

« 3CIR PTY LTD »



CODE OF ETHICS

DOCUMENT CONTROL

This Code of Ethics 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-001
DOCUMENT TITLE	Code of Ethics
VERSION	3.1
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

01

This Code of Ethics establishes the ethical principles and standards of behaviour expected of all 3CIR employees, contractors, trainers, assessors, and business partners. It reflects our core values and our commitment to operating with integrity in all aspects of our business. Our company name — 3CIR — stands for our five core values:

SCOPE

02

This Code applies to all persons engaged by or on behalf of 3CIR, including directors, employees (permanent, casual, and temporary), contractors, sub-contractors, trainers, assessors, volunteers, and training partners. It applies to all activities undertaken on behalf of 3CIR, whether conducted in person, online, or remotely.

OUR ETHICAL PRINCIPLES

03

3.1 TOWARDS OUR STUDENTS AND CLIENTS

3CIR exists to deliver quality education outcomes. We are committed to:

- Providing truthful, accurate, and transparent information about our courses, qualifications, outcomes, and fees
- Delivering training and assessment that meets the requirements of the relevant training packages and ASQA 2025 Standards for RTOs info@3cir.com
- Treating all students with dignity, fairness, and respect regardless of background, identity, or circumstance
- Protecting student data and personal information in accordance with the Privacy Act 1988 (Cth) and the Australian Privacy Principles
- Responding promptly and fairly to student complaints and feedback
- Ensuring accessibility and making reasonable adjustments for students with disability or other identified needs
- Never misrepresenting qualification outcomes, employment prospects, or course requirements

3.2 TOWARDS OUR STAFF

People are 3CIR's most valuable resource. We are committed to:

- Providing a safe, healthy, and supportive work environment — including for remote workers
- Treating all staff with fairness, respect, and dignity in all interactions
- Prohibiting discrimination, harassment, bullying, and victimisation in any form
- Providing equal opportunity in recruitment, development, and progression
- Respecting the privacy of all personal and employment-related information
- Supporting the physical and psychological wellbeing of all staff
- Encouraging professional development and continuous learning
- Protecting workers from reprisal when raising concerns in good faith

CONFLICTS OF INTEREST

04

All staff must avoid situations where personal, financial, or other interests conflict — or could reasonably be perceived to conflict — with their duties to 3CIR or to our students. Any actual or potential conflict of interest must be disclosed immediately to your line manager or the COO. Disclosures are recorded and managed confidentially.

GIFTS AND HOSPITALITY

05

Employees must not accept or offer gifts, hospitality, or benefits that could influence — or be perceived to influence — business decisions or professional judgement. Any gift or benefit offered to or by a 3CIR employee above \$100 AUD must be reported to and approved by the COO. Gifts received are recorded in the Gifts Register maintained by the COO. See the Anti- Bribery and Corruption Policy (3CIR-POL-GEN-003) for full detail.

CONFIDENTIALITY

06

All staff must protect confidential information belonging to 3CIR, its students, partners, and stakeholders. Confidential information must not be disclosed to unauthorised persons, used for personal benefit, or retained beyond the legitimate purpose of the engagement. This obligation continues after employment or engagement ends.

RAISING CONCERNS

07

3CIR promotes a culture of openness and psychological safety. If you witness or suspect any breach of this Code, you are encouraged to report it to:

— Your direct line manager

— The COO or CEO

— Via email to info@3cir.com All reports made in good faith will be treated seriously, investigated promptly and confidentially, and the reporter will be protected from reprisal in accordance with the Public Interest Disclosure Act 2010 (Qld) and the Whistleblower Protection Policy (3CIR-POL- GEN-008).

CONSEQUENCES OF BREACH

08

Breaches of this Code will be taken seriously and managed in accordance with the Enforcement Policy (3CIR-POL-HR-004). Consequences may include disciplinary action up to and including termination of employment or contract. Serious breaches may also be reported to relevant regulatory authorities. info@3cir.com

REVIEW

09

This Code is reviewed annually by the CEO and COO in consultation with staff, or sooner if required by legislative change, audit findings, significant incident, or material organisational change. This Code is a controlled document. Printed copies are uncontrolled. The COO is responsible for version control; the CEO is the approval authority. The Code is reviewed at least annually and whenever material legislative or operational change occurs.

4.5 DOCUMENT CONTROL OF THIS CODE

Stakeholders — students, partners, suppliers, and external parties — can raise concerns about ethical conduct through info@3cir.com, the formal Complaints Handling Procedure, or the Whistleblower Protection channel. All concerns are treated in confidence and reviewed by the CEO and COO.

4.4 STAKEHOLDER FEEDBACK

Ethical conduct is reinforced at least annually through team meetings, leadership communications, and targeted scenario-based training where risk is elevated (such as supplier engagement, student assessment, and data handling). The Compliance Officer monitors awareness through observation, engagement surveys, and incident trend analysis.

4.3 PERIODIC AWARENESS

The current approved version of this Code is published on the 3CIR Google Shared Drive and accessible through the 3CIR ISO Compliance Portal (compliance.3cir.com). Any worker or external party may request a controlled copy from the Compliance Officer.

4.2 ACCESSIBILITY

Every new employee, contractor, trainer, assessor, and partner receives this Code during induction as part of the New Employee Onboarding process (3CIR-FOR-HR-001). Induction includes a structured review of the Code, its expectations, and the consequences of breach. Completion is recorded in the Training and Competency Matrix (3CIR-REG-HR-001).

4.1 INDUCTION

This Code of Ethics is actively communicated to all persons engaged by 3CIR to ensure universal awareness and embedded ethical practice across the organisation. 3CIR is committed to making this Code visible, accessible, and periodically reinforced.

COMMUNICATION AND AWARENESS

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AUTHORISATION & APPROVAL

This policy (3CIR-POL-GEN-001) 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. Version 3.1 — 21 April 2026. Added Section 4 Communication and Awareness to close POL-GEN-001-F01 Cl. 7.4 gap identified in Wave 5 semantic review. 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. info@3cir.com

VERSION HISTORY NOTE

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. info@3cir.com

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CORE VALUES

**Courage • Commitment • Comradery
Integrity • Respect**

CONNECT • LEARN • SUCCEED