Modern Slavery Statement

FOR REPORTING PERIOD 1 JULY 2021 – 30 JUNE 2022

Acknowledgment of Country

We acknowledge the traditional custodians of the lands on which our organisation is located and where we conduct our business. We pay our respects to Elders including past, present and emerging. We are committed to honouring their cultural and spiritual relationships which have a continual connection to land, waters and communities.

Legal Declaration

This Modern Slavery Statement (**Statement**) represents the initiatives and steps undertaken by Corporate Travel Management (**CTM**) Limited ACN 131 207 611 , as the parent entity for all Reporting Entities[1] covered by this Statement, to assess and address risks of modern slavery in operations and the supply chain for the reporting period of 1 July 2021 – ended 30 June 2022 (**FY22**).

To prepare this Statement, CTM engaged with each of the Reporting Entities covered by this Statement. This included engagement with members of senior management of the Reporting Entities.

This Statement was approved by the Corporate Travel Management Limited Board on 26 October 2022 on behalf of all Reporting Entities covered by this statement and signed by a responsible member as defined by the *Modern Slavery Act 2018 (Cth)*.

Introduction

Corporate Travel Management Limited ACN 131 207 611 and its subsidiaries[1] (together, the **Group**) is committed to acting ethically, with integrity. The Group develops, implements, and governs effective systems and controls to mitigate the risks of modern slavery across our business and our upstream and downstream supply chains.

The Group's focus is to continually improve our performance and transparency in our approach to identifying and mitigating modern slavery.

This Statement describes the actions taken by the Group to assess and address the risks of modern slavery in its operations and supply chain for FY22. The assessment represented in this Statement is based upon responses provided by suppliers that were independently verified by CTM's assessment team, using reasonable endeavours.

This Statement recognises the Group's journey to identify and address modern slavery risks is ongoing and represents a living document for the Group's continued initiatives.

1 Refer to page 7 for the relevant CTM Reporting Entities

Mandatory Criteria

Consistent with the *Modern Slavery Act 2018 (Cth)* (the **Act**), this Statement addresses the following mandatory reporting criteria in the following sections:

1. Define the approach, and   Pg 2-4
   a) identify the reporting entity

   b) describe the operation of the reporting entity   Pg 5-7

   c) 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   Pg 7, 9, 10, 13

   d) 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   Pg 8, 11, 13

   e) describe how the reporting entity assesses the effectiveness of such actions   Pg 14-15

   f) describe the process of consultation with any entities that the reporting entity owns or controls, and confirm the entity giving the Statement   Pg 14-16

   g) include any other information that the reporting entity, or the entity giving the Statement, considers relevant.   Pg 17

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Managing Director's Report

At CTM, we recognise the efforts taken to reduce the occurrence of modern slavery in Australia and around the world. Globally, an estimated 40.3 million people are subject to modern slavery, including 24.9 million in forced labour and 15.4 million in forced marriages. An estimated 1 in every 4 victims of modern slavery are children.

We acknowledge that locally, an estimated four adult victims of trafficking or modern slavery go undetected for every case identified.

No organisation can be 100% confident that they are not indirectly linked to modern slavery within their supply chain. Based on this understanding, CTM is committed to providing transparent disclosure of modern slavery risks in our operations and supply chain and the practical steps we take to manage and mitigate modern slavery risks as far as practicable.

In line with the *Modern Slavery Act 2018 (Cth)*, CTM proactively works with our supply chain to assess and address modern slavery risks. Our 'innovate to generate' culture means we are continually improving our ways of working and readily identify and address potential modern slavery risks.

Many of our major supply partners are large multinational organisations with stringent processes embedded in their corporate governance framework to manage modern slavery risks. Most of which publish their modern slavery statements. CTM is supportive of their efforts and will continue to collaborate with all partners to mitigate modern slavery risks across the travel industry.

