

# Diversity Policy

**Webjet Group Limited**

Version 2.0

# Version Control

<b>Document Owner/s</b>	Group CEO & MD
<b>Document Name</b>	Diversity Policy
<b>Version Control</b>	<p>1.0 Document created on demerger and formation of Webjet Group Limited.</p> <p>2.0 Alignment to Code of Conduct and additions to Commitment to Diversity.</p>
<b>Material Changes</b>	Reviewed in line with Positive Duty under Sex Discrimination Act & Psychosocial Hazards under WHS Laws.
<b>Approved by</b>	Webjet Group Limited Board
<b>Date Approved</b>	March 2026
<b>Review Period</b>	Annual
<b>Date of Next Review</b>	March 2027
<b>Regulatory Requirements</b>	<p>Internal Risk Governance</p> <p>ASX Corporate Governance Principles and Recommendations (4th Edition, Recommendation 1.5 — Diversity Policy)</p> <ul style="list-style-type: none"> <li>• Sex Discrimination Act 1984 (Cth) including positive duty obligations (Respect@Work reforms)</li> <li>• Fair Work Act 2009 (Cth) – general protections and adverse action</li> <li>• Disability Discrimination Act 1992 (Cth)</li> <li>• Age Discrimination Act 2004 (Cth)</li> <li>• Racial Discrimination Act 1975 (Cth)</li> <li>• Work Health and Safety legislation in all Australian jurisdictions, including psychosocial hazard duties</li> <li>• Occupational Health and Safety Act 2004 (Vic) (for Victorian operations)</li> </ul>

## Supporting Documents.

Document Name	Description
<b>Risk Management Framework</b>	Framework that sets out the totality of systems, processes, and methodologies for the management of risk at Webjet Group Limited
<b>Code of Conduct</b>	Standards and expectations of ethical behaviour and honesty and with full regard for the safety and wellbeing of our people, customers, the wider community and the environment.

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# 1. Defined terms & interpretation

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## Defined terms

In this document:

- a) ASIC means the Australian Securities and Investments Commission.
- b) ASX means ASX Limited or, depending on the context, the financial market it operates.
- c) ASX Corporate Governance Council means the Corporate Governance Council convened by the ASX.
- d) ASX Corporate Governance Principles and Recommendations means the Corporate Governance Principles and Recommendations published by the ASX Corporate Governance Council, as amended or replaced from time to time.
- e) Corporations Act means the Corporations Act 2001 (Cth).
- f) Protected Attribute means a characteristic protected under Australian anti-discrimination laws, including sex, sexual orientation, gender identity, intersex status, marital or relationship status, pregnancy, breastfeeding, race, age, disability, religion, family responsibilities, and other characteristics protected by law.
- g) Diversity includes gender, cultural background, ethnicity, Aboriginal and Torres Strait Islander status, age, disability, neurodiversity, sexual orientation, gender identity, socio-economic background, carer status, and lived experience.

## Interpretation

Where relevant, words used in this policy have the same meaning as in the Corporations Act.

# 2. Introduction

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- a) The ordinary shares of Webjet Group Limited are listed for quotation on the ASX under the code WJL.
- b) As a listed entity, Webjet Group Limited is committed to compliance with the ASX Corporate Governance Principles and Recommendations where it is practical and appropriate, in the context of the nature, scope and circumstances of the business of Webjet Group Limited, for it to do so. Relevantly, Recommendation 1.5 provides that companies should establish a policy concerning diversity.
- c) This Diversity Policy is designed to support Webjet Group Limited's commitment to diversity and to compliance generally with the ASX Corporate Governance Principles and Recommendations.
- d) Webjet is required to take reasonable and proportionate measures to eliminate unlawful discrimination, harassment, sex-based harassment and hostile workplace environments as far as possible, in line with the positive duty under the Sex Discrimination Act.
- e) Fostering diversity and inclusion is also a requirement under national psychosocial hazard regulations. A lack of inclusion, discrimination and bullying are recognised psychosocial hazards under WHS laws.

# 3. Benefits of diversity

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Workplace diversity refers to the variety of differences between people in an organisation. Diversity encompasses, among a range of matters, differences in gender, race, ethnicity, age, disability and cultural background. Webjet Group Limited believes that embracing and leveraging diversity in its workforce contributes to the achievement of its corporate objectives and enhances its reputation.

It enables Webjet Group Limited and its controlled entities (Group) to:

- a) recruit the right people from a diverse pool of talented candidates;
- b) retain and develop an appropriate skills base within the Group;

- c) make more informed and innovative decisions, drawing on the wide range of ideas, experiences, approaches and perspectives that employees from diverse backgrounds, and with differing skill sets, bring to their roles in Webjet Group Limited; and
- d) better represent the diversity of all stakeholders.
- e) create an environment that enables people with disabilities to participate equitably through reasonable adjustments and inclusive practices, contribute to psychological safety by ensuring all employees feel respected, valued and able to contribute without fear of discrimination or exclusion.

## 4. Commitment to diversity

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The Webjet Group Limited supports an inclusive and diverse working environment and will not tolerate discrimination, harassment, vilification and victimisation in alignment with its values as set out in its Code of Conduct.

