



KAPLAN

June 2025

Modern Slavery Statement 2024

Kaplan Australia Holdings Pty Limited





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Message from the Managing Director

This statement affirms Kaplan Australia's unwavering commitment to eradicating modern slavery and human trafficking in all forms. We maintain a zero-tolerance policy and remain vigilant in identifying, addressing, and remediating any instances of modern slavery within our operations in Australia and throughout our global supply chains.

As a responsible and ethical corporate organisation, Kaplan holds itself to the highest standards of environmental, social, and governance (ESG) performance. We are guided by the principles enshrined in our Code of Business Conduct and the United Nations Guiding Principles on Business and Human Rights, applying these standards rigorously in our ongoing efforts to prevent exploitation and uphold human dignity. We stand firm in the belief that every individual has the right to work freely, without coercion, debt bondage, or fear. Fair treatment, voluntary engagement, and appropriate compensation form the foundation of our workplace ethos. There is no place in our business, in any business, for forced or child labour.

Kaplan acknowledges the vital role that supply chain integrity plays in supporting human rights. We are actively working not only with our direct suppliers but also scrutinising the conduct of their suppliers, recognising that responsibility extends throughout the supply network. Our due diligence efforts and risk management frameworks are key tools in helping us identify vulnerabilities and take swift corrective action where needed.

Our continued focus on identifying and responding to modern slavery risks has fostered greater awareness across the business and helped embed human rights considerations more deeply into our operational and strategic decision-making. As we present this fifth iteration of our Australian Modern Slavery Statement, we have further refined our processes and enhanced the integration of human rights risk assessment into our enterprise-wide practices.

In parallel with our compliance efforts, Kaplan proudly embraces a values-driven approach to positive social change. At the heart of our organisation is a strong belief in compassion, respect, and justice. These values underpin our ongoing collaboration with the Kindness Factory, a partnership that exemplifies our commitment to building a better world. Through a range of joint initiatives, including the Kindness Curriculum, which has now been downloaded by over 3,500 schools across Australia, the US, and the UK, we are fostering empathy, inclusion, and wellbeing in classrooms and communities alike.

Kaplan's mission is to create opportunities and improve lives through education. In doing so, we recognise the privilege, and responsibility, of using our influence to promote respect for human rights globally. We are proud to continue this work, not only as a leading provider of international education, but as a proactive contributor to the global movement to eliminate modern slavery in all its forms.

Rob Regan



Managing Director
Kaplan Australia & New Zealand

Identifying the Reporting Entity



As one of the world's leading providers of lifelong education, the Kaplan Group helps over one million students achieve their educational and career goals each year. Kaplan offers students across the globe a diverse range of affordable and high-quality learning programs in Australia and New Zealand, to support them in achieving their goals. Kaplan's diverse family of brands continues to grow. Kaplan is proud to be delivering University pathway programs and tertiary education programs online and face-to-face on-campus across seven major cities throughout Australia and New Zealand.

Kaplan Australia Holdings Pty Limited is the parent entity of the Kaplan Australia Group. It is part of the worldwide Kaplan group of companies and is wholly owned by a Kaplan UK entity, which in turn is owned by Kaplan Inc. The ultimate parent company is Graham Holdings Company (GHC), which has its head office in the USA and is listed on the NYSE.

Kaplan Australia overall, as well as Kaplan Business School in its own right, each have an annual turnover in excess of the statutory report threshold.

This statement is a Joint Modern Slavery Statement given by Kaplan Australia Holdings Pty Limited and Kaplan Business School Pty Limited, the two reporting entities, in accordance with section 14 of the Modern Slavery Act 2018 (Cth).

Our Structure



The Kaplan business was initially founded by Stanley Kaplan as a test preparation business in the US in 1938. Kaplan Australia was founded in 2006, and now offers a kaleidoscope of education programs through a diverse family of brands that all sit under the ownership and control of the reporting entity.