We have developed our Modern Slavery Risk Framework in light of the 2018 Global Slavery Index including the perceived risk of small to medium enterprises (**SMEs**) within the travel industry. Further, our risk framework approach quantifies what further actions are taken by CTM to:

— Identify and address the risk

— Support and engage with the supply chain partner to further quantify and rectify the issue identified, and

— Prompt the entity to self-report, or report the detection if required

Through our robust framework, CTM is confident in the mechanisms embedded within the business to equip our people to identify and address potential modern slavery within our operations and supply chain. Through our valued partnerships, we are committed to continuing our pursuit of eliminating modern slavery wherever and whenever it is potentially identified.

Jamie Pherous

Managing Director,
Corporate Travel Management Limited

December 2022

About CTM

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 who require quality local tailored travel solutions underpinned by leading technology and robust reporting.

With more than 25 years in business 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.

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 and New Zealand), with an indirect network across more than 130 countries

— Multi-award winning for service and technology innovation globally:

  · Australian Federation of Travel Agents (AFTA) Awards – Voted Best National Travel Management Company 14 times

  · World Travel Awards 2021 – The Leading Travel Management Company 2021 (Australia and North America)

  · Australian Financial Review – Most Innovative Companies List

  · Business Travel Awards Europe 2021 – Best Corporate Booking Platform (Lightning)

  · SmartBrief Awards 2021 – Innovation Award for Travel Management.

We partner with best-in-class 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 CTM experience in every country their travel program operates.

About CTM Global Coverage

The Group, headquartered in Brisbane, operates under four key operating segments; Australia and New Zealand (AU/NZ), Europe, Asia, and North America as illustrated in Figure 1. Notably, CTM also operates through Agency Partners with an indirect network across more than 130 countries.

In FY22, 82% of the Group's revenue was derived outside of Australia and New Zealand, with our North America and Europe operations collectively contributing 78% of the Group's revenue.

For more information about the Group's operations, please refer to CTM's 2022 Annual Report which can be accessed via the CTM's website at investor.travelctm.com.au.

With the ongoing disruption to the travel industry, caused by post-COVID-19 impacts, the Group continued to work with supply chain partners, particularly those who have been severely impacted by the persistent global personnel shortages. The Group remains proactively and closely engaged with supply partners to ensure an ethical approach is maintained to recruiting and treating all personnel fairly, and in line with industry standards and applicable statutory obligations.

