

« 3CIR PTY LTD »



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S U C C E E D

BUSINESS CONDUCT POLICY

DOCUMENT CONTROL

This Business Conduct 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-013
DOCUMENT TITLE	Business Conduct Policy
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REVIEW DATE	22 April 2027
APPROVED BY	CEO / COO
OWNER	CEO
APPROVER	CEO
CLASSIFICATION	Controlled

APPLICABLE STANDARDS

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

01

This Policy establishes 3CIR's commitment to ethical business conduct across all operations. It codifies the principles and standards that guide behaviour and decision-making, ensuring full compliance with applicable Australian laws, regulations, and internationally recognised standards, including those under ISO guidelines.

SCOPE

02

This Policy applies to all 3CIR directors, officers, employees, contractors, partners, and suppliers in every operational context, including remote and international activities. It governs interactions with students, partners, regulators, competitors, and the broader community.

POLICY STATEMENT

03

OUR COMMITMENT TO ETHICAL BUSINESS CONDUCT

At 3CIR, we are dedicated to maintaining the highest standards of ethical business conduct in all our operations. Our commitment to integrity, transparency, and accountability underpins everything we do. This Business Conduct Policy outlines the principles and standards that guide our behaviour and decision-making, ensuring that we fully comply with applicable laws, regulations, and international standards, including those recognised under ISO guidelines.

CORE PRINCIPLES

Our Business Conduct Policy is based on the following core principles:

3.1 COMPLIANCE WITH LAWS AND REGULATIONS

We are committed to full compliance with all applicable laws, regulations, and industry standards, including those specific to Australia. This includes adhering to the Australian Consumer Law, the Corporations Act, and other relevant legislation. Additionally, we align our practices with internationally recognised standards, including ISO 37001 (Anti-Bribery Management Systems) and ISO 19600 (Compliance Management Systems), ensuring that our business conduct meets global best practices.

3.2 INTEGRITY AND FAIR DEALING

Integrity is the cornerstone of our business conduct. We are committed to dealing fairly with our employees, students, partners, suppliers, and competitors. We avoid conflicts of interest, act transparently, and ensure that our business decisions are based on merit, fairness, and the best interests of our stakeholders. We do not tolerate any form of corruption, bribery, or unethical behaviour.

3.3 RESPECT FOR HUMAN RIGHTS

We respect and promote human rights in all our business activities. This includes adhering to the Universal Declaration of Human Rights principles, the United Nations Guiding Principles on Business and Human Rights, and relevant Australian legislation, such as the Modern Slavery Act 2018 (Cth). We are committed to preventing human rights abuses within our operations and supply chains and ensuring that our business practices contribute to all individuals' well-being.

3.4 ENVIRONMENTAL RESPONSIBILITY

We recognise our responsibility to minimise the environmental impact of our operations. Our business practices are designed to comply with ISO 14001 (Environmental Management Systems) and to contribute to sustainable development. This includes reducing our carbon footprint, conserving

IMPLEMENTATION STRATEGY

04

To ensure the effective implementation of our Business Conduct Policy, we have developed a comprehensive strategy that includes the following components:

4.1 LEADERSHIP AND ACCOUNTABILITY

Our leadership team is responsible for setting the tone at the top and ensuring that the principles outlined in this policy are embedded in our corporate culture. This includes promoting a culture of integrity, ensuring compliance with all relevant standards, and holding individuals accountable for their actions.

4.2 EMPLOYEE TRAINING AND AWARENESS

We provide regular training to all employees on the principles of this Business Conduct Policy, including compliance with laws and regulations, ethical decision-making, and ISO standards. This training equips our staff with the knowledge and tools they need to uphold the highest standards of business conduct.

4.3 RISK MANAGEMENT AND COMPLIANCE

We have implemented robust risk management and compliance systems to identify, assess, and mitigate risks related to business conduct. This includes conducting regular audits, monitoring compliance with relevant laws and standards, and taking corrective actions where necessary. Our compliance framework is aligned with ISO 31000 (Risk Management) and ISO 19600 (Compliance Management Systems).

4.4 REPORTING AND WHISTLEBLOWER PROTECTIONS

We encourage all employees, students, and partners to report any concerns about unethical behaviour or non-compliance with this policy. We have established secure and confidential reporting channels, including a whistleblower hotline, to ensure that concerns can be raised without fear of retaliation. Reports are taken seriously, investigated promptly, and addressed appropriately per 3CIR-POL-GEN-008 Whistleblower Protection Policy.

4.5 CONTINUOUS IMPROVEMENT

We are committed to continuous improvement in all aspects of our business conduct. This includes regularly reviewing and updating our policies, staying informed about changes in laws and regulations, and incorporating stakeholder feedback. Our commitment to continuous improvement ensures we remain responsive to emerging challenges and opportunities.

RESPONSIBILITIES

05

CEO	Ultimate accountability for policy. Approves annual review. Provides leadership commitment (ISO Cl. 5.1).
COO & Director	Operational accountability. Ensures policy is embedded in day- to-day operations. Reviews policy annually with CEO.
Compliance Officer	Day-to-day implementation, training delivery, audit-based review, policy update drafting.
All employees	Comply with this policy in all business conduct. Report concerns through documented channels. Participate in training.
Contractors / Partners / Suppliers	Acknowledge and comply with the principles of this policy where relevant to the services provided to 3CIR.

RELATED DOCUMENTS

06

- 3CIR-POL-GEN-001 Code of Ethics
- 3CIR-POL-GEN-003 Anti-Bribery and Corruption Policy
- 3CIR-POL-GEN-005 Code of Conduct
- 3CIR-POL-GEN-007 Modern Slavery and Human Trafficking Policy
- 3CIR-POL-GEN-008 Whistleblower Protection Policy
- 3CIR-POL-GEN-009 Integrity and Corporate Responsibility Charter
- 3CIR-POL-GEN-014 Compliance Policy

REVIEW

07

This Policy is reviewed annually as part of the strategic Management Review cycle, or sooner if triggered by:

- Significant changes to applicable Australian legislation or ISO standards
- Findings from internal or external audit relating to the subject matter of this policy
- Material changes to 3CIR's operating model, scope, or stakeholder base
- Stakeholder feedback or complaints relating to the subject matter of this policy

AUTHORISATION & APPROVAL

This policy (3CIR-POL-GEN-013) 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

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CONTACT US



REGISTERED OFFICE

Suite 676, 190 Oxford Street
Bulimba QLD 4171
Australia

ABN 34 614 174 702



1300 517 039



info@3cir.com



www.3cir.com

CORE VALUES

Courage • Commitment • Comradery
Integrity • Respect

CONNECT • LEARN • SUCCEED