



Modern Slavery Statement

For the Financial Year Ending 30 June 2025

Custom Learning Design Pty Ltd (ABN 84 659 065 639)

1. Identification of the Reporting Entity

This Modern Slavery Statement is submitted voluntarily by Custom Learning Design Pty Ltd (CLD) under the Modern Slavery Act 2018 (Cth). CLD is an Australian-owned private company registered in New South Wales, Australia. The statement covers the activities of Custom Learning Design Pty Ltd for the reporting period ending 30 June 2025.

2. Structure, Operations and Supply Chains

Structure: Custom Learning Design Pty Ltd is an independent learning design and technology company. It operates as a single legal entity governed by its Managing Director and Board of Directors. CLD does not currently own or control any subsidiary entities.

Operations: CLD designs, develops, and delivers digital learning solutions and workforce capability programs for government, corporate, and not-for-profit organisations across Australia and the Pacific region.

Our services include:

- Bespoke eLearning and compliance training development
- Learning Management System (LMS) hosting and administration (CustomLMS.online)
- Leadership, governance, and digital transformation training
- Learning consultancy and change management services

CLD's workforce is based in Australia and comprises a mix of employees, contractors, and consultants. Most activities are undertaken in Australia, with some international support for technology and creative services.

Supply Chains: CLD's supply chain primarily includes:

- Australian-based software, IT hosting, and cloud infrastructure providers
- Professional services suppliers (graphic design, animation, translation, voice-over, and IT development)
- Office equipment and software licensing providers
- Subcontracted service providers for creative, accessibility, and learning content production.

We prioritise working with Australian suppliers, Indigenous businesses, and ethically certified partners. Where international suppliers are used, they are typically large, reputable technology and hosting providers subject to international human rights and compliance frameworks.

3. Risks of Modern Slavery Practices in Our Operations and Supply Chains

CLD acknowledges that modern slavery can occur in any sector or country and may take forms such as forced labour, debt bondage, or human trafficking.



Our overall risk is considered low, given the professional and skilled nature of our workforce and the predominance of Australian-based suppliers. However, we recognise potential areas of vulnerability in:

- Offshore technology and software development services
- Procurement of IT hardware and electronic equipment
- Freelance and subcontractor arrangements in media, translation, or design sectors.

CLD does not own or control other entities. Should this change, we will assess and address risks across all related entities to maintain compliance.

4. Actions Taken to Assess and Address These Risks

CLD has implemented several measures to identify, assess, and address modern slavery risks within our operations and supply chains. These include:

- Supplier Code of Conduct requiring supplier compliance with the Modern Slavery Act 2018 (Cth)
- Procurement screening to ensure ethical sourcing and labour compliance
- Inclusion of modern slavery and human rights clauses in contracts
- Employee and contractor awareness on ethical sourcing
- Preference for Indigenous and social enterprise suppliers.

5. Assessing the Effectiveness of Our Actions

CLD continually monitors and evaluates the effectiveness of our actions through:

- Annual review of supplier declarations and contracts
- Reporting and escalation mechanisms for unethical conduct
- Monitoring internal training completion rates
- Continuous improvement through executive review and procurement policy updates.

Effectiveness is measured by the absence of identified modern slavery incidents and improved supplier transparency.

6. Consultation with Entities Owned or Controlled

CLD does not currently own or control any other entities. Should this change, CLD will ensure future statements are prepared in consultation with those entities and will extend our ethical sourcing and compliance policies across all operations.

7. Other Relevant Information

CLD's ethical commitments extend beyond compliance with the Modern Slavery Act. We are guided by our:

- Reconciliation Action Plan (RAP)
- Environmental, Social and Governance (ESG) Framework
- Supplier Diversity Policy.

CLD is also committed to maintaining a secure, Australian-hosted environment for data and learning systems and upholding ethical business practices across all partnerships.



8. Approval and Signature

This Modern Slavery Statement was approved by the Board of Directors of Custom Learning Design Pty Ltd on 20 October 2025 and signed by the Managing Director as the responsible member of the reporting entity.

Signed:

Ria O'Donnell

Ria O'Donnell
Managing Director
Custom Learning Design Pty Ltd
Date: 20 October 2025