



learningpool

Learning Pool
Code of Business
Conduct





Contents

01. A message from our CEO	6	Corporate opportunities	34
02. Our purpose, mission, vision, and values	8	Exchanging business gifts and entertainment	35
03. Do the right thing	12	Preventing bribery and corruption	38
About our code	13	Relationships with government officials and third parties	39
Applicability	14	Competing fairly	41
Expectations	15	Keeping accurate books and records	44
Expectations for managers	16	Safeguarding systems and technology	45
Asking questions and raising concerns (whistleblowing)	18	Anti-money laundering and global business	47
Good faith reporting and non-retaliation	21	05. We've got your back	48
Violations and discipline	21	Operating as "one company"	49
04. Let's build to grow	22	Promoting health and safety	52
Upholding our environmental, social, and governance responsibility	23	Ensuring personal privacy	54
Engaging with customers and third parties	25	06. Contacts and resources	56
Protecting assets and information	26		
Protecting sensitive information	26		
Third parties' and previous employers' information	28		
Intellectual property	30		
Avoiding conflicts of interest	31		
Outside work and board memberships	32		
Family and personal relationships	32		
Investments	34		

01

A Message from our CEO

We're serious about our values here at Learning Pool.

- **Build to grow.**
- **We've got your back.**
- **Do the right thing.**

Whether you've seen them in print or witnessed them in action, you'll know even as our business and culture grows quickly, we still prioritize acting with our values top of mind.

Our values speak directly to how we conduct ourselves with customers, with suppliers, and with everyone who works here; Learning Pool has been synonymous with a company you can trust since its founding. We want that to continue to set us apart from our competitors.

We've developed our Code of Business Conduct as a practical guide that can help you make decisions about how you live the values in your everyday work:

Are we tempted to take a shortcut for a one-time benefit, or are we building to grow?

Are we doing something that benefits ourselves at the expense of others, or have we got the backs of everyone impacted by our decisions?

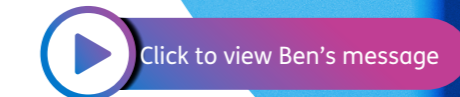
And, of course, are we doing the right thing?

If you ever have any trouble answering these questions, or see something that isn't what you'd

expect from Learning Pool, speak up. We've got dedicated resources to help you take the next step.

If you're a people manager, it's vitally important that you understand the responsibilities you take on for helping others speak up and speak out when our values aren't being upheld. We believe that even one person can make a big difference. After all, we believe extraordinary things happen when companies invest in their people. Together, we can ensure that our values and the trust that customers and colleagues put in Learning Pool live long into the future.

Ben Betts
CEO, Learning Pool



02 Our Purpose, Mission, Vision and Values

Purpose:

