

Corporate Social Responsibility Statement

Webjet Limited ABN 68 002 013 612

Corporate Social Responsibility Statement

Webjet operates a geographically diverse business, with operations in Asia Pacific, Europe, Middle East and the Americas.

In each region in which it operates, Webjet takes its corporate social responsibility (CSR) obligations seriously and has structures and procedures in place to underpin its corporate social responsibilities.

At the core of Webjet's CSR program are three fundamental areas of focus:

- Diversity and inclusion
- Operating responsibly
- Environment and sustainability

In the near future, Webjet expects to add a fourth area of focus for its CSR program – philanthropy.

While each of these areas is an important part of the program, the overall objective of Webjet's CSR program is to help our people be fully effective in the business, make decisions which are informed by our values and key principles and are responsible choices bearing in mind their effect in three specific areas - social, economic and environmental.

DIVERSITY and INCLUSION

Our people are Webjet's number one priority and their future, privileges and rights are central to the way we operate.

Diversity is a key part of Webjet's social obligations. Diversity is understanding that each person brings a distinct life experience to the table. Diversity is not limited to only gender. It includes diversity of race, ethnicity, sexual orientation, disability, religion, age, cultural background, life experience, thought and idea.

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. Having an inclusive environment allows Webjet to fully leverage the contributions of its employees, which enriches Webjet as an organisation and makes it a better place to work.

Webjet's approach to diversity and inclusion involves three key areas:

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| People | Webjet's goal is to attract, develop and retain a workforce that is reflective of the business and communities we support. Webjet seeks to build teams that bring diversity of thought, experience and background to the table at every level. |
| Environment | Webjet's aim is to create an inclusive environment that celebrates differences and encourages unique perspectives. |
| Leadership | A key responsibility of the leaders at Webjet is to maximise workforce engagement to ensure a robust talent pipeline and leadership alignment and engagement. |

Gender diversity

Webjet strives to ensure that all of its policies and procedures work to benefit its people and provide an equal and fair opportunity to succeed.

Webjet is committed to a representation of women throughout its workforce, including at senior management and Board levels, which is reflective of the gender balance across the company.

While a thriving workforce is about more than gender, examining how we are doing with respect to the employment of women in the Webjet workforce is a good place to start:

- Approximately 55% of all global employees are women;
- 30% of the senior management team (globally) are women; and
- 28% of the Board of Directors are women (Webjet is committed to the long-term goal of ensuring at least 25% of the Board and senior management team are women).

Webjet has a range of strategies, policies and practices in place to drive representation of women and minorities in its workforce. The objective is for both sexes (including those with a minority background) to be fairly represented, valued and rewarded in its workforce.

Inclusion

Webjet is committed to the provision of inclusion training and tools to ensure that we are preparing our leaders to foster a diverse and inclusive culture based on merit and on accountability for diversity and inclusion outcomes.

In all that we do, we will continue to strive to create a culture of belonging – where everyone is welcome - so that we can continue to drive innovation and growth through our people and reward them fairly for the work they do.

Recruitment and bias

As part of Webjet's commitment to ensuring diversity across the company and in leadership roles, it also aims to provide a fair and transparent recruitment process based on:

- sourcing, selecting and appointing the best possible candidates for available positions based on merit;
- developing our people wherever possible;
- positively managing candidates and selection processes; and
- ensuring new employees are on-boarded as quickly and as smoothly as possible.

Webjet is also working in its recruitment and selection processes to remove bias from hiring and promotion decisions. It aims to make all roles accessible and transparent to all suitable candidates. Where required, appropriate guidance on recruitment practices is provided by the senior management team, which is in turn further supported by the requirement to have balanced (and diverse) short lists and interview panels.

OPERATING RESPONSIBLY

A high priority for Webjet is a workplace culture and approach to business that reflects Webjet's values and key beliefs.

Corporate culture

Webjet believes the culture of an organisation is critically important. Webjet is committed to creating a workplace where its 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 is treated with respect is a key to business success.

The Webjet Board and senior management team is very conscious of setting the tone within the Company and of monitoring the drivers that shape the culture and values within the Webjet workplace. It is vital that the management team engages with and encourages employee participation; where employees can 'speak up'; where employees may raise concerns and where the Board and management will act to address poor behaviours.