Kaplan Business School is a globally recognised provider of higher education business degrees in Australia, with the MBA being the most popular program among students. It is the only independent higher education provider that operates across five States, with campus locations in Sydney, Melbourne, Brisbane, Adelaide, Perth and the Gold Coast. The broad program offering includes a range of undergraduate and postgraduate courses in business, accounting, marketing, management, tourism, entrepreneurship, health services, digital management, analytics, project management, leadership, and information technology.

Kaplan Business School's focus on student-centric areas such as quality of teaching, student support, learner engagement, graduate outcomes, and employability, has been acknowledged in a number of Australian and global awards and rankings.



Kaplan Professional is Australia's leading provider of financial planning, real estate, mortgage broking, insurance and leadership education. Over 45,000 professionals each year benefit from the education and training services provided. This includes over 1,500 corporate clients, encompassing the majority of financial institutions in the country.

Qualifications are developed in consultation with industry experts and range from the certificate level through to a master's degree. Kaplan Professional is highly respected and renowned for its extensive industry partnerships, flexible delivery options, progressive learning and assessment, personalised study experiences and student support.

In addition to its strong domestic presence, Kaplan Professional continues to expand its financial education services throughout Asia and New Zealand, supporting the region's evolving professional development needs and regulatory frameworks.

Our Structure



The University of Adelaide College delivers world-class pathway programs to the University of Adelaide, which is consistently ranked in the top 1% of universities worldwide and one of Australia's prestigious Group of Eight universities. In 2024 the University began its merger process with the University of South Australia, and the College retained its status as a preferred pathway provider for the newly established Adelaide University, set to commence operations on 1 January 2026. This ongoing partnership underscores Kaplan's significant role in supporting international students' academic journeys in Australia.

The College delivers Foundation Studies and Degree Transfer Programs that prepare students for entry into the first or second year of a Bachelor's degree and a Pre-Master's Program for transition into a Master's degree. These programs are designed in partnership with the University — delivered across two campuses in Adelaide and Melbourne — and presented by experienced and highly qualified teachers, with a strong emphasis on student-focused, personalised support.



**COLLEGE OF
INTERNATIONAL
EDUCATION**

The University of Newcastle College of International Education is the official on-campus pathway college to the University of Newcastle, providing entry to over 130 undergraduate and postgraduate degrees at a world-class university. Students benefit from small-class sizes and one-on-one support to gain the English and academic skills required to thrive at university.

Students are also aided by free access to all the exceptional facilities and services at the University of Newcastle from day one, including seven state-of-the-art libraries, over 150 clubs and societies, career counselling and a Centre for Teaching and Learning that provides academic assistance.

Our Structure



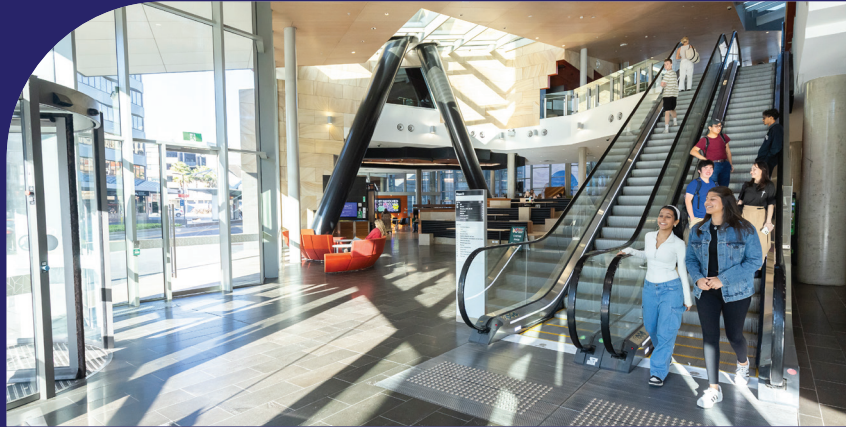
Murdoch College supports students from around the world in taking their first steps towards tertiary study at Murdoch University.

Located on Murdoch University grounds, students are able to experience campus life while accessing world-class facilities. The College delivers Foundation Studies and Diploma pathways that prepare students for entry into the first or second year of a bachelor's degree as well as English language pathways and Post-graduate Qualification Program that articulates into a master's degree. These Programs help students to develop the skills necessary to be proactive and independent in their studies, allowing for a smooth transition into Murdoch University.



