

« 3CIR PTY LTD »



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S U C C E E D

MODERN SLAVERY AND HUMAN TRAFFICKING POLICY

DOCUMENT CONTROL

This Modern Slavery and Human Trafficking 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-007
DOCUMENT TITLE	Modern Slavery and Human Trafficking 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

PURPOSE

01

Modern slavery is a serious crime and a grave violation of fundamental human rights. It encompasses forced labour, debt bondage, human trafficking, sexual exploitation, forced marriage, and the worst forms of child labour. 3CIR Pty Ltd is committed to ensuring that modern slavery and human trafficking have no place in our business operations or supply chains.

LEGISLATIVE FRAMEWORK

02

- Modern Slavery Act 2018 (Cth) — requires larger entities to report on modern slavery risks and actions
- Criminal Code Act 1995 (Cth) — Divisions 270–271 (slavery, sexual servitude, and human trafficking offences)
- Fair Work Act 2009 (Cth) — worker protections and exploitation provisions
- Migration Act 1958 (Cth) — unlawful non-citizen work provisions
- Anti-Discrimination Act 1991 (Qld)

SCOPE AND REPORTING OBLIGATIONS

03

While 3CIR's current annual consolidated revenue is below the \$100 million threshold that triggers mandatory reporting obligations under the Modern Slavery Act 2018 (Cth), 3CIR voluntarily commits to the principles of the Act and will reassess its formal reporting obligations annually as the business grows. Voluntary modern slavery statements may be published on our website.

OUR COMMITMENTS

04

- 3CIR does not engage in or facilitate any form of modern slavery, forced labour, child labour, or human trafficking
- We pay all workers lawfully, on time, and in accordance with the Fair Work Act 2009 (Cth) and applicable awards
- We do not withhold identity documents or use debt bondage, coercion, or deception to secure or retain workers
- We engage only workers who have the legal right to work in Australia and verify this during onboarding
- We require all contractors and suppliers to represent and warrant that they do not engage in or facilitate modern slavery
- We will not knowingly engage any supplier or partner with a credible, substantiated connection to modern slavery practices

RISK ASSESSMENT

05

3CIR's operations as an online education provider involve limited direct modern slavery risk due to our Australian-based workforce and online delivery model. However, we recognise potential indirect risks in our supply chain, including: technology and software procurement; digital marketing and advertising platforms; and professional services contractors. These risks are assessed through the Supplier and Contractor Evaluation Register (3CIR-REG- QMS-001) and the Risk and Opportunities Register (3CIR-REG-IMS-003).

DUE DILIGENCE AND SUPPLIER EXPECTATIONS

06

3CIR conducts proportionate due diligence on new suppliers and contractors. Our supplier evaluation process (3CIR-FOR-QMS-004) includes consideration of labour practices and modern slavery risk. We expect all suppliers to:

- Comply with all applicable Australian labour laws and modern slavery obligations
- Pay workers lawfully and maintain accurate employment and payment records
- Prohibit forced labour, child labour, and debt bondage in their operations
- Allow workers to terminate employment without penalty upon reasonable notice
- Cooperate with any reasonable audit or assessment of their labour practices

REPORTING CONCERNS

07

Any person who suspects modern slavery, human trafficking, or forced labour involving 3CIR, its suppliers, or its partners should report immediately to:

- The COO or CEO — info@3cir.com
- Australian Federal Police Modern Slavery tip line — 1300 363 347
- Australian Border Force — 1800 875 842
- National Human Trafficking Support Line (Red Cross) — 1800 021 021 Reports made in good faith will be treated seriously and the reporter protected from reprisal under the Whistleblower Protection Policy (3CIR-POL-GEN-008).

TRAINING AND AWARENESS

08

All staff receive modern slavery awareness training during induction. The COO monitors for updated guidance from the Australian Border Force and the Department of Home Affairs and ensures training content remains current. Training completion is recorded in the Training and Competency Matrix (3CIR-REG-HR-001).

REVIEW

09

This policy is reviewed annually by the CEO and COO, or sooner if triggered by legislative change, a supplier concern, or a material change to business operations.

AUTHORISATION & APPROVAL

This policy (3CIR-POL-GEN-007) 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