

Keypath Education International, Inc. Modern Slavery Policy

Adopted on: June 14,

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

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](#),

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

- (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 (this method may be used to retain anonymity); or
- (c) Eric Israel (General Counsel, 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 29 -1.156(at)2 1poik adoptd()TjEMC16 (i)-3 ecT(R)6 (P (td()TJ-29.16

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

This Policy was last updated on June 14, 2023.