

2024 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

- *Modern Slavery Act 2015 (UK Act)* (United Kingdom)
- *Modern Slavery Act 2018 (Cth) (Act)* (Australia)
- *Fighting Against Forced Labour and Child Labour in Supply Chains Act (2023)* (Canada) (**Canadian Act**)

2. Reporting entities

The Company and each of the reporting entities listed below adopts and submits this statement in accordance with the Act, UK Act and Canadian Act.

The Company's consolidated revenue was AUD\$109.9m as at the financial year ended 30 June 2024.

Subsidiaries that are reporting entities in this Report:

1. 3P Learning Australia Pty Ltd (ABN 29 135 793 609)	Australia
2. 3P International Holdings Pty Limited (ACN 169 566 545)	Australia
3. Blake eLearning Pty Ltd (ABN 64 140 998 821)	Australia
4. Pairwise Pty Ltd (ABN 69 164 681 618)	Australia
5. 3P Learning Canada Limited (2016828515)	Canada
6. 3P Learning UK Limited (Company number 05919214)	UK
7. Blake eLearning UK Limited (02092638)	UK

3. Our corporate structure, operations and supply chains

3.1 Corporate structure

The Company's corporate structure comprises:

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.

3.2 Our operations and supply chain activities

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.

Our Suppliers and Vendors	We engage a range local and global providers of goods, utilities and services for: our physical offices, travel and hospitality, telecommunications, cloud hosting, IT hardware and software, SAAS, professional services (tax, audit, legal, advisory), design services, publishing and printing services, and global promotional products.
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Our Sales, Customer Service and Marketing teams engage, manage and coordinate our communications and customer service experience to customers (schools, teachers and parents) and the public directly in person, by email or phone, and through our distributors.

Our Distributors	<p>B2B: For our school customers we may appoint local sub-distributors for their leadership presence in educational services in their local region.</p> <p>B2C: For direct customers (parents) our products are available for subscription online via our website, or through App Stores and their platform providers.</p>
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4. Risks of modern slavery practices in our operations and supply chains

The Company’s services and those of its reporting entities are provided by skilled employees under common management and our Group Policy frameworks that monitor and mitigate risk in our global operations. In relation to external suppliers and distributors of the Company and its reporting entities, our review of their modern slavery risk profiles was completed in 2023 to enable our ongoing framework for onboarding risk assessments, and ongoing monitoring for new and existing vendors.

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 have local presence such as Australia, Canada, UK, USA, but also the following jurisdictions: 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.

Specific assessments

For the Company’s group operations, our steps to assess and manage modern slavery risks considered among other things, the following:

Areas that carry risk	How we conduct reviews or what we consider in assessments
Technology in our supply chain Hardware, software and SaaS	Due diligence frameworks consider: <ul style="list-style-type: none"> - relevant certifications - jurisdiction of domicile and operations - subcontractors - employee profile of the vendor - relevant policies and modern slavery statements - other commercial and legal terms in contracts
Other goods manufactured in our supply chain	
Services - Distribution services and agents	
Services – Professional, non-professional, and personal (expert, consultant or social media)	
Services – Projects and personal (experts, social media sponsorship arrangements)	

Labour risks

Our policy at 3P Learning is that forced labour or child labour is prohibited in our supply chains and operations.

The 3P Learning People and Culture Committee reviews the Company’s people strategy, and this includes the policies and practices of the Company designed to comply with law, encouraging the creation of an ‘Employer of Choice’ culture and aligning to business requirements and the Company’s values.

For the supply chains of the Company and its reporting entities, a review of the risks of prohibited forms of labour (forced labour and child labour) was initiated in 2024. In our global operations, additional focus on production processes and labour standards of vendors and their sub-contractors will apply for vendors deemed non-low risk.

These assessments are continually developed, and presently apply more generally to a range of suppliers and manufacturers of goods, and vendors with complex contracting or supply arrangements. If our assessment is that a vendor cannot be managed to achieve an acceptable low risk rating with relevant due diligence, then 3P Learning considers it may not engage those vendors.

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 and awareness in relation to Company policies.

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

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

During the 2024 reporting period, staff training was accompanied by a review of the modern slavery risk rating for operations and supply chains. Areas in the supply chain noted as medium risk were reviewed for its effectiveness of controls.

This review maintained the overall assessment of low modern slavery risks in the Company's operations with our current protocols in onboarding service providers and vendors. The Company's risk management processes are monitored by the 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 2025 reporting period. These steps may include:

- Maintain our review processes for the Company's ongoing monitoring and onboarding steps;
- Review areas of focus for additional staff training and awareness;
- Review the Modern Slavery Statements of our vendors if available, as part of contract renewal and onboarding
- Review and improve our measures and reporting on the effectiveness of our actions.

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.

The measures to evaluate the effectiveness of our Group processes to ensure that forced labour and child labour are not being used in our business supply chains continue to be developed. We consider the collation of data available to us, our steps to maintain and update monitoring, and training measures continue to enable better manage the modern slavery and human trafficking risk engagement with our suppliers, vendors and distributors. The effectiveness of these processes and oversight of decisions by the CEO and our Board are reviewed annually.

7. Reporting entities consultation

The Company's reporting entities develop and own the intellectual property of, and hold distribution rights for, the education programs offered by 3P Learning Group. The review of modern slavery risks of the suppliers and sub-distributors of these entities was completed jointly with input from a range of stakeholders in our reporting entities and group operations.

Following consultation, the board of directors of the following subsidiaries approved the publication of this statement for the purposes of the UK Act and Canadian Act, respectively:

- 3P Learning Canada Limited on 6 December 2024,
- 3P Learning UK Limited on 6 December 2024, and
- Blake eLearning UK Limited on 6 December 2024.

3P Learning Canada Limited – s.11 attestation

In accordance with the requirements of Canadian Act, and in particular section 11 thereof, I, in the capacity of Director, attest that I have reviewed the information contained in the report on behalf of the governing body of the entity listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Canadian Act, for the reporting year listed within this report.



Jose Dante Palmero, CEO

6 December 2024

8. Approval

This statement was approved by the Board of Directors of 3P Learning Limited, as the principal governing body, on 11 December 2024.



Matthew Sandblom
Executive Chairman
3P Learning Limited