



# Keypath Education International, Inc. Modern Slavery Policy

Adopted on: June 14, 2023

# Keypath Modern Slavery Policy

## Keypath Education International, Inc. ARBN 649 711 026

### Understanding Modern Slavery

Modern slavery is a serious human rights issue, and includes conduct such as human trafficking, slavery, servitude, forced labour, forced marriage, debt bondage, deceptive recruiting for labour or services and the worst forms of child labour.

Modern slavery is an issue of global significance and Keypath recognises that every organisation has a role to play in mitigating its impact. Keypath is committed to playing a part in protecting the human rights of those individuals who are potentially affected by our business activities.

### Application of Policy

This Policy covers Keypath Education International, Inc. ARBN 649 711 026 and its owned and controlled entities from time to time (collectively, **Keypath**), as well as Keypath's Board members, Executive Leadership team, employees, contractors and affiliates (wherever they may be located).

This Policy also covers any person or entity which is contractually bound to comply with it pursuant to the terms of an agreement with Keypath (which may include our suppliers and other business partners).

This Policy applies in addition to, and should be read in conjunction with, Keypath's existing [Code of Conduct](#).

### Purpose of this Policy

The purpose of this Modern Slavery Policy (**Policy**) is to set out:

- (a) Keypath's commitment to:
  - i. respecting the rights of individuals and addressing the risks associated with modern slavery; and
  - ii. taking action to prevent and eliminate modern slavery in our supply chains and operations;
- (b) Keypath's framework for compliance with the Act including the preparation and publishing of an annual Modern Slavery Statement; and
- (c) the responsibilities of Keypath's staff, Executive Leadership team, Board members and suppliers for identifying, reporting on and managing any modern slavery risks.

### Communicating this Policy

A copy of this Policy is available on the Keypath website at all times, and will otherwise be made available on request. Employees, contractors, affiliates and suppliers will be made aware of this Policy and will be provided with a copy of this Policy, as appropriate.

## Taking meaningful action against modern slavery

While our due diligence indicates that Keypath's exposure to the risks of modern slavery is limited, we are committed to ensuring that Keypath plays an active part in protecting the human rights of those individuals who are potentially affected by our business activities. We do this by requiring that within our business operations:

- (a) we do not use any form of forced labour;
- (b) we do not use child labour;
- (c) we pay a living wage to all individuals;
- (d) individuals are not required to work excessive hours;
- (e) we do not tolerate discrimination; and
- (f) all forms of abuse or harassment in our workplace are prohibited.

Keypath has a number of policies and processes in place to assist in identifying and managing the risk of modern slavery in our supply chains. These include:

- (a) undertaking an annual review of Keypath's modern slavery risks and our associated processes to address those risks, including an assessment of our operations, as well as the operations of our suppliers and business partners;
- (b) obligations in our standard contractual terms to ensure that Keypath's suppliers are contractually obligated to:
  - i. take reasonable steps to identify, assess and address the risks of modern slavery in their operations and supply chains;
  - ii. notify Keypath if they become aware of any actual or suspected modern slavery practices within their operations or supply chain; and
  - iii. comply with any reasonable requests made by Keypath for information regarding the supplier's supply chain practices and modern slavery risks.
- (c) Keypath's various corporate policies, including:
  - i. our [Code of Conduct](#), which sets out our expectations for ethical, lawful and respectful conduct standards;
  - ii. our [Risk Management Policy](#), which ensures that appropriate systems are in place to identify financial and non-financial risks to Keypath, to identify and effect appropriate controls, allocate responsibility and ensure any material changes in risk profile are disclosed in accordance with Keypath's [Continuous Disclosure Policy](#);
  - iii. our [Whistleblower Policy](#), that supports and encourages employees, consultants, contractors, suppliers and officers to raise concerns anonymously; and
  - iv. our [Anti-Bribery and Corruption Policy](#) that reinforces our commitment to high ethical and socially responsible standards in our procurement practices.