Human rights

The respecting of human rights is not only the right thing to do, but it also aligns Webjet's values and expectations with the communities in which it operates. As a core value, Webjet cares about its people, the communities it is part of and the world in which it operates.

Webjet makes business decisions that work to avoid the creation of circumstances where human rights could be impacted.

Webjet has company-wide policies in place to manage the risk of human rights issues within its business and those of its suppliers and business partners.

At a practical level, Webjet sets appropriate labour conditions in all of its workplaces in line with the relevant national laws and the appropriate conventions. Webjet also actively manages the activities of its workforce and works with its suppliers, including internationally, to identify and manage human rights related risks and opportunities.

Harassment and Discrimination

Webjet values individual differences, experiences and capabilities. Webjet is committed to equal opportunity in all employment decisions. It prohibits any form of harassment or discrimination on the basis of race, colour, sex, sexual orientation, gender identity or expression, creed, religion, age, marital status, national origin, ancestry, pregnancy, medical condition, citizenship, physical or mental disability and/or any other characteristic unrelated to the requirements of the particular employment.

Training and Development

Webjet believes strongly in investing in its people for the long term. It offers employees a range of formal and informal ways in which to learn, develop and grow. Employees are supported and encouraged to undertake personal and professional development as Webjet's future success is dependent in large part on its employees being skilled, motivated and supported in the workplace.

Webjet also actively encourages continuous and self-directed learning and the promotion of knowledge sharing, social collaboration, internal / external mentoring and coaching.

Workplace Flexibility

With operations in many countries around the world, flexibility is critical to Webjet in implementing its business strategy. It is important in attracting and retaining talented employees and in facilitating productivity across the business.

Flexible work options include: flexible work locations and hours, job sharing, informal ad-hoc arrangements, part time work, flexible start and finish times and different types of personal leave. At Webjet, achieving our business objectives is more important than strict formality in the way we conduct our business. Flexibility in our formal and informal working practices also recognises that rigid working patterns may not always suit our customers, our staff or our circumstances. Flexibility also recognises that, to achieve our business objectives, there does need to be a balance between the work and personal commitments of our people.

Flexibility also demands Webjet be more mobile - to use technology in better, simpler and more agile ways to connect with our customers and to serve the needs of our employees. Webjet is constantly striving to achieve that objective with its customers and employees.

Remuneration

Webjet aims to ensure that all its employees are appropriately remunerated and rewarded for their performance. Remuneration should be equitable and sufficiently competitive to attract, motivate and retain the best people. It should also be of a quantum that is fair and reasonable having regard to factors such as the complexity of the Webjet business (especially its geographic spread) and internal pay relativities.

Webjet also seeks to assist its employees by creating a work environment that supports its people and enables them to do their best work. Webjet has an ongoing focus on managing performance both at the individual and team level (which processes equally involve both the employee and the management team leader).

Business ethics and transparency

While workplace culture and diversity are vital to our people, business ethics and transparency are equally important, at a business level, in driving business success for Webjet.

The Webjet approach to business is dependent on consistent application of the highest level of ethics, integrity and transparency in all dealings. It is also founded on full and timely disclosure of all material information concerning its business. It is important that not only shareholders, but all market participants, understand clearly how Webjet operates.

Webjet is committed to compliance with all relevant laws and regulations. Webjet has a zero-tolerance approach to crime and corruption in the conduct of its business. Compliance with the law means both observing the letter and spirit of the law and managing our business such that Webjet is recognised as a good corporate citizen at all times.

Equally important to Webjet are:

- its Code of Conduct for its Board and senior management (refer to https://www.webjetlimited.com/wp-content/uploads/2017/07/Code_of_conduct_17August2016.pdf). It sets out Webjet's expectations regarding the conduct of its employees, both personally and in carrying on Webjet's business; and
- transparency – Webjet must not only comply with all laws (for example, its obligations in relation to financial reporting, taxation, anti-money laundering and anti-corruption), but it must also be seen to have complied and made full disclosure (as required by the respective laws, regulatory authorities and financial markets).

Anti-bribery / anti-corruption

Webjet is committed to conducting its business fairly, honestly and efficiently.

