



Acknowledgment of Country In the spirit of reconciliation, Corporate Travel Management acknowledges the Traditional Custodians of country throughout Australia and their continued connections to land, sea and community. We pay our respect to their Elders past, present and emerging and extend that respect to all Aboriginal and Torres Strait Islander peoples today.

About this Statement

This Modern Slavery Statement (Statement) is made under both the Australian Modern Slavery Act 2018 (Cth) (AU MSA) and the United Kingdom Modern Slavery Act 2015 (UK MSA). It sets out the initiatives and steps undertaken by the CTM Group to assess and address risks of modern slavery in our operations and supply chain for the financial year ended 30 June 2023 (FY23).

The Reporting Entities

Corporate Travel Management Limited (CTM) ABN 171 31 207 611 is an Australian public company listed on the Australian Securities Exchange. This Statement is made on behalf of CTM and its subsidiaries (together, CTM Group) that are reporting entities under the AU MSA and UK MSA. References to 'CTM', 'CTM Group', 'Group' and the terms 'we' and 'our' are used in this Statement to refer collectively to the CTM Group.

The list of CTM subsidiaries covered by the Statement is provided in Appendix A.

This Statement has been reviewed by CTM Group's global legal and sustainability teams, in consultation with senior management and subject matter experts from the relevant areas of our business.

This Statement was approved by the CTM Board on 15 December 2023 on behalf of all reporting entities covered by this Statement and is signed by the Managing Director and a Director of the CTM Board, as required by the AU MSA and UK MSA.

FY23 Highlights

Strengthening Supplier Engagement Governance processes

Establishing a Global Procurement Policy

Enhancing Awareness through increased uptake in the Modern Slavery Risks Training for our people

\$2.95bn

3, **2**06

30 JUN FTE STAFF COUNT (+351 v FY22)

\$660.1m

97%

\$167.1m

\$77.6m
STATUTORY NPAT ATTRIBUTABLE TO OWNERS



Mandatory Criteria

This Statement addresses the mandatory/recommended reporting criteria under the AU MSA and UK MSA in the following sections:

AU MSA	UK MSA	Page Reference	
Identify the reporting entity Describe the structure, operations and supply chains of the reporting entity	Organisation structure and supply chains	Pg 6, 9, 18	
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity, and any entities that the reporting entity owns or controls	Parts of the organisation's business and supply chains where there is a risk of slavery and human trafficking taking place, and the steps it has taken to assess and manage that risk	Pg 8, 13-14	
Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes	Organisation's policies in relation to slavery and human trafficking; its due diligence processes in relation to slavery and human trafficking in its business and supply chains Training about slavery and human trafficking available to the organisation's staff	Pg 13-15	
Describe how the reporting entity assesses the effectiveness of such actions	Organisation's effectiveness in ensuring that slavery and human trafficking is not	Pg 13-16	
Describe the process of consultation with any entities that the reporting entity owns or controls, and confirm the entity giving the statement	taking place in its business or supply chains, measured against such performance indicators as it considers appropriate	Pg 16-18	
Include any other information that the reporting entity, or the entity giving the statement, considers relevant.		Pg 11-12	



Managing Director's Statement

This year, we are proud to present a joint statement that covers both the Australian and United Kingdom legislative requirements.

At CTM, we are committed to continuing to develop a program of works to strengthen our modern slavery risk management framework and be more transparent about the modern slavery risks in our operations and supply chain.

Key actions we have taken this year include strengthening our governance processes around supplier engagement, establishing a global procurement policy and enhancing awareness of modern slavery risks with our people.

Recognising our role to support our customers to make informed sustainable travel decisions, we will continue to proactively work with our supply chain to assess and address modern slavery risks. Our 'innovate to generate' culture means continually improving our working methods and readily identifying and addressing potential modern slavery risks.

Sustainability is a key strategic element of how we conduct business every day. We aim to be recognised as a global leader in travel management solutions, which supports our reputation as an innovative and inspiring company of choice for our stakeholders.

Our proprietary technology solutions empower travellers to make more sustainable travel decisions. During FY23, we also continued to build on our supply partner relationships to enhance sustainability performance and reduce travel-related environmental impacts.