Red Marker was divested from the Kaplan Group in 2024. Red Marker was a RegTech and LegalTech provider for enterprise organisations with a consumer focus.

Our Operations



As a provider of mainly face-to-face education services, human capital is central to our operations. The majority of our workforce comprises professionally qualified personnel based in Australia who possess a strong understanding of their employment rights and entitlements.

Our personnel include full-time, part-time and casual personnel, who may be unionised and under an enterprise agreement, sessional workers and academics who are also active professionals in their fields.

Regardless of worker type, we are committed to a workforce that is free of harassment and unlawful discrimination, including race, colour, religion, national origin, gender (including pregnancy), age, disability, sexual orientation, gender identity, HIV status, marital status or any other status protected by the laws or regulations in the locations where we operate. In 2024 a new Enterprise Agreement took effect, delivering enhanced benefits that go beyond statutory minimums to promote employee wellbeing and positive workplace culture. Staff covered by the agreement now receive pay rates above the applicable Award, along with a suite of progressive leave entitlements, including paid wellbeing leave, foster parent leave, volunteer leave, menstruation and menopause leave, sorry business leave, and 15 days of paid family and domestic violence leave.

Given these comprehensive safeguards and benefits, the overall risk of modern slavery within our workforce is assessed as low. More broadly, these practices reflect Kaplan's position as a highly ethical organisation, one that not only complies with its legal obligations, but also actively prioritises the dignity, wellbeing, and fair treatment of its staff. Our people are at the heart of what we do, and we are proud to support them with conditions that promote respect, safety, and inclusion in every aspect of their working lives.

At Kaplan we aim to inspire and empower our people. We are an organisation that places a high value on learning, a place that encourages growth; that appreciates and nurtures difference; that seeks to make a positive global impact by being a good corporate citizen; and that recognises everyone's role in enabling success. Guided by these principles, Kaplan and its staff are committed to upholding the following core values:

KAPLAN VALUES

Integrity

Support

Knowledge

Opportunity

Results

Kaplan Guiding Principles

OUR PROMISE. THINGS WE DO NOT TOLERATE.

We have various company policies that apply to ensure that the correct conduct and behaviours are followed by all personnel in our operations. Our Personnel Handbook, which aims to clearly define our corporate culture, sets out these policies as well as various guidance.



Our Supply Chain



IDENTIFYING OUR SUPPLY CHAIN



EDUCATION AGENTS

Resellers who provide recruitment to, and marketing of, Kaplan's education programs to international students



LABOUR HIRE

Contractors to supplement mainly the IT team and teaching personnel



TEACHING & LEARNING MATERIALS

Books, teaching materials and online library subscriptions and resources



TECHNOLOGY VENDORS

On-shore and off-shore, for the supply of IT hardware, development and maintenance of IT software, SaaS providers, systems and solutions



CONSTRUCTION

Fit out projects for office space and schools



PROPERTY LEASING, LICENSING AND HIRE

Leasing and licensing of office space and school campus space and hiring of venues for graduation ceremonies and special workshops



PROFESSIONAL SERVICES

Accountants, auditors, consultants, lawyers, recruiters and other advisers



TRAVEL & ACCOMMODATION

Corporate travel booking provider, air and land transportation and hotel accommodation



STATIONERY AND PRINTING

Education booklets, marketing collateral, office stationery and student cards



MARKETING AND MERCHANDISE

Advertising, signage, banners, stands, merchandise and branded clothing



WORKPLACE SERVICES & UTILITIES

Catering, cleaning, maintenance, waste collection, utilities, offsite storage solutions, security monitoring, printer hire, plant hire, vending machines and coffee machine suppliers, and packaging, post and delivery



STAFF SERVICES

Wellbeing and safety services and insurance providers



ENTERTAINMENT, PHOTOGRAPHY AND VIDEOGRAPHY

Entertainers at events including bands and DJs and recording of graduation ceremonies and events

Our Supply Chain

Importantly, we recognise that our supply chain extends beyond our direct suppliers to include the suppliers of our suppliers. These sub-suppliers are incorporated into our ongoing supply chain reviews and risk assessments concerning modern slavery and human trafficking.

