



Modern Slavery Statement

Keypath Education 2023

Keypath Education International, Inc.
FY23 (ended June 30, 2023)

This statement covers the activities of Keypath Education International, Inc. (ARBN 649 711 026) and its owned and controlled entities (Keypath) during the financial year ended June 30, 2023.

This is Keypath's third modern slavery statement under the *Modern Slavery Act 2018* (Cth) and sets out the actions we have taken to assess and address modern slavery risks in our operations and supply chains.

Our structure

Keypath Education International, Inc. is a publicly listed

Due diligence

Keypath carried out its risk assessment for FY23 to identify the key modern slavery risks that exist within our operations and supply chains, including any that have arisen since our previous review in the FY22 reporting period.

Keypath considered the breakdown of its annual vendor spend, along with risk factors for those vendors such as geographic location, industry, and the type of goods and services, in order to identify the suppliers that required further due diligence.

In FY23, Keypath's top 5 categories for goods and services procurement were:

1. Digital marketing and related services;
2. Professional services and insurance including legal, taxation and accounting services, as well as insurance broking and premiums;
3. Information Technology (IT) including software, SaaS platforms, hardware and support and technical services;
4. Leasing and office costs, as well as office supplies;
- 5.

Policies and procedures

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

- » Modern Slavery Policy which has been developed to set out Keypath's responsibilities and expectations in relation to modern slavery risks in its supply chain, and covers entities within the Keypath group, as well as Keypath's Board members, Executive Leadership

vendors;» prepara

Keypath aims to continuously improve its business practices and processes, including in relation to the minimization of modern slavery risks in its supply chain. Each reporting period, Keypath deepens its understanding of its own supply chain, the indicators of modern slavery risks and the ways in which Keypath could respond to and minimize those risks if they arise in the future. We also understand that the risks and accompanying mitigation strategies to address those risks may change over time as our business changes, due to broader global, economic and societal changes, with the entry into new markets and as more information becomes available as to modern slavery practices in areas relevant to our supply chain.

Assessing our effectiveness against our FY23 goals, Keypath can confirm that it:

- » Further assessed its supply chain and enhanced its due diligence tools, by undertaking deeper due diligence activities, and developing draft supplier questionnaires, to determine the existence of any risk of modern slavery.
- » Adopted a stand-alone Keypath Modern Slavery Policy.
- » Rolled out our updated vendor contract templates, incorporating obligations in relation to modern slavery.
- » Considered whether training is required for staff to ensure an appropriate base level of knowledge around modern slavery risks exists across our organization, and prepared a draft training module.

Keypath reviews the effectiveness of its modern slavery program annually, and t e h h look to build out key performance indicators as part of its review, as it continues to further develop its modern slavery program.

Keypath is pleased to be able to report that no suspected or confirmed modern slavery incidents were identified in our assessment for FY23. This is a key criterion against which to measure the effectiveness of our actions, however, we remain vigilant in identifying such incidents or risks going forward, noting that the non-identification of modern slavery incidents is only an indication of success if the underlying practices for due diligence and mitigation are comprehensive in nature.

Consultation

Keypath has a group wide approach to managing modern slavery risk, which ensures that our policies, systems and processes are applied consistently across the Keypath group. Through its common senior management and directors, each Keypath entity has reviewed this statement and was given an opportunity to provide input through common board members who sit across each Keypath entity. In addition to being put to the Board of Keypath Education International, Inc. for review and approval, this statement was reviewed by Keypath's Global Chief Executive Officer, General Counsel and Company Secretary, and Deputy General Counsel, Australia and Asia-Pacific.

As we make our third statement, we recognize there are further steps we can take to assess and address the risks of modern slavery in our operations and supply chains.

In FY24, Keypath intends to:

- » Further assess its supply chain by undertaking deeper due diligence activities, for example, by way of supplier questionnaires, to determine the existence of any risk of modern slavery, and if so, taking steps to address that risk.
- » Finalize and implement the Supplier Risk Assessment Tool and Questionnaire developed in FY23.
- » Continue to roll out our updated vendor contract templates more broadly, incorporating obligations in relation to modern slavery.
- » Continue work to embed strategic thinking regarding modern slavery into the Keypath's day to day operations, whether by dedicated training, or the establishment of procedural material to assist personnel to manage the risk of modern slavery within our supply chains.

As part of Keypath's future modern slavery minimization plans, and in accordance with Walk Free's Toolkit on how businesses can combat modern slavery, Keypath will take a particular focus on:

- » The highest risks of modern slavery by region or sector;
- » Suppliers who provide goods and services with a higher risk of modern slavery in their supply chain; and
- » Strategic suppliers where Keypath has greater influence and control.

This statement has been approved by the Board of Keypath Education International, Inc. in their capacity as the principal governing body for Keypath Education International, Inc.

This statement is signed by Steve Fireng in his role as Global Chief Executive Officer and Managing Director of Keypath Education International, Inc.



Steve Fireng
Global CEO and
Managing Director

December , 2023



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