

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

Financial Year 1 May 2025 — 30 April 2026

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 2025 – 30 April 2026. Learning Pool's total annual turnover exceeds the £36 million threshold set out in section 54(2) of the Modern Slavery Act 2015.

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. and Ecovadis Silver certified organisation, 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 actively embodying our core values, which were shaped by our own people and reflect who we are and where we're headed.

Our values matter most at the points where our organisation changes. Learning Pool has grown in part through acquisition, and each organisation we bring in the business arrives with its own people, working practices, and supplier relationships. Our values are the standard we apply to all of them. Holding a single, consistent set of expectations across every part of the business, however recently it joined us, is how we maintain the integrity of our operations and our supply chain, and how we continue to serve our customers well as we grow.

Do the right thing

Integrity matters. We lead with honesty, fairness, and accountability to create lasting impact, even when it's the harder choice. ***That means:*** *We're honest and upfront, own our mistakes, and choose what's right – even when it's tough or comes at a cost.*

We've got your back

We succeed together by showing trust, resilience, and teamwork— stepping up for each other when it counts. ***Simply put:*** *We stay strong through challenges, adapt to change, support one another, and bounce back from setbacks—moving forward with flexibility, focus, and a positive mindset.*

Raise the bar

We take ownership, stay curious, and keep growing—excellence is about progress, not perfection. ***In practice:*** *We actively seek feedback and commit to learning and growth, always working to become our best selves.*

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.

Our Structure, Operations, and Supply Chains

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 2026, Learning Pool has 435 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. It 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.

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 have developed 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.

Modern Slavery Risk in Our Operations and Supply Chains

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.

Learning Pool recognises, however, that a lower sector risk profile is not the same as an absence of risk, and that a finding of no risk may reflect the limits of an assessment rather than the reality of a supply chain. During this reporting year we reviewed our procurement categories to identify where residual modern slavery risk is most likely to concentrate. We identified the following categories as carrying comparatively higher inherent risk:

- Information technology hardware and end-user devices, where risk arises in electronics manufacturing and raw material extraction several tiers below our direct suppliers.
- Facilities services at our office locations, including cleaning and maintenance, where risk arises from the use of low-wage, agency-supplied, and migrant labour.
- Subcontracted technical and creative services, including software engineering, development, and audio visual production, particularly where subcontractors engage their own personnel or operate outside the jurisdictions in which Learning Pool has a permanent presence.
- Promotional merchandise, printed materials, and event goods procured in connection with marketing activity and company-hosted events.
- Accommodation, catering, and event venues engaged directly by Learning Pool for company-hosted events.

Risk in these categories sits predominantly beyond our direct suppliers, in tiers where our commercial leverage and visibility are lowest. We have limited visibility below tier one, and we identify this as the principal limitation of our current assessment. Our approach is therefore to prioritise these categories in supplier onboarding and renewal diligence, to direct enhanced due diligence toward them, and to extend our understanding of the tiers beneath our direct suppliers over successive reporting years.

We did not identify any incidents of modern slavery in our own operations or supply chains during this reporting year. 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

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 recognise the importance of these issues and encourage use of our Speak Up & Non-Retaliation Policy 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.

Our Modern Slavery and Human Trafficking Policy applies to all employees, directors, and managers, whether permanent, temporary, part-time, or contract, and to third parties working with Learning Pool, including consultants, suppliers, partners, and agents. It sets out the red flags that individuals are expected to recognise and the consequences that follow a breach, including immediate termination of a supplier, agent, or partner relationship.

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.

Training

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 an annual cadence. Communications and

additional targeted guidance are delivered throughout the year to keep modern slavery risk top of mind for employees.

Targeted guidance is directed to those employees whose roles bring them into contact with suppliers, subcontractors, and third parties, including colleagues in Finance, Legal, Compliance, and procurement roles, so that the individuals most likely to encounter a red flag are equipped to recognise and escalate it.

Raising Concerns and Remediation

Employee Reporting

Modern slavery can be challenging to detect, and we recognise 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 and Compliance 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.

Reports concerning modern slavery or human trafficking are escalated to the Chief Compliance Officer and the Legal team in addition to HR, reflecting the specialist nature of the risk and the response it requires.

The Ethics Helpline is operated by an independent third party and is available to our employees. We are reviewing how access to the Helpline and to our other reporting channels can be extended to workers employed by our suppliers and subcontractors.

Remediation

Where modern slavery is identified in our operations or supply chains, our first obligation is to the people affected. Our approach is to prioritise remedy for affected workers over the immediate termination of a supplier relationship, recognising that abrupt withdrawal can deepen the harm to the individuals concerned. We will engage with the supplier to establish the facts, agree a corrective action plan with defined timeframes, support access to remedy for affected workers, and involve law enforcement and specialist support organisations where appropriate. Where a supplier is unwilling to engage or fails to remediate, we will terminate the relationship.

Assessing Effectiveness

Many of our efforts in this reporting year build upon the foundation established in our 2025 statement, with continued focus on strengthening internal capabilities and driving accountability across our operations and supply chain. We remain committed to enhancing the effectiveness of our programs and are refining our tools and metrics to assess performance over time.

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.

We measure our performance against these indicators as follows:

Measure	FY 2025–26	FY 2024–25	Direction
Employees completing required training within the assigned period (%)	99.33%	99%	▲
New suppliers screened through the pre-qualification questionnaire (# and % of new suppliers onboarded)	100%	100%	—
Concerns raised relating to modern slavery or human trafficking (#)	0	0	—
Incidents of modern slavery identified in our operations or supply chains (#)	0	0	—

We recognise that a low number of reported concerns is not evidence of an absence of risk, and we assess our reporting data alongside our training and awareness results rather than in isolation.

Progress and Commitments

In our statement for the financial year ending 30 April 2025, we committed to the following:

- 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.

During this reporting year we took the following steps:

- Reviewed our procurement categories to identify where residual modern slavery risk concentrates, and set out that assessment in this statement for the first time.
- Reviewed our Supplier Compliance onboarding processes and developed a FY27 plan to continuously improve it.
- Updated our Modern Slavery and Human Trafficking policy, disseminated it to the organisation, and achieved 100% acknowledgment.

For the financial year ending 30 April 2027, we commit to the following:

- Extending our supply chain mapping beyond tier one in the risk categories identified in this statement.
- Improving our Supplier onboarding questionnaire to include additional ESG questions
- Validating whether and how our Ethics Helpline can be made accessible to workers employed by our suppliers and subcontractors.
- Introducing modern slavery and labour standards questions into the selection and contracting of accommodation, catering, and event venues engaged directly for company-hosted events, where Learning Pool holds a direct commercial relationship and can exercise meaningful leverage.
- Reporting against the performance indicators set out in this statement with comparative data for the preceding year.

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 29 July 2026, who will review and update it on an annual basis in line with its financial planning year end, ending 30 April.

I confirm that the information in this statement is accurate to the best of my knowledge and belief.

Benoit de la Tour

Benoit de la Tour

Chief Executive Officer

Learning Pool Ltd.

29 July 2026