



WebBeds Group

Code of Conduct.

webbedsgroup.com

Our values.

Respect.

Our people are our greatest asset. They bring passion, commitment, dedication, and pride in what they do. We respect each other, we value collaboration, we are prepared to have robust debate and we have fun in what we do.

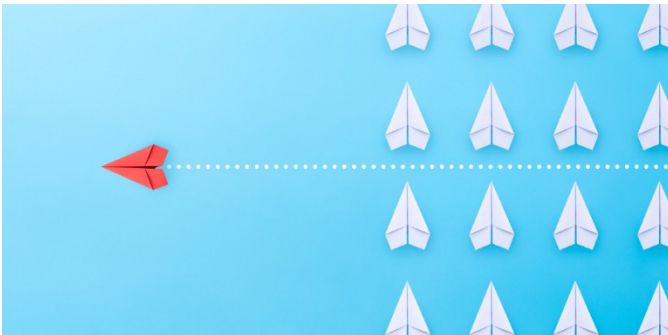


Integrity.

We are focused on delivering superior outcomes. We always seek to do the right thing and value integrity, accountability and delivering quality in everything we do.

Delivering value.

We are focused on delivering high quality products, excellence in customer service, maintaining strong relationships with our supply partners, providing an engaging and supportive work environment for our employees, and delivering value for our shareholders and the broader community.



Agility.

Unafraid to disrupt traditional norms, we constantly challenge ourselves to look for new ways to win and deliver value. Our people are agile and nimble and we empower them to effect change.

Hunger to win.

As we grow, we remember our humble roots and always strive to retain the spirit that comes with being the challenger brand. We constantly seek to challenge ourselves to find new growth opportunities, innovations and creative ways to deliver value across all aspects of our business. We value curiosity, being brave and having confidence to try new things.



1. About our Code of Conduct.

WebBeds Group Limited 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.

This Code of Conduct (**Code**) outlines the minimum standards of conduct and behaviour we expect of all our people, including employees, directors, contractors, and everyone working at WebBeds Group Limited or its controlled entities (together **WebBeds Group**), regardless of your location.

Please familiarise yourself with the requirements of this Code and ensure you understand them fully. You are required to comply with this Code whilst working at WebBeds Group and whenever you are identified as a representative of WebBeds Group (including outside working hours or your workplace).

This Code should be read in conjunction with other WebBeds Group policies and guidelines applicable to you, some of which are referred to in this Code.

Depending on the entity you work for within WebBeds Group, there may also be provisions in your employment or engagement agreement or policies specific to your division, employer entity or geographic region that cover topics similar to those in this Code. Should there be any conflict between the provisions of this Code and those in your employment or engagement agreement or applicable local policies, the latter will prevail.

Any suspected breach of this Code will be treated seriously and investigated. A breach of this Code will be reported to the Risk Committee and the Board as appropriate and may result in disciplinary action, including termination of your employment.

This Code will be reviewed and changed from time to time to ensure it is operating effectively. This Code does not form part of any contract of employment or enterprise agreement. The most up-to-date version of this Code can be found on your local intranet and on our investor website at webtravelgroup.com.

2. Diversity and inclusion.

WebBeds Group is an equal opportunity employer and welcomes people from a diverse range of backgrounds. We strive to create an inclusive environment that respects and celebrates cultural diversity in our workplace.

Our decisions regarding recruitment, selection for specific roles and career progression are based on personal merit, competency and the candidate's potential to effectively perform the role. We recognise the importance of attracting and retaining talented people with a diverse mix of skills, backgrounds, ethnicity, experience and expertise.

For more information please refer to our Diversity Policy.

3. Our expectations of you.

3.1 Compliance with laws and ethical standards

We strive to conduct ourselves and our business in an ethical manner at all times. Ethical conduct relates to standards of behaviour characterised not only by complying with the law, but also by acting honestly, fairly, with integrity and with respect for others and the communities and environments in which we operate.

As a WebBeds Group team member, you are expected to:

- comply with the letter and spirit of all laws and regulations applicable in Australia and in any jurisdiction in which WebBeds Group carries out operations or activities;
- comply with all policies, procedures and guidelines of WebBeds Group;
- observe the highest standards of honesty, integrity and ethical behaviour;
- conduct our business in accordance with our values; and
- strive to earn and maintain the respect and trust of fellow team members, customers and the wider community.

3.2 Safety, wellbeing, respect and human rights

Safety, health and wellbeing

The safety, health and wellbeing of our people are our highest priority. We will ensure that every effort is made, and every precaution is taken, to ensure that our people are provided with safe, healthy and comfortable working conditions.