Every representative of Webjet (which includes employees, contractors and consultants) must, regardless of their position or location, comply with all applicable anti-bribery laws. No Webjet representative may offer, give or receive bribes, in any form, to or from any person including government officials, customers or suppliers. Any conduct that creates the perception of bribery must also be avoided. Any breach of this requirement will be treated with utmost seriousness. Equally, no Webjet representative will suffer adverse consequences or be penalised in any way for refusing to pay a bribe, even if doing so may negatively affect Webjet's business.

Webjet is subject to a myriad of Australian and foreign anti-corruption laws (including the US Foreign Corrupt Practices Act) which, among other things, prohibits the payment of bribes to foreign officials to assist in obtaining or retaining business. Webjet is very conscious of these anti-corruption laws, particularly when interacting with public officials (of countries, states and local jurisdictions), including employees of state-owned enterprises, and has a policy of strict adherence with all anti-corruption laws.

Political engagement

Where government or regulatory decisions may significantly affect our business, industry or the communities in which we operate, Webjet may actively involve itself or participate in the political process through engagement with government / regulatory officials and policy-makers. While Webjet is committed to conducting these activities in a manner that is responsible, is in the best interests of its shareholders, employees, and other stakeholders and/or is necessary to facilitate compliance with applicable laws and reporting requirements,

Webjet does not and will not otherwise engage in any lobbying or similar activities and has not made, and does not intend to make in the future, political contributions or donations of any kind.

Webjet also prohibits its directors and employees from using company resources to promote personal political views, causes or candidates. No personal political contributions or expenses will be directly or indirectly reimbursed. Consistent with applicable law, Webjet will not take any adverse employment action against any employee on the basis of his or her personal political affiliation or lawful political activity.

Anti-money laundering, counter-terrorism financing and sanctions laws

Webjet is committed to complying with all applicable anti-money laundering, counter-terrorism financing and sanctions laws and regulations.

While anti-money laundering, anti-terrorist financing and trade sanctions and embargos may restrict Webjet's ability to do business with certain individuals, entities and countries, Webjet is very conscious of these restrictions on its business activities and seeks at all times to conduct its business in compliance with these requirements in each jurisdiction in which it carries on business.

Consumer and competition Law

Consumer laws seek to provide for transparency and fairness in dealings between companies and retail consumers (for example, by insisting on the clear and transparent display of fees and charges and in prohibiting advertising or other conduct which may be misleading and/or deceptive).

Competition laws prohibit certain types of agreements and practices that restrict competition.

Webjet seeks to fully comply with these laws and to market its products and services and transact generally with its customers in a manner which is open, fair, transparent and not misleading or deceptive.

Tax

Webjet is committed to being a responsible corporate taxpayer.

As a business which operates in many countries, tax is an important and increasingly complex issue for Webjet.

Webjet's policies on taxation are set by the Board (with the assistance of the Audit Committee). The policies are consistent with Webjet's global tax obligations and with the Australian Taxation Office (ATO) recommendations for tax risk management and governance. They are subject to regular review.

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

- fully comply with the taxation and reporting laws of each jurisdiction in which Webjet operates;
- full and fair disclosure of all information relevant to its financial affairs and taxation in all jurisdictions in which is required to lodge taxation returns; and
- the payment in a timely manner of all taxes (direct and indirect) which the Webjet Group is legally obliged to pay in each jurisdiction in which it is required to pay tax.

Webjet takes a conservative approach to tax risk. Management of tax risk will always be balanced with Webjet's objective to create and safeguard shareholder value. Where there is a choice between an aggressive tax position and a more conservative position, Webjet will take the more conservative approach.

As Webjet is obliged to act in the best interests of its shareholders, it will seek, as a matter of policy, to legitimately minimise its obligation to pay tax. It will not, however, do so if the means by which that objective is achieved involves Webjet in the use of a contrived, artificial or non-commercial structures or transactions. For example, Webjet will not engage in any activity or conduct where the substantive purpose of the conduct is to avoid taxation or where, if the activity or conduct is undertaken, it is likely to have a material and adverse impact on the reputation and standing of Webjet.

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

To its knowledge, Webjet has lodged all tax returns and paid all taxes which it is legally obliged to pay as at the current date. It is not the subject of a tax audit or review by the tax authorities in any country, nor is it in dispute with any such tax authority. Similarly, it is not aware of any investigation by any tax authority in any country into its tax affairs.

