



# Modern Slavery Policy

## Scope

This policy applies to all staff, contractors, suppliers and other business partners and stakeholders engaged in work for the Kaplan Australia Group (hereby referred to as 'Kaplan') in relation to Kaplan Business School, Kaplan Professional, Kaplan International Languages, Kaplan Higher Education incorporating Murdoch Institute of Technology, the University of Adelaide College and the University of Newcastle College of International Education.

## Purpose

The purpose of this Policy is to:

- provide guidance about best practices to minimise the risk of modern slavery in Kaplan's supply chain;
- mandate compliance with modern slavery legislation;
- recognise the risk of modern slavery in Kaplan's supply chain and the detrimental effects of modern slavery on others; and
- improve Kaplan's practices to address the risk of modern slavery in its supply chain.

## Policy Statement

Slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour, forced marriage, debt bondage and human trafficking, whether adults or children, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. Kaplan is committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

Kaplan is also committed to ensuring there is transparency in our own business and in our approach to confronting modern slavery throughout our supply chains, consistent with our disclosure obligations under Australian modern slavery legislation. Kaplan expects the same high standards from all of our contractors, suppliers and other business partners and stakeholders. As part of our contracting processes, Kaplan includes specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery, servitude or debt bondage, whether adults or children, and Kaplan expects that our suppliers will hold their own suppliers to the same high standards.

This policy applies to all persons and entities working for Kaplan or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

This policy does not form part of any contractual arrangements, whether for service or employment, and Kaplan may amend, replace, supersede or withdraw it at any time and without notice.

## Definitions

The following terms and definitions are applicable to this Policy.

**Kaplan Australia Group** means Kaplan Australia Holdings Pty Ltd ACN 117 261 980 (**KAH**), a related body corporate (as defined in section 50 of the *Corporations Act 2001 (Cth)*) of KAH or any entity that directly or indirectly controls or is controlled by, or is under common control with, KAH (where 'control' has the meaning given in **section 50AA** of the *Corporations Act 2001 (Cth)* and 'controlled' has a corresponding meaning).



## Policy Principles

- Modern slavery practices within Kaplan's supply chain will not be tolerated.
- All employees will be equipped to be able to recognise modern slavery and to take action to address it.
- Appropriate structures will be put in place within Kaplan to facilitate compliance with these principles.

## Responsibilities

The General Counsel, Kaplan Australia (Compliance Manager) has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it. The Compliance Manager is also responsible for approving our annual modern slavery statement and ensuring that it complies with our disclosure obligations under Australian modern slavery legislation.

The Compliance Manager has primary and routine responsibility for implementing this policy, monitoring its use and effectiveness and dealing with any queries about it. The Compliance Manager's responsibilities extend to:

- monitoring, consulting and auditing internal controls and procedures to identify risks of modern slavery practices in our operations under Australian modern slavery legislation, including in our subsidiary organisations;
- monitoring and consulting with our suppliers, contractors and business partners to identify risks of modern slavery practices in our supply chains;
- developing measures to assess and address any risks of modern slavery practices, including through due diligence in our contractual relations;
- monitoring the effectiveness of those measures;
- developing appropriate training materials and programs for our employees to comply with this policy; and
- preparing our annual modern slavery statement in accordance with our disclosure obligations under Australian modern slavery legislation.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains, including any areas of our business and supply chains which are identified as at risk of modern slavery practices.

## Compliance with the Policy

- You must ensure that you read, understand and comply with this policy.
- The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for Kaplan or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.
- You must notify the Compliance Manager as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future.
- You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.
- If you believe or suspect a breach of this policy has occurred or that it may occur, you must notify the Compliance Manager as soon as possible. You should note that where appropriate, and with the welfare and safety of local workers as a priority, Kaplan may give support and guidance to our suppliers to help them address coercive or exploitative work practices in their own business and supply chains.
- If you are unsure about whether a particular act, the treatment of workers more generally or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with the Compliance Manager.



- Kaplan aims to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. Kaplan is committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the Compliance Manager immediately. If the matter is not remedied, and you are an employee, you should raise it formally using the relevant procedure under our Grievances, Complaints and Appeals Handling Policy.

## Communication and Awareness

Kaplan will provide regular training on this policy to its employees involved in hiring and procurement. This will include training on how to identify modern slavery practices and the particular parts of our business and supply chains which are subject to a greater risk of modern slavery practices. Reviewing this policy will also form part of the induction process for all individuals who work for Kaplan, whether as an employee or a contractor.

Kaplan's commitment to addressing the issue of modern slavery in our business and supply chains must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

## Breaches

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

Kaplan may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

## Complaints and Appeals

Students who are dissatisfied with the application of this Policy, or who wish to appeal a decision made by Kaplan, may refer to the School's Grievances, Complaints and Appeals Handling Policy (available on the School's website) for information regarding their options.

## Relevant Legislation

Please find the most relevant legislation which applies to this policy:

- Modern Slavery Act 2018
- Privacy Act 1988

## Related Policies

This policy is to be read in conjunction with:

- Kaplan's Guidelines for Checks on Students from Sanctioned Countries, particularly in terms of which countries Kaplan cannot accept students from and when a World Check is required;
- Kaplan's Global Anti-Corruption Policy;
- the Graham Holdings Company Code of Business Conduct;
- Kaplan's Corporate Social Responsibility Policy; and
- Kaplan's Whistleblower Policy.



## Version Control and Accountable Officers

It is the joint responsibility of the Implementation Officer and Responsible Officers to ensure compliance with this Policy.

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|-------------------------------|--|---|----------------------|-----------------------|
| <b>Policy Category</b>        | Legal  |   |                      |                       |
| <b>Responsible Officer</b>    | General Counsel  |   |                      |                       |
| <b>Implementation Officer</b> | Executive Director, Kaplan Business School & Kaplan International Pathways ANZ |   |                      |                       |
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| <b>Approved by:</b>           |  |   |                      |                       |
| General Counsel               |  |   |                      |                       |
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