



# Modern Slavery Statement

For the period 1 July 2019 – 30 June 2020

## 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 own business or in any of our supply chains.

We are also committed to ensuring there is transparency in our own business and in our 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.

This Modern Slavery Statement is the Group's first annual Modern Slavery Statement published for the purposes of the Modern Slavery Act and covers the activities of CTM and its reporting entities in respect of the financial year ended 30 June 2020 (**FY20**) in identifying, managing and addressing potential modern slavery risks and impacts in our operations and supply chain.

Refer to page 10 for the CTM Group members that are considered reporting entities under the Modern Slavery Act. This Modern Slavery Statement is made on behalf of these reporting entities.

## 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
- Travel Services UK/Europe.

In FY20, 76% of the Group's revenue was derived outside of Australia and New Zealand, with over 60% of revenue earned by our North America and Europe operations.

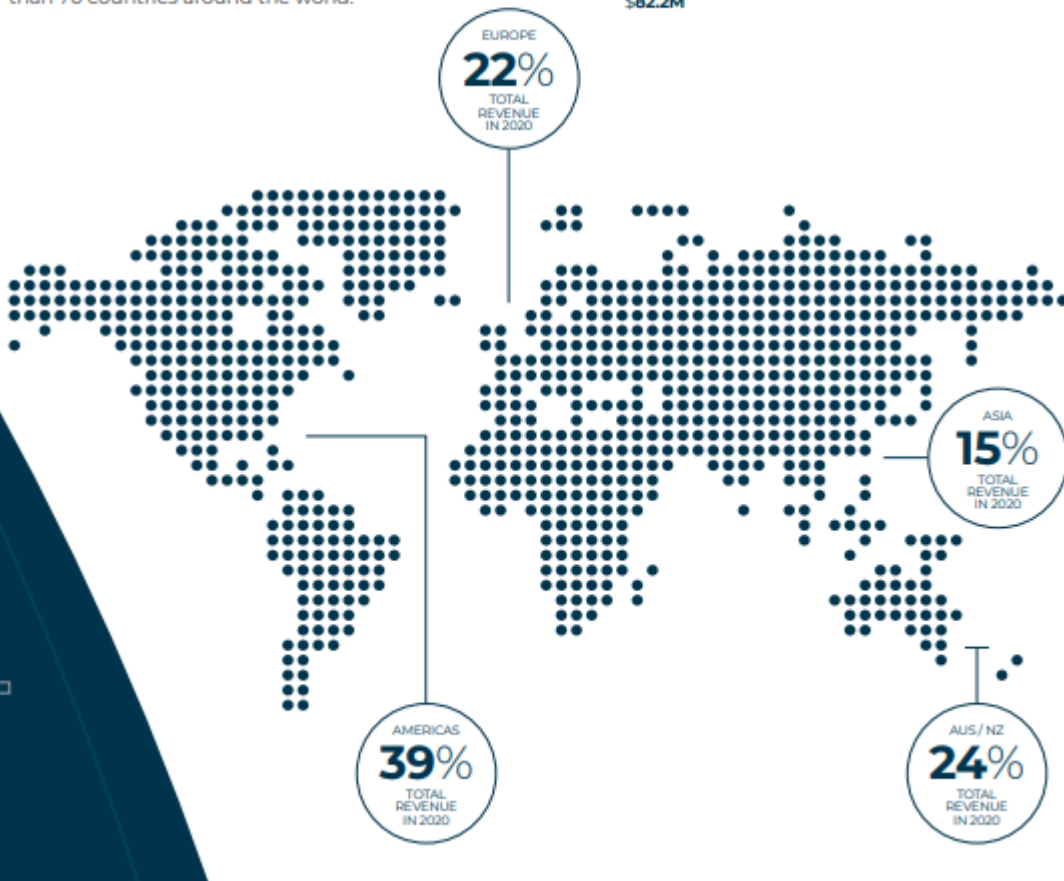
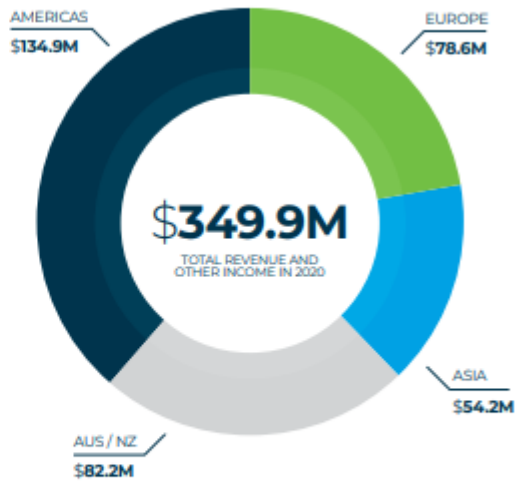
For more information about the Group's operations and strategy, please refer to CTM's 2020 Annual Report.

