# **Global Whistleblowing Policy**



Version number	1.1
Last Approved	Jan 31, 2024
Classification	PUBLIC

Learning Technologies Group plc – Proprietary and Confidential – This document contains confidential information, which is the property of Learning Technologies Group plc, and may not be distributed externally without explicit written permission.

## Overview

At LTG, we are committed to supporting our colleagues to raise awareness of any unethical, dishonest, wrongdoing or any behaviour that may fall under the purview of this whistleblowing policy. We will support colleagues to raise these issues directly to their line manager/appropriate person or confidentially via a third party managed helpline.

### Applicability

The applicability of this statement falls under purview of the Global Policy Applicability Statement.

#### Scope

This policy applies to all LTG colleagues.

# **Global Whistleblowing Policy**

As an organisation, LTG is committed to maintaining the highest standards of honesty, integrity, and ethical conduct. We have zero tolerance towards fraud and unethical practices in the workplace. We are dedicated to making LTG a safe, inclusive, and respectful place to work.

If, during your employment with LTG, you experience or witness any dishonest or unethical behaviour, acts of corruption, health and safety breaches, harassment, bullying, or other forms of wrongdoing, we strongly encourage you to report this immediately. You can do this through two channels:

1. Direct Reporting: You can report to your line manager or any other appropriate person within the organisation.

2. Confidential Whistleblowing Helpline: You can contact Safecall, our independent whistleblowing service.

Safecall can be contacted via File a Report. All calls and emails to Safecall will be treated with the utmost confidentiality by independent staff who will not disclose your details to LTG, unless you wish and agree to do so. You also have the option to remain anonymous if you choose.

We assure you that LTG will not tolerate any form of retaliation against individuals who make good-faith reports of suspected misconduct. We are committed to investigating all reported concerns fairly and thoroughly.

In addition to our internal reporting mechanisms, you have the right to report any concerns to relevant external bodies or regulators, in line with local laws and regulations.

Safecall is a complimentary service and does not replace our existing policies and procedures. We encourage all employees to familiarize themselves with these policies and procedures, which are easily accessible to all.

We are committed to reviewing this policy regularly to ensure it remains effective and relevant, considering changes in law, regulations, and business environment.

Last review date: 15/04/2024

## Document control

This policy is only controlled in its live, digital format. Any other format or export of this policy is an uncontrolled version of this document

Document Owner	HR		
Author(s)	Senior HR Team		
Required Approver(s) and Approval Date	Senior HR Manager	Apr 15, 2024	
Review cycle	ANNUAL		
Next review date	Apr 15, 2025		

### Version History

es		
----	--	--

Nov 1, 2024	@angelina.kilmer	1.1	Change Policy classification from Confidential to Public
Jul 30, 2024	@Paul Gordon	1.0	Policy format update only