



# Modern Slavery Statement

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FOR REPORTING PERIOD 1 JULY 2023 - 30 JUNE 2024

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## 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 and present and extend that respect to all Aboriginal and Torres Strait Islander peoples.

## 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 2024 (FY24).

### 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.

Prior to Board approval, this Statement was reviewed by CTM Group's Global Chief Legal Officer and Head of Sustainability, 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 3 December 2024 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.



# FY24 Highlights

Introduction of a Global Supplier Code of Conduct

Enhanced due diligence processes for supplier selection and engagement

Increased modern slavery proficiency in our Supplier Relations team with targeted training and engagement

\$970m  
NEW CLIENT WINS\*

\$201.7m  
UNDERLYING EBITDA

30 JUN FTE STAFF COUNT  
3,192  
(-14 v FY23)

97%  
CLIENT RETENTION

\$716.9m  
REVENUE AND OTHER INCOME

\$84.5m  
STATUTORY NPAT ATTRIBUTABLE  
TO OWNERS

<sup>1</sup> All figures in AUD based upon client assumptions of annualised spend at time of winning.

# Mandatory Criteria

This Statement addresses the mandatory and 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	6, 12, 15
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	8, 12 - 13
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	7, 12 - 14
Describe how the reporting entity assesses the effectiveness of such actions	Organisation's effectiveness in ensuring that slavery and human trafficking is not taking place in its business or supply chains, measured against such performance indicators as it considers appropriate	7, 12 - 14
Describe the process of consultation with any entities that the reporting entity owns or controls, and confirm the entity giving the statement		2, 15
Include any other information that the reporting entity, or the entity giving the statement, considers relevant.		8 - 11



# Managing Director's Statement

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

Addressing modern slavery is a complex issue and is a crucial element of building a just and equitable society. CTM, along with our suppliers, acknowledge the important role we play in the travel industry to ensure we have a robust framework in place to identify and address modern slavery in our supply chain.

Sustainability remains a key strategic element of how we conduct business every day. As a recognised global leader in travel management services, CTM strives to empower our customers to make sustainable travel decisions with a view to reduce adverse impacts of travel. This extends to the mitigation of modern slavery risk and CTM is on a progressive journey to ensure the risk mitigation strategies and actions are embedded in our processes and are part of our culture. This statement represents our fourth Modern Slavery Statement since we commenced reporting in 2020 and should be read in conjunction with our [FY24 Sustainability Report](#).

During FY24, we have continued our efforts to review and engage with our supply chain to deepen our understanding potential of modern slavery exposure. This is important for our journey to ensure we have the necessary governance and controls in place to best manage the associated risks and maintain transparency with our stakeholders.

## Key actions we have taken this year include:

- enhancing our governance framework with the introduction of a [Global Supplier Code of Conduct](#) which clearly outlines our expectations and the requirements of our suppliers. It also stipulates CTM's mechanism for raising concerns about suspected or non-compliance;
- enhanced due diligence processes for supplier selection and engagement;
- developing modern slavery awareness throughout our business through our sustainability engagement strategy; and
- increasing modern slavery proficiency in our Supplier Relations team through targeted training and engagement.

Whilst we are pleased with our progress to date, we have identified areas that will require our focus going forward and this includes supporting our smaller upstream and downstream suppliers. We acknowledge the challenge in this area and recognise we cannot take a one size fits all approach.

For FY25 and beyond, we will work to undertake a number of key initiatives including but not limited to sharing of educational resources and establishing additional modern slavery indicators.

We would like to thank our customers, employees, investors and all our stakeholders for their continued support, and we look forward to delivering on these important commitments in FY25 and beyond.



**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 with an indirect network across more than 100 countries.

For more information about the Group's operations, please refer to CTM's FY24 Annual Report, available on our website at [investor.travelctm.com.au](https://investor.travelctm.com.au).

## 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.

## 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.

This year, CTM celebrated its 30th anniversary. CTM has come a long way from the humble beginnings of a two-person startup. By fostering a culture of innovation and agility, CTM empowers our teams globally to explore new ways to deliver value.

Empowerment is key to CTM's growth strategy. CTM invests in people by providing the tools, training and support they need to excel. This ensures an agile workforce that is resilient and ready to seize opportunities in a rapidly evolving market.

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

This is the CTM Group's fourth Statement under the AU and UK MSA and the second joint Statement by the CTM Group. The Group continues to focus on continuous improvement on our journey to mitigate modern slavery risk in our supply chain by enhancing our risk management approach. This Statement sets out the Group's approach and actions taken to manage modern slavery risks throughout FY24, as well as look ahead to initiatives and further actions for FY25 and beyond.