Safety is everyone's responsibility at WebBeds Group, and it is your responsibility to:

- take all steps necessary to ensure your own health and safety;
- not do anything that would endanger the safety of any other person;
- immediately report to your manager or Talent and Culture representative any safety incidents, injuries or hazards identified in or around your working environment; and
- comply with all health and safety policies, procedures and guidelines.

For more information please refer to our Occupational Health and Safety Policy and our Drug and Alcohol Policy.

Respect in the workplace

We are committed to treating everyone with dignity and respect. At WebBeds Group, it is everyone's responsibility to participate in the development, promotion and maintenance of a working environment free from discrimination, bullying and harassment.

Bullying is any repeated unreasonable behaviour directed towards a person or group of people that creates a risk to their mental or physical health and safety. Some examples may include:

- verbal abuse, screaming, insults, swearing at a person or name-calling;
- deliberate exclusion or isolation from workplace activities;
- intimidation and threats;
- assigning meaningless tasks unrelated to a person's job; or
- deliberately withholding information that is vital for effective work performance.

Bullying is always unacceptable and may be against the law.

Harassment occurs when someone engages in unwelcome behaviour in relation to a particular attribute that results in a person feeling offended, humiliated or intimidated, and under the circumstances, it would be reasonable for them to feel this way. Some examples may include telling insulting jokes about a person's sexual orientation or racial group and making derogatory comments or taunts about someone's religion.

Even if there is no intention to offend or humiliate, seemingly harmless acts such as gossip, jokes, teasing or the use of inappropriate nicknames, could all possibly constitute harassment.

Discrimination is treating or proposing to treat someone unfavourably because of a personal characteristic protected by the law. These are referred to as 'protected attributes' and may include but are not limited to:

- gender, marital status, pregnancy, breastfeeding or parental or carer status;
- sexual orientation, gender identity or intersex status;
- race, colour, descent, nationality or ethnic background;
- religious belief, political opinion or industrial activity;
- disability, disease or injury; and
- age.

Unlawful discrimination, bullying and harassment are not tolerated at WebBeds Group and may constitute serious misconduct and result in disciplinary action.

For more information please refer to our Equal Employment Opportunity, Bullying and Harassment Policy.

Human rights and modern slavery

Wherever we operate, we respect the human rights of our people, our customers and those of our suppliers and business partners. We reject all forms of modern slavery, including slavery, servitude, forced labour and human trafficking. We are committed to identifying and mitigating modern slavery and human rights risks across our own business and through our supply chain relationships.

Our latest Modern Slavery Statement, along with previously published statements, are available on our investor website at webtravelgroup.com.

3.3 Conflicts of interest

You are expected to act in the best interests of WebBeds Group. You should avoid any situation which involves, or may involve, an actual or perceived conflict between your personal interests, commercial activities or affiliations outside of WebBeds Group (including any duties you owe to third parties) and the interests of WebBeds Group.

Any actual, potential or perceived conflicts of interest must be disclosed to the appropriate people (including your manager and Talent and Culture leader) or, if you are a member of the Board, in accordance with our Board Charter.

If you have an actual or perceived conflict of interest, you should not participate in any decision-making process relevant to the conflicted matter or be present during any discussions relating to the conflicted matter.

3.4 Trading in WebBeds Group securities

You should never deal (or procure another person to deal) in the shares or other securities of WebBeds Group or another company if you have unpublished price sensitive information which could materially affect the price or value of those shares or securities. There are blackout periods during which you are not permitted to trade in WebBeds Group securities, and additional restrictions apply to directors and senior managers.

For more information please refer to our Share Trading & Conflicts Policy.

3.5 Anti-bribery and corruption

You must comply with all applicable anti-bribery and corruption laws, regardless of your location or position. Failing to comply with anti-bribery and corruption laws is a criminal offence and can result in significant penalties, including imprisonment, large fines and reputational damage.

You must never offer or accept any bribe, kickback, secret commission or other payment or benefit of a similar nature, including any irregular payment to influence or achieve a particular business outcome for WebBeds Group.

All suspected corrupt conduct at WebBeds Group will be thoroughly investigated. Appropriate disciplinary action will be taken against anyone who is found guilty of bribery or corruption, including referral to appropriate law enforcement or regulatory bodies for independent investigation.

For more information please refer to our Anti-Bribery and Corruption Policy.

3.6 Gifts, entertainment and hospitality

As a WebBeds Group team member, you are expected to maintain honest, unbiased and ethical relationships with all our business partners.

