

Anti-Fraud and Corruption Policy

Webjet Group Limited

Version 3.0

Version Control.

Document Owner/s	Group Chief Financial Officer		
Document Name	Anti-Fraud and Corruption Policy		
Version Control	1.0	October 2024	Document created on demerger and formation of Webjet Group Limited.
	2.0	August 2025	Minor changes to policy and escalation process
	3.0	August 2026	Minor changes to roles and responsibilities to align with Company structure
Material Changes	Addition of reference to the Legislative and Regulatory context, Code of Conduct, Policy applicability and Investigation Protocols.		
Approved by	Webjet Group Limited Board		
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Regulatory Requirements	• Internal Risk Governance • ASX Listing requirements relating to risk management • Criminal Code Act 1995 (Cth) • Proceeds of Crime Act 2002 (Cth) • Corporations Act 2001 (Cth) • State and Territory legislation relating to anti bribery and corruption • Anti-bribery and corruption legislation in the overseas jurisdictions in which Webjet Group Limited operates (including New Zealand and Canada)		

Supporting Documents.

Document Name	Description
Risk Management Framework	Framework that sets out the totality of systems, processes, and methodologies for the management of risk at Webjet Group Limited
Code of Conduct	Webjet Group Limited's Code of Conduct that sets out the organisation's values and ethical standards.

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1. Purpose.

- 1.1 The purpose of this Policy is to protect Webjet Group Limited's assets and reputation and to ensure compliance with applicable legislation and regulation in relation to anti bribery and corruptions and fraud by:
 - 1.1.1 reinforcing Board and senior management commitment and responsibility for identifying fraudulent and corrupt activities and for establishing policies, controls and procedures for prevention and detection of these activities;
 - 1.1.2 reinforcing the requirement for all directors, executives, managers, employees or contractors are prohibited from corrupt and fraudulent conduct and encourages the immediate reporting of any instance of fraud or corrupt conduct;
 - 1.1.3 providing a framework for conduct of investigations to ensure all suspected fraudulent and corrupt activity is dealt with appropriately; and
 - 1.1.4 assigning responsibility for the development of controls to prevent and detect fraud.

2. Legislative and Regulatory Context.

- 2.1 The Webjet Group Limited is subject to a comprehensive framework of global regulation prohibiting bribery and corruption.
- 2.2 In Australia, the Criminal Code Act 1995 (Cth) prohibits bribery of Commonwealth and foreign public officials (Divisions 141, 142 and 70) and false dealing with accounting documents, with recent amendments introducing a corporate offence for failure to prevent foreign bribery.
- 2.3 The Crimes Act 1961 (New Zealand) contains the principal anti-corruption offences, including bribery of domestic public officials (ss 99–106), corrupt payments to Ministers of the Crown or Members of Parliament (ss 103–105), and private-sector corruption offences such as secret commissions (ss 105A–105C).
- 2.4 In Canada, the Corruption of Foreign Public Officials Act (SC 1998, c 34) prohibits the bribery of foreign public officials and related book-keeping offences.

3. Risk Appetite.

- 3.1 Serious criminal and civil penalties and reputational damage may be incurred if the organisation is involved, directly or indirectly with bribery and corruption.
- 3.2 The Webjet Group Limited Board and executive management team have zero tolerance and no appetite for any conduct constituting bribery and corruption or any form of fraud which is strictly prohibited and subject to due investigation may result in disciplinary action.

4. Scope.

- 4.1 This policy applies to all employees (including directors, executives and managers) and contractors of Webjet Group Limited and its subsidiary companies (the n).
- 4.2 Any irregularity or suspected irregularity, involving a shareholder, vendor, consultants or any other third-party agencies doing business with the Group or its employees or contractors, is included in the scope of this policy.
- 4.3 The policy does not have regard to the employees' or contractors' length of service, title or relationship to the Group.

