



corporate travel
management

WHISTLEBLOWER GUIDELINES

Corporate Travel Management (CTM) became a public company, listed on the Australian Securities Exchange (ASX) in December 2010. CTM are committed to responsible corporate governance, including ensuring that appropriate framework and processes are in place to encourage employees raising concerns about inappropriate conduct within the organisation.

Accordingly, the Board has endorsed this Whistleblower Policy to support the CTM Code of Conduct and our overall governance framework.

Purpose and Scope of these guidelines

These guidelines apply to all CTM employees, or any other parties acting as agents or representatives of CTM. The guidelines also apply to any new business operation/s acquired as part of CTM's growth strategy, from the date of legal integration of both companies

The purpose of the guidelines is to:

- Ensure that inappropriate conduct is detected, investigated correctly, addressed appropriately and clear remedial actions are taken to prevent such conduct again in the future.
- Ensure that the processes for dealing with any report of inappropriate conduct are outlined for all parties;
- Promote the responsibility of CTM Directors, staff and contractors to report inappropriate conduct within the organisation;
- Outline the processes and communication channels for dealing with reports of inappropriate conduct;
- Ensure that our staff feel encouraged and supported to report inappropriate conduct by emphasising the protections offered to those who do so in good faith.

CTM's Commitment to Legal Obligations

CTM are committed to aligning with all local and international laws that are designed to protect employees who report any inappropriate conduct matter or corporate violation and assist with all required enforcement proceedings as prescribed by legislation at that time.

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Policy

CTM encourages all employees and contractors to exercise their right and responsibility to raise any concerns they have about a known or suspected unlawful or inappropriate conduct.

To support this commitment and encourage an open and fair working environment, CTM provides a process to confidentially raise serious concerns without fear of discriminatory treatment, dismissal or reprisal.

CTM are committed to taking prompt and appropriate action in investigating each report to ensure that the matter is appropriately addressed and if applicable, remedial action implemented to stop any re-occurrence of the situation.

Definition of Inappropriate Conduct

Inappropriate Conduct means serious conduct which is, or potentially could be (but not limited to):

- A breach of a legal obligation;
- A criminal offence (including theft, drug use/sale, violence or threatened violence and criminal damage to property);
- Fraudulent, dishonest or corrupt behaviour;
- Unsafe to an individual, or violate regulatory requirements in relation to the working environment;
- In breach of the Code of Conduct and/or any of the company's policies;
- Shown to conceal business activities or records that may prove an occurrence of any of the above.

Protected Disclosure and Whistleblower Confidentiality

An employee or contractor who reports Inappropriate Conduct in accordance with the Whistleblower Guidelines will be protected and any associated legislative standards at that time. This protection will extend to repercussions or reprisals such as discriminatory treatment, dismissal, formal warnings and confidentiality protections (where possible) assuming that the submission made is made on a good faith basis, and based on reasonable grounds. Any breach to this found will also result in formal disciplinary action towards an individual or parties who are found to be non-adhering to this policy, regardless of their scope of role within CTM.

Where a Whistleblower's report of Inappropriate Conduct is proven to be maliciously false, the Whistleblower will be subjected to disciplinary action, which may include summary dismissal.



All reasonable steps will be taken by the company to maintain the confidentiality of a Whistleblower. Details of the Whistleblower will only be given to those that would be reasonably required to know in order to support the investigation of the matter and they will also be bound in this confidentiality protection towards the Whistleblower.

As stated previously, CTM are committed to also aligning to any relevant legislative requirements and this may result in the Whistleblowers' identity being disclosed, for example, a police investigation. In a matter concerning a threat to an individual/s health and safety matter, the health and safety responsibility will supersede confidentiality if the matter could not be resolved without disclosure of the Whistleblower.

In the event that the Whistleblower is implicated within the investigation and identifies this initially, CTM will consider this in regards to a mitigating factor in the determination of any disciplinary action to be taken against the Whistleblower.

Whistleblowers' who wish to remain anonymous may do so, but it should be noted that this could delay, impede or impact the effectiveness of the result if not all the information is provided or not in a manner specific enough to take clear action.

Reporting Inappropriate Conduct

Where an employee or contractor is concerned about Inappropriate Conduct observed within CTM, in the first instance they should discuss it with either the HR Manager or the Company Secretary who will ensure that the employee or contractor are advised of the correct process to follow. This will involve submission of a signed statement incorporating a summary of events to the best of their knowledge and any other supporting evidence they may have. In addition they should provide any investigative streams that the company needs to consider in the submission.

In instances where a Whistleblower wishes to remain anonymous, he or she can forward their submission directly to the Human Resources and/or Company Secretary.

Depending on the nature of the submission and/or the parties involved, the HR Manager or Company Secretary will commence a formal process of investigation, only involving those who must be involved in order to properly investigate the claim, and as previously stated, protection of the Whistleblower is paramount to CTM.

Internal Reporting

CTM will escalate any activities that sit within this policy to the Board at the next available Board meeting, or for deemed serious matters that require more urgent escalation, an extra-ordinary Board meeting will be called.



Employee and Contractor Access to this Policy

All employees will be required to read this as part of their formal induction process into CTM. Staff compliance in reading and agreeing to the policy is formally tracked within the business as part of our policy and procedural compliance process. Contractors will have this policy included in the CTM Contractor contractual agreement.

Communication with the Whistleblower

Assuming that the Whistleblower is not employed by CTM or, if this person is employed by CTM, the Whistleblower will be kept regularly informed of updates, to the level at which the specifics of the investigation can be legally disclosed.

Review of this Policy

The Board is responsible for approving these Guidelines and/or agreeing to amendments from time to time as identified or required by law.

Other Relevant Documents

This Policy should be read in conjunction with related CTM policies including:

- a) Code of Conduct;
- b) CTM Confidentiality Clause;
- c) CTM Employment Contracts and associated employment conditions.

