



Modern Slavery Statement

For the period 1 July 2020 – 30 June 2021

INTRODUCTION

Corporate Travel Management Limited and its subsidiaries (**CTM Group, CTM** or the **Group**) is committed to improving our practices to combat modern slavery and human trafficking. At CTM we are committed to acting ethically and with integrity in all our business dealings and relationships and to developing, implementing and enforcing effective systems and controls to mitigate the risks of modern slavery taking place in our business and supply chain.

We are also committed to ensuring there is transparency in our business and approach to tackling modern slavery across our supply chains, consistent with our reporting obligations under the *Modern Slavery Act 2018* (Cth) (**Modern Slavery Act**). We expect the same high standards from all of our contractors, suppliers and other business partners and that they hold their own suppliers to the same high standards.

CTM's Modern Slavery Statement covers the activities of the CTM Group in respect of the financial year ended 30 June 2021 (**FY21**) in identifying, managing and addressing potential modern slavery risks and impacts in our operations and supply chain.

This Modern Slavery Statement is made on behalf of Corporate Travel Management Limited and its subsidiaries as the reporting entity for the purposes of the Modern Slavery Act. Refer to page 10 for further information.

ABOUT THE CTM GROUP

The CTM Group is a global provider of travel management solutions to the corporate market. CTM provides both local and global travel management solutions around the world. The Group's global partner network provides customers with consistency and assurance wherever they travel. CTM's international network is underpinned by compatible systems, processes and service culture in every market, delivering savings, efficiency and compliance for our clients. CTM employs over 2000 people across our global operations.

The Group's global headquarters are based in Brisbane, Australia and we have offices in Australia, New Zealand, United Kingdom, Europe, Asia and North America. CTM has four key geographic operating segments being:

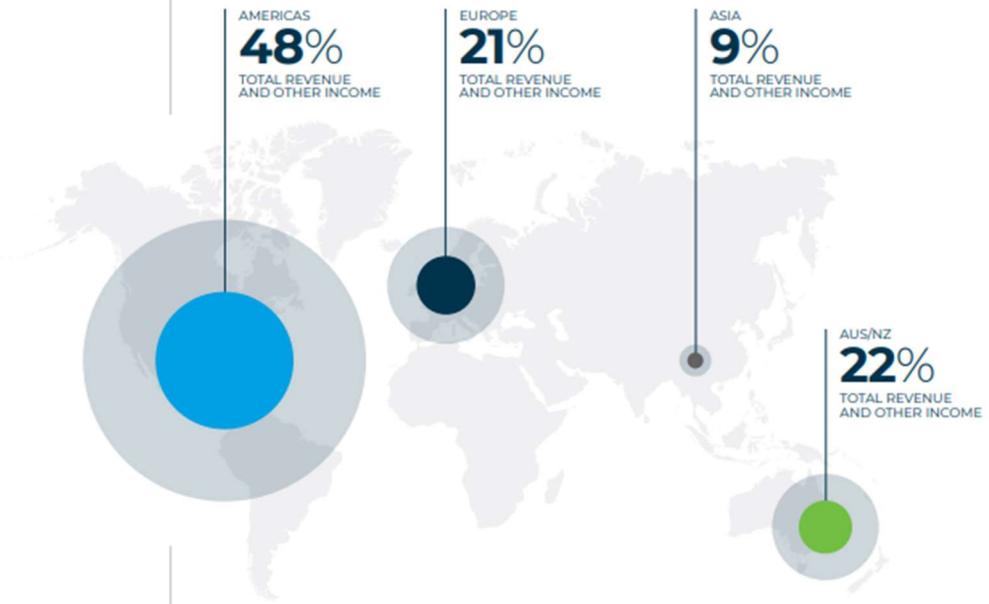
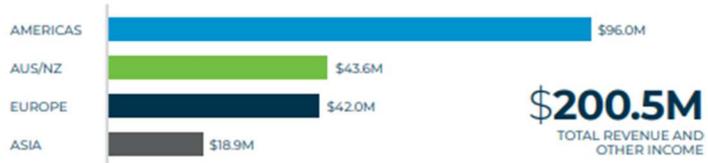
- Travel Services Australia and New Zealand;
- Travel Services North America;
- Travel Services Asia; and
- Travel Services UK/Europe.