Whistle blowing

Webjet encourages all employees to report any allegations of misconduct by any employee and/or failures by Webjet to honour its obligations, both legal and ethical, or to comply with its values. Its policies provide protection to the whistle blower and confidentiality. Steps are taken regularly, including in the induction of all new employees, to make employees aware of this policy and its importance in maintaining the required standards of corporate and employee behaviour within Webjet.

Information security and privacy

Information, which includes both business and customer information, and intellectual property are critical to Webjet's business and its success. They allow Webjet to connect with its customers, to provide the products and services they require and to drive its business globally. Webjet's information collection, management and storage systems and its intellectual property are vulnerable to unauthorised access and other security risks.

Protecting customer personal information and Webjet's systems and information is crucial. Webjet takes great care to secure its systems and all information from unauthorised use, viruses, data breaches and other risks. It uses very sophisticated software, applications and/or hardware to prevent unauthorised access to its network and databases.

In addition, Webjet actively protects its intellectual property (including its name, brand and logo) and is respectful of the intellectual property rights of third parties.

Personal information

In the course of its ordinary business, Webjet receives personal and confidential information from its customers (for example, full names, street and email addresses, credit card numbers, passport details and travel plans). Receipt of this information is necessary in order for Webjet to carry on its business and provide its products and services to its customers. Webjet is very cognisant that any failure to maintain the privacy of customer information could cause significant damage to its customers and to Webjet's reputation and brand.

Protecting the privacy and confidentiality of our customers' information is fundamental to the way Webjet does business. Webjet is proud of its record in handling confidential personal information. Webjet values the ongoing trust that its customers have in it to protect their privacy.

Webjet takes great care to protect all customer personal information from misuse and loss, which includes protection from unauthorised access, modification and disclosure (regardless of whether the personal information is stored in hardcopy or electronically).

Webjet takes active steps to properly identify customer personal information and to:

- store it only on approved and secure databases;
- maintain physical security (such as locks and security systems);
- transmit and use this information only in accordance with Webjet’s policies and in compliance with all applicable data protection laws;
- encrypt the data where appropriate to do so;
- use information only for the purpose for which it was disclosed;
- provide access to the information only to those persons within Webjet who need access to perform their duties and who are authorised to have such access;
- share only what is required to be shared with any external party; and
- make sure that all organisations and persons who may receive the information understand its confidentiality and have similar protection and security measures in place.

For all information stored electronically (for example, databases), Webjet maintains computer and network security. It uses firewalls (security measures for the internet) and other security measures such as identification codes and passwords to control access to its network and systems. It continually maintains and monitors its online security systems to ensure that they are secure and that customer personal information is appropriately protected when they use Webjet’s platform.

While protection of the privacy and confidentiality of sensitive personal data is vital, security breaches and/or the loss of confidentiality of sensitive personal information can occur. If any such event does occur for any reason, Webjet will comply fully with its obligations under the applicable privacy legislation, including, as appropriate, the notification of all persons affected by the breach. It is also committed to taking such action as appropriate to limit the impact on any customer of a security breach or unauthorised access to that customer’s personal non-public information.

Stakeholder engagement

Webjet engages with a diverse range of stakeholders (being any persons or groups who may be potentially affected by Webjet’s operations or who may have an interest in, or influence on, what Webjet does).

Webjet is committed to making announcements and distributing communications to shareholders in accordance with the Corporations Act and ASX Listing Rules.

Webjet also generally supports the ASX Corporate Governance Council’s Corporate Governance Principles and Recommendations and is committed to effective communication with shareholders.

At a shareholder level, Webjet discloses and/or publishes information regularly about its operations, plans and expectations, whether by disclosure to regulatory agencies or by publication on its website. Webjet also meets regularly with investors, proxy advisers, shareholder associations and other members of the financial community.

Customers

Webjet is fully committed to the delivery to its customers of its products and services in a reliable, efficient, timely and cost-effective manner. Webjet is also committed to the provision of quality service and to continuing engagement with its customers on all issues. Webjet seeks and encourages feedback about its business and services, particularly from customers, including by regularly surveying customers to ascertain if it is delivering on their expectations and, if not, how Webjet can improve its service.

