

Our policies on slavery and human trafficking

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. 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.

There is to be no harsh or inhumane treatment, including any sexual harassment, sexual abuse, corporal punishment, slavery, mental or physical coercion or verbal abuse of workers, nor is there to be the threat of any such treatment as outlined in our Recruitment Policies and Code of Business Conduct.

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, past or recent military status or any other status protected by the laws or regulations in the locations where we operate.

Due diligence processes for slavery and human trafficking

As part of our initiative to identify and mitigate risk we comply with our due diligence processes as outlined in the Graham Holdings Company Statement of Ethical Principles, Code of Business Conduct, Whistleblowing Policy and the Kaplan International Human Resources policy documentation.

We have -145(n)5 117 301 ss Conduct

Training

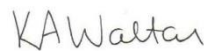
To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to our staff including Senior Management Teams.

Our effectiveness in combating slavery and human trafficking

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

- Effective use of the Recruitment and Selection Policy;
- Use of labour monitoring and payroll system;
- Completion of audits conducted by internal and external auditors; and
- Level of communication and personal contact with next link in the supply chain and their understanding of, and compliance with, our expectations.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes **Kaplan Financial Limited** s slavery and human trafficking statement for the financial year ending 2022. Kaplan Financial Limited is a subsidiary within the Kaplan group.



Kathy Walton

Director of **Kaplan Financial Limited**