5. Definitions.

- 5.1 **Bribery** is defined as offering, promising, giving, requesting, agreeing to receive or accepting any financial or other advantage, directly or indirectly, to or from any person (including a public official or a private-sector counterparty) with the intention of improperly influencing a decision, obtaining or retaining business, or securing an improper advantage.

- 5.2 **Corruption** is defined as a dishonest activity in which a director, executive, manager, employee or contractor of an entity acts contrary to the interests of the company and abuses his/her position of trust in order to achieve some personal gain or advantage for him or herself or for another person or entity.
- 5.3 Examples of corrupt conduct which is prohibited includes but is not limited to:
- 5.3.1 payment of secret commissions (bribes or gratuities) in money, or some other value, to other businesses, individuals or public officials;
 - 5.3.2 receipt of bribes or gratuities from other businesses, individuals or public officials;
 - 5.3.3 release of confidential information, for other than a proper business purpose, sometimes in exchange for either a financial or non-financial advantage;
 - 5.3.4 a staff member manipulating a tendering process to achieve a desired outcome; and
 - 5.3.5 a conflict of interest involving a staff member acting in his or her own self-interest rather than the interests of the Group.
- 5.4 **Executive Leadership Team** refers to the Group's senior executive leadership team, comprising the Group CEO & MD, the Group CFO and such other senior executives as the Group CEO&MD may designate from time to time, responsible for the day-to-day management of the Group.
- 5.5 **Fraud** is defined as an intentional act by one or more individuals to defraud the Group or its subsidiaries, involving the use of deception to obtain an unjust or illegal advantage. A fraud can typically result in actual or potential financial loss to any person or entity. However, this is not always the case and proof of actual or potential financial loss is not a pre-requisite to a breach of this policy.
- 5.6 Examples of fraud could include, but are not limited to:
- 5.6.1 misappropriation of funds, securities, stock, supplies or other assets including use of assets for private purposes;
 - 5.6.2 causing a loss to the Group or creating a liability for the Group by deception;
 - 5.6.3 impropriety in the handling or reporting of money or financial records;
 - 5.6.4 profiting from insider knowledge of the Group activities;
 - 5.6.5 accepting or seeking anything of value from contractors, vendors or persons providing services or goods to the Group;
 - 5.6.6 false invoicing for goods or services never rendered or backdating agreements;
 - 5.6.7 submission of exaggerated or wholly fictitious accident, harassment or injury claims; and
 - 5.6.8 misuse of sick or family leave.

6. Code of Conduct.

- 6.1 This Policy is to be read together and in alignment with the Group's Code of Conduct:
- 6.2 The Group is committed to operating to the highest standards of ethical behaviour and honesty and with full regard for the safety and wellbeing of our people, customers, the wider community and the environment.
- 6.3 There are minimum standards of conduct and behaviour we expect of all our people, including employees, directors, contractors, and everyone working at the Group, regardless of your location.
- 6.4 This Policy and the Code should be read together setting out the standards of behaviour for all employees, directors, executives, managers and contractors.

7. Policy.

- 7.1 The Group requires all employees, directors, executives and managers and contractors, at all times, to act honestly and with integrity and to safeguard the company resources for which they are responsible.
- 7.2 The Group is committed to protecting all revenue, expenditure and assets from any attempt to gain illegal financial or other benefits.