We have placed increased focus on understanding the operations and practices of sub-suppliers. However, obtaining detailed and substantive information about these deeper tiers of the supply chain has proven challenging.

Many small suppliers provide limited or unclear responses, often due to resource constraints or a lack of formal processes. Even among larger suppliers, who we would reasonably expect to have the capacity to conduct due diligence, there are limitations. These suppliers may themselves struggle to secure comprehensive information from their own supply chains, either due to the complexity of those relationships or the unwillingness or inability of their sub-suppliers to respond meaningfully. As a result, we acknowledge the inherent difficulty in accessing reliable and complete data about sub-supplier practices, despite our continued efforts to seek transparency.



Identifying our Modern Slavery Risks



1. EDUCATION AGENTS

Our most significant suppliers are education agents, who play a vital role in promoting Kaplan's programs and guiding prospective international students. Predominantly based overseas, these agents provide critical information about studying and living in Australia and often assist with the student visa application process.

Almost all of our international students are recruited through education agents, with many located in countries such as Bangladesh, Cambodia, China, Colombia, Malaysia, Mongolia, Indonesia, Pakistan, Thailand, Venezuela, and Vietnam. According to the Global Slavery Index 2023, these countries are identified as having a higher prevalence of modern slavery, which underscores the importance of monitoring risks within this segment of our supply chain. This raises a potential risk that individuals working for those agents may be subject to exploitative practices, including forced labour or unpaid work.

2. INTERNATIONAL STUDENTS

There is also a broader risk that agents, either intentionally or inadvertently, may facilitate the misuse of student visa processes by individuals engaged in human trafficking. In such instances, international students themselves may become victims of modern slavery. To help mitigate this risk, our staff receive regular reminders and training to stay alert to indicators of potentially non-genuine student behaviour, such as unexplained absences, prolonged non-attendance, or noticeable disengagement from their studies.

We remain particularly mindful of the documented patterns of forced labour and trafficking affecting individuals from India, especially women. While a significant number of Kaplan's MBA students are Indian nationals, the risk of trafficking-related issues in this context is mitigated by two key factors. This is primarily because a large proportion of our Indian students are already onshore in Australia and are therefore recruited by local agents, rather than through offshore channels. Additionally, the structure and cost of higher-fee postgraduate programs make them an unlikely target for trafficking arrangements.

Identifying our Modern Slavery Risks



3. RISK IN SUPPLY CHAIN

Kaplan purchases a variety of goods and services to operate its education businesses. Some inputs come from industries that are considered higher risk, such as cleaning, apparel and IT.

We have contracts with IT suppliers for the purchase of IT hardware, software-as-a-service and the development of software systems. Some of these suppliers have operations in the Philippines and Vietnam. We are aware that the Philippines has been documented as a country with a higher risk of modern slavery. In 2024, we reviewed the arrangements and contractual terms with our supplier in the Philippines.

We have a significant software development and support agreement with an Australian entity that has a UK parent company. We consider this arrangement, and arrangements with other IT service providers who also have Australian based operations, to be low risk.

We purchase a significant amount of our hardware from Dell Australia. We note from Dell's own published Modern Slavery Statement that it has taken a variety of actions to verify the absence of modern slavery in its supply chain. As a founding member of the Responsible Business Alliance it appears to have a highly mature and developed screening process of its own suppliers.

We continue to work closely with our cleaning contractor to monitor and assess for modern slavery in their operations. This year's RPF process provided a valuable opportunity to further identify and evaluate risks within their operations.

While our spend on merchandise and apparel is relatively very minor, we have issued modern slavery questionnaires to all our merchandise and apparel suppliers. Some source their underlying product from China where garment workers hidden deep within the supply chain may face exploitative practices and health and safety risks.

