UK MODERN SLAVERY ACT STATEMENT
FOR
LEARNING POOL LTD. ("LEARNING POOL")

Introduction

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, all of which have in common the deprivation of a person's liberty by another to exploit them for personal or commercial gain.

Learning Pool wholeheartedly acknowledges that Modern Slavery in all forms (including human trafficking, servitude, forced and bonded labour, child labour, sexual and criminal exploitation, debt bondage) is a serious violation of human rights. We have a zero-tolerance approach to modern slavery, and we are committed to acting ethically and with integrity in all our business dealings and relationships. We implement and enforce effective systems and controls to help ensure modern slavery is not taking place anywhere within our own business or our supply chains.

We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under section 54(1) of the Modern Slavery Act 2015.

This is Learning Pool's Modern Slavery Statement for Financial Year 1 May 2023 – 30 April 2024.

About Learning Pool

At Learning Pool, we're passionate about investing in our people. We firmly believe that it's only when we do right by our Learning Pool team that we can achieve our mission: to create learning experiences that deliver extraordinary outcomes for companies and their people.

Since our inception, we've prioritised supporting our team's growth and aspirations—both inside and outside of work—empowering our employees to excel in their roles, give back to their communities, and continue to be inspired, challenged, and gratified by the work that they do and contributions they make at Learning Pool. As a Certified B Corp., we are committed to the highest standards of social and environmental performance. This commitment extends to all our stakeholders: our employees, our customers, and the third parties with whom we partner.

Our Core Values

Learning Pool expects all employees at every level of our organisation to act ethically and do right for our customers, business partners, and each other. This means living our core values:

> ***Do the right thing***
> When it comes to our interactions with our customers, communities, and each other, we go beyond what must be done, and do what should be done.
>
> ***We've got your back***
>
> We support the health, safety, and wellbeing of our employees and are committed to making the world a better place through comprehensive environmental, social, and governance practices.
>
> ***Let's build to grow***
>
> Our team consistently drives the business forward with new ideas and great initiatives, creating career opportunities while conducting legal and ethical business.

Our commitment to identify and reduce the risks of modern slavery in our supply chain is an important extension of our mission, vision, and values. We strive to facilitate a collaborative work environment, which supports diversity, equity, inclusion, and belonging, enabling us to take pride in our corporate culture and the work that we do to deliver extraordinary outcomes for our employees, customers, and the communities in which we live and work.

Organisational Structure

Learning Pool is a private limited company that was incorporated on 10 July 2006 in Northern Ireland. We are an award-winning learning technology provider, supporting the evolving ambition of more than 1,500 clients and accommodating over 26 million active learners. Learning Pool's solutions provide everything needed to build, manage, and deliver employee onboarding, upskilling, and compliance. Our enterprise portfolio of solutions develops an effective and agile workforce through data-driven learning experiences.

As of 30 April 2024, Learning Pool has 448 full-time employees located in the United Kingdom, Europe, and the United States. Learning Pool's registered address is Old City Factory, 100 Patrick Street, Derry, BT48 7EL.

Our Commercial Relationships

Learning Pool's supply chain consists of goods and services procured to enable our people to deliver extraordinary outcomes for its customers. LP's supply chain comprises primarily of web hosting services, general business supplies, and third-party software to facilitate the production of our own services. Our supply chain also includes a select number of

subcontractors who provide skilled services, including, but not limited to, software engineering and development, audio visual development, and subject matter expertise in various L&D topic areas for inclusion in course copy.

The software/licensing business sector is not considered high risk in relation to the Modern Slavery Act 2015. Learning Pool does not enter into intricate supply chains, have multiple levels of contracting or subcontracting, or partner with businesses based in impoverished regions of the world where labour/employment laws are minimal or poorly enforced.

Our anti-modern slavery strategy and diligence processes are developed and maintained by a cross-functional group, which includes representatives from Legal, Compliance, Finance, and Human Resources (*"HR"*).

We are actively working to develop a Supplier Management Framework to ensure consistency across the organisation. Our framework is underpinned by prevention, detection, and assurance practices that modern slavery or human trafficking is not taking place within our supply chains. This includes internal policies and processes, related training, and enhanced due diligence.