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 with our suppliers.

# Key Locations

## Total revenue generated by region

As of June 30, 2020, Corporate Travel Management operates across four continents and, supported by our Global Partner Network, has the ability to service customers in more than 70 countries around the world.



## GOVERNANCE FRAMEWORK

CTM recognizes 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 2020 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
- 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 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 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.

The Board has ultimate responsibility for the policy 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
- 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.

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 framework assessment helps us to understand and manage both the 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.

Consistent with our ongoing review of our business practices, we expect to continue to further refine our policies and practices, including our Supply Chain Assessment Framework, and to assess areas for collaboration with our suppliers through which we can work together to further mitigate the risks of modern slavery within our business and supply chain.

## 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 global business to capture the geographic location and nature of all products and services sourced by the Group in order to undertake more targeted supplier risk assessments across our supply chain.

## 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 either in its own business or in the supplier assessments undertaken in FY20, if we were to identify modern slavery or a heightened risk of modern slavery, we would work with the supplier to understand the risk and resolve the issue.

## FUTURE PRIORITIES

In FY21 and beyond, we have plans to continually build upon and improve our existing risk management and remediation frameworks as they relate to modern slavery and human trafficking. This includes:

- enhancing employee training regarding the Group's policies relevant to modern slavery and human trafficking so that all employees have a higher level of understanding of the risks of modern slavery in our business and supply chain and are better able to:

- recognise those modern slavery risks
  - identify and report potential violations of CTM's policies
  - understand the consequences for failing to limit the risk of modern slavery in our business and supply chain
- rolling out the Supply Chain Assessment Framework to a wider group of suppliers beyond our strategic supply partners
- reviewing the current self-assessment questionnaire used in the Supply Chain Assessment Framework.



## CTM's Supply Chain Assessment Focus

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

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

## REPORTING ENTITIES

The following CTM Group entities are considered reporting entities under the Modern Slavery Act and are covered by this Modern Slavery Statement:

| COMPANY NAME                              |
|---|
| Corporate Travel Management Limited       |
| Corporate Travel Management Group Pty Ltd |
| Andrew Jones Travel Pty Ltd               |
| SCT Travel Group Pty Ltd                  |
| Travelcorp Holdings Pty Ltd               |
| Travelcorp (Aust) Pty Ltd                 |
| WA Travel Management Pty Ltd              |
| Floron Nominees Pty Ltd                   |
| Sainten Pty Ltd                           |
| ETM Travel Pty Ltd                        |
| Travelogic Pty Ltd                        |

## CONSULTATION AND APPROVAL PROCESS

A process of consultation across CTM and its reporting entities helped to guide the preparation of this Modern Slavery Statement. This included engagement with members of senior management and the directors of the reporting entities.

This Modern Slavery Statement has been approved for each reporting entity by the Board of Directors of Corporate Travel Management Limited.



**Jamie Pherous**

Managing Director

Corporate Travel Management Limited

17 February 2021