CTM FY22 Performance

NORTH AMERICA — $217.7M

EUROPE — $83.9M

AU/NZ — $69.8M

ASIA — $17.3M

$388.7M
TOTAL REVENUE AND OTHER INCOME

NORTH AMERICA
56%
TOTAL REVENUE AND OTHER INCOME

EUROPE
22%
TOTAL REVENUE AND OTHER INCOME

ASIA
4%
TOTAL REVENUE AND OTHER INCOME

AU/NZ
18%
TOTAL REVENUE AND OTHER INCOME
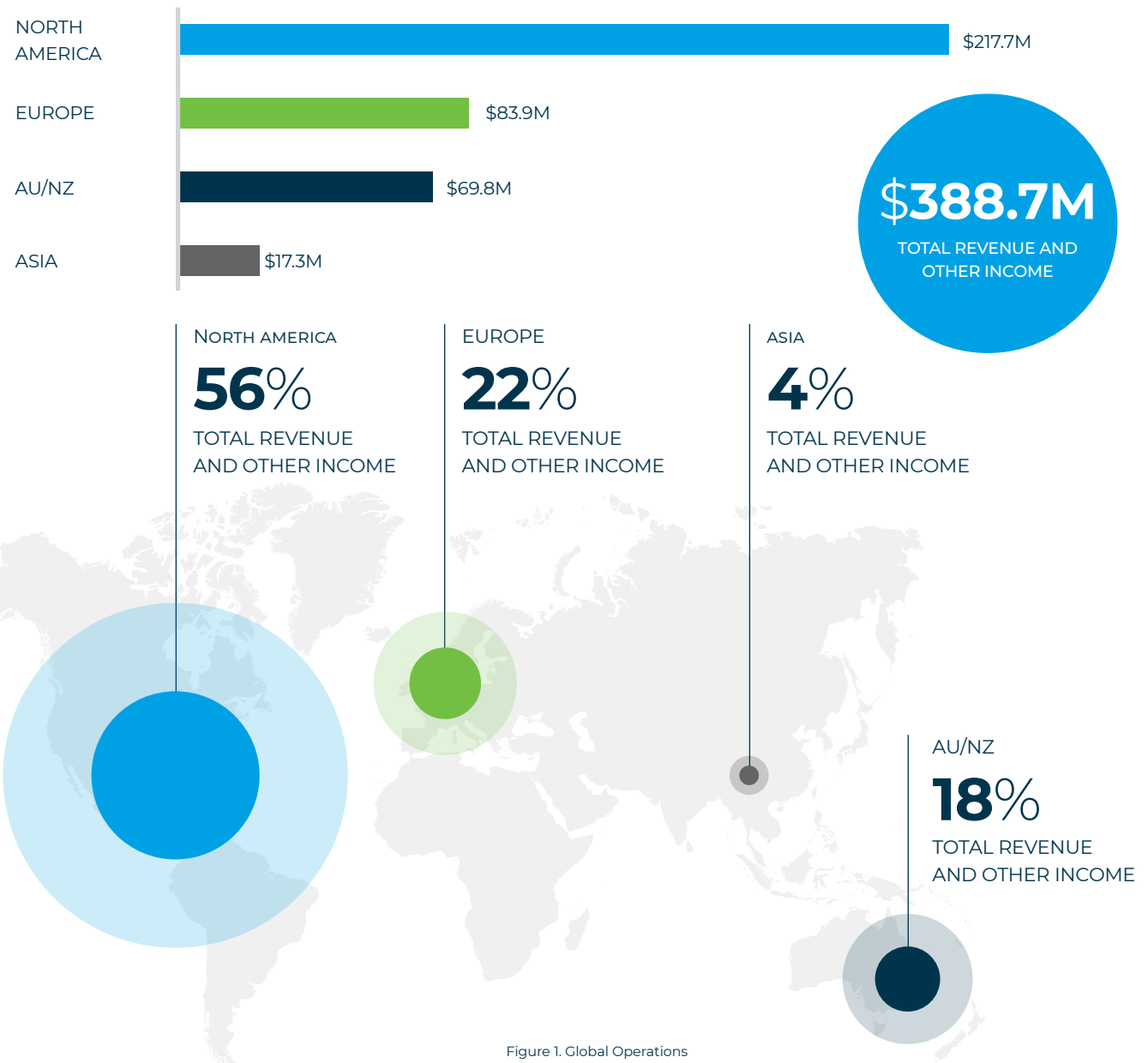
Figure 1. Global Operations

CTM Reporting Entities

The following CTM Group Entities are considered Reporting Entities under the Modern Slavery Act and are covered by this Statement.

