



Corporate Responsibility Policy

At Kaplan, we are working hard to build a brighter future together. We are guided by our values (Act with Integrity, Grow Knowledge, Empower & Support, Create Opportunity, Drive Results Together) and we intend to create success for our learners, our customers, our people and for our organisation in a positive and sustainable way.

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1. Purpose and scope

- a. This policy applies to all businesses and employees within the Kaplan Professional UK group (KPUK). It sets out our commitment to have a positive impact through the way in which we do business, on our environment and in our community. It acts as an umbrella to various more detailed policies, and it incorporates our 'Responsible Business' and 'Creating Success for our People' pillars, as well as our three 'Brighter Future' pillars: Environment, Community and Every Learner.

2. Responsible business

We act with integrity, and we're proud to be conducting business the right way.

- a. [Health & safety](#)
 - i. We operate a Health & Safety Policy which is reviewed annually.
 - ii. We have three trained and British Safety Council/NEBOSH-certified Health & Safety practitioners in place, we provide manual handling training for Warehouse Operatives and Facilities Officers, and a Health & Safety induction guide is included within our induction programme for new employees.
 - iii. We have specific policies and procedures in place to cover our warehouse operation, first aid, fire marshals, and lone working.



b. Ethics & compliance

- i. Graham Holdings Company, Kaplan's parent company, operates a group Code of Business Conduct, which employees must confirm they have read upon joining and every two years thereafter. All employees are required to complete training every two years.
- ii. Kaplan operates an Anti-bribery & Corruption Policy and employees in higher-risk role categories are required to complete training every two years.
- iii. An up-to-date Modern Slavery Statement is published to our website annually. This statement outlines Kaplan's standards to ensure that all employees are treated with respect and dignity, are working under their own free will, and are being properly compensated for their efforts. We are committed to combatting slavery and human trafficking and ensuring that we are not complicit in any human rights violations. We support and respect the principles proclaimed in the Universal Declaration of Human Rights and believe businesses should ensure that they are not complicit in human rights abuses.
- iv. Kaplan has put in place appropriate data protection policies and privacy notices. All employees complete data protection training upon joining and every two years thereafter, and information security training upon joining and then annually.

c. Labour practices

- i. We are committed to maintaining a workplace free from child labour, forced labour, physical abuse or discipline, the threat of physical abuse, sexual or other harassment, and verbal abuse or other forms of intimidation.
- ii. We believe everybody should be paid a wage which is sufficient to live on, so all our employees receive a rate which is no less than those published by the Living Wage Foundation. We intend to become accredited as a Living Wage employer, and will work with relevant suppliers to pursue this.
- iii. All of our teams are required to operate clear, fair pay structures which are made available to employees on our intranet and in a weekly internal vacancies email.
- iv. Where possible, we engage employees on permanent employment contracts. We only use fixed term contracts for projects and other short/medium term needs. We use agency temps only for short term needs or for urgent cover (the exception being in our warehouse, where we engage operatives via a temp to perm arrangement without interviewing them, and reduce their probationary periods by the duration of the temp engagement). When we engage people on a casual worker basis, the flexibility works both ways - the individuals have the right to turn down work we offer, and to accept work from other employers or clients.



d. Equality, diversity & inclusion

- i. We operate an Equality, Diversity & Inclusion (EDI) Policy, and we aim to provide an environment that embraces diversity and promotes equality and inclusion in a way which enables and inspires all our employees to succeed.
- ii. Our job description and vacancy advertisement templates contain a candidate EDI statement, which all recruiting managers are required to include.
- iii. All our employees and managers undertake EDI training which was created in-house at Kaplan.
- iv. Through measurement and data analysis, and by listening to our colleagues, we seek to identify where any significant inequalities exist within our organisation and we implement strategies to reduce or eliminate them.
- v. We issue quarterly employee EDI reporting, and we've started issuing an annual employee EDI report.

e. Procurement

- i. We aim to have a positive impact through the way in which we do business, on our environment, and in our community. To extend this impact into our supply chain we operate a Responsible Procurement Policy, which incorporates a Supplier Code of Conduct that our suppliers are required to agree to.
- ii. Procurement decisions are based upon product, service, price and our Responsible Procurement Policy.
- iii. Organisations with whom we spend or expect to spend more than £50,000 per year are asked to provide information which demonstrates their compliance with our Responsible Procurement policy.

3. Creating success for our people

At Kaplan, we help create successful careers for our learners and customers - and for our employees too. Our values guide us to make Kaplan a great place to work where everyone can succeed.