This Statement is also linked to CTM's Sustainability Strategy which is founded on four key pillars aligned with the World Economic Forum reporting framework – Governance, Planet, People and Prosperity. The strategy evolved in FY23 with renewed vigour and purpose, where we have presented a standalone FY23 Sustainability Report which sets out how the Group continues to progress its sustainability performance. The report can be accessed via CTM's website at investor travelctm com au.

I take great pride in sharing this Statement and in partnership with our employees, customers, suppliers, and stakeholders, stand by our commitment to addressing and preventing any form of modern slavery within our organisation.



Jamie Pherous

Managing Director,
Corporate Travel Management Limited

About CTM Global Coverage

The Group, headquartered in Brisbane, Australia, operates under four global operating regions: Australia and New Zealand, UK and Europe, Asia, and North America. In addition, CTM also operates through agency partners, identified as our tier-two supply chain with an indirect network across more than 100 countries.

For more information about the Group's operations, please refer to CTM's FY23 Annual Report, accessed via CTM's website at investor.travelctm.com.au.

Travel demand has increased globally during FY23 as the corporate travel market rebounded due to eased COVID-19 related travel restrictions. In FY23, the Group continued to work with supply chain partners, particularly those impacted by capacity constraints, including the persistent global personnel shortages. The Group actively and closely engage with supply partners to ensure an ethical approach is maintained to recruiting and treating all personnel in line with industry standards and applicable statutory obligations.

Introduction

CTM is an award-winning global provider of innovative and cost-effective travel management solutions to the corporate travel market. CTM provides an extensive, reliable and flexible travel management solution for global businesses that require quality, locally tailored travel solutions underpinned by leading technology and robust reporting.

CTM's business model is based on supporting the travel needs of our customers in a complex and changing environment, with personalised customer service and innovative proprietary technology, backed by our financial strength and the global scale of our operations.

With nearly 30 years in corporate travel, CTM's breadth of travel management experience and expertise enables our customers to leverage extensive knowledge, insights and tried and tested solutions from similar and differing businesses to optimise their program strategies.

We partner with independent travel management companies that complement CTM's wholly-owned operations through common service standards, consistent travel tools, seamless and secure data aggregation, and common values to ensure our clients enjoy the experience in every country their travel program operates.

Company Snapshot

- Founded in Australia in 1994. CTM has grown to an estimated fourth largest travel management company globally.
- Publicly listed since 2010 (ASX: CTD).
- Global coverage (North America, Europe, Asia, Australia & New Zealand), with an indirect network across more than 100 countries
- Multi-award winning for service and technology innovation globally

This is the CTM Group's third Statement under the AU and UK MSA and the first joint Statement by the CTM Group. The Group focuses on continuous improvement of our performance and transparency in our risk management approach to identifying and mitigating modern slavery risks in our operations and supply chain. This Statement sets out the Group's approach and actions taken to manage modern slavery risks throughout FY23, as well as look ahead to initiatives and further actions required for FY24 and beyond.

CTM Corporate Recognition (Awards)

2023

Australia: National Travel Industry Awards (NTIA)

- Most Outstanding Global Travel Management Company
- Most Outstanding Business Events Agency
- Sustainability Award Business

Asia: TTG Awards

- Best Corporate Travel Agency

Europe: Business Travel Sustainability Awards

- Best Corporate Booking Platform (Lightning)

2022

Australia: Australian Federation of Travel Agents (AFTA) Awards

- Most Outstanding Travel Management Company

United States: World Travel Awards

- United States Leading Travel Management Company

CTM Modern Slavery Overview

Timeline of Actions

CTM has continued its journey to develop and mature our approach to systematically identify and implement actions to address modern slavery risks, as illustrated here.



Compliance Training

Modern Slavery and Protection of Human Rights included in all mandatory training across all regions.



Risk Framework and Training

Global Slavery Index aligned Modern Slavery Risk Framework implemented across all regions. Governance Questionnaire.





assessment

Enhanced Governance Processes and Supplier Engagement

Policies uplift and enhanced governance process to foster greater supplier engagement.



Robust assessment and

mitigation of risk implemented.

Global Modern Slavery Statement

Joint reporting under the Australian and United Kingdom regime for consistent governance across the Group.

Consistent survey templated for completion and assessment across all regions.