- 7.3 Any fraud or corruption committed against the Group and its subsidiaries, is material and as a consequence all cases will be thoroughly investigated, and appropriate disciplinary action will be taken against any staff member who is found guilty of corrupt or fraudulent conduct. This may include referral to the appropriate law enforcement or regulatory agencies for independent investigation.
- 7.4 The Group prohibits practices that may compromise, or appear to compromise, the integrity or independence of our business activities. As such:
- 7.4.1 Employees, directors, executives, managers and contractors must not offer or accept gifts, entertainment, hospitality, or other benefits that could reasonably be regarded as influencing business decisions or creating a conflict of interest.
 - 7.4.2 All political donations, sponsorships, or contributions (whether monetary or in-kind) must be pre-approved by the Group CEO & MD and the Company Compliance Officer and comply with applicable laws and internal policy requirements.
 - 7.4.3 Given the Group's regular dealings with airlines, airports, tourism bodies and government regulators, particular care must be taken when interacting with government officials. Any gift, entertainment or hospitality offered to, or received from, a government official, regardless of its value, must be approved in advance by the Group CEO & MD the Company Compliance Officer.
 - 7.4.4 Employees, directors, executives, managers and contractors must not bribe any public official, domestic or foreign or any private sector official or representative, which is strictly prohibited.
 - 7.4.5 No employee, director, executive, manager or contractor may arrange for, request or permit a third party (including any agent, intermediary or supplier) to do anything that would breach this Policy if it were done by the Group directly.

8. Fraud and Corruption Control.

Board and senior management responsibility

- 8.1 The Board and the Executive Leadership Team are ultimately responsible for setting the tone at the top and have a responsibility to:
- 8.1.1 ensure there is effective fraud and corruption risk management framework in place;
 - 8.1.2 understand the fraud and corruption risks that the Group exposed to;
 - 8.1.3 maintain oversight of the fraud risk assessment and the controls in place to mitigate the risks identified; and
 - 8.1.4 monitor reports on fraud risks, policies and control activities which include compliance with this policy and obtaining assurance that the controls are effective.
- 8.2 The Board Audit and Risk Committee is responsible for reviewing recommendations from management concerning the adequacy of the coverage and quantum of insurance cover for crime, fraud and fidelity risk for Webjet Group Limited and making recommendations to the Board for approval as part of annual insurance renewal program.

Business unit and Employee responsibilities

- 8.3 All business unit managers are responsible for:
- 8.3.1 fostering an environment within their businesses that makes active fraud and corruption control a responsibility of all employees;
 - 8.3.2 articulating clear standards and procedures to encourage the deterrence of fraud and corruption; and
 - 8.3.3 the detection and reporting of offences should they occur.
- 8.4 All employees are responsible for complying with company policies and procedures, codes of personal conduct and ethics, avoidance of conflict of interest and maintaining vigilance in early detection, reporting and prevention of fraud and corruption.
- 8.5 Managers and supervisors are responsible for communicating and raising awareness of the risks relating to fraud and corruption with their employees and for ensuring compliance with company policies and procedures, adequate rotation of employees and levels of staffing are in place.

- 8.6 Most importantly they should establish and maintain adequate internal controls that provide for the security and accountability of company resources and prevent/reduce the opportunity for fraud and corruption to occur.

Finance - Revenue Protection Function

- 8.7 The Revenue Protection Function (with the support of IT security, risk and the broader Finance function) has the primary responsibility for:
- 8.7.1 investigating internal and external fraud matters, including using external parties where required and notifying law enforcement or regulatory agencies as necessary;
 - 8.7.2 working with the risk owners to ensure residual fraud risks are well managed and mitigated and reported as appropriate to the Group CFO;
 - 8.7.3 ensuring that the risk of fraud is being appropriately managed and controlled by business units;
 - 8.7.4 analysing loss trends arising from fraud; and
 - 8.7.5 advising and assisting relevant business units in the implementation and maintenance of best practice techniques and controls to prevent and detect fraud.
- 8.8 The broader Finance Function must implement robust processes and controls in relation to expenditure, investments and transfers of money. Provisions, losses and write offs in relation to fraud must be made in accordance with the Group's Accounting Policies and Procedures.

Legal Function

- 8.9 The Legal Function is responsible for:
- 8.9.1 conducting bribery, fraud and corruption risk assessments via workshops with the businesses to assess the adequacy and effectiveness of Webjet Group Limited fraud risk management processes;
 - 8.9.2 reporting residual bribery, fraud and corruption risks to the Board Audit and Risk Committee; and
 - 8.9.3 ensuring that the risk of fraud, bribery and corruption is being appropriately managed and controlled by business units.
 - 8.9.4 providing advice and requisite management assistance regarding any investigation or litigation linked to a fraud or corruption event.

