations 0.05%
- Cat 6: Business travel 0.74%
- Cat 7: Employee commuting

# Climate Change Risk and Disclosure.



#### **FY25 IN REVIEW.** (CONTINUED)

#### **Ongoing Initiatives to reduce emissions**

We continue to look for ways to reduce our emissions including:

#### **Energy:**

- 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
- Reviewing physical offices and looking for opportunities to rationalise the Company's footprint
- Engaging with landlords and energy providers to find pathways to increase access to direct supplies of renewable energy

#### Water:

- Installation of low flow water fixtures
- Use of water efficient appliances

#### Waste:

- Reducing paper usage and encouraging recycling
- Moving towards being paper lite
- Responsible disposal of old computers and cell phones

#### FY26 focus

Building on prior work, we will continue to prepare for the introduction of mandatory climate reporting. The key activity will be completing a second pass climate risk assessment specifically for Web Travel Group and undertaking a mitigation modelling and decarbonisation planning process.

# Business Ethics and Corporate Governance.



#### Why this is important to us

Web Travel Group is committed to maintaining ethical standards in the conduct of its business activities and strongly believes its reputation as a responsible and ethical business organisation is important to its ongoing success. We also believe an organisation's culture is critically important and 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.

#### How we manage this area

The Board has overall responsibility for the corporate governance of the Company and has established three standing committees (Audit, Risk, and Remuneration and Nomination) to assist in discharging its responsibilities.

The Risk Committee is responsible for overseeing the development and reviewing the effectiveness of the Group's sustainability framework to ensure it is consistent with the Group's business strategy and objectives, supports the Group's values, and addresses material sustainability risks facing the Group.

The Risk Committee currently has oversight of ESG disclosure. When the mandatory climate reporting regime comes into force from FY26, oversight of reportable ESG disclosures will move to the Audit Committee, including responding to the emerging mandatory climate-related reporting regime.

An overview of the Company's ESG governance is set out below:

#### Web Travel Group Board



The Board and senior management team are also conscious of setting the tone within the Company and monitoring the drivers that shape the culture and values within the workplace. The Board is regularly updated on whistleblowing allegations.

# Business Ethics and Corporate Governance.



#### What we focus on

Web Travel Group has a wide range of internal and external standards, regulations, strategies and policies that help guide our ESG approach, manage ESG risks and drive ESG performance:

#### Sustainability governance

| Guiding our approach   | Managing risks   | Driving action   |
|--|--|--|
| Internal   |  |  |
| <ul> <li>Corporate Governance Statement</li> <li>Code of Conduct</li> <li>Anti-fraud and Corruption Policy</li> <li>Occupational Health and Safety Policy</li> <li>Equal Employment Opportunity, Bullying and Harassment Policy</li> <li>Diversity Policy</li> <li>Human Rights Policy</li> <li>Market Disclosure and Communications Policy</li> <li>Customer satisfaction surveys</li> <li>People survey/engagement check-in</li> </ul> | <ul> <li>Data privacy and cybersecurity policies</li> <li>Artificial Intelligence Policy</li> <li>Global Whistleblowing Policy</li> <li>Independent audit and assurance (financial and security e.g. Sekuro)</li> <li>Employee Assistance Program</li> <li>Whispli (anonymous whistleblower reporting tool)</li> </ul> | <ul> <li>Sustainability Framework</li> <li>Gender diversity target<br/>(40% women in senior<br/>management by 2040)</li> <li>Employee value<br/>proposition</li> <li>Hybrid working enabled<br/>globally</li> <li>Parental leave policies</li> </ul> |
| External   |  |  |
| <ul> <li>ASX Corporate Governance Principles and Recommendations</li> <li>Payment Card Industry Data Security Standard (PCI-DDS v4)</li> <li>Global Reporting Initiative (GRI)</li> <li>Sustainability Accounting Standards Board (SASB)</li> </ul>  | <ul> <li>ISO 27001:2022 (information security) certification</li> <li>Australian Sustainability         Reporting Standards (ASRS)</li> <li>Modern Slavery Act</li> <li>Privacy Act</li> </ul>   | <ul><li>40:40 Vision</li><li>Modern Slavery Statement</li></ul>  |

### Strategy and performance reporting through annual reporting suite

Post demerger we are reestablishing our cross-functional Sustainability Committee with representatives from across the Company including Finance, Risk, Marketing and Operations to participate in driving our sustainability work forward.