In FY21, 80% of the Group's revenue was derived outside of Australia and New Zealand, with our North America and Europe operations collectively contributing 75% of the Group's revenue.

For more information about the Group's financials, operations, and strategy, please refer to [CTM's 2021 Annual Report](#). With ongoing disruption in the travel industry caused by the COVID-19 pandemic, we have continued to maintain regular contact with our suppliers and have endeavored, as far as possible and wherever sensible and practical, to maintain normal commercial arrangements and relationships with our suppliers, stakeholders and clients.

Total revenue and other income generated by region

Corporate Travel Management operates across four continents and, supported by our global network of partners, has the ability to service customers in every corner of the world.



GOVERNANCE FRAMEWORK

CTM recognises the importance of good corporate governance practices which assist in ensuring the accountability of the Board and management of the Group. The Group believes that 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.

The Group has a number of policies in place that support CTM's governance framework to address the risk of modern slavery in our business and supply chain. The Board regularly reviews the Group's corporate governance practices to ensure these practices meet the requirements of applicable legislation and corporate governance standards.

For more information about CTM's corporate governance framework, practices and policies please refer to the Group's 2021 Corporate Governance Statement at <https://investor.travelctm.com.au/corporate-governance/>.

Code of Conduct

CTM's Code of Conduct for directors, senior executives, employees, consultants and contractors, sets out the fundamental principles of business conduct expected by the Group.

The Code of Conduct promotes:

- acting in accordance with the law;
- acting with honesty, integrity and fairness; and
- commitment to a high standard of professionalism and avoidance of conflicts of interest.

Whistleblower Policy

Consistent with the Group's Code of Conduct which promotes acting with honesty, integrity and fairness, 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 in relation to discriminatory treatment, dismissal or reprisal and breaches of their confidentiality. The CTM Whistleblower Policy can also be used for any grievance processes relating to reporting modern slavery concerns or incidents anonymously.

The Whistleblower Policy 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 Health and Safety Policy

CTM is committed to providing a healthy and safe workplace for its employees, contractors and visitors. Employees are required to complete all relevant periodic training. At CTM we also focus on employee mental health and overall health and wellbeing through a range of local initiatives.

Equal Opportunity and Diversity Policy

CTM values and recognises the importance of having, and being able to attract, retain and motivate, a diverse team. The Equal Opportunity and Diversity Policy sets out minimum standards which are designed to foster a culture that values and promotes workplace diversity, flexibility and inclusion.

Anti-Bribery and Corruption Policy

CTM takes a zero-tolerance approach to bribery and corruption and is committed to conducting its business with honesty and integrity and the highest standards of personal and professional ethical behavior. The Anti-Bribery and Corruption Policy sets out the Group's and employee's responsibilities and the responsibilities of third parties we deal with in observing and upholding our position on bribery and corruption. It also provides information and guidance to our employee's on how to recognise and deal with bribery and corruption issues.

The Board has ultimate responsibility for the policies and approves, reviews and assesses the Group's achievement against its measurable objectives.

Risk Management

CTM's Audit & Risk Committee reviews and makes recommendations to the Board in relation to risk matters such as the adequacy of the Group's processes for managing risk, including modern slavery risks.

CTM's Remuneration & Sustainability Committee also assists the Board to fulfil its duties and responsibilities in relation to sustainability, social and environmental risks relevant to the Group, including through monitoring the Group's policies and initiatives to ensure appropriate safeguards are in place for dealing fairly and ethically with customers, suppliers, competitors, employees and other stakeholders.

The Group's senior executives are responsible for the identification, evaluation and monitoring of material business risks on an ongoing basis as well as for embedding a culture throughout the Group that promotes awareness of potential exposures created by risk.

SUPPLY CHAIN

CTM appreciates working with many different suppliers, providers and industry partners which enables the Group to deliver a great service to our clients. The Group's supply chain can be classified into the following key categories:

- travel management service suppliers including airlines, hotel chains, car rental companies, rail providers, global travel distribution system providers;
- information, communications and technology;
- property services including facilities management, utilities, cleaning and waste management;
- marketing; and
- office supplies.

ASSESSING MODERN SLAVERY RISK

Supply Chain Assessment Framework

As part of our initiative to identify modern slavery and mitigate associated risks in our business and supply chain, in FY20 CTM established a working group to review our supply chain. The Group developed a Supply Chain Assessment Framework which was rolled out to CTM's strategic supply partners, being material suppliers of goods and services necessary for the Group to provide travel management services to our clients. Throughout FY21, the working group met and undertook a review of our supply chain.