Corporate Travel Management Ltd, Australia
ACN 131 207 611

CTM Finance Pty Ltd, Australia
ACN 654 309 958

Corporate Travel Management Group Pty Ltd, Australia
ACN 005 000 895

Tramada Holdings Pty Ltd, Australia
ACN 092 226 170

1000 Mile Travel Group Pty Ltd, Australia
ACN 602 638 899

QBT Pty Ltd, Australia
ACN 128 382 187

Tramada International Pty Ltd, Australia
ACN 617 598 008

Tramada Systems Pty Ltd, Australia
ACN 080 578 954

TravelEdge Pty Ltd, Australia
ACN 092 658 421

Inspire Travel Management Pty Ltd, Australia
ACN 621 234 357

Show Group Pty Ltd, Australia
ACN 630 644 398

Quay Services Pty Ltd, Australia
ACN 149 898 288

Communico Services Pty Ltd, Australia
ACN 139 057 079

STA Travel Academic Pty Ltd, Australia
ACN 626 947 046

Nexus Point Travel Pty Ltd, Australia
ACN 154 293 991

Granted Worldwide Pty Ltd, Australia
ACN 124 802 115

GSS Travel NZ Pty Ltd, Australia
ACN 622 867 869

Figure 2. CTM Group Reporting Entities as at 30 June 2022

CTM Modern Slavery Overview

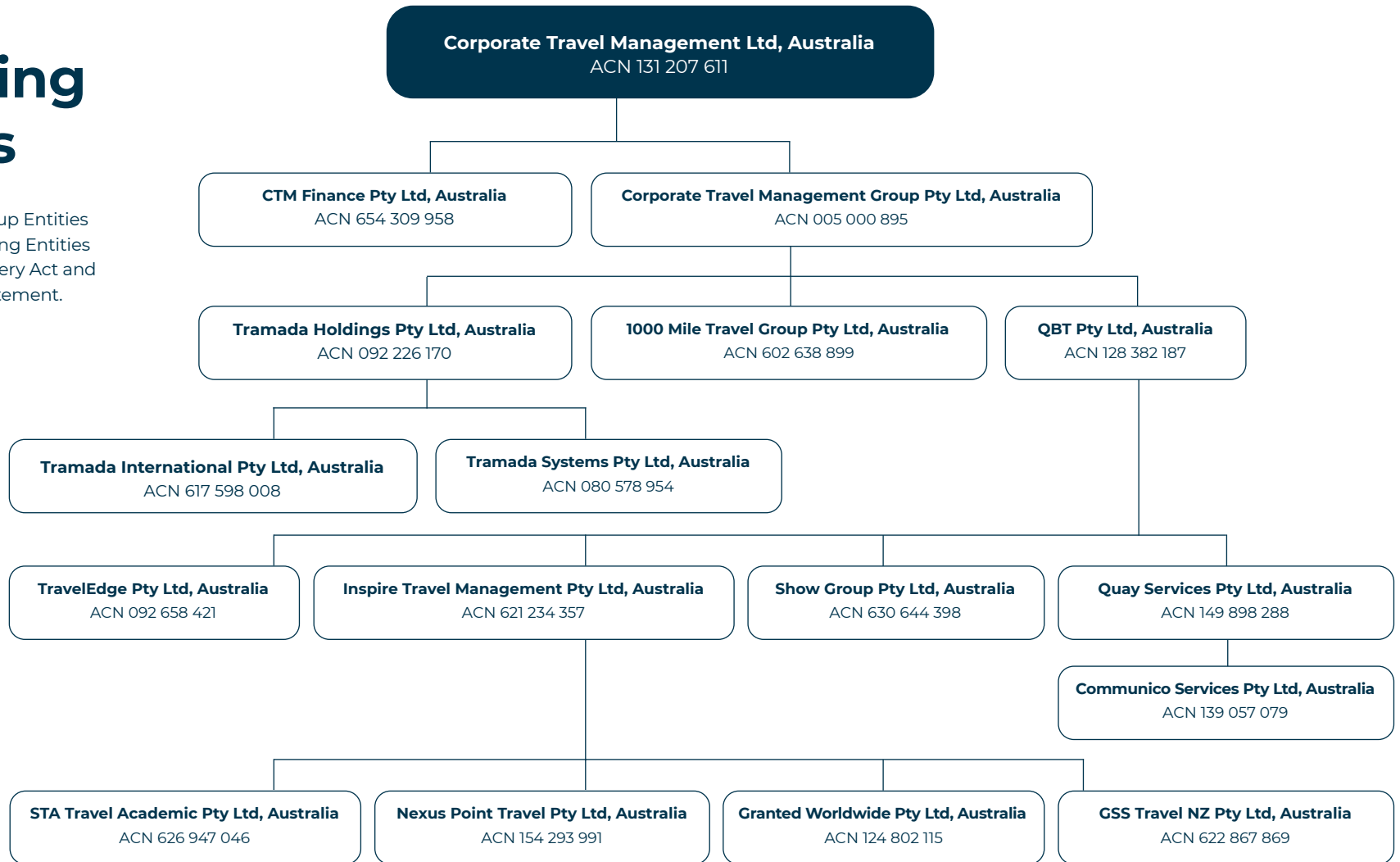## Timeline of Actions

Since publishing its first Modern Slavery Statement in FY20 in line with the *Act 2018*, the Group has continued its journey to mature actions towards mitigating modern slavery risks as illustrated in Figure 3.

