3P Learning

*Better ways to learn*

# 2026 Modern Slavery & Human Trafficking Statement

*Prepared by: Risk and Compliance team | Draft date: November 2026 | Reporting period: 1 July 2025 to 30 June 2026*

## 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 assessments.

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); and
- Modern Slavery Act 2018 (Cth) (Act) (Australia).

The Company also has regard to the Modern Slavery Act 2018 (NSW) in its capacity as a supplier to New South Wales Government customers, and continues to monitor emerging supply chain transparency and forced labour requirements in the United States and the European Union as set out in Section 6 below.

The reporting period for this statement is 1 July 2025 to 30 June 2026.

## 2. Reporting entities

The Company is a reporting entity under the Act, with consolidated revenue of AUD$104 million for the financial year ended 30 June 2026. This joint statement covers the Company and each entity it owns or controls, listed below. It is also made on behalf of Blake eLearning Pty Ltd for the purposes of the Act and the UK Act, and on behalf of the other listed subsidiaries that report under the UK Act, as identified in Section 8.

Reporting entities and other entities owned or controlled by the Company covered by this statement:

| Entity | Jurisdiction |
|---|---|
| Blake eLearning Pty Ltd (ABN 64 140 998 821) | Australia and UK |
| 3P International Holdings Pty Limited (ACN 169 566 545) | Australia |
| 3P Learning Australia Pty Ltd (ABN 29 135 793 609) | Australia |
| Pairwise Pty Ltd (ABN 69 164 681 618) | Australia |
| Intrepica Pty Ltd (ABN 44 128 896 980) | Australia |
| Blake eLearning UK Limited (02092638) | UK |
| 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:

| Role | Responsibility |
|---|---|
| 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, supported by the Risk & Compliance 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.

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: for B2B school customers we may appoint sub-distributors for their leadership presence in educational services in their local region. For B2C direct customers (parents) our products are available for subscription online or through app platform providers.

In Australia, a material part of our business involves supplying educational software and services to government education department customers. We take account of the modern slavery expectations of suppliers in the way we manage our own supply chain, in addition to our obligations as a reporting entity under the Act.

# 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 policy frameworks that 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 since 2023 has continued to inform our framework for onboarding risk assessments for new vendors, and ongoing monitoring of existing vendors.

## Our operations

For the Company's operations:

- By spend, most of the services and goods supplied to the Company relate to technology, SaaS, hosting, app store platforms, professional services and utilities. The Company also buys physical goods (printing, inventory and promotional goods), labour-intensive services (cleaning, mailing and print-to-post), offshore outsourced and employer-of-record labour, and influencer and talent services.
- Most suppliers by number and spend are located in the jurisdictions where 3P Learning operates (Australia, Canada, the UK and the USA). A smaller number of suppliers, distributors and labour providers are located in other jurisdictions, including in Asia and Latin America, and receive additional attention under our framework.
- Distributors and resellers of our programs are subject to onboarding due diligence. During the reporting period, distributor contracts were reviewed as they came up for renewal to include required modern slavery clauses, and this work is continuing.

During the reporting period, the Company reviewed its external vendors under its Modern Slavery Risk Assessment Framework, having regard to jurisdiction, the nature of spend and activity indicators. Vendors representing approximately 98% of spend were assessed as low risk. A small number of vendors in specific categories, described below, were identified for further engagement and enhanced due diligence, consistent with our framework.

## Specific assessments

For the Company's operations the assessment of modern slavery risks and steps to manage that risk include:

| **Areas that carry risk** | **How we conduct reviews or what we consider in assessments** |
|---|---|
| Technology – Supply chain<br>Hardware, software and SaaS | - due diligence<br>- relevant certifications<br>- jurisdiction of domicile and operations<br>- subcontracts<br>- employee profile of the vendor<br>- relevant policies and modern slavery statements<br>- commercial and legal review of contracts |
| Other goods manufactured – supply chain | |
| Distribution services and agents | |
| Services – professional, non-professional, and personal (expert, consultant or social media) | |
| Services – projects and personal (experts or social media sponsorship arrangements) | |

During the reporting period, the Company completed a structured review of its software and technology vendor register, covering the contracted software and service providers used across the

business. As part of that review, the Company confirmed that a majority of its most material global technology vendors by spend and usage, including core cloud infrastructure, productivity, collaboration, developer tooling, advertising and payments platforms, either publish their own current modern slavery statement or have attested to the Company's standard modern slavery warranty clause. Vendors without a confirmed statement or attestation remain subject to ongoing review and, where appropriate, direct outreach requesting an attestation.