## Responsibilities

The prevention, detection and reporting of modern slavery and other forms of exploitation are the responsibility of all people working for or with Keypath.

**Employees** are required to read, understand and comply with this Policy, and to report any suspected instances of modern slavery. Keypath will investigate all reports of suspected modern slavery, and will take appropriate action where necessary.

**Senior Managers** are responsible for ensuring that all employees, contractors and affiliates reporting to them are made aware of and understand this Policy, and that any instances of modern slavery reported to them are dealt with in accordance with this Policy and Keypath's requirements under the Act.

The **Executive Leadership team** is responsible for managing modern slavery risk, including ensuring that this Policy is communicated and implemented across the organisation.

The **Board** is responsible for ensuring that this Policy is implemented and that adequate resources are allocated to prevent and eliminate modern slavery in our operations and supply chains, including reviewing and approving Keypath's annual Modern Slavery Statement in accordance with the requirements of the Act.

We expect **our suppliers and business partners** to comply with this Policy as required, and to take steps to prevent and eliminate modern slavery in their operations and supply chains.

## Suppliers

The vast majority of Keypath's operations are carried out in high income countries that tend to have a lower vulnerability to modern slavery, however we recognise that they are not immune. Goods and services that we procure to perform our core business activities may originate from countries that have higher vulnerability to modern slavery than our core operational locations.

Keypath understands that the risks of modern slavery relating to our suppliers will vary depending on their industry, geographic location and company size.

Keypath will take reasonable steps to ensure that its suppliers are aware of, and expects its suppliers to comply with, this Policy. It is a requirement that all of our suppliers operate in accordance with all applicable laws and regulations, which includes those relating to modern slavery.

Keypath requires its suppliers to take all reasonable steps to ensure that there is no modern slavery in their supply chains. This includes:

- (a) not employing children under the legal age of employment;
- (b) not using any form of forced, bonded or involuntary labour;

- (c) complying with all applicable laws and mandatory industry standards regarding working hours, overtime, wages and benefits; and

In the event that a supplier to Keypath identifies any modern slavery (or a material risk of modern slavery) in their supply chain, Keypath requires them to take practical and effective steps to address that occurrence or risk.

Suppliers must notify Keypath as soon as possible of any occurrence, or material risk of modern slavery which has been identified, and notify relevant authorities where required.

Suppliers must also provide Keypath with all reasonably requested information that Keypath may require in order to meet its own modern slavery reporting obligations.

### **How to report a modern slavery risk**

Keypath encourages its employees, contractors, affiliates and suppliers to act as soon as possible in reporting any suspected or actual modern slavery occurring in our supply chain, or in the operations of Keypath or its suppliers.

Reports can be made to:

- (a) Directly to your Keypath manager or for suppliers, to your authorised Keypath contact;
- (b) to Keypath EthicsPoint (Reporting Centre) via [keypathedu.ethicspoint.com](mailto:keypathedu.ethicspoint.com) (this method may be used to retain anonymity); or
- (c) Eric Israel (General Counsel, [Eric.Israel@keypathedu.com](mailto:Eric.Israel@keypathedu.com)).

### **Breach of Policy**

We may terminate our relationship with individuals or organisations who are found to have acted in breach this Policy. Where required, Keypath may also refer such conduct to the relevant authorities.

### **Adoption of Policy**

This Code was adopted by the Board on the date on the front cover of this Code, takes effect from that date and replaces any previous policy in this regard.

### **Amendment of Policy**

This Policy can only be amended with the approval of the Board.

### **Review of Policy**

Keypath values continuous improvement, and as part of our commitment to eliminating the risk of modern slavery from our supply chains, we will review this Policy on a regular basis to ensure that it remains current and effective.

The Company Secretary will communicate any amendments to employees as appropriate.

This Policy was last updated on June 14, 2023.