Our Governance Framework

Good corporate governance is fundamental to the long-term sustainability of the Group. CTM recognises the importance of good corporate governance practices which assist in ensuring the accountability of the Board and management of the Group. These practices are fundamental to the long-term performance and sustainability of the Group, the delivery of strategic objectives and contributing to the preservation of shareholder value.

For more information about the Group's corporate governance framework consistent with the ASX Corporate Governance Council Corporate Governance Principles and Recommendations (4th Edition), please refer to the CTM 2023 Corporate Governance Statement at investor.travelctm.com.au/corporate-governance.

Risk Management

Risk management forms a core part of our day-to-day business. CTM's senior leadership team is responsible for identifying, evaluating and monitoring material risks on an ongoing basis and promoting a risk aware and pragmatic reporting culture across the Group.

The CTM Board is responsible for the oversight and management of risk and is supported by the Board's Audit & Risk Committee where required. In performing this oversight role, the Audit & Risk Committee:

- regularly reviews the Group's risk appetite and risk tolerance concerning strategic and operational risks;
- monitors and provides guidance on risks that may impact the Group's reputation and/or the Group achieving its objectives, and
- reviews actions taken by management to reduce and/or mitigate risk exposure, modern slavery and supply chain risks.

CTM categorises its supply chain to identify areas of perceived risk and will continue to improve this taxonomy in line with the Global Slavery Index to drive transparent reporting further.

For more information about the Group's risk management approach and disclosure of risks, please refer to the CTM FY23 Annual report at investor.travelctm.com.au/corporate-governance.

ESG Assessment

In the reporting period, we have completed our first Materiality Assessment and our first formal Climate Change Impact Assessment. The assessments highlighted significant opportunities to continue improving our services to our customers to manage the identified technology, market, physical and reputation risks.

We also progressed several planned initiatives to improve our modern slavery mitigation practices in FY23, including:

- Improving data availability and transparency
- Defining ethical procurement practices to establish a suitable benchmark
- Enhancing governance practices throughout our supply chain, including a mandate to respect and uphold human rights within our business activities and to strengthen relationships with reputable business partners.

Further details of the assessments are available on our website at investor.travelctm.com.au/corporate-governance.

CTM Policies

The Group's Code of Conduct sets out the fundamental principles of conduct expected by the Group. The Code of Conduct is further supported by several policies, which are set out on page 10 of the Statement. The code of conduct is available on our website at investor.travelctm.com.au/corporate-governance.

¹ Refer to Appendix B - Risk Framework

Procurement Policy

The Group's Procurement Policy outlines the principles and identifies the standards that apply to procurement and the purchase of goods and services to support a culture of sustainability accountability, transparency and respect for human rights and ethical behaviour.

The Procurement Policy also outlines CTM's commitment to due diligence and engagement in the procurement process, in particular, ensuring compliance with applicable local and international statutory requirements including Modern Slavery Human Rights Acts and fair labour and operating practices.

In FY24, there will be a renewed focus on review and improvements to all policies, standards and procedures to specifically delineate social responsibility requirements, including those applicable to addressing modern slavery.

Supply Chain Stakeholders

As a travel management company, CTM identifies upstream and downstream suppliers within the corporate and leisure travel market. Many of our major supply partners are large multinational organisations with rigorous processes embedded in their corporate governance framework to manage modern slavery risks, including contractual requirements and obligations to publish modern slavery statements under the AU MSA and UK MSA.

As part of our continuous improvement actions, CTM has enhanced the visibility of our downstream supply chain in FY23 to include our indirect tier-two suppliers. We acknowledge that further work is required to deepen knowledge and increase visibility of our indirect tier two supply chain, with challenges for organisational

focus and limitation of resources to enhancing mitigation of modern slavery risks. This will also be the area of focus for FY24 to identify support CTM can provide to the smaller upstream and downstream suppliers, including but not limited to introducing mandatory supplier training to increase awareness of modern slavery risks.



Supply of Goods and Services:

- Legal, marketing and financial consultants
- Governance advisors
- Information and technology services
- Property services, including utilities, cleaning/waste management
- Transfer Services



Supply of Goods and Services:

- Airlines
- Hoteliers
- Car Rental Merchants
- Rail Providers
- Global Travel Distribution Providers

Figure 1. CTM upstream and downstream Supply Chain



CTM Policies

The Group has several policies in place underpinning our governance framework to address modern slavery risks in our business and supply chain.