- a. **Act with Integrity:** Integrity is engrained in the way we work, and everything we do is consistent with our purpose and values. We build clarity around how we will create success - the Kaplan Way.
- b. **Empower & Support:** We make sure everyone has the space and the tools they need to work together and continuously improve how and what they deliver to our customers - directly or indirectly.



- c. Create Opportunity: This is a place where people can become inspirational educators, grow into experts in our specialist fields and build leadership careers. Those who drive Kaplan's success, find their success at Kaplan.
- d. Grow Knowledge: Learning is in our DNA. Investing in our ever-growing knowledge of our customers, our markets and our individual fields creates success for our learners - and for ourselves.
- e. Drive Results Together: Focusing on what matters most, we collaborate and partner with colleagues, setting targets and measuring progress to turn ambitions into outcomes, which we all then celebrate.

4. Environment

We are committed to working together to continuously improve our practices so we can minimise our impact on the environment, as set out in our Environment Policy.

- a. Given the nature of our main business activities (education and assessment) we are not a high carbon emitter but we aim to further minimise our carbon footprint by giving particular focus to the impact of our energy use and our business travel.
- b. We are committed to continuously improving our energy-efficiency and reducing the impact of our energy use.
- c. Given the nature of our main business activities (education and assessment) we are not a high user of resources such as fossil fuels or water. We have traditionally used a significant amount of paper for our learning materials and business activities, but we source sustainably and we are reducing our use of paper through a variety of initiatives.
- d. We are committed to minimising the impact of our waste and we have processes in place to reduce, reuse and recycle.
- e. To demonstrate our environmental commitments to our learners and to help them minimise their own environmental impact, the physical items we provide to them (eg books, binders and bags) are environmentally friendly.
- f. We will work towards introducing a recognised environmental management framework to our business operations.

5. Community

We empower and support our employees to contribute positively to their communities.



- a. We operate a payroll giving scheme to make it easy for our employees to donate to charities, and we pay all the administration charges.
- b. In addition to employee-led local fundraising drives, we run national events and initiatives annually.
- c. Employees are encouraged to take two days of paid volunteering leave each year.
- d. We seek opportunities to gift valuable but unused resources to good causes, and charities make use of our spare classroom space during quieter teaching seasons.

6. Every learner

We are here to make a difference to every learner and inspire them to succeed, so our aim is to create courses and environments that give all learners an equal opportunity to achieve the outcomes they are seeking. Our charity partnerships help us to achieve that purpose externally in addition to internally.

- a. We operate a Learner Equality, Diversity & Inclusion Policy and we are committed to providing a learning environment where everyone is treated fairly and equally and with respect and dignity, and everyone has an equal opportunity to succeed.
- b. All learners, including apprentices complete bespoke equality, diversity and inclusion training modules through their induction process.
- c. We know that learners with differences and disabilities sometimes need adjustments to be made and/or extra support, and we make sure we provide it, working in partnership with our client organisations and the professional institutes as needed.
- d. We are committed to continuing to meet all requirements regarding equality for our apprenticeships programmes, and to extending relevant equality indicators to our broader learner population.
- e. We actively gain feedback from learners about what we are not doing well from an EDI perspective through focus groups, surveys, our complaints and appeals procedure and our dedicated EDI mailbox.
- f. We use apprenticeship EDI data to understand the composition of our learner population, and are seeking ways to extend this to our broader learner population.
- g. As part of our focus on addressing social disadvantage, we partner with charities to provide courses at no cost to learners, and we provide scholarship places to give learners an opportunity to develop in accountancy where it may otherwise have been unaffordable.
- h. We partner with education charities to facilitate the sharing of Kaplan employees' expertise for good causes which connect with our organisation's purpose.



- i. We raise funds for education charities that work with learners whose opportunities may be more limited than those of others, to help make a difference to those learners.
- j. We work with partner organisations to promote access to the professions, encouraging those with no direct links to accountancy, tax or financial services to consider it as a career opportunity.

7. Policy review & contacts

- a. If you have any questions about this policy, your line manager or the HR team can help.
- b. Our policies are reviewed and (if required) updated at least every two years in line with legal obligations, business objectives, and operational needs. We will notify staff of some key changes, but it is not practical to notify of every change that occurs so it is everyone's responsibility to keep themselves up to date with the current versions of policies as made available via our intranet. Please revisit employment policies at regular intervals, and refer to specific relevant policies when the need arises.