

MODERN SLAVERY POLICY

SiteMinder prides itself on acting ethically, transparently and with integrity in everything that it does. This includes upholding human rights and contributing to the global effort to end all forms of modern slavery.

This modern slavery policy (**Policy**):

- (a) outlines our approach to mitigating the risks of modern slavery within our business operations and supply chain; and
- (b) applies to all persons working for SiteMinder, in any capacity (**Staff**).

WHAT IS MODERN SLAVERY?

Modern slavery is a crime and violation of fundamental human rights. It takes various forms such as slavery, servitude, forced and compulsory labour, forced marriage, debt bondage and human trafficking, all of which have in common the deprivation of a person's liberty in order to exploit them for personal or commercial gain.

There are an estimated 40.3 million victims of modern slavery globally. Women and girls are over represented, comprising 71% of the victims and nearly two-thirds of modern slavery victims are in the Asia-Pacific region.

COMBATTING MODERN SLAVERY

SiteMinder takes a **zero-tolerance** approach to modern slavery and we are committed to ensuring that modern slavery is not occurring within our business. We strive for transparency consistent with our disclosure obligations under Australian modern slavery legislation and expect the same high standards from all of our contractors, suppliers and partners (**Suppliers**).

SiteMinder maintains a Contracts and Procurement Policy that requires risk assessments and approvals from Legal and senior management prior to the engagement of Suppliers. As part of this process, where appropriate (e.g. where a Supplier operates in an industry or country vulnerable to modern slavery), we must request additional information and assurances from the Supplier to be reasonably satisfied that its business operations are free from modern slavery.

Where we are not satisfied that a Supplier is complying with all local labour laws, international treaties and standards of fair work, we must not engage it.

If we identify modern slavery occurring within a Supplier's operations, we must take appropriate action, including education, remediation and/or alerting the relevant authorities.

RESPONSIBILITY FOR THIS POLICY

SiteMinder's General Counsel has overall responsibility for ensuring that this Policy complies with our legal and ethical obligations.

Management at all levels are responsible for ensuring that Staff understand and comply with this Policy and are given adequate training on the risks of modern slavery.

Staff are invited to comment on this Policy and suggest ways in which it can be improved. Comments, suggestions and queries are encouraged and should be addressed to the company's General Counsel.

COMPLIANCE WITH THIS POLICY

The prevention, detection and reporting of modern slavery is the responsibility of all Staff.



You must notify your manager or the General Counsel if you believe or suspect that a breach of this Policy has occurred or may occur in the future.

If you are unsure whether a particular act is a breach of this Policy, raise it anyway. SiteMinder will support anyone who raises a genuine concern, even if they turn out to be mistaken.

You may also report breaches of this Policy in accordance with SiteMinder's Whistleblower Policy.

COMMUNICATION OF THIS POLICY

This Policy and our zero-tolerance approach to modern slavery should be communicated to all Suppliers at the outset of our relationship with them and reinforced as appropriate thereafter.

BREACHES OF THIS POLICY

Any person who breaches this Policy will face disciplinary action, which could include dismissal or termination for misconduct.



MODERN SLAVERY STATEMENT

INTRODUCTION

SiteMinder prides itself on acting ethically, transparently and with integrity in everything that it does. This includes upholding human rights and contributing to the global effort to end all forms of modern slavery.

The *Modern Slavery Act 2018* (Cth) requires reporting entities to publish an annual modern slavery statement outlining the steps taken to identify, manage and mitigate the risks of modern slavery in the entity's operations and supply chain (**Statement**).

This Statement is published by SiteMinder Limited ACN 121 931 744 registered at Bond Store 3, 30 Windmill Street, Millers Point NSW 2000 ("**SiteMinder**", "**we**", "**our**") in relation to our business activities during the financial year ending 30 June 2020 (**Reporting Year**).

OUR STRUCTURE

SiteMinder Limited is the group's parent company located in Sydney. The group includes the following wholly-owned subsidiaries that manage SiteMinder's operations in EMEA, the Americas and Asia-Pacific:

- London – SiteMinder Distribution Limited
- Galway – Online Ventures Hospitality Limited
- Dallas – SiteMinder Hospitality Corporation
- Bangkok – Online Ventures (Thailand) Limited

We also have representative offices in Berlin, Manila and Bangalore.

SiteMinder employs 700+ staff across the above-mentioned offices, serving 34,000+ customers in 150+ countries.

OUR BUSINESS

SiteMinder supplies a suite of cloud software as a service (SaaS) products to hoteliers and other temporary accommodation providers (**Platform**).

The business was founded in Sydney in 2006 with the aim of providing hoteliers with the technology to grow reservations, increase revenue and eliminate manual processes. We have since become one of the world's leading travel technology companies.

SiteMinder's consolidated revenue for the Reporting Year was AUD\$113M.

OUR SUPPLY CHAIN

The Platform is developed in Sydney by our in-house software developers, engineers and designers. From time to time, the product development function is supported by highly specialised third-party contractors in the Ukraine, Brazil, Philippines and India.

All staff, whether employees or personnel supplied by contractors, are paid full and fair remuneration in accordance with local and international labour laws and regulations. Given the expertise required for the services contracted outside Australia, we would not be able to engage any third party contractors if we were to pay less than market rates. None of the countries from which we source third party software development are considered at risk in the latest Global Slavery Index Survey (2018).

Given the nature of our business, we consider our supply chain to have a very low risk of modern slavery.

OUR POLICIES

We maintain the following policies which, together, set out the minimum standards and expectations of all staff, and assist us in combating modern slavery risks:

- Code of Conduct
- Contracts and Procurement Policy
- Whistleblower Policy
- Anti-Bribery Policy
- Equal Opportunities and Dignity at Work Policy
- Fair Treatment Policy
- Compassionate Leave Policy
- Flexible Working Guidelines

In December 2020, we adopted a Modern Slavery Policy to strengthen existing policies and awareness and make the prevention, detection and reporting of modern slavery everyone's responsibility.

The above-mentioned policies have the full support of our Board of Directors and senior management. Breaches of company policies result in appropriate disciplinary action.

DUE DILIGENCE PROCESSES

Our Legal and Human Resources departments, in co-ordination with senior management, take reasonable precautions to avoid complicity in modern slavery practices. As part of the due diligence process, where appropriate (e.g. where a supplier operates in an industry or country vulnerable to modern slavery), we may request additional information and assurances relating to the supplier's business operations and supply chain. Our standard form supply agreements also require vendors to comply with all local and international laws.

ADHERENCE TO OUR VALUES

SiteMinder takes a strict **zero-tolerance** approach to modern slavery. If we identify modern slavery practices occurring within a supplier's operations, we will take appropriate action, including education, remediation, termination and/or alerting the relevant authorities.

OUR EFFECTIVENESS IN COMBATING MODERN SLAVERY

We manage risks to our business according to their severity, and likelihood. We do not consider there is any real risk of modern slavery occurring in our supply chain. Nevertheless, we do have contractual processes in place to require compliance by suppliers of relevant processes and standards. During the Reporting Year, there were no instances of modern slavery identified.

APPROVAL

This Statement was approved by SiteMinder's Board of Directors on 16 December 2020.

Signed on behalf of SiteMinder by:



Sankar Narayan
(CEO)

Date:

6/1/21