Employees and contractors

Webjet recognises the value of its people and the importance of timely, topical and regular engagement. An informed and engaged workforce is critical to the achievement of Webjet's business strategies and objectives.

Governments and regulators

At local, national and international levels, Webjet relies on a high level of public policy certainty to make the commercial and operational decisions necessary in order to build its business with a minimum of risk. As necessary and where appropriate, Webjet seeks to engage proactively with all governments and regulators.

Investment community

Webjet engages regularly with a wide range of participants in the financial community (including shareholders, investors, financial institutions, equity analysts, environment, social and governance (ESG) analysts and proxy advisers) with regard to its performance, strategy, operations and prospects. It does so in accordance with all corporate and securities laws, in a timely manner and with the aim of achieving a fair valuation of Webjet and its shares in the equity markets.

Webjet has a policy of responding in a timely manner to all shareholder and investor requests (by phone, email and face-to-face discussions).

Media

Print, online, broadcast and social media are a vital part of the world in which Webjet operates. The media plays an important role as a source of information about the travel market generally and about Webjet's operations, plans and future prospects. Webjet engages regularly with print, online, broadcast and social media to ensure information in the public arena about travel and its business is generally known and presents a fair and balanced view of Webjet, its business and future prospects.

Suppliers

Suppliers are important to Webjet's success and reputation. As Webjet requires certainty and consistency in the supply of the products it sells, Webjet engages regularly with its suppliers and, in doing so, the key guidelines for Webjet are:

- fair and ethical decision making and interactions;
- consistent and clear rules of engagement;
- compliance with all relevant laws and regulations;
- appropriate management of conflicts of interest and supply risk;
- communication and documentation of requirements and expectations; and
- successful and sustainable relationships with suppliers.

ENVIRONMENT & SUSTAINABILITY

Webjet accepts that, as part of doing business in both Australia and internationally, its customers, shareholders, employees and the community expect that it will do so in an environmentally responsible manner.

While Webjet's impact on the environment is very limited by reason of it being primarily an on-line business, Webjet approaches its responsibilities to the environment in two major ways.

First, Webjet seeks to create a work environment where sustainability is a central tenet to the way its staff work and to ensure that its employees know, despite Webjet being an on-line business, it is serious in its efforts within its offices to become more energy efficiency and reduce waste.

For example, Webjet is actively working to reduce energy usage by the following initiatives which are being implemented, as apposite, globally:

- the use of sensor lighting in all office locations;
- installation of energy efficient lighting (where possible) in tenancy areas;
- minimising after hours air-conditioning use;
- installation of blinds to minimise cooling and heating costs;
- automatic switch off devices on appliances and equipment when not in use;
- water reduction through low flow water fixtures; and
- the use of water and energy efficient appliances.

Webjet has also taken significant steps to reduce waste by:

- reducing paper usage and encouraging recycling where possible;
- printing information only when necessary and moving towards double-sided copying;
- sourcing and using recycled paper for printed materials when possible;
- the use of electronic files and filing; and
- the appropriate disposal of old computers and cell phones (including by donating to charities for re-use).

Webjet is committed to transparency around its environmental impact and disclosure of that impact.

Second, while the on-line nature of its business (the sale of travel products – predominantly flights and hotels) limits its interaction with the end consumer, Webjet can play a role in educating its customers, and the travelling public in general, on the economic, social and environmental impacts of their travel. In this area, within its B2B business, Webjet does seek, where it is appropriate to do so, to have an impact on the environment through the promotion to its customers of environmentally responsible and sustainable travel.

PHILANTHROPY

Philanthropy is not a material part of Webjet's CSR program at this time. However, Webjet expects to increase its focus and commitment to philanthropy in coming years through a range of initiatives. For that purpose, it intends to look closely at a number of options, including:

- a workplace giving program in which Webjet will match employee donations on a dollar-for-dollar basis;
- the support of nominated charities through workplace giving and fundraising initiatives;
- a program whereby employees can volunteer their time and other support to community charities; and
- the establishment of a 'Webjet Foundation' to support chosen charities and causes identified by our staff

where it believes that it can make a difference. The focus will be on philanthropic activities which are non-political, receive limited or no support from government or other corporate bodies and which are aligned with activities of particular relevance to Webjet and/or are causes identified and supported by our staff.

WEBJET LIMITED

1 June 2018