



# Modern Slavery Statement

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FOR REPORTING PERIOD 1 JULY 2024 - 30 JUNE 2025

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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. We also acknowledge the enduring connection to the land, the stories, traditions and living cultures of 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 2025 (FY25).

### The Reporting Entities

Corporate Travel Management Limited (CTM) ABN 171 31 207 611 is an Australian public company listed on the Australian Securities Exchange (ASX). 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 Legal and Sustainability Teams in consultation with Senior Management and subject matter experts from the relevant areas of our business. This Statement was approved by the CTM Board on 19 December 2025 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.

# 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, 13, 16
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	9, 13-14
Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes	Organisation's policies in relation to slavery and human trafficking; its due diligence processes in relation to slavery and human trafficking in its business and supply chains  Training about slavery and human trafficking available to the Organisation's staff	7-8, 13-15
Describe how the reporting entity assesses the effectiveness of such actions	Organisation's effectiveness in ensuring that slavery and human trafficking is not taking place in its business or supply chains, measured against such performance indicators as it considers appropriate	7-8, 13-15
Describe the process of consultation with any entities that the reporting entity owns or controls, and confirm the entity giving the statement		2, 16
Include any other information that the reporting entity, or the entity giving the statement, considers relevant.		9-12



# Managing Director's Statement



This year, we are proud to share our fifth Modern Slavery Statement, covering both the Australian and United Kingdom legislative requirements. This report not only reflects the progress we have made to date, but also our commitments in response to evolving needs.

Modern slavery is a complex issue that requires leadership, accountability and collaboration to adequately address and mitigate emerging risks globally. 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 risk in our supply chain.

In FY25, we have seen the growing importance of sustainability for our customers, investors and suppliers. This sentiment was echoed in our FY25 materiality assessment which reinforced the developing criticality of supply chain management for our business and stakeholders, as well as the importance of complying with current and emerging sustainability legislation.

As a global TMC, CTM is well positioned to support our customers to make responsible travel decisions and meet their sustainability goals. Our customers' priorities remain paramount to us. To further explore CTM's sustainability initiatives and performance, please refer to our Sustainability Report, available on our website at [investor.travelctm.com.au](https://investor.travelctm.com.au).

In the past year, we have continued to enhance our modern slavery due diligence approach and sought further opportunities to collaborate with key stakeholders including our suppliers and peers. These activities support CTM's commitment to further our understanding and management of our potential supply chain risks.

## Key enhancements taken this year include:

- Developed a modern slavery fact sheet to raise awareness of the critical role our suppliers play in assisting CTM identify, address and mitigate modern slavery risks across our global operations and supply chain;
- Embedded modern slavery reporting obligations and reinforced awareness of CTM's Supplier Code of Conduct in supply partner agreements at onboarding and on an ongoing basis;
- Engaged an external consultant to conduct a risk assessment and scheduled modern slavery training for Directors and key senior executives;
- Implemented a supplier contract management platform to improve visibility of our supply chain risks;
- Expanded the scope of the modern slavery questionnaire to strengthen due diligence process;
- Continued to identify opportunities for collaboration with industry partners to mitigate modern slavery risk issues.

While we have made significant progress in the past year, we acknowledge that there is still work to be done. Throughout FY26 we will continue to progress our efforts in areas such as risk assessment, education, particularly with our Board of Directors and key Executive Management, and the introduction of a dedicated modern slavery risk management tool.

We thank our customers, employees, investors and all our stakeholders for their continued support, and we look forward to advancing our efforts in this space in FY26 and beyond.



**Jamie Pherous**  
Managing Director

# 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 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.



Global coverage (North America, UK, 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 travel 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, innovative proprietary technology and the global scale of our operations.

With over 30 years in corporate travel, CTM empowers our teams, fostering a culture of innovation and agility. 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 and secure data aggregation to ensure our clients enjoy the same experience in every country.

This is the CTM Group's fifth Statement under the AU and UK MSA and the third joint Statement by the CTM Group. The Group focuses on continually improving our risk management approach to mitigate modern slavery risk in our supply chain. This Statement sets out the Group's approach and actions taken to manage modern slavery risks throughout FY25, as well as look ahead to initiatives and further actions for FY26 and beyond.





