

Keypath Education International, Inc. Communications Policy

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Communications Policy

Keypath Education International, Inc. ARBN 649 711 026 (the Company) and its subsidiaries

1. Background

1.1 Overview

The Company is committed to effective communication with its clients, customers, shareholders, market participants, employees, suppliers, financiers, creditors, other stakeholders and the wider community. The Company will ensure that all stakeholders, market participants and the wider community are informed of its activities and performance.

The Company will endeavour to make publicly available all information to ensure that trading in its shares takes place in an efficient, competitive and informed market.

1.2 Purpose

This Communications Policy contains the Company's approach and commitment to communication. The Policy is designed to ensure that the Company:

- (a) provides timely and accurate information equally to all shareholders and market participants regarding the Company including its financial situation, performance, ownership, strategies, activities and governance; and
- (b) adopts channels for disseminating information that are fair, timely and cost efficient.

In addition to those policies and processes contained in the Continuous Disclosure Policy, the Company has implemented a number of processes to ensure achievement of these goals.

1.3 Investor relations program

The Company will have an investor relations program that facilitates effective two-way communication with investors. The Company's investor relations programs will both focus on professional investors (and financial market participants who service them), and engage with retail investors (and the organisations that represent them), to understand the matters of concern or interest to those investors. Significant comments or concerns raised by investors or

- (i) take adequate precautions to ensure that information is only used for those purposes for which it is provided and is not misused or disseminated to the Company's detriment; and
- (ii) ensure that the information is returned or destroyed when the purpose is complete.

Such precautions may include obtaining a confidentiality agreement or other undertaking. Advice about these measures can be obtained from the Company Secretary.

Any information concerning the Company which is not generally available and which may have a material effect on the price or value of the Company securities may need to be disclosed in order for the Company to comply with its continuous disclosure obligations referred to in its Continuous Disclosure Policy and in section 3 of this Communications Policy.

3. Communications with shareholders, employees and the market

3.1 Continuous and periodic disclosure

The Company is a public company lisseueperie2.1(()1.8(th)1.7(a)1.A-14.5S(l4(Xs)46.8(g)0.2(d)1(of)-9.la)-

The Company will regularly review its policies and procedures that it has in place to facilitate and encourage participation in shareholder meetings where practicable, including in relation to providing shareholders with dial-in details or providing a link to a live webcast, or by making available on its website a recording or transcript of the meeting as soon as it reasonably can, and providing direct voting facilities to allow shareholders to vote ahead of the meeting without having to attend or appoint a proxy.

In the case of private meetings between the Company and analysts or investors, the Company is not expected to provide security holders with the opportunity to participate. The Company must however ensure that in these meetings they do not disclose any information that a reasonable person would expect to have a material effect on the price or value of the securities that has not already been disclosed to the market.

3.4 Access to public presentations

In addition to releasing a copy of a presentation containing material price sensitive information or new and substantive information to ASX prior to delivering that presentation publicly (as discussed in the Company's Continuous Disclosure Policy), the Company may consider providing security holders the opportunity to participate in that presentation where practicable, for example, by providing them with dial-in details or providing a link to a live webcast, or by making available on its website a recording or transcript of the presentation as soon as it reasonably can.

3.5 Information on the website

The Company's website is one of the cornerstones of the Company's Communication Policy with shareholders and the market. All information released to the ASX will be posted on the Company's website as soon as practicable after the ASX has confirmed that it has received the information (see section 4.2 below).

3.6 Briefings

The Company recognises the importance of the relationship between the Company and its institutional investors, brokers and analysts. The Company may from time to time conduct

3.8 Employee briefings

The Company will from time to time conduct employee briefings so that all staff are aware of activities within the Company. These briefings may be conducted by the CEO or an appropriate manager.

3.9 Electronic communication

The Company recognises that it is often efficient to communicate electronically, and, accordingly:

- (a) shareholders will be given the option to receive communications from, and send communications to, the Company and its share registry electronically; and
- (b) the Company's email system allows staff and stakeholders to communicate simply and easily with management and staff of the Company.

Employees and other stakeholders have access to the Company's email system and are encouraged to use it to improve the flow of information and communication generally.

The Company will use email to ensure a continued flow of information and to communicate effectively with staff. Staff should feel free to communicate with any member of management by email.

3.10 Website

The Company's website is an important communication tool for the Company's employees and investors and other external stakeholders, such as customers, suppliers and financiers.

The Company's website contains a range of information of relevance to stakeholders including relevant corporate governance policies and codes, its statement of values media and market announcements and presentations to shareholders and institutional investors. Other examples of the information that will be available on the Company's website are listed in the Company's Continuous Disclosure Policy.

Stakeholders are encouraged to view the website on a regular basis so that they can keep up to date with information concerning the Company.

4. Other communications

4.1 Communications with the media

All communication with the media will be through the Chair, the Managing Director/CEO or the CFO, or persons authorised by the Board.

4.2 Communications with other stakeholders

The Company is committed to ensuring that all stakeholders regularly receive information about the Company and its activities. While individual briefings may be held with key stakeholders, such as financiers, the principal means of ensuring that stakeholders have access to information will be through the Company's website.

5. Other matters

5.1 Questions

If you have any questions arising from the Company's Communications Policy, please contact the Company Secretary.

5.2 Amendment of policy

This policy can only be amended with the approval of the Board.

5.3 Adoption of Policy and Board review

This policy was adopted by the Board on the date on the front cover of this policy and takes effect from that date and replaces any previous policy in this regard.

The Board will review this policy periodically. The Company Secretary will communicate any amendments to employees as appropriate.

Schedule

(Periodic Disclosures)

The Company will disclose in its annual report, on its website, or in other appropriate communications, the following¹:

Roles and responsibilities of board and management

1. the respective roles and responsibilities of its board and management;
2. those matters expressly reserved to the board and those delegated to management;

Appointment of directors

- 3.

Diversity and Inclusion Policy

5. its diversity and inclusion policy, or a summary of that policy;
6. the measurable objectives that its board, or a relevant committee, has set for achieving gender diversity and its progress towards achieving those objectives;
7. Either:
 - 7.1 the respective proportions of men and women on the board, in senior executive positions and across the whole organisation (including how the Company has defined "senior executive" for these purposes); or
 - 7.2 if the Company is a "relevant employer" under the Workplace Gender Equality Act, the Company's most recent "Gender Equality Indicators", as defined in and published under that Act²;
8. as a larger Company with a significant number of employees, the numbers of women at senior executive level and the relative proportion of women and men in management roles immediately below senior executive;

Performance evaluation processes for board and senior executives

9. its process for periodically evaluating the performance of the board, its committees and individual directors and, in relation to or for each reporting period, whether such a performance evaluation was or has been undertaken in accordance with that process during or in respect of that period;
- 10.