## CTM Corporate Recognition (Awards) FY24

### Australia: Travel Industry Association Awards (NTIA)

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

### Asia: TTC Awards

- Best Corporate Travel Agency

### Europe: Business Travel Sustainability Awards

- Best Corporate Booking Platform – Lightning (for the second year in a row)





# CTM Modern Slavery Progress

## Key actions for FY24

During FY24, we have progressed the following actions:

- enhancing our governance framework with the introduction of a Global Supplier Code of Conduct which clearly outlines our expectations and the requirements of our suppliers. It also stipulates the mechanism for raising concerns about suspected or non-compliance at CTM;
- enhanced due diligence processes for supplier selection and engagement;
- developing modern slavery awareness throughout our business through our sustainability engagement strategy; and
- increasing modern slavery proficiency in our Supplier Relations team through targeted training and engagement.

## Progress against the objectives and continuous improvements set out in our FY23 statement.

The progress we have made in FY24 are set out below.

### Governance



**Increase and improve ethical procurement maturity and transparency** – we have enhanced our procurement framework in FY24 to better support policy, business planning, and governance of procurement-related supplier engagement to reduce risk of modern slavery in CTM’s supply chain. This includes introducing the Global Supplier Code of Conduct and making it a mandatory requirement for our major suppliers where possible.



**Regular engagement of stakeholders to stay relevant** – we engaged with our customers and suppliers regularly throughout FY24 to ensure we are alive to changes in the industry and customer requirements.

### Prosperity



**Maximise transparency to reduce modern slavery instances in our supply chain.** We acknowledge this is a work in progress and the challenges associated with this.



**Improve knowledge sharing across the company and industry.** We have focused our knowledge sharing with Supplier Relations team in FY24 and will look to build capability to support knowledge sharing through training courses and workshops (in meaningful ways) in FY25.



**Maximise ethical procurement to positively benefit our clients, suppliers and communities.** In FY24, we have introduced a Global Supplier Code of Conduct to promote ethical procurement. We will continue to progress our work on this objective to incorporate human rights considerations into due diligence of major supplier contracts, in line with our sustainability strategy.

# 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 successful delivery of strategic objectives and contributes 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 2024 Corporate Governance Statement available on our website at [investor.travelctm.com.au/corporate-governance](https://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 more transparency in its reporting<sup>1</sup>.

For more information about the Group's risk management approach and disclosure of risks, please refer to the CTM FY24 Annual Report available on our website at [investor.travelctm.com.au/corporate-governance](https://investor.travelctm.com.au/corporate-governance).



## Sustainability

CTM is committed to the long-term sustainability of our business and has developed a sustainability strategy that encompasses various initiatives, factors we believe will support our long-term success. These include the ways we interact with our people, customers and shareholders; how we can reduce our impact on the environment; and how we can support the communities in which we operate.

In the reporting period, we have seen significant evolution in the sustainability landscape and an increase in stakeholder expectations globally. Our customers, investors, regulators, employees and suppliers have made clear to us the importance that they place on sustainability - especially sustainable travel.

Further details of our sustainability strategy and targets are set out under the CTM FY24 Sustainability Report which is available on our website at [investor.travelctm.com.au/corporate-governance](https://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 9 of the Statement. The code of conduct is available on our website at [investor.travelctm.com.au/corporate-governance](https://investor.travelctm.com.au/corporate-governance).

In addition to the Code of Conduct, 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 and Human Rights Acts and fair labour and operating practices.

As part of our continuous improvement actions, CTM introduced a Global Supplier Code of Conduct in FY24 which sets CTM's expectations of suppliers including safety, integrity, environment, sustainability, culture and human rights standards. The Global Supplier Code of Conduct also sets out a clear linkage for concerns to be raised and reported under CTM's Whistleblower Policy. We acknowledge that in some circumstances and due to the nature of our business we experience challenges in engaging with certain suppliers and we are required to adapt and tailor our approach accordingly. We also acknowledge further work is required to deepen knowledge and identify opportunities for further collaboration with our industry partners to verify and help resolve modern slavery and human trafficking risk issues.

