



Policy Name:	Annual Mandatory Compliance Training
Attention:	All LSH Group Australia Employees
Version:	1.4
Last Reviewed:	1 st April 2026
Effective From:	1 st April 2026
Approved By:	GCEO / Corp Review / MD

Annual Mandatory Compliance Training Policy

1. Purpose

This Policy sets out LSH Group Australia's requirements for annual mandatory compliance training. The objective is to ensure all staff and the associated workforce understand and comply with their legal, regulatory and policy obligations, and to promote a culture of ethical conduct, safety, respect and accountability.

This Policy supports compliance with, including but not limited to, the Fair Work Act 2009 (Cth), Work Health and Safety legislation, anti-discrimination and equal opportunity laws, privacy and data protection laws, and any applicable industry-specific regulatory obligations.

2. Scope

This Policy applies to all staff and the associated workforce of LSH Group Australia (collectively referred to as *you* for the purposes of this Policy), including employees, apprentices, trainees and other engaged persons performing work for or on behalf of LSH Group Australia.

3. Mandatory Compliance Training

3.1 Overview

Mandatory compliance training is designed to:

- inform you of your obligations and responsibilities while engaged by LSH Group Australia;
- support lawful, ethical and professional conduct;
- promote a safe, respectful and inclusive working environment; and
- mitigate legal, regulatory and operational risk to the organisation.

3.2 Delivery

- Mandatory compliance training is delivered via online modules through the Company's nominated learning management system (LMS), which may be updated from time to time.
- Training content may include but is not limited to: work health and safety, discrimination and harassment prevention, ethical conduct, privacy and data protection, cyber security, and any other training required by law, regulation or Company policy.

3.3 Training Period and Validity

- The annual compliance training cycle for active employees generally commences in June and concludes on 31 December each calendar year.
- Unless otherwise specified, each mandatory module is valid only for the relevant calendar year and expires on 31 December.



3.4 Completion Requirements

- Active employees must complete all mandatory compliance training modules by 31 December each year.
- New employees must complete all mandatory compliance training within one (1) month of commencement, or earlier where required by law or operational need.
- Completion status will be recorded in the LMS and forms part of the Company's compliance records.

3.5 Notifications and Reminders

- Human Resources (HR) will issue reminder notifications to your work email address prior to the expiry of any mandatory training. These notifications will outline:
 - the modules required to be completed;
 - the timeframe for completion; and
 - instructions for accessing the LMS.
- These notifications constitute a lawful and reasonable direction of the Company.

4. Roles and Responsibilities

4.1 Employees and Associated Workforce

- You are responsible for completing all mandatory compliance training within the required timeframes.
- You must advise your supervisor or HR as soon as practicable if you experience any genuine difficulty completing the training.

4.2 Supervisors and Managers

- Supervisors and managers are responsible for ensuring staff are provided with reasonable opportunity and time during work hours, where practicable, to complete mandatory training.
- Supervisors and managers must monitor completion and address non-completion in a timely manner.

4.3 Human Resources

- HR is responsible for administering the training framework, monitoring completion, issuing reminders and maintaining training records.

5. Non-Compliance

- Failure to complete mandatory compliance training within the required timeframe, without reasonable explanation, may constitute a failure to comply with a lawful and reasonable direction.
- Where training is not completed:
 - HR will notify you and your supervisor;
 - further reminders and opportunities to comply may be provided; and
 - continued non-compliance may result in disciplinary action, up to and including termination of employment or engagement, in accordance with applicable industrial instruments, contracts and Company policies.
- Supervisors or managers who fail to take reasonable steps to ensure completion by their teams may be managed in accordance with the Company's performance management processes.
- Heads of Department will receive periodic reports identifying non-completion and are expected to address issues in consultation with HR.
- The Executive Committee may be provided with periodic reports on overall organisational completion rates.



6. Breach of Policy

LSH Group Australia treats breaches of its policies and procedures seriously. Concerns regarding non-compliance are encouraged to be raised and will be managed fairly, confidentially and in accordance with applicable laws, employment agreements, industrial instruments and Company procedures. Disciplinary action may include counselling, formal warnings or other action up to and including termination of employment or engagement.

7. Definitions

- **Associated workforce** – Any person engaged in an LSH Group Australia activity, including apprentices and trainees.
- **Active employees** – Any current staff member employed by LSH Group Australia.
- **Mandatory compliance training** – Training required by legislation, regulation or Company policy to ensure awareness of legal obligations, standards of conduct and job-related responsibilities.
- **Learning management system (LMS)** – The system used by the Company to deliver and record online training.
- **Staff** – Any person employed by LSH Group Australia on a continuing or fixed-term basis.
- **Supervisor/Manager** – The person responsible for managing the performance and day-to-day activities of a staff member.
- **Head of Department** – The head of a business division or function, such as HR, IT, Finance, Insurance or Aftermarket.

8. Policy Status

This Policy does not form part of any employee's contract of employment. It is a lawful and reasonable direction of the Company with which compliance is required. Any statement in this Policy about what the Company will or will not do does not create a legally binding obligation on the Company.

This Policy may be amended from time to time to reflect changes in legislation, regulatory requirements or organisational needs.