The Supply Chain Assessment Framework covers five key areas, with an overarching reflection given to align CTM's company values with the values of our suppliers. The Supply Chain Assessment Framework assessment criteria helps CTM to understand and manage the geographical, environmental and social impacts of strategic suppliers in our supply chain.

The Supply Chain Assessment Framework assists CTM to assess the performance of our strategic suppliers against our requirements and expectations with respect to modern slavery and human trafficking.

Modern slavery risk in the supply chain

The majority of the reporting Group's direct suppliers are located in geographies that demonstrate greater awareness of modern slavery and therefore, based on external data available through Walk Free "Modern Slavery Index", represent a lower risk of modern

slavery. However, our supply chain is geographically dispersed and, in regions such as Asia and the Middle East and in direct and indirect supply areas such as hotel accommodation, we acknowledge that there is a higher risk of modern slavery occurring in the supply chain, particularly where suppliers may employ non-skilled employees on minimum wages and casual arrangements. In the absence of full transparency, there exists a risk of suppliers at lower levels in the supply chain (e.g., suppliers who may supply products and services to our direct suppliers) engaging in conduct inconsistent with our standards.

CTM has adopted a risk-based approach to assessing and monitoring modern slavery risks and the Group continues to develop and enhance systems and controls which are aimed at minimising the risk of modern slavery taking place in our own business or in any of our supply chains. For example, we are continuing to progressively develop a more comprehensive supply chain map across our business to capture the geographic location and nature of all products and services sourced by the Group globally in order to undertake a more targeted supplier risk assessment.

CTM has identified what it believes may be the most common modern slavery risks and associated practices in the travel industry including (but are not limited) to the following:

- Airlines – potential under payment of workers, excessive work hours and health and safety
- Accommodation – potential under payment of workers, excessive work hours and health and safety
- Ground transport providers – potential under payment of workers, excessive work hours and health and safety
- Technology providers – potential under payment of workers, excessive work hours and health and safety

Remediation

CTM works in a collaborative manner with our suppliers to encourage compliance with our expectations regarding modern slavery and human rights standards. While CTM did not find any instances of modern slavery in its own business, if we were to identify modern slavery or a heightened risk of modern slavery, we would work with the supplier, stakeholders and/or relevant third party to understand the risk and resolve the issue.

Training and Awareness

In FY 21, we introduced and deployed modern slavery and human rights training and awareness sessions across CTM's business to assist staff with detecting and mitigating potential modern slavery risks. The Group approach recognises that our employees (including our directors) are key to maintaining a compliant and ethical approach to our

business practice. All new CTM employees complete this training and carry out annual refresher training. As part of the training process, all employees are guided to read CTM policies and complete an acknowledgement. CTM's training and related policies aim to help raise awareness and understanding of key issues relating to modern slavery and how we can do our part in decreasing the risk of modern slavery occurring.

At CTM we also aim to raise awareness of the risks and issues associated with modern slavery and human trafficking with our employees. Employees are encouraged to communicate and raise any concerns or issues that they observe in their role with their local leadership team, who are encouraged to escalate where appropriate.

CTM's Milestones in its FY21 Journey

- Launched first Modern Slavery Statement 31 March 2021
- Launched CTM Supply Chain Assessment Framework August 2020
- Identification of strategic supply partners to CTM in each region October 2020
- Modern Slavery survey conducted with strategic supply partners in October 2020
- Modern Slavery awareness and training sessions deployed across CTM's business for all staff employees June 2021

Like most companies, the global COVID-19 pandemic continues to present challenges to CTM its operations and staff with direct impacts on the business still being experienced. COVID-19 has limited CTM's ability to undertake some on the ground activities that would help to identify modern slavery risks and incidents such as site visits.

FUTURE PRIORITIES

In FY 22-23, we aim to create a comprehensive understanding of modern slavery and human rights issues within our business and supply chain. CTM adopts a continuous improvement approach to its performance in this area. As a company, we continue to review, develop and promote our policies and practices to identify and mitigate modern slavery and human trafficking risks in our business and supply chain. Key areas of focus for CTM include:

- implementing a Compliance Standard for our key suppliers to assist CTM in further identifying and preventing forms of modern slavery in our business and supply chain;
- making enhancements to our Supply Chain Assessment Framework, in particular, reviewing the current self-assessment questionnaire; and
- updating a number of our relevant policies to include specific references to modern slavery and human trafficking.