Our Actions to Address Modern Slavery Risks



1. OPERATIONS

Awareness Raising and Training

In our previous reporting period, all personnel were initially made aware of the requirements of the modern slavery laws and their role in helping to mitigate any risks through an 'All Personnel' internal communication note issued by the head of our People & Culture team. Our Modern Slavery policy is available on our internal intranet for all personnel to view, in addition to our public website. Personnel, including future personnel will be made aware of, and updated on, modern slavery risks through ongoing planned annual communications.

We ensure that all relevant personnel complete a mandatory training module, "Combatting Modern Slavery", through our learning management system, Litmos, to teach them how to identify and mitigate potential modern slavery risks in our operations and supply chain. This training is received by personnel involved in agent selection, management roles, procurement, human resources, legal, governance and compliance roles, senior managers and executive directors. We achieved a very high compliance rate for completion of the modern slavery training module.

In 2024, we reviewed the Personnel list to identify certain roles for more targeted training and tailored communications. Particular focus was given to staff involved in student services, counselling and welfare monitoring, agent selection and procurement decisions. These staff received more personalised guidance, including direct emails outlining key indicators of modern slavery and instructions on how to report any suspicious activity.

In addition, other well established corporate initiatives support our desire to operate ethically. Personnel must complete bi-annual mandatory company training, and an annual questionnaire, on the GHC Code of Business Conduct. Personnel are regularly made aware of the Kaplan values and vision through publication on our Intranet, in our internal communications and as displayed in our work place. Our vision and values are aligned with the requirements of modern slavery laws.

We have dedicated representatives that have a high understanding of how to conduct effective due diligence to identify modern slavery and the requirements of Modern Slavery Act. These representatives are from the following areas:

- Legal
- Quality, Regulations & Standards
- People & Culture

All personnel are responsible for reporting any potential modern slavery risks. If any risks are identified personnel have various means by which to notify the organisation. In addition to notifying their manager, personnel can utilise resources in connection with the whistleblower process and anonymous reporting to a third party provider through the GHC Ethics Hotline.

Our Actions to Address Modern Slavery Risks



2. SUPPLY CHAIN

RFP Cleaning Contract

This year we issued a new request for proposal (RFP) to appoint a cleaning services provider for all our sites across Australia. Following a thorough due diligence process, which included a comprehensive modern slavery assessment, we resolved to retain our existing cleaning services provider. The renewed contractual terms include the requirement to adhere to stringent modern slavery provisions, including warranties and a termination right in Kaplan's favour in the event of any breach of modern slavery laws by the supplier.

Supplier Code of Conduct Policy

Our Supplier Code of Conduct policy is now firmly established and continues to be incorporated into vendor agreements. This policy clearly sets out our expectations of our suppliers, including in relation to labour and human rights, work health & safety, diversity & inclusion, anti-money laundering, anti-corruption & bribery, sanctions, environmental, social & governance and modern slavery. This policy is in addition to our more specific Modern Slavery Policy. We make every attempt to ensure that any new supplier must agree to comply with our Supplier Code of Conduct as a condition of doing business with us. Over the past two years we have successfully implemented contractual provisions requiring our IT suppliers to adhere to our Supplier Code of Conduct. As a result, approximately 30% of our current IT suppliers are now contractually bound by these standards.

Due Diligence and Audit

We internally review our supply chain to identify and evaluate any possible risks as well as to review aspects of the supply chain itself. In particular, we have a robust education agent selection and management process across all of our providers that submit agents through a centralised system and consists of the following:

- Extensive documented application, including business registration, bank account evidence, references and the completion of a questionnaire, which includes mandatory questions about modern slavery and what steps the agent is taking to eliminate the risks of modern slavery in their operations. Background check of the company and authorised signee through WorldCheck One — a global risk intelligence database.
- In 2024 we continued our process of prioritising in-person interviews of new agents, or video conferences where this is not possible. Throughout the year we also met with existing agents located around the globe to promote our courses and maintain good relations. This gives us an opportunity to more closely observe their operations and better understand their values and practices. More than 1700 visits were made to agents in 2024, which is a material increase compared to 2023.
- Requirement to sign our standard agency agreement with terms that require compliance with the Modern Slavery Act.
- Ongoing checks of all WorldCheck One entries through automated notification
- Annual review of all education agents' performance including reasons for visa refusals.