FY20

Initial Modern Slavery Statement.

FY21

Awareness and Training

Training awareness delivered to all employees on modern slavery risk within the business.

FY21

Supplier Questionnaire

Strategic supply partners required to complete Sustainability and Governance Questionnaire.

FY22

Risk Framework

Updated Modern Slavery Risk Framework implemented across all regions aligned to the Global Slavery Index.

FY22

Compliance Training

Modern Slavery and Protecting Human Rights added to mandatory compliance training across all regions.

FY21

Subsequent FY21 Modern Slavery Statement developed.

FY22

Standardised Survey

Consistent survey templated for ease of completion and assessment across all regions.

FY22

Stakeholders identified

Upstream and downstream supply chain stakeholders with perceived risk assessed for reporting purposes.

Figure 3. CTM Modern Slavery Maturity Timeline

Our Governance Framework

Good corporate governance is fundamental to the long-term sustainability of the Group. Through our governing framework we strive to progress our purpose; to act lawfully, ethically and in a socially responsible manner. These values further define our risk management framework to create long-term value for our stakeholders.

For more information about the Group's corporate governance framework, please refer to the CTM 2022 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 the identification, evaluation and monitoring of material risks on an ongoing basis as well as promoting a risk awareness, identification and reporting culture across the Group.

The Board is responsible for the oversight and management of risk and is supported by the 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, reviews and provides guidance on risks that may impact the Group's reputation, and/or the Group achieving it's objectives, and

— reviews actions taken by management to reduce and/or mitigate risk exposure, including modern slavery risks.
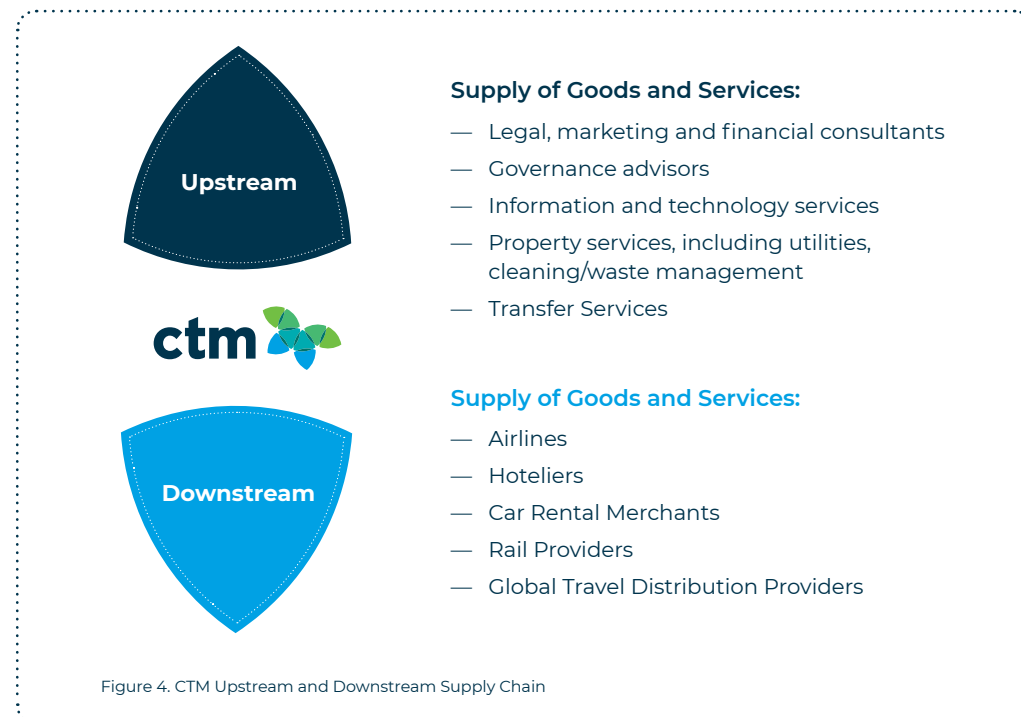
CTM Policies

