



# LEARNING TECHNOLOGIES GROUP - MODERN SLAVERY STATEMENT FOR FINANCIAL YEAR 2024

This statement is made pursuant to Section 54(1) of the Modern Slavery Act 2015 and constitutes our group's slavery and human trafficking statement for the financial year ended 31 December 2024.

Learning Technologies Group Limited ("LTG", "our" or "we"), formerly known as Learning Technologies Group plc, takes a zero tolerance approach to modern slavery and human trafficking. We strive to act with integrity and transparency in all business dealings and to put in place effective systems and controls to safeguard against any form of modern slavery, servitude, forced or compulsory labour or human trafficking taking place in our own business and in our supply chain. In addition to this Modern Slavery Statement, we have implemented a Business Ethics, Anti-Corruption and Anti-Bribery Policy for which we require annual related staff training. We have also established an Environmental, Social and Governance Committee that oversees and co-ordinates ESG initiatives, communicates best practices and showcases our achievements across the group.

#### **ORGANISATION'S STRUCTURE**

We are a global group of companies in the learning and talent management technology sector, spanning 35 countries across Europe, Asia-Pacific, the Middle East and the Americas. For the financial year ended 31 December 2024, LTG was a public limited company listed on the AlM Market. On 31 March 2025, LTG was acquired by General Atlantic (the "Acquisition"), resulting in the cancellation of its AlM listing on 1 April 2025 and subsequent re-registration as a private company on 23 April 2025. As the Acquisition was completed after the end of the 2024 financial year, it did not affect or impact LTG's business operations during this reporting period.

Following the Acquisition, LTG continues to serve primarily as the holding company for the global group and has maintained its existing policies and practices regarding modern slavery and human trafficking. More information on our corporate governance practices is available on our corporate website (<a href="https://www.ltgplc.com">www.ltgplc.com</a>).

# **OUR SUPPLIERS**

Being a technology company, LTG's supply chain is very short. We consider ourselves to be relatively low risk in relation to modern slavery given the services and products we provide and the type of suppliers we use. We place the utmost value on supporting the principles that are outlined in the Modern Slavery Act 2015. Where we do need the assistance or resources of external suppliers, we operate a purchasing policy in our business and conduct due diligence on our key suppliers prior to any engagement. We have a zero tolerance policy regarding slavery in any of its forms and human trafficking and look to ensure these activities are not taking place in our own business as well as in any part of our supply chain. We may also require our partners and suppliers to review and/or accept our Business Ethics, Anti-Corruption and Anti-Bribery Policy, Sustainable Procurement Policy Statement, and/or our Code of Conduct. We have updated a substantial number of our relevant company standard terms and conditions schedules with related contractual obligations.

#### **DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING**

As part of our initiative to identify and mitigate risk we have in place policies and systems to:

- Identify and assess as well as monitor and mitigate potential risk areas in our supply chains;
- Educate staff to mitigate the risk of slavery and human trafficking occurring in our supply chains,



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- through staff awareness training and the implementation of supplier codes of conduct;
- Protect whistleblowers and investigate reports of Modern Slavery (including a confidential whistleblowing portal for employees); and,

# **OUR EFFECTIVENESS IN COMBATING SLAVERY AND HUMAN TRAFFICKING**

We encourage all staff and suppliers to inform us of any concerns that modern slavery practices may have been identified. Our Legal Department raises awareness of the issue of modern slavery and how we can address it on a regular basis. In addition, we align with principles of responsible sourcing, including adhering to the prevailing minimum wage standards applicable within our employees' relevant country of operation.

This statement covers the period 1 January 2024 to 31 December 2024, has been approved by the Board of Directors and is signed on behalf of the Board by the Chief Executive below.

Jonathan Satchell

Chief Executive, Learning Technologies Group Limited

Approved by the Board of Directors 5 November 2025

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