Learning Pool's Legal Team is also responsible for reviewing and negotiating all third-party contracts. They ensure that all contracts are reviewed for compliance with Learning Pool's policies to help ensure that the contracts we enter into contain provisions that conform with the Act or relevant laws of the jurisdictions in which we operate.

We will continue to challenge ourselves to seek out solutions to identify as early as possible any incidence of modern slavery or any practice which could facilitate such abuses.

Policies and training

As part of our strategy to identify, assess, and mitigate risk in our supply chain, including modern slavery, we maintain a range of policies and procedures. All Learning Pool employees are required to adhere to and comply with our Code of Business Conduct (*"Code"*) and relevant policies, including modern slavery, anti-corruption, anti-money laundering, and discipline policies. These policies are based on best practice policy governance to help us set clear expectations for our employees, suppliers, and other business partners, while also establishing a framework that helps us monitor compliance with our standards. All employees are required to read and acknowledge these policies on an annual basis.

We also maintain policies that address discrimination, harassment, and general workplace conduct. We expect all of our employees to recognize the importance of this issue and encourage use of our Openness and Whistle-Blowing policies to address any concerns that they have, including with our suppliers, customers, and all those who are directly linked to

our business. Together, these resources play an integral role in embedding our values throughout our organisation.

Training plays a fundamental role in our work to embed our core values and expectations around compliance. We have an established formal training program, and we continue to evaluate, review, and enhance our training program year over year. Training on Learning Pool's Code and supporting policies is deployed to all new employees and existing employees on a regular cadence. Communications and additional targeted guidance are delivered throughout the year to keep modern slavery risk top of mind for employees.

Employee Reporting

Modern slavery can be challenging to detect, and we recognize that our policies and processes alone may not go far enough to prevent against the risk of all adverse impacts in our supply chain. For this reason, Learning Pool actively encourages its employees to report all suspected violations of our values, Code and its related policies, or the law, that could arise within our supply chain. Employees can either raise concerns internally or via our third-party Ethics Helpline. Concerns can be made anonymously where allowed by local law. Information from reports is shared with members of the HR team. All allegations of improper conduct received through the Ethics Helpline are promptly and confidentially investigated, and when necessary, Learning Pool's Board of Directors (*"Board"*) is informed.

Due Diligence

The Finance team, in partnership with Legal, Compliance, and Information Security teams, review all new supplier requests and conduct additional diligence based on the risk profile of the supplier.

Before Learning Pool begins a relationship with a supplier, our internal teams evaluate the jurisdiction, industry dependencies, and government affiliations that the supplier may maintain in accordance with our modern slavery policy guidance. This includes all relevant OFAC and OFSI sanctions checks to ensure the supplier is free of sanctions or embargo. All this information is aggregated in our pre-qualification questionnaire for vetting new suppliers, which also includes social and environmental sustainability questions to evaluate risks and opportunities early in our relationships.

If a supplier operates in a country or industry with a higher risk index, or if our standard diligence checks highlight areas of concern, suppliers are subject to enhanced due diligence by the Legal, Finance, and Compliance teams.

We continuously evaluate the effectiveness of our due diligence programme. We are dedicated to improving our existing procedures for the proactive detection, mitigation, and monitoring of modern slavery (and other adverse impacts) throughout our entire supply

chain. As we move ahead, the knowledge gained from our due diligence programs will remain integral to our continuous improvement efforts, including integration of such insights into Learning Pool's policies, systems, and controls.

Key Performance Indicators to Measure Effectiveness

We are creating more effective internal tools and metrics for assessing the future performance of our programs. Key performance indicators include:

- Providing employee training regarding modern slavery awareness and reporting;
- Measuring employee awareness of modern slavery risk;
- Validating that sufficient information and documentation is being provided by third parties as part of supplier onboarding and/or renewal;
- Ensuring informed decision-making via enhanced due diligence processes; and
- Measuring our speak up culture pursuant to Whistleblowing and Openness policies.

Board Approval

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015. It has been approved by Learning Pool's Board of Directors, on May 28, 2024, who will review and update it on an annual basis in line with its financial planning year end, ending 30 April.

Paul McElvaney
Founder, Executive Chair