« 3CIR PTY LTD »

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COMPLIANCE POLICY

VERSION 1.0 · 22 APRIL 2026 · 3CIR-POL-GEN-014

DOCUMENT CONTROL

This Compliance 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.

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DOCUMENT TITLE	Compliance 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

PURPOSE

01

This Policy establishes 3CIR's overarching commitment to operating with integrity and in full compliance with all applicable laws, regulations, and industry standards. It is the umbrella policy that governs 3CIR's compliance posture, underpinning all other controlled compliance documents.

SCOPE

02

This Policy applies to all 3CIR operations, directors, officers, employees, contractors, suppliers, and partners. It governs compliance with Australian legislation (Commonwealth and State), industry standards, ISO requirements, and internal policies.

POLICY STATEMENT

03

OUR COMMITMENT TO COMPLIANCE

At 3CIR, we are unwavering in our commitment to operating with integrity and in full compliance with all applicable laws, regulations, and industry standards. Compliance is a fundamental aspect of our business operations and is essential to maintaining the trust of our students, employees, partners, and the broader community. Our Compliance Policy outlines the principles and practices that guide our efforts to ensure that our operations are aligned with legal requirements, ethical standards, and international best practices, including ISO standards recognised in Australia.

CORE PRINCIPLES

Our Compliance Policy is built upon the following core principles:

3.1 ADHERENCE TO LAWS AND REGULATIONS

We are committed to complying with all applicable local, state, and federal laws and regulations in Australia, and any international laws that govern our operations. This includes compliance with the Australian Corporations Act 2001 (Cth), the Privacy Act 1988 (Cth), the Australian Consumer Law, the Work Health and Safety Act 2011 (Qld), and other relevant legislation catalogued in 3CIR-REG-IMS-004 Compliance Obligations Register. We also align our practices with internationally recognised standards, including ISO 19600 (Compliance Management Systems) and ISO 37001 (Anti-Bribery Management Systems).

3.2 ETHICAL BUSINESS CONDUCT

Compliance is closely tied to ethical business conduct. We ensure that all our actions are guided by integrity, fairness, and transparency. This includes avoiding conflicts of interest, ensuring accurate reporting, and maintaining honest and open communication with all stakeholders. Our commitment to ethical conduct extends to all operations, from procurement and financial management to interactions with students and partners.

3.3 RISK MANAGEMENT

We proactively manage compliance risks by identifying, assessing, and mitigating potential areas of non-compliance. Our risk management framework is aligned with ISO 31000 (Risk Management) and includes regular risk assessments (3CIR- REG-IMS-003), internal audits (3CIR-PRO-QMS-002), and implementing controls to prevent non-compliance. We are committed to continuously improving our risk management processes to remain compliant in a dynamic regulatory environment.

3.4 TRANSPARENCY AND ACCOUNTABILITY

IMPLEMENTATION STRATEGY

04

To effectively implement our Compliance Policy, we have developed a comprehensive strategy that includes the following components:

4.1 LEADERSHIP AND GOVERNANCE

Our leadership team is responsible for promoting a culture of compliance and ensuring that the principles outlined in this policy are integrated into our corporate culture. This includes providing oversight, setting clear expectations, and ensuring all employees have the necessary resources and support to comply with applicable laws and standards. Governance accountabilities are documented in 3CIR-REC-IMS-018 Governance Structure Formalisation Record.

4.2 EMPLOYEE TRAINING AND AWARENESS

We regularly train all employees on compliance-related topics, including legal and regulatory requirements, ethical decision-making, and the specific provisions of our Compliance Policy. This training equips employees with the knowledge and tools to identify and address compliance risks. Training records are maintained per 3CIR-REG-HR-001 Training and Competency Matrix.

4.3 COMPLIANCE MONITORING AND AUDITING

We have established robust monitoring and auditing processes to ensure our operations comply with applicable laws and standards. This includes conducting regular internal audits per 3CIR-SCH-IMS-001 Internal Audit Schedule, monitoring key compliance metrics, and reviewing our compliance performance against established benchmarks. We also engage external auditors (e.g., Kiwa Compass Assurance Services for ISO certification) to provide independent assessments of our compliance practices.

4.4 REPORTING AND WHISTLEBLOWER PROTECTIONS

We encourage all employees, students, and partners to report any concerns related to non-compliance with this policy. Concerns may be raised through the channels specified in 3CIR-POL-GEN-008 Whistleblower Protection Policy. All reports are taken seriously, investigated promptly, and addressed per 3CIR-PRO-QMS-001 Nonconformance and Issue Resolution Procedure.

4.5 COLLABORATION WITH REGULATORS AND PARTNERS

We maintain open and constructive relationships with regulators (ASQA, OAIC, Workplace Health & Safety Queensland, ACNC where applicable) and industry bodies to ensure that we are fully informed of any changes in laws or regulations that may impact our operations. We also collaborate with our partners (including scope-RTO partner Asset College) to ensure that they adhere to the same high standards of compliance that we uphold per 3CIR-PRO-QMS-003 Supplier and Contractor Management

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-003 Anti-Bribery and Corruption Policy
- 3CIR-POL-GEN-008 Whistleblower Protection Policy
- 3CIR-POL-GEN-013 Business Conduct 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-014) is authorised and approved for release in accordance with 3CIR's Integrated Management System governance framework.

AUTHORISED BY	AUTHORISED BY
Marcella Knottenbeld	**Matthew Pitt**
Chief Executive Officer	Chief Operating Officer & Director
Signature Date: / / 2026	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 before relying on this document.

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CORE VALUES

Courage · Commitment · Comradery
Integrity · Respect

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