Human Resources / People and Talent Function

- 8.10 The Human Resources Function is responsible for ensuring adequate procedures are in place that address:
- 8.10.1 appropriate security screening and selection of employees;
 - 8.10.2 disciplinary / dismissal procedures;
 - 8.10.3 employment contracts that include relevant conditions of employment relating to fraudulent and corrupt conduct;
 - 8.10.4 monitoring of annual leave entitlements to ensure that employees do not accumulate excessive annual leave entitlements i.e. four weeks over and above their yearly entitlement;
 - 8.10.5 clarification and formalisation of responsibilities / segregation of duties (where possible, these should be included in relevant position descriptions); and
 - 8.10.6 investigation of reports made through the whistleblower service with matters escalated to the appropriate authority in line with the Whistleblower Policy and legal obligations.

9. Investigation Protocols.

- 9.1 If an investigation identifies that fraud or corruption has occurred, the matter will be escalated to the Group CEO & MD and Group CFO and Board Chair and Chair of the Board Audit and Risk Committee in accordance with Section 11 of this Policy.
- 9.2 Decisions to prosecute or refer the examination results to the appropriate law enforcement or regulatory agency will be made in conjunction with Webjet Group Limited's legal counsel, and the Board.

- 9.3 In the event of an investigation, members of the investigating team will have free and unrestricted access to all Webjet Group Limited's records and premises. They will have the authority to examine, copy and remove any information within the scope of the investigation.

10. Training.

- 10.1 The Group is committed to ensuring all employees, directors, executives, managers and contractors fully understand this policy and how it is to be used. The Group will provide this policy as part of induction of new employees, directors, executives, managers and contractors.
- 10.2 The Group will provide role specific training on how to recognise and deal with corruption and bribery, particular those employees and officers whose duties place them at a heightened risk of fraud, bribery or corruption of their role.

11. Reporting.

- 11.1 Any employee or contractor who suspects fraud or corrupt activity must confidentially report the matter through one of the following options:
- 11.1.1 notifying their immediate manager or their HR manager;
 - 11.1.2 notifying the Company's Compliance Officer or using the anonymous online reporting tool as detailed in the Whistleblowing Policy;
 - 11.1.3 directly notifying one or more independent non-executive Director members of the Board Audit and Risk Committee.
 - 11.1.4 lodging a report under the Group Whistleblowing Policy.
- 11.2 It is the responsibility of all employees to report all suspected, attempted or actual fraud or corruption incidents. All information received will be treated confidentially by recipient of the report under clause 11.1.
- 11.3 Investigations in regard to the reported matter will not be disclosed or discussed with anyone other than those who have a legitimate need to know.
- 11.4 The table below outlines the escalation requirements upon receiving a report of suspected fraud or corruption.

Size and nature of report	Escalation
Any report of suspected fraud or corruption received by management	The Group CEO & MD or Group CFO
Where the incident meets the definition of corruption (regardless of the financial impact).	The Group CEO & MD or Group CFO (as the case may be), which persons will be responsible for escalating to: • the Board Chair; and/or • the Board Audit and Risk Committee Chair and/or • the Board. For minor incidents (the financial impact is less , or is assessed as less, than \$20,000), the Group CEO & MD / Group CFO must discuss the matter, including any legal action or required disclosure, with the Board Chair and/or Chair Board Audit and Risk Committee Chair. For more major incidents (the financial impact is greater (or assessed as greater) than \$20,000), the Group CEO & MD or Group CFO must prepare an immediate report for the Board. The Board will discuss the matter, including any legal action or required disclosure, with the Group CEO & MD or Group CFO and determine the course of action, as appropriate.

12. Policy Review.

- 12.1 This Policy must be reviewed at least annually to ensure it remains current, effective, and aligned with relevant legal, regulatory, and operational requirements.
- 12.2 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.



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