#### **Business ethics**

Web Travel Group 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. Key policies include the **Code of Conduct**, **Whistleblowing Policy** and supporting policies the Company has adopted which commit it to meeting its responsibilities in areas where ethical and legal issues arise including policies covering Anti-fraud and Corruption, Internet, Email and

Further details of the Board's corporate governance framework and practices are set out in the **FY25 Corporate Governance Statement** including Board skills/experience matrix and approach to Board renewal.

Social Media, Equal Employment Opportunity, Bullying and

Harassment, and Occupational Health and Safety.

### **Business Ethics and Corporate Governance.**



#### **FY25 IN REVIEW.**

#### **Governance**

#### Governance

- Board and Board committee reviews were undertaken in respect of the year.
- Introduced a new Artificial Intelligence Policy outlining appropriate usage and restrictions.

#### Whistleblowing allegations

• The Company had no whistleblowing allegations during the year.

#### **Mandatory training**

• All employees receive general cyber awareness training as part of the onboarding process, and are required to complete this annually, which includes data privacy training.

# Cyber Security and Data Privacy.



#### Why this is important to us

As a digital travel company, Web Travel Group prioritises the security of its business applications including our point-of-sale sites, booking platforms, and financial and data management systems. We are committed to ensuring the protection of data we collect, transmit and store, and strive to maintain a best practice governance program to mitigate the risk of a cyber-attack. Maintaining best practice governance when it comes to data privacy and cyber security is key to preventing security or data breaches which have the potential to impact the satisfaction and confidence of our clients and partners, as well as the operational and financial performance of the Company.

#### How we manage this area

We have implemented a robust security program that ensures the protection of our people, processes, technology and data. The program is closely aligned with organisational goals and objectives to achieve optimal outcomes. The program is managed by our Chief Information Security Officer (CISO) who sets the security strategy, vision and policies for the Company. This function is also responsible for governing security, compliance and data privacy programs.

The CISO reports directly into the Group Chief Operating Officer. The Board's Risk Committee has oversight of data privacy and cyber security, and both are standing agenda items for Risk Committee meetings. The Board and executive management team provide strong support for our data security program which allows us to swiftly implement any relevant controls, policies and technologies to support the program. Our security program is embedded into our daily business processes and is now a key part of our company culture.

Web Travel Group complies with a range of legal and regulatory obligations within the jurisdictions we operate in.

### What we focus on **Cyber Security.**

#### Governance

Governance is a key component of the security program and used to ensure compliance with the Company's policies and procedures. Regular governance and compliance checks, and monitoring controls help ensure the security program is operating consistently throughout the organisation, meets the Company's key objectives, and meets our regulatory and legal obligations.

#### Managing risk

Our security program allows us to continually identify key threats and monitor the level of known risks related to the Company. Our risk management program allows us to understand critical risk areas, create relevant mitigation plans and ensure governance to allow the Company to operate with an acceptable level of risk. Key risks are identified through regular security testing, scanning, security tools and applications, vendor risk assessments, security by design risk assessments, simulations and audit functions. We also work closely with threat intel groups to understand emerging risks and threats that may impact our organisation and the travel industry.

Our security program encompasses all aspects of the business to ensure associated risks are identified and mitigated effectively.