Table 1. Relevant CTM Policies

Policy Title	Policy Scope
Anti-Bribery and Corruption Policy	We take a zero-tolerance approach to bribery and corruption and are committed to conducting our business with honesty, integrity, and the highest personal and professional ethical behaviour standards. The Anti-Bribery and Corruption Policy sets out the Group's responsibilities and the responsibilities of third parties we deal with in observing and upholding our position on bribery and corruption, including potential risks to modern slavery and provides information and guidance to our employees on how to address these issues.
Code of Conduct	Our Code of Conduct for directors, senior executives, employees, consultants and contractors sets out the fundamental principles of business conduct expected by the Group; to act in accordance with the law, to act with honesty, integrity and fairness, and a commitment to a high standard of professionalism and avoidance of conflicts.
Equal Opportunity and Diversity Policy	We value and recognise the importance of having and being able to attract, retain and motivate a diverse team. The Equal Opportunity and Diversity Policy identifies the minimum standards which are designed to foster a culture that values and promotes workplace diversity, flexibility and inclusion.
Risk Management Policy Statement	The statement identifies our risk management approach to use best practices to support and enhance activities in all business functions, embraces a culture that promotes awareness of potential exposures and opportunities created by risk, and utilises a structured risk management program to minimise reasonably foreseeable harm to people, disruptions to operations and damage to reputation. Our risk management approach is guided by the Australia/New Zealand Standard on Risk Management (AS/NZ ISO 31000:2009).
Whistleblower Policy	CTM's Whistleblower Policy provides a framework to support the raising of concerns about inappropriate conduct within the Group and to protect those who raise concerns, including discriminatory treatment, dismissal or reprisal and breaches of their confidentiality. The policy applies to all current and former CTM directors, officers, employees and suppliers (and employees of suppliers) and any other parties acting as agents or representatives of CTM.
Workplace Bullying and Harassment Policy	The Workplace Bullying and Harassment Policy provides a clear framework to ensure all persons employed by CTM, and or those persons temporarily assigned to perform actions on behalf of the Group, are not subject to bullying, harassment, including sexual harassment, and those elements impacting a person's human rights.
Procurement Policy	The Procurement Policy sets out CTM's commitment to encourage responsible procurement, providing beneficial social and environmental outcomes through our purchasing activities and the strategic role we play in the broader travel industry.
Environmental Sustainability Policy	The Environmental Sustainability Policy demonstrates our commitment to the long-term sustainability of our business, key stakeholders and the communities in which we operate. We acknowledge our responsibility and the strategic role we play in assisting the broader travel industry to reduce its collective footprint.



Training and Awareness

In FY23, CTM continued to provide training to our workforce to increase awareness on how to identify potential issues concerned with Modern Slavery and the Protection of Human Rights via mandatory Modern Slavery and Protecting Human Rights training modules. This training is required as part of the onboarding process and our people are required to conduct an annual refresher training module as part of CTM's compliance program. The competency-based training and awareness package focuses on empowering our people with the information required to understand and identify elements of modern slavery, including:

- What is Modern Slavery and Human Trafficking
- Reasons for the Modern Slavery Act
- Types of Modern Slavery
- Recognising the potential signs
- Actions to take
- Legal protection and reporting
- Knowledge and competency check

In FY23, we hosted awareness workshops with our supplier relations team which covered results of modern slavery surveys and modern slavery risk mitigation strategies.

CTM's training statistics for FY23 is provided at Figure 2.

Total Training Hours Completed

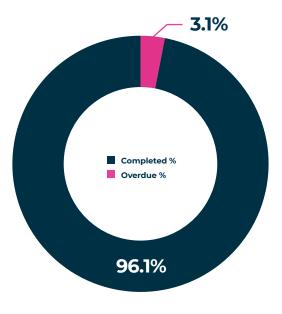


Figure 2. FY23 Compliance-based training completion

Grievance and Reporting Mechanisms

Our People

The Group is committed to fostering a culture where our people and others feel safe to speak up on matters or conduct that concerns them. The Group Whistleblower Policy has been updated and reviewed during the reporting period which provides clarity on how the Group will support and protect our people and others to express their concerns, as well as the manner in which concerns can be raised and managed.