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 include our approach to mitigating modern slavery[2].

2   Detailed further on page 10

Supply Chain Stakeholders

The Group categorises its supply chain to identify areas of higher risk and will continue to improve this taxonomy to further drive transparent reporting.

The Group has visibility of its tier one supply chain but acknowledges further work is required to close the gap on tier two and three suppliers. The Group identifies its upstream and downstream suppliers, providers and industry partners as illustrated in Figure 4.

Upstream

ctm

Downstream

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 4. CTM Upstream and Downstream Supply Chain

CTM Policies

The Group has a number of policies in place that underpin the Group's governance framework to address the risk of modern slavery 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 is committed to conducting its business with honesty, integrity, and the highest standards of personal and professional ethical behaviour. The 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. The Code of Conduct 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 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	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 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	We are committed to providing all employees with a healthy and safe workplace that is free from sexual harassment as well as harassment based on other legally protected characteristics. The policy provides the structure and foundation to ensure all persons employed by us, 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.

Training and Awareness

Knowledge, skills and training are critical elements towards enabling our people to identify potential risks of modern slavery within our operations and supply chain.

Modern slavery-based training is required to be completed for each new starter, with all employees required to complete the training on an annual basis thereafter.

As part of our recently launched Global Learning Management System, the Group introduced '*Modern Slavery*' and '*Protecting Human Rights*' training packages across CTM's business in FY22. The enhanced competency-based training and awareness packages focus on empowering our people with 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

Looking ahead to FY23, further improvements will be implemented to provide the business with transparent required versus completed compliance-based training reports, including Modern Slavery and Protecting Human Rights modules. Training completion status for FY22 is provided in Figure 5.

0.6%

99.4%
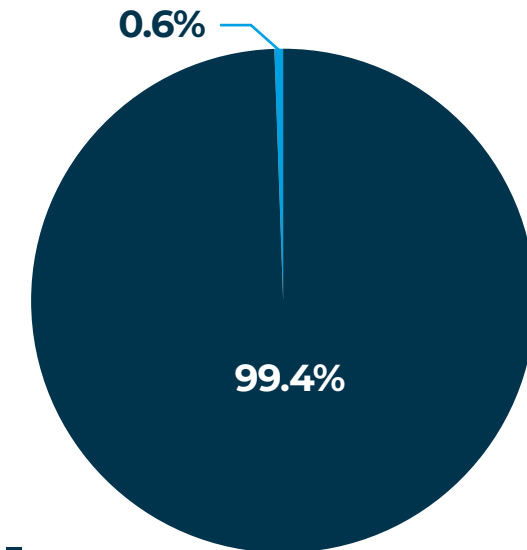
■ Completed %
■ Overdue %

Total Training Hours Completed

441 hours and 47 Minutes

Figure 5. FY22 Compliance-based Training Completion

Grievance and Reporting Mechanisms

Our People

Our Grievance Handling Procedure places our people at the centre of our values by empowering them 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 further reported to the Fair Work Commission, Fair Work Ombudsman, and/or the Australian Human Rights Commission, as applicable.

Supply Relation Managers

Our Supply Relation Managers work with our downstream supply partners to continually improve the value proposition we deliver to our clients. As part of our due diligence process, CTM works to strengthen these relationships to sustain a deeper understanding of the aspects and impacts affecting each supply partner's industry sector, such as labour shortages, market downturns and specific supply chain pressures.