#### Compliance

Maintaining PCI-DSS compliance is critical to ensure the protection of cardholder data and meeting payment industry requirements. Separately, our ISO 27001:2022 compliance program establishes a broader information security management framework, maintained and regularly governed by the security team. Web Travel Group is audited annually by external auditors to achieve PCI/DSS and ISO 27001:2022 certifications.

We are committed to ensuring we run a robust security program, and work towards improving our maturity levels on a regular basis based on the NIST CSF 2.0 maturity assessment model.

Our data security program encompasses all aspects of the business to ensure associated risks are identified and mitigated effectively.

# Cyber Security and Data Privacy.



#### **Training**

Human risk management is a key component of the security program. We mitigate these risks through regular security awareness updates, annual security awareness training for all staff, targeted training for high-risk employee groups, and through conducting regular phishing simulation tests to highlight key exploit methods to our employees. Training is also provided for anyone who fails a phishing simulation test.

#### Security breaches

Any cyber events would be managed using our incident response plan, which we test periodically. We are focused on ensuring our preparedness to respond to cyber-attacks through incident response simulations, and the introduction of specific playbooks for each business division to respond to different cyber events. Response procedures are updated appropriately to better align to our business processes following these exercises. Rebuild and recovery procedures are in place and tested periodically.

### What we focus on **Data Privacy.**

#### **Policies**

The Company's Privacy policies are available to direct guests and clients, on our commercial booking platforms. Data subjects can exercise their rights to access and control their personal information by following the steps set out in our privacy policies.

We also have various data protection policies in place to support our role as a data controller including Data Protection Agreement (Controller to Processor), Data Protection Agreement+SCCs (C2C), Technical and Organisational Measures. Our data classification policy, data retention and disposal policy outline our commitment to ensuring sensitive data is collected and stored in conjunction with the guiding principles of the General Data Protection Regulation (GDPR) and other relevant data protection regulations.

As new privacy reforms come into effect, we look to ensure we are optimising the way we safeguard our data, continuing to reduce the amount of data we collect and store, be transparent about what we do with the data, and ensure we have the appropriate controls in place to demonstrate compliance with regulatory and legal requirements.

#### Managing risk

Web Travel Group is ISO 27001:2022 certified, which ensures we have implemented an Information Security Management System that supports the security of data we collect, transmit and store. We are committed to protecting our data by reducing any associated risks by:

- complying with the OECD privacy principles to mitigate any associated risks;
- continually improving security and data protection maturity levels using the NIST CSF 2.0 maturity framework;
- executing robust organisational and technical measures
  to ensure the security of our data; using a privacy by design
  approach to ensure data is protected adequately and the
  right provisions are in place in all third-party agreements;
- ensuring our staff are appropriately trained on protecting data; and
- regularly reviewing the data we collect and store, and reducing the risk we carry by removing data sets that are no longer required for legal or operational purposes.

Where relevant, we request third parties we enter into an agreement with to sign our Data Protection Agreement to ensure the appropriate provisions are in place to protect the management of data and data transfers.

Data requests are managed by our Customer Operations Team. All requests are validated to ensure they are legitimate, and legally required processes are followed prior to responding. We conduct legitimate interest assessments that consider interferences with rights and freedoms of individuals. Details of Personal Data held and supporting processes are communicated to data subjects who wish to exercise their data subject rights.

#### Training

All employees receive general cyber awareness training as part of the onboarding process, and are required to complete this annually, which includes data privacy training.

#### **Privacy breaches**

While protection of the privacy and confidentiality of sensitive personal data is vital, a breach of confidential or sensitive personal information can occur. If a data breach were to occur, Web Travel Group will comply fully with its obligations under applicable privacy legislation including, as appropriate, the notification to all impacted parties. The Company has a robust incident response plan to execute in the event of a suspected privacy breach, which is tested annually by independent external auditors.