Subject to the below guidelines, you are prohibited from receiving gifts, entertainment, meals, travel or any other good or service of value from existing or potential business partners, where such receipt might directly or indirectly influence, or be perceived to influence, your business judgement or decision-making.

You must advise your manager as soon as you receive or are offered any gift, including meals and entertainment. While gifts should generally be declined, you may accept a gift if the following guidelines are followed:

- If accepted, the cumulative value of gifts received from a business partner should not exceed \$300 in any 12-month period.
- Gifts that do not meet the above criteria may be accepted only if you have obtained senior leadership team approval and:
 - the gift is an event and there is a valid business reason for attending such event;
 - the gift will be used as a shared item (such as food baskets); or
 - the gift will be used as a charity or raffle prize at a WebBeds Group company-wide or departmental function.
- The gift is not made during a period in which bids are being sought to award a new contract or renegotiate an existing contract with a business partner.

- Gifts won as part of a contest or give-away, where other individuals have an equal chance of winning, are excluded from the above requirements.
- Notwithstanding the above, gifts of cash or other negotiable instruments, including loans, are always prohibited regardless of their value.

3.7 Competition and consumer law

At WebBeds Group, our goal is to promote business success through the pursuit of fair competition within the regulatory requirements. Competition and consumer laws exist to promote and maintain fair and open competition and protect consumers. You must comply with all competition and consumer laws that apply in the countries in which we operate, including the Australian Consumer Law. Depending on your role and location, you may also be required to complete mandatory competition and consumer law training.

If you are unsure about a competition or consumer law matter, you should speak with your manager or a member of our legal team.

3.8 Protection of WebBeds Group assets

As a WebBeds Group team member, you may be given access to WebBeds Group assets to enable you to perform your role. WebBeds Group assets includes tangible and intangible assets such as funds, equipment, systems, products, confidential information, intellectual property (including trademarks and business names) and other assets and resources belonging to WebBeds Group. You are responsible for taking care of any WebBeds Group assets that you have access to and using them in an appropriate and responsible way.

You must:

- only use WebBeds Group assets for WebBeds Group's legitimate business purposes and not for personal gain or to WebBeds Group's detriment;
- use WebBeds Group assets responsibly and in accordance with the terms on which they are provided to you;
- use reasonable endeavours to protect any WebBeds Group assets in your possession from harm, damage or loss;
- act with honesty and integrity in the handling of funds and financial records of WebBeds Group;
- avoid any conduct that could cause financial loss or legal liability for WebBeds Group; and
- immediately report any suspected fraud or theft of WebBeds Group assets for investigation.

3.9 Confidentiality and privacy

Confidentiality

During your time with WebBeds Group you may be entrusted with confidential information about WebBeds Group and its businesses. This can include business plans, strategies, customer lists, technical or financial information, commercial arrangements, trade secrets, know-how, personal information and intellectual property.

You are required to:

- use WebBeds Group's confidential information only for the purpose of performing your role;
- not disclose WebBeds Group's confidential information except on a 'need-to-know' basis to other WebBeds Group team members or authorised recipients (such as professional advisers and auditors) or if required by law;
- protect WebBeds Group's confidential information and make sure it remains confidential, including prominently marking all copies of confidential information as 'confidential' and complying with all security measures and processes designed to safeguard the information from loss or unauthorised access or use; and
- notify your manager immediately upon becoming aware of any actual or suspected loss, unauthorised use, copying or disclosure of WebBeds Group's confidential information and use reasonable endeavours to prevent or stop such loss, unauthorised use, copying or disclosure.

When you leave WebBeds Group, you should immediately stop using WebBeds Group's confidential information and at WebBeds Group's option, either return or destroy any confidential information in your

possession or control. We may require you to certify this in writing. Your obligations of confidentiality to WebBeds Group will continue even after you leave WebBeds Group.

Privacy

At WebBeds Group, we respect the privacy of people who deal with us. All of us are responsible for complying with the laws that govern the collection, use and protection of personal information obtained from our customers, team members and others. You should familiarise yourself with the terms of the Privacy Policy applicable to your business division, which are available online. As a general rule, you should never share someone else's personal information without that person's consent.

If you are unsure about a matter relating to privacy or the handling of personal information, you should speak with your manager, our Data Protection Officer or a member of our legal team.

3.10 Continuous disclosure

WebBeds Group Limited is listed on the ASX and must comply with the continuous disclosure requirements of the Corporations Act and the ASX Listing Rules. All price sensitive information must be disclosed immediately to the ASX, except in some limited circumstances. Price sensitive information is information that a reasonable person would expect to have a material effect on the price or value of WebBeds Group's securities.