Through engagement, we can identify potential modern slavery issues and discuss remedial actions where required.

Incident Management

Aligned with the Group's Risk Management Framework, our employees have the right to notify and raise an incident should a grievance, breach or potential breach of modern slavery be encountered, identified or witnessed within our supply chain.

The incident is then investigated through engagement with the supplier and risk severity assessed as detailed throughout this Statement.

Whistleblower Policy

As identified earlier, the 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. The policy further protects those who raise the concern 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 modern slavery assessment adopts a risk-based approach to assess and monitor modern slavery risks. Our supply chain stakeholders are classified in accordance with Global Slavery Index (GSI) data to indicate the level of perceived risk to the business. This approach (as detailed in Appendix A) allows us to categorise our suppliers by location and the nature of products and services provided.

The majority of our direct suppliers are organisations that are in geographies that demonstrate a greater awareness of modern slavery. Based on GSI 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 those suppliers which operate either in a high modern slavery risk area, and/or may employ non-skilled employees on minimum wages or casual arrangements. As such, the Group identified 36 moderate to high risk suppliers, as highlighted in Table 2 here, of which a survey assessment was conducted as part of the FY22 modern slavery assessment.

Table 2. 2022 CTM Perceived Supply Chain Risk Assessment

| Region	Description	Goods & Services Perceived Moderate Risk	Supply Partner Perceived Low Risk	Supply Partner Perceived Moderate Risk	Supply Partner Perceived High Risk – Survey Required	Grand Total
Group	Airline		1	1		2
Group	Corporate Services	8				8
Group	Hotelier			6	4	10
Group	Technology		3	1		4
Group	Car Rental/ Transfer	1		2		3
AU/NZ	Airline		4		1	5
AU/NZ	Corporate Services	7	1			8
North America	Airline		3			3
North America	Hotelier		9	7	1	17
North America	Technology				1	1
North America	Car Rental/ Transfer			1		1
Europe	Airline		4	1		5
Europe	Hotelier			3	1	4
Europe	Technology			1		1
Asia	Airline		3		1	4
Asia	Hotelier		2		1	3
Asia	Technology			2		2
Grand Total		**16**	**30**	**25**	**10**	**81**

Assessed Risk Outcomes

The 36 supply chain stakeholders identified as perceived moderate to high risk for Group and/or AU/NZ market were required to complete a modern slavery survey to assist in quantifying the risk severity.

Amongst other things, the modern slavery assessment survey required stakeholders to confirm their geographical operations, along with standards and governance mechanisms in place to indicate their current level of maturity.

The survey responses were further scored against a calculation model to validate the level of risk the supplier may pose to the Group. The modern slavery assessment for FY22 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 6.

However, as part of the assessment process, 4 supply partners were assessed as a moderate risk due to the geographical locations of their business and, lack of information provided to confirm their modern slavery risks awareness and governance practices. Refer to the remediation section on page 15 for further information on actions taken by the Group.