# Cyber Security and Data Privacy.

# Responsible Governance

#### **FY25 IN REVIEW.**

### **Cyber Security.**

#### **Risk management**

- Further enhanced our Cloud Security posture through the implementation of improved security software across all cloud environments. This is supported by our governance function to ensure identified risks and being mitigated as per our Risk Management Framework.
- Created new role to manage security governance activities
  to ensure the Company is complying with set policies
  and procedures, and highlight key risks that need to be
  mitigated. This role is also responsible for using internal
  and external threat intel to identify key risks to the Company
  and ensure appropriate controls are in place to reduce the
  exposure to risk.
- New Training and Awareness Manager role created to further enhance our security awareness training activities and provide the added focus on mitigating human risk through additional training initiatives.
- The initial stages of the Company's Identity and Access Management (IAM) project was completed to identify key risk areas and develop a new IAM strategy and design to be implemented in FY26.
- Focused on further mitigating supply-chain risk through security reviews of new vendors, suppliers and clients.
- Conducted significant security testing across all environments, including the addition of web application scanning to our vulnerability management program to identify critical risks or vulnerabilities in our environment and mitigate these appropriately. Penetration testing is conducted annually.
- Incident response activities were conducted to ensure preparedness and further enhance the supporting response procedures.
- Security meet-up with key global stakeholders to improve collaboration.
- External maturity assessment conducted against the NIST maturity framework to provide guidance for developing the security strategy.

#### **Certifications**

- ISO 27001:2022 certified. Audited annually by LRQA.
- PCI-DSS v4 certified. Audited annually by an external QSA (qualified security assessor).

#### **Training**

- All employees were mandated to complete the Company's security awareness training program in FY25.
- Targeted training program enhanced to expand the scope of high-risk employee groups and roles.
- Increased security awareness communications to staff to ensure messaging aligned with current threats to Web Travel Group.

#### **Breaches**

• No reportable security breaches

#### **Data Privacy.**

#### **Risk management**

- Enhanced controls around data loss prevention.
- Implemented initiatives to reduce the amount of data we store and time it is stored for and seek to minimise the amount of data we collect. Assessed all new projects, enhancements and new vendors onboarded to ensure the appropriate safeguards, and organisational and technical measures are in place for the protection of data.
- Appropriate safeguards in place to protect cross border transfers of customer data.
- Incident response plan tested by independent external auditor.
- Reviewed and made necessary updates to all data protection agreements.
- Keeping abreast of all privacy reforms across relevant jurisdictions.

#### **Training**

- All new and existing staff received privacy awareness training in FY25
- Privacy awareness communications included in our regular awareness campaigns.
- Training and awareness program updated to include more data privacy content.

#### **Breaches**

• No reportable privacy breaches.

# Responsible Supply Chain Management (Modern Slavery).



#### Why this is important to us

We recognise modern slavery is a growing global issue and are committed to ensuring high standards of governance to minimise modern slavery risks and improve ethical standards within our business and across our supply chains.

#### How we manage this area

During the reporting period, Web Travel Group completed a demerger of its B2C business units (comprising Webjet OTA, Cars & Motorhomes (formerly GoSee) and Trip Ninja). Prior to the implementation of the demerger, each business unit had a representative on our Modern Slavery Working Group and each business unit took part in implementing our modern slavery action plan. Following the demerger, Web Travel Group has been working on restructuring its Modern Slavery Working Group to include key functional representatives from its WebBeds business. Active engagement, consultation and collaboration with our controlled entities is a key component of our modern slavery governance, noting that all controlled entities are overseen by the Web Travel Group leadership team and have common policies.

The President of each WebBeds region 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 the Company's Modern Slavery Working Group and relevant finance, human resources and supply chain teams.

The Board's Risk Committee is tasked with assessing and addressing modern slavery risks, while final accountability sits with the Board. The Risk Committee regularly considers modern slavery risks and reviews and recommends the approval of the annual Modern Slavery Statements to the Board. The Company's Board and the Board of each subsidiary that is a reporting entity under the Modern Slavery Act review and approve this statement.