This includes compliance with all anti-discrimination, workplace and WHS legislation. Webjet will not tolerate discrimination on the basis of any protected attribute under Australian law.

Webjet Group Limited is committed to achieving the goals of:

- a) providing access to equal opportunities at work based primarily on merit;
- b) attracting and retaining a management team with a diverse mix of skills, backgrounds, ethnicity, experience and expertise; and
- c) fostering a corporate culture that embraces and values diversity and uses that diversity to deliver business outcomes.
- d) Webjet will provide reasonable adjustments in recruitment, employment and development processes to ensure equal opportunity for people with disabilities or other support needs.

Webjet Group Limited is an equal opportunity employer and welcomes people from a diverse range of backgrounds. The Group is committed to designing and implementing programs that will assist in the development of a diverse pool of skilled and experienced employees.

## 5. Board selection process

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- a) Webjet Group Limited's Board Charter provides that the Board should ensure that it has available an appropriate mix of skills and experience to ensure the interest of shareholders generally are served.
- b) The Board is itself responsible for (among other things) ensuring that processes to assess the necessary and desirable competencies of Board members, including, experience, expertise, skills and performance of the Board and its committees, are implemented.
- c) As part of that process, the Board undertakes the following tasks, among others:
  - i. evaluating the performance and effectiveness of the Board (as a whole) and the directors (individually), particularly in terms of fulfilling their responsibilities in a manner that serves the interests of all shareholders;
  - ii. before recommending an incumbent, replacement or additional director, reviewing their qualifications, including capability, availability to serve, conflicts of interest, and other relevant factors;
  - iii. assisting in identifying, interviewing and recruiting candidates for the Board;
  - iv. annually reviewing the composition of each committee and presenting recommendations for committee memberships to the Board as needed;
  - v. overseeing Board succession, including succession planning to maintain an appropriate mix of skills, experience, expertise and diversity on the Board; and
  - vi. in conjunction with the Remuneration Committee, determining and overseeing remuneration policies and practices designed to retain the appropriate persons, based on expertise, experience, merit and

- performance, and not gender, race ethnicity, age, physical ability or cultural factors, as senior executives and employees of Webjet Group Limited.
- vii. The Board will aim to maintain appropriate gender representation consistent with the ASX Corporate Governance Principles.

## 6. Achieving and maintaining diversity.

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Commencing in the financial year ending 31 March 2025 the Board will review and assess, at least annually, its policies and procedures by reference to its diversity objectives (as set out in clauses 3 and 4).

- a) Diversity objectives may include targets for gender representation, cultural diversity, accessibility, leadership representation, and inclusive leadership capability. Objectives will be measurable and time-bound.
- b) The Board proposes to disclose in the Annual Report for each relevant financial year its diversity objectives and the policies and procedures it has adopted in achieving those objectives.
- c) To assist in discharging the Board's responsibilities under this policy, the Board, in conjunction with the Company's senior management team, proposes to:
  - i. undertake an annual review:
    - A. to assess the success of Webjet Group Limited in implementing its diversity policies in the prior year; and
    - B. to determine if its diversity policies and procedures are and are likely to continue to be appropriate and to foster merit based assessment and a corporate culture that embraces and values diversity; and
    - C. to ensure Webjet Group Limited, and its policies and procedures, comply with all applicable legal requirements in respect of diversity and that such policies and procedures remain relevant and effective.
    - D. Reviews must also assess any psychosocial hazards linked to discrimination, exclusion or poor workplace culture and ensure controls are in place.
  - ii. report to the shareholders on the findings of this review and its recommendations for any changes in Webjet Group Limited's diversity objectives and the policies and procedures for achieving its diversity objectives (having regard to any gaps in such objectives and the policies and procedures identified in the course of the review).
- d) Achievement of the diversity objectives set by the Board is a factor which will be considered in assessing the performance of the Board, the Chief Executive Officer and other members of the senior executive team within Webjet Group Limited.

## 7. Roles and Responsibilities

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- a) Every employee within Webjet Group Limited is responsible for supporting and maintaining Webjet Group Limited's corporate culture, including its commitment to diversity in the workplace.
- b) All employees must contribute to an inclusive, respectful and psychologically safe workplace and must not engage in discrimination, harassment, bullying or exclusionary behaviour.
- c) Managers must actively promote diversity and inclusion, address inappropriate behaviour promptly, support reasonable adjustment requests, and ensure recruitment and development processes are merit-based, inclusive and free from discrimination.
- d) Employees and managers must report discrimination, harassment or exclusionary behaviour through Webjet's reporting pathways, including the EEO or Grievance Procedure, or the Whispli platform.

## 8. Review of Policy

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- a) This Policy must be reviewed at least annually to ensure it remains current, effective, and aligned with relevant legal, regulatory, and operational requirements.
- b) The Policy may be reviewed and updated more frequently where there is a material change in applicable legislation, business operations, risk environment, or other relevant circumstances that warrant earlier review. Responsibility for the review lies with the Policy Owner.
- c) Stakeholders, including employees and Health & Safety Representatives (where applicable), will be consulted as part of the policy review process.

Webjet Group Limited

March 2026



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