Our Grievance Handling Procedure empowers our people with the tools they need should they feel their employment conditions do not meet industry standards. This includes actions that can be taken to report their grievance(s) through the appropriate channels for investigation and considered response.

Any reportable conduct towards employment conditions, including modern slavery, is reported to the Board and will also be reported to the Fair Work Commission, Fair Work Ombudsman, and/or the Australian Human Rights Commission, as applicable.

Incident Management

Aligned with the Group's Risk Management Framework, our people have an ability to notify and raise any issues should an incident, near miss or potential breach be encountered, identified or witnessed within our supply chain. The incident is then investigated having regard to the impact and risk severity. It is then further assessed through engagement with the supplier, supplier relations team and other relevant parties.

Whistleblower Policy

The Group's Whistleblower Policy applies to all current and former directors, officers, employees, contractors and suppliers (and employees of suppliers) and any other parties acting as agents or representatives of the Group.

The policy provides a framework to support people who may witness concerns about inappropriate conduct, including potential modern slavery risks (including potential risks as identified within the procurement supply chain). The policy further protects those who raise any concerns about discriminatory treatment, dismissal or reprisal and breaches of their confidentiality. All reportable conduct is covered by the Whistleblower Policy and is investigated by the relevant senior leader internally or external investigator as relevant to the conduct identified.



Assessing Modern Slavery Risk

Supply Chain Assessment Framework

Our assessment framework adopts a risk-based approach to assess and monitor modern slavery risks. Our supply chain stakeholders are classified in accordance with Global Slavery Index 2018 data to indicate the level of perceived risk to the business. This risk framework approach (as detailed in Appendix B) allows us to categorise our suppliers by location and the nature of products and services provided.

Many of our direct suppliers are organisations that are in geographies that demonstrate a greater awareness of modern slavery and requirements for large organisations to publish annual modern slavery statements. Based on Global Slavery Index 2018 data, these represent a minor to moderate perceived risk of modern slavery. However, we acknowledge that there is potentially a higher perceived risk of modern slavery occurring in the supply chain.

Table 2, details the perceived risk of suppliers which operate either in a high modern slavery risk area and/or may employ non-skilled employees on minimum wages or casual arrangements based on the Global Slavery Index 2018 data.

Table 2. 2023 CTM Perceived Supply Chain Risk Assessment

Supplier	CTM Region	Low	Moderate	High	Extreme
Tier 1	'	31	25	10	
	ANZ	5		1	
Airline	Asia	4	1	1	
Amme	EMEA	4	1		
	North America	4	1		
Can Damtal	Global		2		
Car Rental	North America		1		
	Asia	3			
Hatal Chain	EMEA		3	1	
Hotel Chain	Global		4	1	
	North America	6	3		
	Asia			1	
Hotelier	Global		2	3	
	North America	1	3	1	
	Asia	1	2		
To also also as	EMEA		1		
Technology	Global	3	1		
	North America			1	
Tier 2		9	53	42	14
	ANZ	1			
Travel Partner	Asia	2		30	8
	EMEA		41	10	6
	North America	6	12	2	
Grand Total		40	78	52	14



Assessed Risk Outcomes

Aligned with the Global Slavery Index 2018, CTM has adopted a risk framework to identify those upstream and downstream suppliers with a perceived risk towards modern slavery. As a result, 35 Tier 1 (Suppliers) and 109 Tier 2 (Travel Partners) were identified as perceived moderate to extreme-risk supply chain stakeholders for the Group. These suppliers were requested to complete a modern slavery assessment survey to assist in quantifying the risk severity as part of the FY23 modern slavery assessment.

Amongst other things, the modern slavery assessment survey required identified suppliers to confirm their operations' geographical location(s). Identified suppliers were also requested to confirm their governance framework relating to modern slavery, including policies, standards, awareness, and training mechanisms to indicate their level of maturity to modern slavery risks. The survey responses were further scored against a consistent calculation model to validate the level of risk the supplier may pose to the Group.

It is noted that the majority of our tier-one supply partners are large multinational organisations with stringent processes embedded in their corporate governance frameworks to manage modern slavery risks in their supply chain, including contractual requirements and requirement to publish annual modern slavery statements under the AU MSA and UK MSA.

For our smaller to medium enterprises (SMEs), tier two downstream supply chain, whilst there are no immediate concerns identified in FY23, it is acknowledged that our tier two downstream supply chain could improve their modern slavery governance framework with increase in resources and tightened focus within their business operations.