Our **Code of Conduct**, **Whistleblowing Policy** and **Sanctions Policy** also support our modern slavery mitigation program.

Our annual **Modern Slavery Statements** are available on our investor website (in addition to the online Modern Slavery Register). Our next Modern Slavery Statement is due to be released in September 2025.

#### What we focus on

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. Our modern slavery mitigation program has been in place for four years and we have continued to improve and mature 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.

# Responsible Supply Chain Management (Modern Slavery).



#### **FY25 IN REVIEW.**

Our FY25 Modern Slavery Statement is due to be released in September 2025 and will describe the actions we have taken during the year to manage modern slavery risks in our global operations and supply chains.

Our most recent Modern Slavery Statement (published in September 2024) set out progress made during FY24 including:

- Delivered modern slavery awareness training to an additional 10% of our global workforce (in addition to the 86% who completed it during FY23).
- Embedded modern slavery awareness training into our new starter commencement process.
- Introduced a new Human Rights Policy applicable to all individuals associated with Web Travel Group and its controlled subsidiaries across the globe.
- Incorporated modern slavery as a standing discussion item into regular meetings held by the Risk Committees of both Web Travel Group and (prior to the demerger) our largest business division, WebBeds.
- Collaborated across our business units via our Modern Slavery Working Group.
- Disclosed additional data relating to our global workforce, including gender statistics, and including new heat maps for the key locations of our global workforce showing their prevalence and vulnerability to modern slavery based on the Global Slavery Index.

### **FY25 GRI General Disclosures.**

| Disclosure | Disclosure title (General Disclosures)                                 | FY25 Response  | Page |
|------------|--|--|------|
| 2-1        | Organisational details   | Web Travel Group snapshot  | 4    |
| 2-2        | Entities included in the organisation's sustainability reporting       | Web Travel Group snapshot  | 4    |
| 2-3        | Reporting period, frequency and contact point                          | Inside front cover   | 1    |
| 2-4        | Restatements of information  | No restatements in FY25. Carbon emissions data was re-baselined. | -    |
| 2-5        | External assurance   | No external assurance in FY25                                    | -    |
| 2-6        | Activities, value chain and other business relationships               | Web Travel Group snapshot  | 4    |
| 2-7        | Employees  | Employee engagement and development                              | 8    |
| 2-8        | Workers who are not employees  | Not applicable   | -    |
| 2-9        | Governance structure and composition                                   | Refer to Web Travel Group Corporate Governance<br>Statement      | -    |
| 2-10       | Nomination and selection of the highest governance body                | Refer to Web Travel Group Corporate Governance<br>Statement      | -    |
| 2-11       | Chair of the highest governance body                                   | Refer to Web Travel Group Corporate Governance<br>Statement      | -    |
| 2-12       | Roles of the highest governance body in overseeing managements impacts | Business ethics and corporate governance                         | 17   |
| 2-13       | Delegation of responsibility for managing impacts                      | Business ethics and corporate governance                         | 17   |
| 2-14       | Roles of the highest governance body in sustainability reporting       | Inside front cover   | 1    |
| 2-15       | Conflicts of interest  | Refer to Web Travel Group Corporate Governance<br>Statement      | 1    |
| 2-16       | Communication of critical concerns                                     | Refer to Web Travel Group Corporate Governance<br>Statement      | -    |
| 2-17       | Collective knowledge of the highest governance body                    | Refer to Web Travel Group Corporate Governance<br>Statement      | -    |
| 2-18       | Evaluation of the performance of the highest governance body           | Refer to Web Travel Group Corporate Governance<br>Statement      | -    |
| 2-19       | Remuneration policies  | Refer to Remuneration Report (within Annual Report)              | -    |
| 2-20       | Process to determine remuneration                                      | Refer to Remuneration Report (within Annual Report)              | -    |
| 2-21       | Annual total compensation ratio  | Not reported   | -    |
| 2-22       | Statements of sustainable development strategy                         | Our approach to sustainability                                   | 6    |
| 2-23       | Policy commitments   | Business ethics and corporate governance                         | 17   |
| 2-24       | Embedding policy commitments   | Business ethics and corporate governance                         | 17   |
| 2-25       | Processes to remediate negative impacts                                | Refer to Web Travel Group Corporate Governance<br>Statement      | -    |
| 2-26       | Mechanisms for seeking advice and raising concerns                     | Business ethics and corporate governance                         | 17   |
| 2-27       | Compliances with laws and regulations                                  | Business ethics and corporate governance                         | 17   |
| 2-28       | Membership associations  | Engaging with stakeholders                                       | 6    |
| 2-29       | Approach to stakeholder engagement                                     | Engaging with stakeholders                                       | 6    |
| 2-30       | Collective bargaining agreements                                       | Not applicable   | -    |
|            |  |  |      |

