

Learnosity Ethics and Environment Policy

1st November 2021

Approved by Gavin Cooney, CEO

Introduction

Learnosity strives to conduct business to high ethical standards and seeks to work with suppliers and partners that do the same. We are committed to complying with the laws in the jurisdictions we are established with, i.e. Ireland, Australia, the US, the UK, and Germany. We also seek to “do the right thing” whether or not legally mandated. Our commitment set out in this policy applies to all our operations including the Learnosity and Questionmark divisions.

All employees are responsible for ensuring that this Ethics and Environment policy is followed. If any employee has any concerns that this policy is not being followed, they should report it to their manager or to any member of the executive team at the earliest possible stage. We encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that this or other policies are not being followed in any way.

Please also see Learnosity’s Anti-Bribery and Anti-Corruption Policy and Information Security Policy and Data Security Policy which apply in parallel with this policy.

Human Resources

To promote equal treatment for all employees or potential employees and to provide equal employment and advancement opportunities to all individuals, employment decisions at Learnosity must be based on merit, local market conditions, qualifications, and abilities.

Learnosity does not discriminate in employment opportunities or practices on the basis of race, colour, religion, gender, gender reassignment, gender identity, sexual orientation, pregnancy, status of a parent, marital status, national or ethnic origin, nationality, age, family medical history or genetic information, political affiliation, veteran status, membership or non-membership of a trade union, mental or physical disability (unless justifiable), or any other characteristic protected by law.

Environment

Learnosity is committed to following good practice in minimising the impact of its activities on the environment. Learnosity will continue to provide software which makes it easy for customers to deliver learning and assessments at a distance, thus saving travel and the resultant impact that has on the environment. Learnosity's own activity, with its prime operations being knowledge workers, has low environmental impact by its nature. Learnosity in general encourages employee teleworking and virtual meetings where appropriate (which reduces travel), encourages appropriate recycling and takes environmental factors in mind when purchasing data center services.

Modern Slavery

Learnosity is an ethical company and is committed to zero-tolerance of human trafficking, forced labour and other modern slavery. We support European Union, Australia, UK and U.S. policies and laws in this area. We will not permit modern slavery or human trafficking within our business and seek to appoint responsible suppliers who are similarly committed. We will use reasonable efforts to ensure that modern slavery and human trafficking do not happen within any of our suppliers.

Export Control

Learnosity respects the laws of the countries in which it operates and complies with export control regulations and sanctions applied by the U.S., the European Union, Australia and the UK.

Learnosity will decline to do business with any customer, partner or supplier who is prohibited or in a country prohibited by the U.S, the European Union, Australia, or the UK. We will enforce this with divisional procedures and appropriate contracts with customers and third parties.

If you are not sure whether a country or organization is subject to sanctions, please reach out to the Legal team or to Gavin Cooney, CEO.

Questions, suggestions or issues

If any employee or third party has any questions or suggestions or issues on these policies, please reach out to Gavin Cooney, Learnosity CEO at gavin@learnosity.com or if you prefer reach out to any other Learnosity/Questionmark manager.