In FY24, CTM will continue to collaborate with all partners with a focus on SMEs downstream and upstream suppliers, to enhance greater transparency in the due diligence and procurement process. CTM will also work to identify support the company can provide

to the SMEs' upstream and downstream suppliers, including but not limited to introducing mandatory supplier training to increase awareness of modern slavery risks.

As part of the FY23 modern slavery risks assessment process, 5 suppliers were assessed as a moderate risk due to insufficient information provided on their surveys to confirm their modern slavery risks awareness and governance practices. Separately, 1 supplier was identified via a third party as a potential risk due to allegations of modern slavery practices. Please refer to the remediation section below on actions taken by the Group relating to these findings.

Following completion of actions set out in the remediation section below, the modern slavery assessment for FY23 Tier one and Tier two supply partners resulted in nil instances of modern slavery with an overall classification of risk to the Group as insignificant to minor risk, as illustrated in Figure 3 below

FY23 CTM Assessed Supply Chain Risk Outcomes (Tier 1 and Tier 2)



Figure 3. FY23 Supply Chain Risk Assessment Results

Remediation

As required under our Global Procurement Policy, we work collaboratively with suppliers to encourage compliance with applicable modern slavery and human rights standards.

To quantify the risks posed by the 5 suppliers identified with a moderate risk profile, further actions were undertaken in FY23 with the identified suppliers to establish the extent of modern slavery governance within their business. These actions included:

- Internal review with subject matter experts to quantify the modern slavery risks (if any);
- Direct engagement with each identified supplier to review the assessment outcome and verify their modern slavery governance framework (if any); and
- Detailed re-assessment on the supplier's modern slavery risk profile.

Through this process, all 5 identified suppliers were able to verify their modern slavery governance framework and re-classified as a minor risk, with no further actions required.

Regarding the 1 supplier identified as a potential risk due to allegations of modern slavery practices. Upon CTM seeking clarification of the supplier's position, the supplier was able to present information relating to the allegations to confirm it did not engage in modern slavery practices.

Our modern slavery risk framework identifies specific response mechanisms should we identify a potential or heightened risk of modern slavery in the supply chain.

Further, should a modern slavery risk be substantiated, our process is to encourage our supply partner to self-report or, depending on the severity level, allow CTM to report the issue on their behalf.

During this reporting period, no substantiated issues of modern slavery were identified.



Continuing our Efforts

In FY23, CTM improved its stakeholder visibility and supplier engagement processes to ensure our supply chain can effectively identify and mitigate modern slavery risks to the business. Key actions we have taken this year include strengthening our governance processes around supplier engagement, establishing a Global Procurement Policy and enhancing awareness of our people.

Throughout FY24, the Group aims to further improve our understanding of potential modern slavery and human rights risks across our business and supply chain.

We note the following objectives as part of our continual improvements to our modern slavery governance:

Objectives		Strategic Approach			
Governance	Increase and improve ethical procurement maturity and transparency	The Procurement Framework will support policy, business planning, and governance of procurement-related supplier engagement to reduce risk of modern slavery in CTM's supply chain and create social/industry benefit			
To provide good governance beyond compliance	Regular engagement of stakeholders to stay relevant	Engage with stakeholders regularly to stay relevant to identify risks and opportunities and ensure a robust and ethical supply chain			
	Maximise transparency to reduce modern slavery instances in our supply chain	Identify and implement measures to effectively promote ethical procurement, including Supplier Code of Conduct clauses in our contracting where possible			
Prosperity To enable a socially responsible mindset to proactively reduce the risk of modern slavery in our supply chain.	Improve knowledge sharing across the company and industry	Identify and support Champions to head working groups across each region, which support knowledge sharing through training courses and workshops (in meaningful ways)			
To deliver a positive impact to our stakeholders in alignment with our progress	Maximise ethical procurement to positively benefit our clients, suppliers and communities	Promote, advocate and provide the benefit of ethical procurement throughout the supply chain to maximise social sustainability to the business and community			



About this Report

As part of our core people values, our culture of care places a key focus and commitment to supporting the prosperity of our people and our supply chain to reach their full potential with dignity and equality in a healthy environment.