# CTM Modern Slavery Progress

## Key actions for FY25

During FY25, we have progressed the following actions:

- Developed a Modern Slavery Fact Sheet to raise awareness of the critical role our suppliers play in assisting CTM identify, address and mitigate modern slavery risks across our global operations and supply chain;
- Embedded modern slavery reporting obligations and reinforced awareness of CTM's Supplier Code of Conduct in supply partner agreements at onboarding and on an ongoing basis;
- Engaged external consultant to conduct a risk assessment and scheduled modern slavery training for Directors and key senior executives;
- Implemented a supplier contract management platform to improve visibility of our supply chain risks;
- Expanded the scope of the modern slavery questionnaire to strengthen due diligence process;
- Continued to identify opportunities for collaboration with industry partners to mitigate modern slavery risk issues.



# CTM Modern Slavery Progress

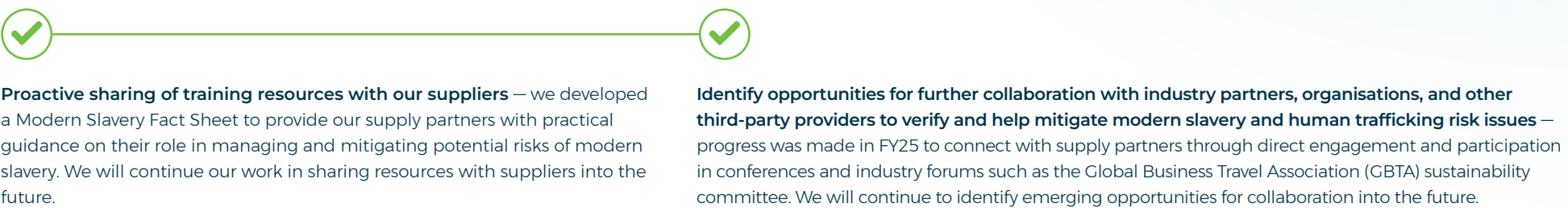
## Progress against the objectives and continuous improvements set out in our FY24 statement.

The progress we have made in FY25 is set out below. While we have made significant progress throughout the reporting year, we recognise that there is still more to be done, including to further our understanding of our supply chain risks and increase collaboration and education with key stakeholders.

### Governance



### Prosperity



# Our Governance Framework

CTM recognises the importance of good corporate governance practices which are fundamental in ensuring the accountability of the Board and long-term sustainability of the Group. These practices are fundamental to the successful delivery of strategic objectives.

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 Corporate Governance Statement available on our website at [investor.travelctm.com.au/corporate-governance](https://investor.travelctm.com.au/corporate-governance).



## Risk Management

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. For more information about the Group's risk management approach, policies and disclosure of risks, please refer to the CTM 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 that 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.

We continue to see significant evolution in the sustainability landscape and an increase in stakeholder expectations and regulatory requirements 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 in our 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 has policies in place that support its governance framework, including a comprehensive Code of Conduct that sets out the ethical and responsible behaviour expected of all employees and Directors.

The Group's Code of Conduct sets out the fundamental principles of conduct expected by the Group. The Code of Conduct is further supported by several policies, which are set out on [page 10](#) of the Statement. As part of CTM's regular review of policy, the Code of Conduct was updated in FY26.

In addition to the Code of Conduct, the Group's Procurement Policy outlines the principles and 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, ensuring compliance with applicable local and international statutory requirements including Modern Slavery and Human Rights Acts and fair labour and operating practices. In FY25, the Procurement Policy underwent a review process to ensure alignment with industry practice and related policies such as the Supplier Code of Conduct.

The Global Supplier Code of Conduct communicates CTM's expectations of suppliers, including meeting safety, integrity, environmental, sustainability, culture and human rights standards. The policy 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.

CTM's Code of Conduct and related policies are available on our website at [investor.travelctm.com.au/corporate-governance](https://investor.travelctm.com.au/corporate-governance).



# 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.

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.
Enterprise Risk Management Policy	The policy 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 FY25, 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 remained consistent between FY24 (99.44%) and FY25 (99.5%).

