



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

Custom Learning Design Pty Ltd (ABN: 84 659 065 639) is the reporting entity submitting this Modern Slavery Statement voluntarily under the Modern Slavery Act 2018 (Cth). This statement covers the reporting period ending 30 June 2025.

2. Structure, Operations and Supply Chains

CLD operates a blended delivery and production model that combines in-house capability with a trusted network of Australian and international specialist providers. While core project management, learning design, governance, and client engagement functions are undertaken by CLD staff in Australia, certain technical and creative components may be supported by external providers. This operational model requires ongoing visibility of our suppliers, subcontractors, and technology partners to ensure that labour practices across all tiers of our supply chain comply with the Modern Slavery Act 2018 (Cth). To manage this, CLD maintains direct oversight of all contracted resources, mandates ethical sourcing requirements in procurement activities, and actively monitors suppliers where specialist work is outsourced.

Structure:

Custom Learning Design Pty Ltd (CLD) is an Australian-owned learning design and technology company. CLD operates as a single legal entity under the governance of its Sole Director and Managing Director, Ria O'Donnell. CLD does not own or control any other entities.

Operations:

CLD provides digital learning solutions and workforce capability programs across Australia and the Pacific region. Services include:

- Custom eLearning and compliance training
- Learning Management System (LMS) hosting and support (CustomLMS.online)
- Leadership, governance, and digital transformation programs
- Consulting and organisational change services

Supply Chains:

CLD's supply chain includes:

- Australian cloud hosting and IT infrastructure providers
- Creative services such as animation, design, translation, and voice-over
- IT hardware and software vendors
- Subcontractors specialising in accessibility and content development

CLD prioritises ethical suppliers and Indigenous businesses where possible.

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

Modern slavery risks can occur at different tiers of supply chains, particularly where visibility is limited or where services, materials, or labour originate from higher-risk jurisdictions or industries. CLD has assessed its operating model, service delivery arrangements, and procurement activities and identified several areas where risks may potentially arise.

Operational Risks

Although CLD's internal operations are based entirely in Australia and carried out by skilled professional staff, we recognise that certain specialised services may involve external providers whose internal labour practices are not always directly visible. These risks include:

- **International freelance or subcontracted creative services**, where translation, animation, or media production work may be facilitated through global service marketplaces. These platforms can involve workers in countries with weaker labour protections, increasing the risk of unfair labour practices or exploitation.
- **Offshore cloud or software development services**, where providers headquartered in low-risk jurisdictions may still use global delivery centres or subcontractors in higher-risk regions. This includes support services, security monitoring, or platform maintenance teams whose labour conditions may not be transparent.

Supply Chain Risks

CLD's supply chain includes technology, hardware, software licensing, and cloud-based services. The greatest exposure to modern slavery risk exists within upstream supply tiers, particularly where manufacturing occurs outside Australia. Key areas include:

- **Global manufacturing of IT hardware, electronic equipment, and components**, which are known internationally to have higher incidences of forced labour, child labour, and unsafe working conditions within mining, assembly, or electronics manufacturing supply chains.
- **Large international cloud and software providers**, which, while reputable, may rely on complex multi-tier supply arrangements involving global data centres, support teams, or outsourced contractors. The lack of visibility across all tiers may obscure potential human rights risks.

Contextual Considerations

While CLD engages primarily with Australian-based suppliers and professional service providers, the company recognises that modern slavery risks can exist even in otherwise low-risk sectors. These risks may stem from:

- Limited transparency in long or complex global supply chains
- Subcontracting arrangements where labour conditions are not independently monitored
- Reliance on multinational vendors whose supply chain spans numerous countries and industries

Entities Owned or Controlled

CLD does not own or control any other entities. Should this change, CLD will extend its risk assessment processes to all related entities, ensuring compliance across governance, procurement, and operational activities.

4. Actions Taken to Assess and Address These Risks

CLD takes a proactive approach to managing modern slavery risks within our operations and supply chains. Our actions focus on responsible procurement, supplier due diligence, and maintaining visibility across all specialist or subcontracted work.