If you become aware of information that you think may be price sensitive information, you should immediately report this to the Managing Director, Company Secretary or Chair of the Board in accordance with our Market Disclosure & Communications Policy.

Public disclosures and public statements about WebBeds Group can only be made by authorised spokespeople. If you are not an authorised spokesperson for WebBeds Group, you must refrain from making any public disclosure or statement about WebBeds Group, including in any interview, speech, article, report or via WebBeds Group's website.

For more information please refer to our Market Disclosure & Communications Policy.

3.11 Internet, email and social media

You must use WebBeds Group's information systems (including email, internet and phones) only in accordance with our Acceptable Use Policy. As a general rule, access to WebBeds Group's information systems is provided to allow you to perform your role as a WebBeds Group team member and for purposes directly related to WebBeds Group's business and operations.

As a member of the broader community, we expect you to exercise prudence and good judgment when using social media. Only authorised social media representatives can represent WebBeds Group on social media. Unless authorised, you must not make any social media commentary regarding WebBeds Group or its policies, strategies, businesses or operations.

For more information please refer to our Acceptable Use Policy.

3.12 Working with external parties

You are expected to deal fairly and honestly with all external parties that you engage with as a WebBeds Group team member, including customers, suppliers, competitors, advisers, regulators and other business partners.

You should never take unfair advantage of an external party through illegal conduct, manipulation, undue influence, concealment, abuse of confidential information, misrepresentation of material facts or any other unethical practice.

3.13 Political engagement

In situations where a government or regulatory decision may significantly affect our business, industry or the communities in which we operate, we may actively engage with the relevant government or regulatory officials or policymakers on such decisions. We are committed to undertaking these engagement activities in a manner that is responsible, in the best interests of our shareholders, employees and other relevant stakeholders and in compliance with applicable laws and reporting requirements. We do not otherwise engage in any political lobbying or similar activities or make political contributions or donations of any kind.

While we do not tolerate discrimination on the basis of personal political affiliation or lawful political activity, you must not use any WebBeds Group resources to make any political contributions or to promote your own political views, causes or candidates.

3.14 Record keeping

Keeping accurate and up-to-date records is important to our business. You must ensure that:

- all financial records, people records and systems are accurate, complete and honestly and reliably reflect WebBeds Group's performance, transactions and financial position;
- all records are retained and preserved in accordance with all applicable laws and WebBeds Group policies; and
- obsolete records are disposed of in a secure manner.

For more information please refer to our Data Retention and Disposal Policy (as relevant).

4. Additional responsibilities for leaders.

We expect all our leaders and managers to foster a culture of honesty, integrity and ethical and law-abiding behaviour amongst other team members.

If you are a leader or manager, you are expected to:

- positively promote this Code by personal example;
- give clear and unambiguous guidance and support to team members regarding the operation of this Code;
- ensure this Code is communicated to and understood by all members of your team (and third parties who need to be aware of it) and hold them accountable for its compliance;
- encourage team members to feel comfortable and safe about speaking up and raising concerns;
- treat all complaints seriously, fairly and sympathetically;
- familiarise yourself with, and adhere to, the complaint reporting and resolution procedures set out in our Whistleblower Policy;
- provide appropriate support to team members while a complaint is being investigated; and
- report any suspected violations of this Code or other unethical or unlawful behaviour in accordance with our Whistleblower Policy.

5. Speak up.

At WebBeds Group, we encourage and require you to speak up if you know or genuinely suspect there has been conduct that is improper, illegal, corrupt, fraudulent or in violation of this Code or another WebBeds Group policy.

In most cases, you should raise your concern with your manager, or your manager's manager. If the matter is more serious, or if you don't feel comfortable raising your concern with your manager or their manager, you can raise it with our Compliance Officer or use our anonymous online reporting tool. If you are a member of the Board, you are encouraged to raise your concern with the Chair of the Board, the Chair of the Risk Committee or the Chair of the Audit Committee.

We are committed to ensuring that anyone who reports genuine concerns or suspected misconduct are supported and can do so without fear of victimisation or detrimental treatment, including but not limited to intimidation, disadvantage or reprisal.

For more information please refer to our Whistleblower Policy.

6. Questions.

If you have any questions regarding this Code or how it should apply in a specific scenario, or if you have any feedback or comments on this Code, always feel free to speak with your manager, your manager's manager, or your Talent and Culture leader.