### **Web Travel Group.**

### **SASB Index.**

#### Internet Media and Services Standard (2018)

| SASB Topics   | Accounting Metrics   | FY25 Response  | Page |
|---|--|--|------|
| Environment footprint of hardware infrastructure              | <ul><li>(1) Total energy consumed</li><li>(2) Percentage grid electricity</li><li>(3) Percentage renewable</li></ul>   | Partial.<br>See emissions reporting.                   | 16   |
| Data privacy, advertising standards and freedom of expression | Total amount of monetary losses as a result of legal proceedings associated with user privacy  | Zero   | 20   |
| Data privacy, advertising standards and freedom of expression | <ul><li>(1) Number of law enforcement requests for user information</li><li>(2) Number of users whose information was requested</li><li>(3) Percentage resulting in disclosure</li></ul> | Partial. Zero reportable breaches of customer privacy. | 20   |
| Data security   | <ul><li>(1) Number of data breaches</li><li>(2) Percentage involving personally identifiable information (PII)</li><li>(3) Number of users affected</li></ul>                            | Partial. Zero reportable breaches of customer privacy. | 20   |
| Data security   | Description of approach to identifying and addressing data security risks, including use of third-party cybersecurity standards  | Cybersecurity and data privacy                         | 20   |
| Employee recruitment, inclusion and performance               | Employee engagement as a percentage  | Employee engagement and development                    | 6    |

### Glossary.

| Term                               | Meaning   |
|------------------------------------|---|
| • APAC                             | Asia Pacific  |
| • ASRS                             | Australian Sustainability Reporting Standards                           |
| • B2B                              | Business to Business  |
| • B2C                              | Business to Consumer  |
| • CISO                             | Chief Information Security Officer                                      |
| <ul> <li>Company</li> </ul>        | Web Travel Group Limited  |
| • CX                               | Customer Experience   |
| <ul> <li>Demerger</li> </ul>       | Demerger of Webjet Group from Web Travel Group (see page 4 for details) |
| • EBITDA                           | Earnings before interest tax depreciation and amortisation              |
| • ESG                              | Environmental, Social and Governance                                    |
| • FY24                             | 12 months ending 31 March 2024  |
| • FY25                             | 12 months ending 31 March 2025  |
| • FY26                             | 12 months ending 31 March 2026  |
| • FY30                             | 12 months ending 31 March 2030  |
| • GDPR                             | General Data Protection Regulation                                      |
| • GRI                              | Global Reporting Initiative   |
| • KPI                              | Key Performance Indicator   |
| • MEA                              | Middle East and Africa  |
| • SASB                             | Sustainability Accounting Standards Board                               |
| • TCFD                             | Taskforce on Climate-Related Financial Disclosure                       |
| • TTV                              | Total Transaction Value   |
| • Web Travel Group                 | Web Travel Group Limited (formerly Webjet Limited)                      |
| <ul> <li>Webjet Group</li> </ul>   | Webjet Group Limited  |
| <ul> <li>Webjet Limited</li> </ul> | now known as Web Travel Group post demerger                             |

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