

## **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.