



## Supplier Code of Conduct

Effective 27 July 2024

### Scope

At Kaplan, we are committed to conducting business ethically, responsibly, and sustainably and we expect our suppliers to be equally committed to such values.

This Supplier Code of Conduct (“**Code**”) describes the minimum standards and practices that Kaplan Australia and New Zealand Group, including Kaplan Business School, Kaplan Higher Education (including our pathways colleges) and Kaplan Professional (collectively referred to as ‘**Kaplan**’) requires of our suppliers (including their employees and contractors) who provide goods and services to Kaplan.

### Application

The requirements outlined in this Code are not intended to: (i) be binding on Kaplan; or (ii) supersede or alter a supplier’s statutory, regulatory and contractual obligations to the extent those obligations contain additional obligations or higher standards than those set out in this Code.

This Code may be amended from time to time by Kaplan uploading a new version to its website at [www.kaplan.edu.au](http://www.kaplan.edu.au). Suppliers will be required to comply with the revised Code if they continue to supply Kaplan with goods and services.

Suppliers are required to communicate this Code to their related entities and their own suppliers and subcontractors who are involved in supplying goods and services to Kaplan.

Kaplan may terminate any of its contracts with the supplier if the supplier materially breaches this Code.

### Labour and Human Rights

At Kaplan, we believe human rights are universal and fundamental rights that preserve

the inherent freedom, dignity, and equality of all human beings. This is why Kaplan requires that its suppliers will:

- comply with applicable labour laws;
- conduct their business consistent with international human rights laws and norms set out in the International Bill of Human Rights and the International Labour Organisation Declaration on Fundamental Principles and Rights to Work; and
- manage their own supply chain and subcontractors guided by the United Nations Principles on Business and Human Rights.

### Modern Slavery

Kaplan is committed to minimising the risk of modern slavery and 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 modern slavery legislation. This is why Kaplan requires that its suppliers will:

- not engage in, or tolerate any form of, modern slavery, including forced labour, debt bondage, human trafficking or any other form of exploitation;
- comply with all applicable laws and regulations and binding codes of practice related to modern slavery, including but not limited to, the Australian Modern Slavery Act, the UK Modern Slavery Act and the US Trafficking Victims Protection Act;
- take steps to identify and mitigate the risks of modern slavery in their operations and supply chains; and
- on reasonable request from Kaplan from time to time, provide accurate information about its operations and supply chain in order for Kaplan to comply with Modern Slavery Laws, including in relation to the preparation of its annual Modern Slavery Statement.

## Work Health and Safety

Kaplan is committed to addressing the risks of physical and psychological harm to its workers and others arising from work. This is why Kaplan requires that its suppliers will:

- comply with all applicable work health and safety legislation;
- operate their businesses consistent with applicable work health and safety codes of practice and guidance materials;
- consult with their workers' representatives regarding relevant work health and safety matters; and
- consult, cooperate and coordinate with Kaplan regarding relevant work health and safety matters.

## Diversity and Inclusion

Kaplan is committed to a culture of inclusion that respects the diverse needs of all our staff, students, partners and visitors. This is why Kaplan requires that its suppliers will:

- have in place and ensure compliance with anti-discrimination, anti-harassment (including sexual harassment) and equal opportunity policies;
- not engage in any unlawful discrimination and take reasonable and proportionate measures to eliminate, as far as possible, sex discrimination, sexual harassment and sex based harassment, hostile work environments and victimisation in connection with its work, workers and workplaces;
- commit to a culture of diversity, respect and inclusion in the workplace and in their interactions with Kaplan staff;
- respect, protect and promote the rights of Indigenous peoples; and
- commit to identifying and eliminating gender pay gaps that may exist in its organisation.