## Supplier Engagement

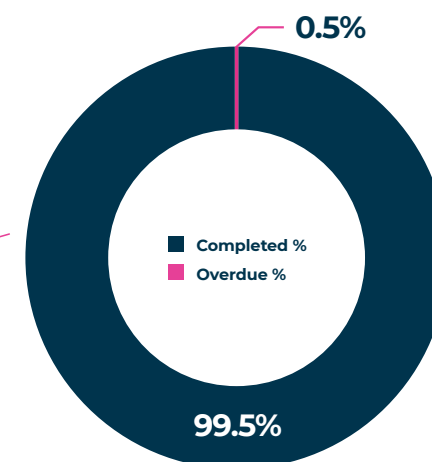
In FY25, a Modern Slavery Fact Sheet was developed to provide supply partners with practical guidance on understanding and addressing risks of modern slavery. The factsheet empowers suppliers to better understand modern slavery, reporting obligations and consider risk mitigation actions such as:

- Developing a modern slavery policy;
- Mapping supply chain;
- Conducting risk assessments;
- Implement due diligence processes;
- Train staff and suppliers;
- Monitor and review; and
- Remediate where needed.

We have identified further engagement opportunities, including targeted modern slavery risk management training which has been scheduled for the CTM Board of Directors for FY26 to support CTM's modern slavery governance.

We will continue to explore employee and external stakeholder training and awareness opportunities for future reporting periods. For more information on modern slavery training and awareness, please refer to our website at [investor.travelctm.com.au/corporate-governance](https://investor.travelctm.com.au/corporate-governance).

FY25: Compliance based training completion



# Grievance and Reporting Mechanisms

## Our People

The Group is committed to fostering a culture where relevant individuals feel safe to speak up on matters or conduct that concerns them. The Group Whistleblower Policy provides clarity on how the Group will support and protect whistleblowers 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 Enterprise 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, CTM Supplier Relations team and other relevant parties.

## Whistleblower Policy

The Group's Whistleblower Policy was reviewed during FY25 and 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 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 Group's Whistleblowing Investigation Officer 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.

In FY25, CTM provided targeted training with respect to Whistleblower rights and protections, roles and obligations, reporting and CTM's policy and procedures to equip relevant staff with the necessary skills to handle disclosures effectively and ensure compliance with legal protections.

CTM's Whistleblower Policy and related documents are available on our website at [investor.travelctm.com.au/corporate-governance](https://investor.travelctm.com.au/corporate-governance).







# Assessing Modern Slavery Risk

## Supply Chain Assessment Framework

In FY25, we continued to focus our assessment on our larger suppliers based on spend and criticality, adopting a risk-based approach to perceived modern slavery exposure. Consistent with our assessment for FY24, our key suppliers are classified in accordance with Global Slavery Index 2023 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 operate 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 2023 data, these regions 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 risk of modern slavery occurring in the supply chain and some geographies.

In FY25, CTM’s annual modern slavery supplier questionnaire and related assessment framework was expanded. This update reflects our enhanced understanding of potential supply chain risks and will allow for more effective assessment of survey results. The revised framework categorises assessed risks from least to most concerning in categories titled insignificant, minor, moderate, major and extreme.

Table 1 details the perceived risk of key direct suppliers which operate either in a high modern slavery risk region or have been identified as having possible gaps in their modern slavery risk management approach.

Table 1. FY24 CTM Perceived Supply Chain Risk Assessment

Supplier	CTM Region <sup>1</sup>	Insignificant	Minor	Moderate	Major	Extreme
Airline	Asia		1			
	AUNZ	2				
	EMEA		4	1		
Ground Transport	AUNZ			1		
	EMEA		1			
	North America		2			
Hotel	Asia			1		
	AUNZ	3		2		
	EMEA	1	2	1		
Total		6	10	6	0	0

<sup>1</sup> Note that only CTM regions in which applicable tier 1 suppliers are engaged are reflected

## Assessed Risk Outcomes

Aligned with the Global Slavery Index 2023, CTM has adopted a risk framework to identify those key suppliers with a perceived higher modern slavery risk exposure.

Our key suppliers were requested to complete a modern slavery assessment questionnaire to assist in quantifying risk severity as part of the FY25 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.

