



# Modern Slavery Statement

Keypath Education 2022

# About Keypath

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At Keypath, central to our belief that education has the power to change the world, is equality of access for individuals from all walks of life, to that education. This includes those who, whether

Supported by Keypath's proprietary end-to-end technology and data platform KeypathEDGE, Keypath partners with universities to design, develop, launch and grow career-relevant, technology-enabled online programs with the goal of preparing students for the future of work.

Our core operations are in the United States and Australia; however, we also have operations and partners in Canada, the United Kingdom, Malaysia and Singapore and, as of the end of the reporting period, had partnerships with 39 universities in these countries. We currently engage around 800 employees around the world and Keypath has offices in Chicago, Melbourne, Sydney, Toronto and Kuala Lumpur.

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## Modern slavery risks

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As with any organisation, Keypath understands that we are not immune to the risks of modern slavery. We recognize that modern slavery may impact our business activities and that we have a responsibility to reduce the risk that we might contribute to modern slavery through our operations and supply chains.

### Risk assessment methodology

We have again utilised our risk assessment methodology which considers a number of indicators of modern slavery risks including sector and industry, the type of products and services, geographical location and specific entity risk.

Keypath has this year extended its assessment to map approximately 95% of our global supply chain spend. Our

## Due diligence

Keypath has carried out its mapping and risk assessment for FY22 to confirm and identify key modern slavery risks that exist within our operations and supply chains, including any that have arisen since our FY21 review.

Keypath considered the annual spend, along with risk factors such as geographic location, industry, and the type of goods, to identify the suppliers that required further due diligence. There has not been any significant change in the Keypath operations or supply chain since the FY21 reporting period and our due diligence showed that the key risk areas reflect those identified in FY21.

For its second reporting period, Keypath elected to focus its further desktop due diligence on the areas that comprise:

- » our largest vendor spend, being the key social media platform vendors (including Google, Meta and Microsoft); and
- » the area we see as presenting the greatest risk of modern slavery – IT hardware procurement.

Keypath considered the significant publicly available information regarding the identified social media vendors to conduct a desktop risk assessment of the likelihood of exposure to modern slavery risks.

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## Policies and procedures

Keypath has a number of policies and procedures in place to ensure strong governance frameworks that enable us to prevent, assess and address modern slavery risks. These include:

- » [Code of Conduct](#) that sets out expectations for ethical, lawful and respectful conduct standards by which all Directors, employees, contractors and suppliers of Keypath are required to abide;
- » [Risk Management Policy](#) 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](#);
- » [Whistleblower Policy](#) that supports and encourages employees, consultants, contractors, suppliers and officers (and, as applicable, their families) to raise concerns anonymously regarding behavior of Keypath or its employees that may be unlawful, unethical or in violation of Keypath policies; and
- » [Anti-Bribery and Corruption Policy](#) that reinforces our commitment to high ethical and socially responsible standards in our procurement practices.

Keypath's policies and procedures are supported by our Legal and Human Resources departments, which ensure that all legal rights and obligations around employment are met for each location in which a Keypath employee is located.

## Mitigation steps FY22

In addition to conducting due diligence activities, Keypath is updating its standard contractual terms to ensure Keypath vendors are both aware of the risks of modern slavery and their own obligations with regard to those risks, and are contractually obliged to act in a manner that supports mitigation of modern slavery risks. These contract terms will be progressively rolled out, commencing with new vendors, from Q1 of calendar year 2023.

Keypath has also taken the following steps to mitigate modern slavery risks:





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