<sup>1</sup> Refer to Appendix B – Risk Framework



# CTM Policies

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

**Table 1. Relevant CTM Policies**

Policy Title	Policy Scope
Supplier Code of Conduct	We strive to always conduct business safely, with integrity, and in line with principles outlined in the Supplier Code of Conduct. The Code sets out CTM's expectation for suppliers to comply with all applicable laws and regulations and in particular standards in relation to safety, integrity, environment, sustainability, culture and reporting, as well as human rights. Suppliers are encouraged to exceed the standards provided in the Code.
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, embrace a culture that promotes awareness of potential exposures and opportunities created by risk, and utilise 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 encouraging 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 FY24, CTM continued to provide training to our people to increase awareness on how to identify potential signs and issues concerned with modern slavery and the protection of human rights.

## Mandatory Modern Slavery and Human Trafficking 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

The completion rate of the mandatory training has increased from 96.1% in FY23, to 99.44% in FY24.

## Introduction to Global Supply Chain

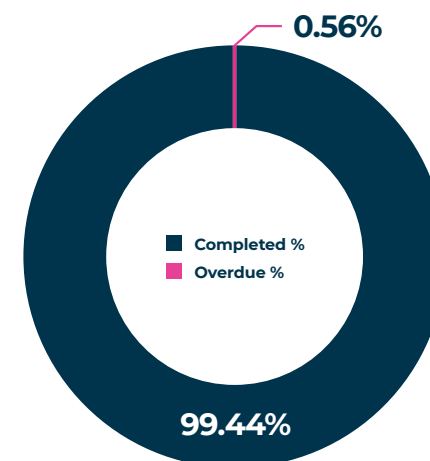
In FY24, we have also delivered targeted training for our employees directly involved in supplier relations. The training was rolled out globally and focuses on empowering our people with due diligence, decision making, engagement and management of supplier contracts.

In FY24, 37 employees were assigned the training in May 2024, and 100% of employees assigned completed the training by July 2024.

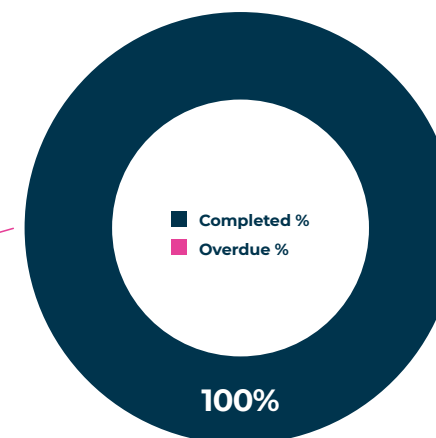
In this course, learning outcomes include:

- Define the global supply chain and its benefits
- Highlight best practices for managing supply chain compliance

FY24: Compliance based training completion



Global Supply Chain 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 Audit and Risk Committee and 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 and rectified/mitigated where possible 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 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 The Group's Whistleblower Policy internally or external investigator as relevant to the conduct identified. The policy is reviewed annually and was updated in the reporting period with a particular focus on providing clarity of process for employees and contractors and general update for ease of readability and application.





# Assessing Modern Slavery Risk

## Supply Chain Assessment Framework

In FY24, we have focused our assessment on our larger suppliers adopting a risk-based approach to perceived modern slavery risks. Consistent with our assessment for FY23, our key suppliers 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 key 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 which we have taken into account in our assessment. However, we recognise the challenges and limitations associated with the assessment framework and acknowledge there is potentially a higher perceived risk of modern slavery occurring in the supply chain and some geographies.

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

**Table 2. FY24 CTM Perceived Supply Chain Risk Assessment**

Supplier	CTM Region	Insignificant	Moderate	High	Extreme
Airline	ANZ	2			
	Asia		1		
	EMEA		5		
	North America		1		
Ground Transport	EMEA		1		
	North America	1	1		
Hotel	ANZ	4	2		
	Asia		1		
	EMEA	3	1		
Total		10	13	0	0



## Assessed Risk Outcomes

Aligned with the Global Slavery Index 2018, CTM has adopted a risk framework to identify those key suppliers with a perceived higher risk appetite towards modern slavery risks. Our key suppliers were requested to complete a modern slavery assessment survey to assist in quantifying risk severity as part of the FY24 modern slavery assessment. Amongst other things, the modern slavery assessment survey required key suppliers to confirm their operations' geographical location(s). Our key suppliers were also requested to confirm their governance framework relating to modern slavery and procurement, including due diligence process, policies, standards, dedicated personnel, awareness, and training mechanisms to indicate their level of maturity and awareness of modern slavery risks.