These values form the basis of our purpose and the principles of how we undertake an assessment of our operations and supply chain to mitigate modern slavery as far as practicable. As such, we aim to achieve a collaborative outcome for the benefit of people within our stakeholder groups and the communities in which we operate.

Consultation and approval process

This Statement has been reviewed by CTM Group's global legal and sustainability teams, in consultation with senior management and subject matter experts from the relevant areas of our business.



Appendix A: CTM Reporting Entities

The following CTM Group entities are considered reporting entities under the AU MSA and UK MSA are covered by this statement:

AUS

Corporate Travel Management Limited

Corporate Travel Management Group Pty Ltd

Floron Nominees Pty Ltd

WA Travel Management Pty Ltd

Sainten Pty Ltd

ETM Travel Pty Ltd

Travelcorp Holdings Pty Ltd

Travelogic Pty. Limited

Andrew Jones Travel Pty Ltd

SCT Travel Group Pty Ltd

Travelcorp (Aust) Pty Ltd

Tramada Holdings Pty Ltd

Tramada International Pty Ltd

Tramada Systems Pty Ltd

CTM Finance Pty Ltd

QBT Pty Ltd

TravelEdge Pty Ltd

Inspire Travel Management Pty Ltd

Quay Services Pty Ltd

Show Group Pty Ltd

STA Travel Academic Pty Ltd

Nexus Point Travel Pty Ltd

Granted Worldwide Pty Ltd

GSS Travel NZ Pty Ltd

Communico Services Pty Ltd

1000 Mile Travel Group Pty Ltd

UK

Corporate Travel Management (UK) Limited

Corporate Travel Management (United Kingdom) Limited

Corporate Travel Management (North) Limited

Portall Travel Limited

Radius Travel WTT Limited

Statesman Travel Limited

Appendix B: Risk Framework

CTM Global Travel Profile	Perceived Risk	1 – Australia and New Zealand (3.1)	2 – Europe & Central Asia (28)	3 – Americas (41)	4 – Asia & The Pacific (46)	5 – Arab States (57)	6 – Africa (62)
Individual/small hotel/motel/other Local travel agent in remote area Local hire vehicle company Local and/or regional tour operating companies Local supplier of goods and/or services	5 Extremely High Risk	M (15)	M (20)	H (24)	H (27)	E (29)	E (30)
Local small transport operator Small hotel chain in regional area Small chain travel agent Event management and operations Freight logistic company crossing borders	4 High Risk	L (10)	M (14)	M (19)	H (23)	H (26)	E (28)
Small international airline carriers Local domestic airline carriers Regional cruise liner operations and/or terminal operator Medium chain hotel groups operating in local regions Regional based transport operator	3 Moderate Risk	L (6)	L (9)	M (13)	M (18)	H (22)	H (25)
Regionally based travel agency National/medium chain hotel/motel/other National supplier of goods and/or services Global cruise liner and vessel operations Global and/or multi-continental tour operating companies Local airline carrier in remote area	2 Minor Risk	L (3)	L (5)	L (8)	M (12)	M (17)	H (21)
International airline carriers operating across main continents Major domestic/national airline carriers Large chain hotel groups operating in multiple countries Rail network operators operating across mulitple regions/countries Large chain hire vehicle companies International/national logistics or supply of goods and/or services	lnsignificant or Low Risk	L (1)	L (2)	L (4)	L (7)	М (11)	M (16)

Note: The numbers in brackets (1-30) allow for further prioritisation of risks within each Rating category, e.g. E (29) has a higher priority than E (28)

Identified RIsk	Support Methodology
L – Insignificant Risk	Requires no immediate action. Maintain relationship and assess risks to Modern Slavery when an incident is identified or circumstances with supplier change.
M – Minor Risk	Maintain relationship and engage/seek further clarification with the business/operation/entity/ on the aspects of Modern Slavery risks indentified to remedy the issue(s).
H – Moderate Risk	Engage directly with supplier and seek validation of the issue identified to improve and reduce the risk or remedy the issue within an agreed timeframe. Seek further guidance on whether the Modern Slavery issue requires further monitoring, reporting and notification.
E – High Risk	Immediately engage and work closely with the supplier on aspects identified. Provide support on where the supplier needs to improve to continue the relationship with CTM. Verify that the supplier will self-report or notify the issue to ensure transparency.



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