As a regulated education provider, we are subject to the Education Services for Overseas Students (ESOS) Act 2000 (Cth) and associated standards that mandate transparent and accurate marketing and recruitment practices. These practices are routinely audited by education sector regulators and are also subject to ongoing monitoring by the Department of Home Affairs.

Our Actions to Address Modern Slavery Risks



Education Agents

Kaplan has continued to make a number of improvements during the reporting period in respect of our education agents. These improvements further reduce the risk of modern slavery arising in Kaplan's supply chain and the supply chains of Kaplan's agents.

During 2024, more than 3000 agent representatives attended our new agent training series, which includes a section on "Agent Obligations". In this section we outlined their obligations including their contractual obligations to report any modern slavery practices and comply with the Modern Slavery Act 2018 (Cth) no matter which jurisdiction they operate within.

Kaplan requires that all new agents complete a detailed questionnaire with modern slavery related questions.

Under the standard agent agreement, all agents are obligated to comply with the Modern Slavery Act 2018 (Cth), report to Kaplan any modern slavery practices identified in their operations or supply chains, maintain modern slavery policies and procedures to the extent required by law, and, upon request, provide Kaplan with information about their operations, labour practices and supply chains. The agent agreements also require all agents to cooperate with any audits, investigations or training initiatives related to modern slavery undertaken by Kaplan or any government authority. In the event of a breach of these obligations, Kaplan has the right to terminate its contract and cease all engagement with the agent.

US and UK Sanctions

As a UK owned, and ultimately US owned, entity we are required to comply with US and UK trade sanctions laws and are prevented from transacting with entities that are connected with certain countries. This includes North Korea, Iran, Cuba, Syria, Russia, Belarus and the Russian annexed regions of Ukraine, including Crimea. The effect of this is to reduce our exposure to transactions with parties in countries that may also coincide with having a higher risk of modern slavery.

Contractual Terms

Where possible we build strong relationships with our supply chain and expect that our suppliers are ethically aligned with our own values. We aim to ensure that this expectation is formally agreed in our contractual terms.

Kaplan has been rolling out detailed modern slavery terms into all our supply contracts under which we purchase goods and/or services. These terms require that suppliers:

- comply with applicable modern slavery laws and in many cases provide corresponding warranties and indemnities
- comply with our modern slavery policy
- do not engage in conduct that is an offence under Division 270 or 271 of the Schedule to the Criminal Code 1995 (Cth)
- ensure that any sub-contractor does the same

Failure by a supplier to adhere to our standard modern slavery terms can be grounds for Kaplan to immediately terminate the contract.

This approach reflects Kaplan's zero tolerance to modern slavery.

Our Actions to Address Modern Slavery Risks



3. GOVERNANCE AND POLICY

Our Australian business has a highly developed governance structure that identifies policy requirements, develops policies, conducts annual policy reviews and monitors compliance. Much of this work is performed by various committees, all of which have established terms of reference and all are accountable to the corporate boards, including:

- Risk & Compliance Committee
- Finance & Audit Committee
- Health & Safety Working Group

Being part of a global organisation, Kaplan Australia is also subject to oversight from both our UK parent and our ultimate parent in the US, which is listed on the New York Stock Exchange. The effect of this is that we are commonly subject to the laws and regulations of the jurisdictions that apply to our parent entities. In addition, our US internal audit team conducts regular checks on agent management, performs annual audits of every personnel member on their compliance with the Code of Business Conduct, requires twice yearly reporting to the global Compliance Committee and has been increasing its focus on risk management in all business areas.

Our policies reflect our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

Kaplan has a strong ethical approach to doing the right thing and expects the same behaviours from its personnel, students and suppliers. This is supported by a highly developed and documented range of relevant company and school policies.

