



## Modern Slavery Statement

This statement is made pursuant to Section 54 of the United Kingdom Modern Slavery Act 2015 (the “Act”) and Section 16 of the Australia Modern Slavery Act 2018, and sets out the steps that Litmos UK, Ltd. and Learning Seat Pty Ltd (together with their affiliates, the “Company”) have taken and will continue to take to ensure that no form of modern slavery or human trafficking (as defined in the Act) is exercised in connection with our business.

The Company is committed to understanding potential modern slavery risks related to our business and ensuring that there is no modern slavery in its own business and supply chains. We fully endorse the principles set out in the Act. We do not condone modern slavery in any form and the Company complies with all applicable laws in the countries in which it operates.

### **Our Business**

The Company is in the business of providing a cloud-based learning management system and content library.

The Company is headquartered at San Francisco, California with other offices located in Bristol, United Kingdom and Melbourne, Australia.

### **Our Policies**

Alongside other corporate policies such as our privacy and anti-bribery policies, the Company has a code of business conduct and ethics that guides the way our employees work. Our commitment to ensuring that there is no modern slavery in its own business and supply chains is expressly reflected in our code of business conduct and ethics, and we maintain a zero-tolerance policy with respect to any violations of the Act in connection with our business.

### **Our Interaction with Suppliers**

In light of the industry in which we operate, products and services we sell, and the type of supply chains we work with, our assessment is that there is a very low risk that modern slavery and human trafficking exist in our business and supply chain.

We choose our suppliers with care and their integrity and ethical business practices form part of the selection criteria. We continue to monitor our suppliers to ensure that they remain in line with our requirements and our ethical standards.

### **The Approach Within the Company**

The Company is dedicated to ensuring that human rights are respected at all times. We expect our employees to maintain the highest ethical standards and comply with all applicable laws and company policies. Our code of business conduct and ethics embodies our requirements.

The Company encourages its team members to report any suspected wrongdoing or dangers in relation to any activity that falls short of our code of conduct. By encouraging a culture of openness and accountability within the Company, we believe that it can help prevent illegal or unethical practices from occurring. Our culture is designed to make it easy for our team members to make disclosures without fear of reprisal.



## **Risk Assessment**

Considering our business consists of predominantly professionally qualified and highly skilled people and the lengths of our supply chains are relatively short, we assess the risk of modern slavery within our business and supply chain to be extremely low. However, we are committed to preventing slavery in all of our corporate activities, and we take affirmative steps to ensure that our supply chains are free from forced or compulsory labor.

## **Performance Indicators and Measuring Effectiveness**

We accept that effective action to prevent modern slavery and human trafficking in our business and supply chain requires constant monitoring and an effective response should issues be identified. Our management will continue to take a zero-tolerance approach to modern slavery and human trafficking and will react accordingly to any transgression whether by our staff or by our suppliers.

## **A Progressive Approach to Modern Slavery**

The Company recognizes that the risks from modern slavery and human trafficking are constantly evolving. We also recognize that efficient methods to identify and address modern slavery and human trafficking will be developed and enhanced. The Company will continue to monitor and evaluate such developments and our approach to preventing modern slavery will be reviewed annually so that we can constantly adapt and improve our approach.

## **Training**

The Company provides its staff education and other training to address those aspects of modern slavery and human trafficking that are relevant to them and the way they work.

This statement is made for the financial year ending on December 31, 2025. The Statement has been approved by the Directors of the Company on December 19, 2024 and is signed on its behalf by Michael Scarbrough who is a director of Litmos UK, Ltd and Learning Seat Pty Ltd.

Yours faithfully,

Michael Scarbrough  
Chief Executive Officer  
Litmos US, L.P.