## Anti-corruption & Anti-bribery

Kaplan prohibits all forms of bribery and corruption. This is why Kaplan requires that its suppliers will:

- not offer, promise, give, pay, authorise or accept the payment of anything of value (such as money, gifts, travel and

entertainment) directly or indirectly (through a third party) to any other party, to persuade that party to help the supplier (or anyone else) secure business (such as a contract, sale, governmental approval, favourable immigration or customs treatment);

- comply with all applicable anti-corruption laws and regulations, including but not limited to, the US Foreign Corrupt Practices Act (FCPA), the UK Bribery Act 2010, and the Criminal Code Act 1995 (Cth) (Australian Criminal Code); and
- maintain accurate and complete records and accounts that reflect all transactions related to their business with Kaplan.

## Anti-money laundering

Kaplan is committed to complying with all applicable anti-money laundering (AML) and terrorist finance laws, rules and regulations and we expect our suppliers to make the same commitments. This is why Kaplan requires that its suppliers will:

- not participate in or facilitate transactions involving funds derived from unlawful acts; and
- not assist transactions knowing, or having reason to know, that the funds came from an illegal activity such as fraud or corruption.

## Sanctions

Kaplan does not conduct business with countries or with parties subject to comprehensive or specific sanctions imposed by the United States, United Kingdom, Australia or New Zealand. Prohibited countries currently include Belarus, Cuba, Iran, North Korea, Russia, Syria and the regions of Crimea, Donbas, Kherson, Luhansk and Zaporizhzhia. This is why Kaplan requires that its suppliers will:

- properly identify sanctions risks in its operations, trade deals and transactions; and
- avoid breaching an applicable sanctions regime.

## Environmental Social Governance (ESG)

Kaplan seeks to be a responsible business that meets the highest standards of community ethics, professionalism, and responsible and sustainable environmental practices. This is why Kaplan requires that its suppliers will:

- adopt effective, responsible and sustainable practices in their operations such as reducing waste, conserving energy and water and promoting sustainable sourcing;
- comply with all applicable environmental laws and take steps to reduce their environmental impact. This includes but is not limited to, a commitment to reducing greenhouse gas emissions over time in line with the Paris Agreement;
- not engage in “greenwashing” to create a false impression of sound environmental practices;
- respect human rights, including but not limited to the health and safety and wellness of staff in addition to the policy commitments stated above under Labour and Human Rights, Modern Slavery, Work Health and Safety, and Diversity and Inclusion; and
- ensure its products, services and operations comply with relevant laws, industry standards and codes of practice.

## Relationship

Kaplan values business relationships built on trust, mutual respect and transparency. This is why Kaplan requires that its suppliers will:

- communicate openly and honestly to provide Kaplan with accurate and timely information; and
- not engage in any conduct that may damage the reputation and good standing of Kaplan.

## Compliance and reporting

Kaplan takes seriously compliance with all applicable laws, regulations and codes. This is why Kaplan requires that its suppliers will:

- comply with all applicable laws and regulations including but not limited to

those related to modern slavery, ESG, anti-corruption, anti-money laundering, sanctions and privacy;

- provide Kaplan with documentation and/or reasonable access to their records for the purpose of auditing their compliance with this Code;
- report any violation of this Code to Kaplan;
- inform Kaplan of the steps being taken to remedy and correct any non-compliance in the supplier’s operations or supply chains;
- inform Kaplan of improvements the supplier or the supplier’s suppliers plan to make, or is/are making, to reduce future non-compliance; and
- have in place and comply with their own internal policies and procedures that address the subject matter of, and are consistent with, this Code.

## Non-Retaliation

Kaplan is committed to ensuring that we observe the highest ethical standards of behaviour, honesty and integrity in all our business activities.

This is why we support disclosers raising concerns regarding any misconduct or improper state of affairs or circumstances (including unethical, illegal, corrupt or other inappropriate conduct) without being subject to unlawful victimisation, harassment or discriminatory treatment. See also Kaplan’s Whistleblower Policy, which covers all Eligible Disclosures (as defined by that policy). A copy of that policy is available on Kaplan’s website.

Suppliers that have any questions or concerns regarding this Code are encouraged to contact the General Counsel, Kaplan Australia & NZ, by emailing [legal@kaplan.edu.au](mailto:legal@kaplan.edu.au).