The survey responses were further scored against a consistent calculation model to validate the level of risk the identified supplier may pose to the Group. The FY24 Perceived Supply Chain Risk Assessment was conducted in line with previous years' assessments to ensure consistency in results year-on-year. For FY24, 26 key tier 1 suppliers were identified and engaged through a modern slavery survey. Of these 26 suppliers, 23 responded to the survey (completion rate of 88%). Through a quantitative analysis process, 13 suppliers were identified as perceived moderate risk to the Group but none of our identified suppliers who completed the survey were found to have high or extreme potential risks of modern slavery in their operations.

The key areas highlighted through the analysis conducted in FY24 include operations in regions with higher perceived risks of modern slavery, absence of internal training and awareness disclosed and overall limited visibility over workforce and supply chain. Following detailed analysis of survey results, these areas were determined to not be indicative of potential risks within our supply chain.

Consistent with the survey findings from our previous years, it is also noted that the majority of our suppliers are large multinational organisations with stringent processes embedded in their corporate governance frameworks to manage modern slavery risks in their supply chain, including their own legal and contractual requirements and requirement to publish annual modern slavery statements under the AU MSA and UK MSA.

For the reporting year, we have renewed our focus with our larger key suppliers to provide more useful survey findings, adopting a risk-based approach based on factors such as spend and criticality to our travel management services. We have therefore not included our agency partners (tier 2 suppliers referred to in the FY23 statement) in this year's survey noting the ongoing challenges faced by our agency partners given the size of their business. CTM remains committed to assisting our agency partners to improve their modern slavery governance framework in FY25 and beyond by sharing educational resources and tools to identify modern slavery risk indicators.







## Continuing our **Efforts**

In FY24, CTM enhanced its supplier engagement processes to ensure we communicate the standard expected of our suppliers in relation to modern slavery and broader human rights issues.

We also recognise the challenges many of our suppliers face in their own supply chain to improve visibility and achieve standardisation of requirements and obligations to effectively identify and mitigate modern slavery risks in our business.

Throughout FY25, the Group aims to further improve our people and our suppliers' 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:**

- > Proactively sharing training resources with our suppliers
- > Make suppliers aware of our Supplier Code of Conduct at time of engagement and on an ongoing annual basis
- > Continue to build in relevant modern slavery reporting and contractual obligations to relevant supply contracts where possible
- > Enhanced senior executive and management education on modern slavery indicators
- > Implement a platform to manage our supplier contracts for better visibility of supply chain globally
- > Enhance third party due diligence approach by expanding the scope of our survey to include additional modern slavery indicators
- > Identify opportunities for further collaboration with industry partners, organisations, and other third-party providers to verify and help mitigate modern slavery and human trafficking risk issues



# 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	CTM Finance Pty Ltd
Corporate Travel Management Group Pty Ltd	QBT Pty Ltd
Floron Nominees Pty Ltd	TravelEdge Pty Ltd
Sainten Pty Ltd	Inspire Travel Management Pty Ltd
ETM Travel Pty Ltd	Show Group Pty Ltd
Travelogic Pty. Limited	STA Travel Academic Pty Ltd
Andrew Jones Travel Pty Ltd	Nexus Point Travel Pty Ltd
Travelcorp (Aust) Pty Ltd	Granted Worldwide Pty Ltd
Tramada Holdings Pty Ltd	Communico Services Pty Ltd
Tramada International Pty Ltd	1000 Mile Travel Group Pty Ltd
Tramada Systems Pty Ltd	

## UK

Corporate Travel Management (UK) Limited	Portall Travel Limited
Corporate Travel Management (United Kingdom) Limited	Radius Travel WTT Limited
Corporate Travel Management (North) Limited	Statesman Travel Limited



# Appendix B: Risk Framework

CTM Global Travel Profile	Perceived Risk	1 – Australia and New Zealand (31)	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	<b>5</b> 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	<b>4</b> 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	<b>3</b> 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	<b>2</b> 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 multiple regions/countries Large chain hire vehicle companies International/national logistics or supply of goods and/or services	<b>1</b> Insignificant or Low Risk	L (1)	L (2)	L (4)	L (7)	M (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
<b>L – Insignificant Risk</b>	Requires no immediate action. Maintain relationship and assess risks to Modern Slavery when an incident is identified or circumstances with supplier change.
<b>M – Minor Risk</b>	Maintain relationship and engage/seek further clarification with the business/operation/entity/ on the aspects of Modern Slavery risks identified to remedy the issue(s).
<b>H – Moderate Risk</b>	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.
<b>E – High Risk</b>	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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