- Admissions Policy
- Agent Management Policy
- Annual Leave Policy
- Attendance Policy
- Background Checking Step-by-Step Guide
- Prevention of Harassment and Bullying Policy
- Contractors and Consultants Policy
- Corporate Social Responsibility Policy
- Diversity, Inclusion and Equity Policy
- FEE-HELP Review Procedures
- Global Anti-Corruption Policy
- Modern Slavery Policy
- Sexual Misconduct Prevention and Response Policy
- Student Work Placements Policy
- Third Party Procedures
- Under 18s Policy (International Students)
- Whistleblower Policy
- Working with Children Check requirements

Assessing the Effectiveness of our Actions



To date there have been no identified incidents or concerns in connection with modern slavery in our operations or supply chain. There were also no reports of any kind received from whistleblowers.

If any such incident or concern were to be reported this would be treated most seriously and be ultimately escalated to the Risk and Compliance Committee (RCC). The RCC would review the matter and issue directions to ensure mitigation and appropriate measures are rolled out in order to ensure any residual risk is minimised.

Any matter of non-compliance is also reported up the group structure to the Kaplan Inc Compliance Committee, which meets twice a year. This committee engages in thorough scrutiny and the issuing of directions, calling upon executive management to provide further details as required.

KPIs

We are using the following key performance indicators (KPIs) to measure how effective we have been to ensure that modern slavery and human trafficking is not taking place in any part of our operations or supply chain:

- Effective use of the Agent Management Policy
- Identifying additional suppliers and sub-suppliers
- Completion rates of supplier modern slavery questionnaire
- Use of labour monitoring and payroll system
- Completion rates for relevant mandatory training of personnel

We continue to assess the best methods for assessing our effectiveness in managing modern slavery risks.

This year we made further steps towards better understanding our sub-suppliers by asking our Suppliers for more details about their suppliers.

As our process for assessing our effectiveness matures we aspire to further develop our KPIs to include:

- Completion of audits conducted by internal and external auditors
- Communication and personal contact with the next link in our supply chain and their understanding of, and compliance with, our expectations.

Consultation with Entities

Kaplan has consulted with each of its business units and shared services teams in order to consider and address each of the due diligence and reporting requirements to prepare this modern slavery statement.

Kaplan's Board of Directors have been informed of Kaplan's obligations and reporting requirements.

The Executive Management team was informed of its obligations under the Modern Slavery Act and each Executive was required to complete relevant training. Many of those Executive Managers were then required to provide lists of their business unit's suppliers, split by geography and service type. A similar exercise was conducted in respect of our centralised operations, which focused on labour hire and contractors. The Finance Team was asked to verify and supplement our supply chain categories and list against the accounts payable entries. All higher risk suppliers were requested to complete a detailed questionnaire to enable us to identify any potential risks.

Any risk findings arising from the supplier questionnaire responses were discussed with the relevant Executive Manager with a view to mitigating and remediating those risks.

A final draft Modern Slavery Statement, or relevant sections thereof, was circulated to designated representatives for review prior to finalisation.



Approval of Governing Body



In accordance with section 14 of the Modern Slavery Act 2018 (Cth), this Joint Modern Slavery Statement was approved by the Board of Kaplan Australia Holdings Pty Ltd (ACN 117 261 980) in June 2025 for the two reporting entities, Kaplan Australia Holdings Pty Ltd (ACN 117 261 980) and Kaplan Business School Pty Ltd (ACN 098 181 947). The Kaplan companies covered by this joint statement are listed in Appendix A.

Appendix A:

Reporting Entities

Kaplan Australia Holdings Pty Limited

ACN 117 261 980

Kaplan Australia Pty Limited

ACN 117 262 165

Red Marker Pty Ltd

ACN 116 217 287

Kaplan International (Melbourne & Adelaide) Pty Ltd

ACN 129 017 385 (in liquidation)

Kaplan Higher Education Pty Ltd

ACN 124 217 670

Kaplan Business School Pty Ltd

ACN 098 181 947

Tribeca Learning Pty Limited

ACN 084 211 423

Kaplan Education Pty Ltd

ACN 089 002 371

Kaplan International English (Australia) Pty Limited

ACN 003 631 043



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