CTM's Supply Chain Assessment Focus

ENVIRONMENT	DIVERSITY & INCLUSION	COMMUNITY	PEOPLE
<ul style="list-style-type: none"> Environmental Policies Green Initiatives Carbon Offsetting Waste reduction Energy Consumption Responsible sourcing of materials 	<ul style="list-style-type: none"> Anti-discrimination Diversity & Inclusion Policy Training & Education Grants & Scholarships Indigenous Engagement Plan Cultural Awareness Training 	<ul style="list-style-type: none"> Social Cause Engagement Volunteering Local Community Involvement Support & Sponsorships Charity Involvement 	<ul style="list-style-type: none"> Equal Opportunity Fair Working Terms & Conditions - in line with local employment laws Human Rights Modern Slavery Employee Health & Wellbeing Training and development opportunities for employees

OVERARCHING CORPORATE GOVERNANCE & ESG / CSR / SUSTAINABILITY

- Governance Framework
- Sustainability
- Corporate and Social Responsibility
- Business Integrity and continuous disclosure
- Anti-bribery & Anti-corruption Policies
- Anti-fraud Policy
- Anti-competitive conduct
- Privacy Policy
- Whistle Blower Policy & Process
- Intellectual Property Management

Supplier alignment to CTM's Values

						
<p>EXCEED TO SERVICE</p> <p>Excellence is a habit not an act.</p>	<p>INNOVATE TO GENERATE</p> <p>Innovation in thinking and doing what nobody else does.</p>	<p>TRUST TO SUCCEED</p> <p>Belief is what makes a person, team, company and community stronger.</p>	<p>EMPOWERED TO ACHIEVE</p> <p>The power to make the right decision to achieve great results.</p>	<p>COLLABORATE TO PERFORM</p> <p>Through teamwork wonderful things can be achieved.</p>	<p>RECOGNISE TO REWARD</p> <p>Celebrate and acknowledge when we have accomplished something special.</p>	<p>PLAY TO WIN</p> <p>People are successful when they have fun in what they do.</p>

REPORTING ENTITY

This Modern Slavery Statement has been prepared by the CTM Group to meet the requirements of the Australian Modern Slavery Act. The Reporting Entity for the purposes of this Modern Slavery Statement is Corporate Travel Management Limited (registered in Australia as ABN 17 131 207 611 under the Australian *Corporations Act 2001* (Cth) and listed on the Australian Securities Exchange) and its owned and controlled entities. The Australian owned and controlled entities of the CTM Group and that are covered by this Modern Slavery Statement are as follows.

COMPANY NAME	ACN	Ownership 2021 ¹
Corporate Travel Management Group Pty Ltd	005 000 895	100.00%
Andrew Jones Travel Pty Ltd	065 009 887	100.00%
SCT Travel Group Pty Ltd	124 599 471	100.00%
Travelcorp Holdings Pty Ltd	128 213 249	100.00%
Travelcorp (Aust) Pty Ltd	063 120 258	100.00%
WA Travel Management Pty Ltd	126 792 256	100.00%
Floron Nominees Pty Ltd	001 573 566	100.00%
Sainten Pty Ltd (trading as Macquarie Group Travel Centre)	073 129 101	100.00%
ETM Travel Pty Ltd	096 289 431	100.00%
Travelogic Pty Ltd	128 213 249	100.00%
Tramada Holdings Pty Ltd	092 226 170	100.00%
Tramada International Pty Ltd	617 598 008	100.00%
Tramada Systems Pty Ltd	080 578 954	100.00%

CONSULTATION AND APPROVAL PROCESS

A process of consultation across CTM was undertaken to help guide the preparation of this Modern Slavery Statement. This included engagement with external stakeholders, investor representatives, members of senior management and the directors of the CTM Group. This Modern Slavery Statement has been approved by the Board of Corporate Travel Management Limited.



Jamie Pherous

Managing Director

Corporate Travel Management Limited

22 December 2021

¹ Each entity has share capital consisting solely of ordinary shares that are held by the Group and the proportion of ownership interests held equals the voting rights held by the Group.