Total

Insignificant Risk

20
16
12
8
4
0

Minor Risk

High Risk

Moderate Risk
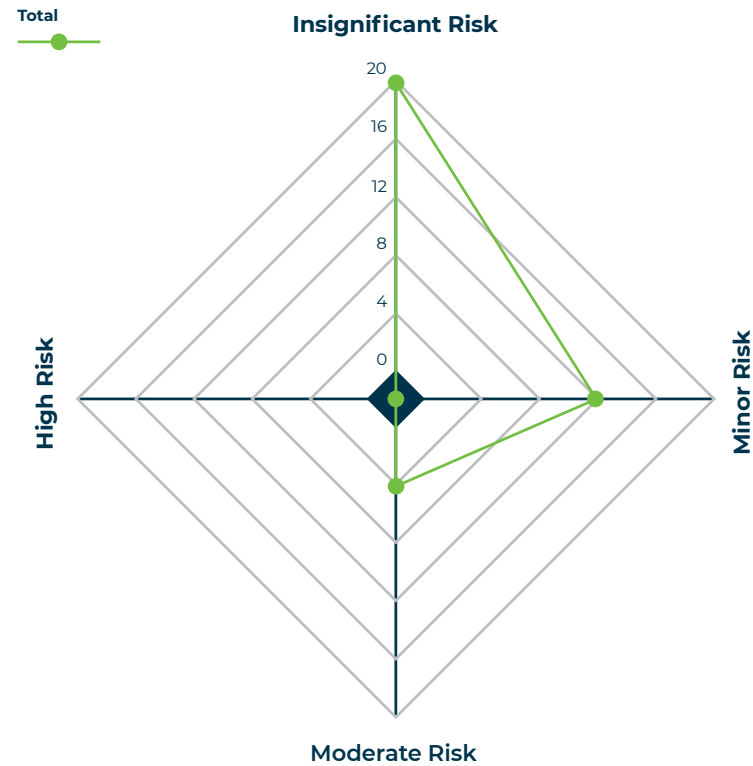
Remediation

We work collaboratively with stakeholders to encourage compliance with applicable modern slavery and human rights standards.

Our Modern Slavery Risk Framework identifies specific response mechanisms should we identify a potential or heightened risk of modern slavery in the supply chain. We are committed to working with the supplier to understand the risk and resolve the issue.

As identified through the assessment process, four supply partners were identified with a moderate risk profile to the Group. To quantify the risks, further actions were undertaken with the supplier to establish the extent of modern slavery governance within their business. These actions included:

— Internal discussion completed quantifying each risk profile;
— Direct engagement with each supplier to discuss the outcome and confirm their modern slavery position; and
— Confirmation of re-assessed risk profile and recording of results.

The four suppliers were able to verify their position on modern slavery governance. As such, their assessments were re-classified as a minor risk with no further actions required.

Further, should a modern slavery risk be substantiated, our process is to encourage our supply partner to self-report, or allow us to report the issue on their behalf, depending on the level of severity. During this reporting period, no substantiated issues of modern slavery were identified.

Continuing our Efforts

In FY22, CTM improved its stakeholder visibility to ensure our supply chain can effectively identify perceived risks to the business.

Throughout FY23, the Group aims to further improve our understanding of potential modern slavery and human rights issues across our business and supply chain.

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

— Establish a global best practice approach to identify and mitigate modern slavery within each region of the CTM Group, including the implementation of a global Modern Slavery Policy.

— Continual enhancement of relevant policies and procedures to mature actions to mitigate modern slavery and human trafficking.

— Identify and eliminate third-party labour recruitment risks in our operations and supply chain.

— Increase engagement with our supply partners to ensure ethical business practices are implemented.

— Expand visibility of CTM Group's agency partners to review potential modern slavery risks within our tier two and three – supply chain partners.

— Take advantage of opportunities to collaborate with our industry and supply chain partners to address modern slavery risk issues collectively.

— Continue tracking of employees' compliance training to ensure greater completion rate of training modules.

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.

The findings of this Modern Slavery Statement have been approved for each reporting entity by the Board of Directors of CTM.

Consultation and Approval Process

A process of consultation across CTM and its Reporting Entities[3] aided the preparation of this Modern Slavery Statement. This included engagement with members of senior management of the Reporting Entities.

3   Refer to page 7 for the CTM Group Reporting Entities covered by this statement

Appendix A: 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	1 Insignificant or Low Risk	L (1)	L (2)	L (4)	L (7)	M (11)	M (16)

Note: (numbers) represent the regional weighted average 'vulnerability of modern slavery risks' per the Global Slavery Index 2018. 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 indentified, or circumstances with supply parter 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 supply partner and seek validation of the issue indentified 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 reporting and notification.
E – High Risk	Immediately engage and work closely with the business/operation/entity on aspects indentified. Provide support and awareness on where the business/operation/entity needs to improve to continue the relationship with CTM. Verify that the business will self-report or notify the issue to ensure transparency for both relationship partners.