

2023 Modern Slavery & Human Trafficking Statement



1. Introduction

3P Learning Limited ABN 50 103 827 836 (the **Company** or **we/us**) is a global leader in Edtech programs for reading, writing and mathematics as well as assessment.

We recognise that freedom from slavery is a fundamental human right, and that modern slavery and human trafficking are crimes with severe consequences for victims. In delivering our programs, we are concerned to ensure that we demonstrate and interact with high ethical standards, and identify and remove modern slavery and human trafficking risks from our operations and supply chains.

The Company and its reporting entities publish this statement in accordance with the *Australian Modern Slavery Act 2018* (Cth) (**Act**) and the United Kingdom's *Modern Slavery Act 2015* (**UK Act**).

2. Reporting entities

The Company and each of the reporting entities listed below adopts and submits this statement in accordance with the Act and UK Act. (The Company's consolidated revenue was AUD\$106.9m as at the financial year ended 30 June 2023, while subsidiaries did not meet the threshold for reporting.)

Subsidiaries that are reporting entities:

- | | |
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| 1. Blake eLearning Pty Ltd (ABN 64 140 998 821) | Australia |
| 2. 3P International Holdings Pty Limited (ACN 169 566 545) | Australia |
| 3. 3P Learning Australia Pty Ltd (ABN 29 135 793 609) | Australia |
| 4. Pairwise Pty Ltd (ABN 69 164 681 618) | Australia |
| 5. Blake eLearning UK Limited (02092638) | UK |
| 6. 3P Learning UK Limited (Company number 05919214) | UK |

3. Our corporate structure, operations and supply chains

3.1 Corporate structure

The Company's corporate structure comprises:

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| Board of Directors | The Board is responsible for setting and overseeing the Company's strategic objectives and performance. |
| Board Committee | The Audit and Risk Committee is a Board-delegated committee responsible for reviewing the material risks facing the Company and for corporate reporting processes. Members of this committee are non-executive directors of the Company. |
| Management | Management of day-to-day operations occur under the Chief Executive Officer (CEO) and the executive leadership team. |
| Business teams | Our operations are delivered by the Product, Technology, Sales, Marketing and Corporate (People and Culture, Finance, Administration) teams. |

The reporting entities are wholly owned subsidiaries of the Company. Management oversees the day-to-day operations and reporting of these entities to report, in turn, to the Board Committee and Board.

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3.2 Our operations and supply chains

Our educational programs and content are designed in-house by the Product and Technology teams. The supply chains we use to deliver programs to customers and students are predominantly made up of global companies providing IT and cloud-based services.

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| Suppliers and vendors engaged by us | Local and global providers of goods, utilities and services for: physical offices, travel and hospitality, telecommunications, cloud hosting, SAAS, technology, professional services (tax, audit, legal, advisory), design, publishing and printing, and global promotional products. |
|--|--|

Our Sales, Customer Service and Marketing teams manage and coordinate the communications and customer service experience to schools, teachers and parents and the public directly (in person or by email or phone) and via distributors.

| | |
|-----------------------------------|---|
| Distributors engaged by us | B2B: for school customers we may appoint sub-distributors for their leadership presence in educational services in their local region. B2C: for direct customers (parents) our products are available for subscription online or through app platform providers. |
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4. Risks of modern slavery practices in our operations and supply chains

The Company's services are provided by skilled employees under common management and policy frameworks that mitigate risk in our global operations. In relation to external suppliers and distributors, we reviewed the Company's vendors and those of its reporting entities for the reporting year to 30 June 2023 in relation to their modern slavery risk profile.

For the Company's operations:

- The significant supply of services and goods to the Company are in relation to utilities, technology and digital marketing vendors.
- Most suppliers are located in the jurisdictions where 3P Learning's offices are located (Australia, Canada, UK, USA) and also Ireland and Singapore.
- Distributors and resellers of our programs are subject to our onboarding due diligence review.

Based on the above, the Company has assessed the risks of modern slavery practices in its operations and supply chains as low.

5. Actions to address modern slavery and human trafficking risks

Activities to assess and address the risks of modern slavery and human trafficking in our operations include: due diligence on suppliers and distributors; ongoing monitoring of suppliers and distributors; and staff training in relation to Company policies.

The following policies supported our business operations during the reporting period:

- Code of Conduct
- Anti-Bribery and Corruption Policy
- Whistleblower Policy.

During the 2023 reporting period, the Company's internal operations were monitored by the Company's Audit and Risk Committee, and People and Culture Committee.

Our review of vendors during the year helps us to identify key areas to monitor for modern slavery risk in the upcoming 2024 reporting period. These steps may include:

- Review the Company's ongoing monitoring and onboarding steps
- Review areas of focus for additional staff training.

6. Measuring our effectiveness

We ensure that slavery and human trafficking is not taking place in our operations or supply chains by focusing on due diligence and staff training for those teams and functions that engage suppliers. Reviews of the effectiveness of our actions will continue in future reporting periods.

7. Consultation with reporting entities

The Company's reporting entities develop and own the intellectual property of, or hold distribution rights for, the education programs of the Company. The review of modern slavery risks of the suppliers and sub-distributors of these entities was completed jointly.

This statement was approved by the Board of Directors of 3P Learning Limited, as the principal governing body, on 12 December 2023 in Leichhardt NSW, Australia.



Matthew Sandblom
Executive Chairman

This statement is published at www.3plearning.com.