### Influencer and talent arrangements

The Company engages content creators, influencers and talent management agencies to promote its programs to families, home schoolers and teachers. These arrangements are mainly in Australia, the United States and the United Kingdom. Because of the way this work is delivered, including the involvement of agencies and production support and the possibility that children may appear in content, the Company gives these arrangements particular attention under its framework. No concerns have been identified. The Company continues to review its influencer and talent agency arrangements as part of its ordinary contract management.

### Labour risks

Our policy at 3P Learning is that forced labour and child labour are 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 and continues to be adopted. 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. They apply a general focus to a range of suppliers and manufacturers, with additional checks for vendors with complex or unclear contracting or supply arrangements. Where a vendor is rated High or Medium, the Company will contact the vendor to obtain a modern slavery statement or attestation. If the vendor does not provide one, the Company will review whether to continue the engagement.

## 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 reporting period, staff training was accompanied by a review of the modern slavery risk rating for operations and supply chains. The review identified opportunities to extend our processes

to vendors engaged outside formal onboarding and to build on the information held for vendors identified for further engagement. Our risk management processes are monitored by the Audit and Risk Committee and the People and Culture Committee.

Our steps during the reporting period included:

- Maintaining our review processes for the Company's ongoing monitoring and onboarding steps;
- Completing a register-wide review of software and technology vendors, recording confirmed modern slavery statements and attestations against our standard warranty clause;
- Reviewing areas of focus for targeted staff training and awareness;
- Reviewing the Modern Slavery Statements of our vendors if available, as part of contract renewal and onboarding, and requesting a standard attestation clause from vendors that do not publish their own statement;
- Reviewing and activating internal engagement to discuss our measures and the effectiveness of our actions. Our vendors may be engaged in day-to-day service level discussions, and in more focused discussions with our Risk and Compliance team, with oversight from the Audit and Risk Committee; and
- Reviewing our FY26 vendor base against our modern slavery framework and engaging with vendors identified for further due diligence.

## 6. Monitoring of emerging regulatory developments

The Company monitors proposed and emerging modern slavery and forced labour requirements across the jurisdictions in which it operates, so that it can adjust its due diligence and reporting practices as these requirements take effect. As at the date of this statement, these include:

- **Australia:** the Australian Government's review of the Act, including proposals for penalties and enhanced reporting and due diligence obligations, which have not yet been enacted;
- **United Kingdom:** proposed reforms to the Section 54 transparency regime, which would introduce mandatory statement content requirements and financial penalties for non-compliance, which have not yet been enacted or brought into force;
- **Canada:** the Canadian Act and guidance from Public Safety Canada on its application. The Company has assessed that no group entity is required to report under the Canadian Act for the reporting period, and will reassess this position annually and if its physical goods, fulfilment, inventory or import arrangements change; and
- **European Union:** Regulation (EU) 2024/3015 prohibiting products made with forced labour from the EU market, which applies from 14 December 2027 and does not yet impose obligations on the Company.

The Company will update its practices and this statement as these reforms progress and, where relevant, come into force.

## 7. Measuring our effectiveness

We seek to identify and address modern slavery and human trafficking risks in our operations and supply chains, focusing on due diligence and staff training for the teams and functions that engage suppliers.

The measures we use to evaluate the effectiveness of our processes continue to be developed. As our framework matures, we will further refine our assessments to take account of vendor certifications, subcontracting and contract terms. In the next reporting period we intend to track the proportion of

vendors identified for further engagement that provide a statement or attestation. The effectiveness of these processes is reported to the CEO and to the Board, which reviews it at least annually.

## 8. Reporting entities consultation

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 with input from a range of stakeholders.

Following consultation, the board of directors of each of the following subsidiaries approved this statement on 19 November 2026: Blake eLearning Pty Ltd for the purposes of the Act and the UK Act; 3P Learning UK Limited and Blake eLearning UK Limited for the purposes of the UK Act; and the following entities as owned or controlled entities consulted under the Act:

- 3P Learning UK Limited
- Blake eLearning UK Limited
- Blake eLearning Pty Ltd
- Intrepica Pty Ltd
- Pairwise Pty Ltd
- 3P International Holdings Pty Limited

## 9. Approval

This statement was approved by the Board of Directors of 3P Learning Limited, as the principal governing body, on 19 November 2026. The statement was authorised for publication on 23 November 2026.



Matthew Sandblom

Chairman

23 November 2026