In FY25, the questionnaire was expanded to obtain additional information and supporting documentation from suppliers, strengthening our understanding of supply partners' modern slavery approach. The questions added in the updated questionnaire gathered insights into the specific high-risk countries operated in, supplier recruitment processes, retention of employee original documentation such as passports, tailored training programs for higher risk employee groups, supply chain assessments and previous investigations into modern slavery risks.

The survey responses were further scored against a calculation model to assess the level of risk the identified supplier may pose to the Group. In FY25, this model and the related response scoring methodology was updated in alignment with the additional metrics collected as part of our revised supplier questionnaire to ensure appropriateness.

For FY25, 26 key tier 1 suppliers were identified and engaged through the modern slavery questionnaire. Of these 26 suppliers, 22 responses were received (completion rate of 85%).

Through a mixed quantitative and qualitative analysis process, 6 suppliers were identified as posing a perceived moderate risk and 2 were identified as posing a potential high risk to the Group. The two potential high-risk suppliers were originally assigned this score due to their affirmative response to a question regarding the

retention of employee original documentation such as passports – a question with high modern slavery risk indication. CTM promptly engaged with these suppliers to seek clarification. In both cases, it was identified that the representatives interpreted the questions differently, which means the answer did not reflect the supplier's approach. Following this process, the risk scores were downgraded accordingly to reflect the suppliers' business process. This was a welcomed exercise by the suppliers' involved and CTM will continue its efforts to work with key suppliers to enhance understanding and knowledge of potential modern slavery risk areas.

The key risk areas highlighted through the analysis conducted in FY25 include the existence of operations in regions and countries with higher exposure to modern slavery risk (according to the Global Slavery Index 2023), absence of internal training and awareness disclosed, limited information about governing policies and procedures and overall limited visibility over workforce and supply chain. Following detailed analysis of survey results and supplier approaches, 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 also 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 FY24 statement) in this year's survey noting the ongoing challenges faced by our agency partners given the size of their business. This is an area we will continue to assess.

CTM remains committed to assisting our agency partners to improve their modern slavery governance framework in FY26 and beyond by sharing resources to identify and assess modern slavery risk.







## Continuing our **Efforts**

In FY25, 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. A platform was introduced to improve supplier contract management, along with mechanisms to incorporate modern slavery reporting obligations into contracts where relevant.

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 FY26, 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:**

- > Enhance modern slavery management processes through the adoption of an enhanced modern slavery risk assessment tool;
- > Participate in industry working groups to further collaboration on modern slavery reporting and supply chain management in the travel industry;
- > Continue to proactively share training and awareness resources with suppliers on an ongoing basis; and
- > Continue uplift of education and training resources and sessions to strengthen capacity of our people to manage supply chain risks.



# Appendix A: CTM Reporting Entities

The following CTM Group entities (as at 30 June 2025) are considered reporting entities under the AU MSA and UK MSA and are covered by this statement:

## AUS

Corporate Travel Management Limited	QBT Pty Ltd
Corporate Travel Management Group Pty Ltd	TravelEdge Pty Ltd
Travelcorp (Aust) Pty Ltd	Show Group Pty Ltd
Tramada Holdings Pty Ltd	Granted Worldwide Pty Ltd
Tramada International Pty Ltd	Communico Services Pty Ltd
Tramada Systems Pty Ltd	1000 Mile Travel Group Pty Ltd
CTM Finance Pty Ltd	Nexus Point Travel Pty Ltd

## UK

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



# Appendix B: Risk Framework

CTM's risk framework establishes a structured approach for identifying, assessing, managing and monitoring internal and external risks at CTM. Please refer to the Enterprise Risk Management (ERM) Policy on our website at [investor.travelctm.com.au/corporate-governance/](https://investor.travelctm.com.au/corporate-governance/)

	1-Insignificant	2-Minor	3-Moderate	4-Major	5-Extreme
5-Very Likely	5-Medium	10-Medium	15-High	20-Extreme	25-Extreme
4-Likely	4-Medium	8-Medium	12-High	16-High	20-Extreme
3-Possible	3-Low	6-Medium	9-Medium	12-High	15-High
2-Unlikely	2-Low	4-Low	6-Medium	8-Medium	10-High
1-Rare	1-Low	2-Low	3-Low	4-Medium	5-Medium



**Registered Office:**

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