

« 3CIR PTY LTD »



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S U C C E E D

ANTI-BRIBERY AND CORRUPTION POLICY

DOCUMENT CONTROL

This Anti-Bribery and Corruption Policy is a controlled document within 3CIR's Integrated Management System. It is governed by the listed standards and forms part of the organisation's quality, environmental, and occupational health & safety framework.

DOCUMENT NUMBER	3CIR-POL-GEN-003
DOCUMENT TITLE	Anti-Bribery and Corruption Policy
VERSION	3.0
ISSUE DATE	14 April 2026
REVIEW DATE	14 April 2027
APPROVED BY	CEO / COO
CLASSIFICATION	Controlled Document

APPLICABLE STANDARDS

ISO 9001:2015	ISO 14001:2015	ISO 45001:2018
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PURPOSE AND SCOPE

01

3CIR Pty Ltd has zero tolerance for bribery and corruption in any form. This policy establishes 3CIR's position, provides guidance to all staff and contractors on identifying and avoiding improper conduct, and sets out the consequences of breach. This policy applies to all directors, employees (permanent, casual, and temporary), contractors, sub-contractors, trainers, assessors, consultants, agents, and any person acting on behalf of 3CIR — in all locations and in all dealings, including those conducted online or remotely.

LEGISLATIVE FRAMEWORK

02

- Criminal Code Act 1995 (Cth) — Division 70 (bribery of foreign public officials) and Division 141–142 (bribery of Commonwealth public officials)
- Criminal Code 1899 (Qld) — Chapter 16 (corruption and abuse of office)
- Corporations Act 2001 (Cth)
- Public Interest Disclosure Act 2010 (Qld)
- Treasury Laws Amendment (Enhancing Whistleblower Protections) Act 2019 (Cth)
- ISO 9001:2015, ISO 14001:2015, ISO 45001:2018 — leadership integrity requirements (Cl. 5.1)

DEFINITIONS

03

Bribery	Offering, promising, giving, requesting, or accepting a financial or other advantage to induce or reward a person to perform their function improperly, or to influence a public official in the exercise of their duties.
Corruption	Abuse of entrusted power for private gain, including but not limited to embezzlement, fraud, nepotism, and extortion.
Facilitation Payments	Unofficial payments made to secure or expedite routine actions by government officials. These are prohibited by 3CIR regardless of where they occur.
Public Official	Any person holding a legislative, executive, judicial, or public administrative function — whether Australian or overseas.

POLICY STATEMENTS

04

All 3CIR personnel must NOT:

- Offer, promise, or give any bribe, kickback, or improper payment to any person, including public officials
- Request, accept, or receive any bribe, kickback, or improper payment from any person
- Make facilitation payments of any kind in any jurisdiction
- Offer or accept gifts, hospitality, or entertainment that could improperly influence — or be perceived to influence — business decisions
- Make political donations on behalf of 3CIR
- Use 3CIR funds or resources for any improper purpose
- Falsify, conceal, or destroy any records, accounts, or documents
- Engage any third party (agent, consultant, intermediary) knowing they may engage in bribery on 3CIR's behalf

GIFTS AND HOSPITALITY

05

Gifts or hospitality of nominal value (under \$100 AUD) may be accepted where they are reasonable, transparent, proportionate, and create no obligation. The following rules apply:

- All gifts or hospitality offered to or received from any party above \$100 AUD must be reported to and approved by the COO within 48 hours
- Gifts must never be offered to or accepted from any party during an active tender, procurement, or regulatory engagement
- A Gifts Register is maintained by the COO — all recorded entries are reviewed at management review
- Gifts received by staff that cannot be declined for cultural reasons should be shared with the team or donated to charity, and recorded

DUE DILIGENCE

06

Before engaging any new supplier, contractor, training partner, or agent, 3CIR will conduct proportionate due diligence to assess bribery and corruption risk. This includes reviewing the third party's reputation, qualifications, and any connections to government officials. Due diligence is recorded in the Supplier and Contractor Evaluation Register (3CIR-REG- QMS-001).

RECORD KEEPING

07

3CIR maintains accurate books and records that fairly reflect all transactions and business activities. No undisclosed or unrecorded account, fund, or asset may be established or maintained. All expense claims must include a legitimate business purpose, be supported by receipts, and be approved by a manager prior to reimbursement.

REPORTING AND WHISTLEBLOWER PROTECTION

08

Any person who knows of or suspects a breach of this policy must report it immediately to:

- Their direct line manager
- The COO or CEO
- Via email to info@3cir.com Reports may be made confidentially. 3CIR will not tolerate retaliation against any person who reports a genuine concern in good faith, in accordance with the Whistleblower Protection Policy (3CIR-POL-GEN-008), the Public Interest Disclosure Act 2010 (Qld), and the Treasury Laws Amendment (Enhancing Whistleblower Protections) Act 2019 (Cth).

CONSEQUENCES OF BREACH

09

Breaches of this policy constitute serious misconduct and may result in: immediate termination of employment or contract; reporting to relevant law enforcement authorities; civil or criminal prosecution. There will be no exemptions based on seniority, commercial pressure, or local custom.

TRAINING AND AWARENESS

10

All staff and key contractors receive anti-bribery and corruption awareness training during induction and at least annually thereafter. Training completion is recorded in the Training and Competency Matrix (3CIR-REG-HR-001).

REVIEW

11

This policy is reviewed annually by the CEO and COO, or sooner if triggered by legislative change, incident, or audit finding.

AUTHORISATION & APPROVAL

This policy (3CIR-POL-GEN-003) is authorised and approved for release in accordance with 3CIR's Integrated Management System governance framework.

AUTHORISED BY

Marcella Knottenbeld

Chief Executive Officer

Signature

Date: / / 2026

AUTHORISED BY

Matthew Pitt

Chief Operating Officer & Director

Signature

Date: / / 2026

DOCUMENT CONTROL NOTICE

This is a controlled document. Printed copies are uncontrolled. Check the Document Control Register (3CIR-REG-IMS-001) to verify currency. Note: Signature block updated 22 April 2026 to reflect the current governance structure per 3CIR-REC-IMS-018 Governance Structure Formalisation Record v1.0. Document content and original effective date remain unchanged. This update is an authorised configuration correction, not a material revision of the document.

VERSION HISTORY NOTE

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CORE VALUES

Courage · Commitment · Comradery
Integrity · Respect

CONNECT · LEARN · SUCCEED