Ethical Procurement and Supplier Screening

CLD considers modern slavery risks during procurement and supplier selection. This includes reviewing supplier practices, assessing sector and geographic risk, and requiring suppliers to confirm compliance with the Modern Slavery Act 2018 (Cth) as part of onboarding.

Supplier Code of Conduct and Contractual Safeguards

CLD has a Supplier Code of Conduct that sets clear expectations regarding labour standards and ethical practices. Modern slavery clauses are included in our supplier agreements, requiring transparency, fair labour practices, and notification of any identified risks.

Oversight of Subcontractors and Specialist Providers

Where CLD engages external specialists for design, media production, translation, accessibility or technical development, we maintain direct oversight of their work. Subcontractors must confirm ethical labour practices, and higher-risk arrangements receive additional checks before engagement.

Internal Awareness and Governance

Modern slavery responsibilities sit with the Sole Director and Managing Director. Staff involved in procurement and supplier engagement receive guidance on identifying and escalating potential risks, ensuring that modern slavery considerations are embedded in day-to-day decision-making.

Continuous Improvement

CLD reviews suppliers and contracted arrangements annually, monitors updates in government guidance, and refines our procurement and due diligence processes as our operational needs evolve. We prioritise partners who demonstrate strong ethical and labour standards, including Indigenous and socially responsible suppliers.

5. Assessing the Effectiveness of Our Actions

CLD monitors the effectiveness of its actions to prevent modern slavery by reviewing supplier arrangements, contract requirements, and internal processes each year. As a professional services organisation with a predominantly Australian supplier base and a small, highly skilled workforce, CLD has not identified any modern slavery risks or incidents within our operations or supply chains to date.

Our assessment approach includes:

- **Annual reviews** of supplier contracts and declarations to ensure modern slavery clauses and ethical sourcing requirements remain current.
- **Monitoring supplier behaviour** throughout engagements, including checking for any indicators of exploitative labour practices.
- **Maintaining clear escalation pathways**, enabling staff to report any concerns directly to the Sole Director and Managing Director.
- **Reviewing internal awareness activities**, ensuring staff involved in procurement remain informed about modern slavery obligations.

CLD considers its actions effective at this time, based on the absence of identified risks or incidents during this reporting period and the continued transparency of our suppliers.

6. Consultation with Entities Owned or Controlled

CLD does not own or control any other entities. If this changes, CLD will undertake a structured consultation process with any new entities to ensure their operations, procurement practices, and governance arrangements align with CLD's ethical standards and modern slavery compliance obligations.

7. Other Relevant Information

CLD's commitment to ethical business practices extends beyond our obligations under the Modern Slavery Act 2018 (Cth). As a learning design and technology organisation working closely with government, corporate, and community partners, we recognise the importance of operating transparently, responsibly, and in a manner that contributes positively to the communities we serve.

CLD's broader ethical framework is supported by several initiatives and governance mechanisms, including:

- **Our Reconciliation Action Plan (RAP)**, which strengthens relationships with Aboriginal and Torres Strait Islander communities and encourages the use of Indigenous-owned suppliers.
- **Our Environmental, Social and Governance (ESG) approach**, which guides responsible decision-making across sustainability, social responsibility, and ethical conduct.
- **Our Supplier Diversity Policy**, which prioritises local, ethical, and socially responsible suppliers, including small businesses and Indigenous enterprises.
- **Our commitment to secure, Australian-hosted technology environments**, ensuring that data storage and system management align with industry standards and minimise offshore exposure.

These initiatives form part of CLD's ongoing efforts to ensure that our work, our partnerships, and our supplier relationships are grounded in transparency, fairness, and respect for human rights. As CLD continues to grow, we will review and strengthen our governance practices to ensure they remain aligned with best-practice expectations and support our ongoing efforts to prevent modern slavery.

8. Approval and Signature

This Modern Slavery Statement was approved by the Sole Director and Managing Director of Custom Learning Design Pty Ltd on 19 November 2025 and is signed below as the responsible member under the Modern Slavery Act 2018 (Cth).

Signed

Ria O'Donnell

Ria O'Donnell
Sole Director and Managing Director
Custom Learning Design Pty Ltd
19 November 2025