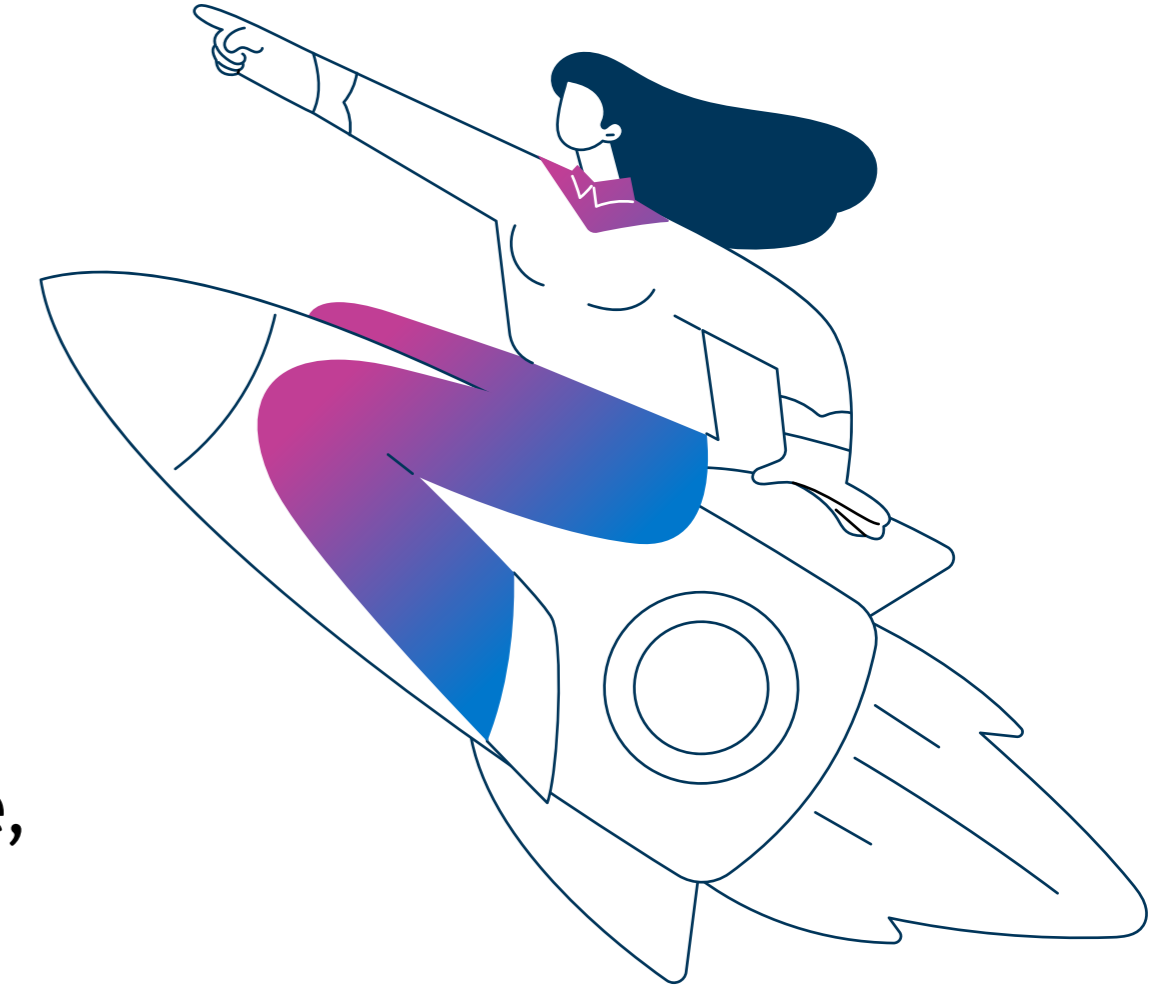
Learning Pool is a mission driven company, passionate about improving the world in which we live and work

Mission:

To create learning experiences that deliver extraordinary outcomes for companies and their people

Vision:

Wherever you find ambitious companies investing in their people, you'll find Learning Pool





Values:

At Learning Pool, the values we live by define who we are collectively and ensure we continually grow as a business and culture:

Because our values are so integral to our work, it is important that we understand the actions and behaviors that exemplify these core principles. For this reason, we have used the values as the foundation for our Code of Conduct.

As you read through the Code, please take note of the various ways in which you can demonstrate our values in your daily work and interactions with others.



Do the right thing

When it comes to our interactions with our customers and each other, we go beyond what *must* be done, and do what *should* be done.



Let's build to grow

Our team consistently drives the business forward with new ideas and great initiatives, creating career opportunities while conducting legal and ethical business.



We've got your back

We support the health, safety, and wellbeing of our employees and are committed to making the world a better place through comprehensive environmental, social, and governance practices.



Do the
right thing

03 Do The Right Thing

About our Code

Our Code highlights some of the laws, policies, and standards that all of us are expected to follow. We are committed to the highest standard of ethical conduct and behavior, and we consider this Code our guidebook for how to do business the right way. It discusses our values and the ways in which these values impact our approach to our work.

Consider this Code a resource, which you can refer to at any point to ensure that you understand the

standards that we are all expected to live up to. We explore a number of important topics and policies; however, should you need to refer to a specific Learning Pool policy, these can be found linked throughout relevant sections of this code or you can find them in the Staff Handbook. And, when it makes sense to talk to someone, the code provides contact information for resources who can answer any questions you may have.



Applicability

We believe that even one person can make a big difference.

That is why our Code of Conduct applies to all stakeholders of Learning Pool, regardless of which part of the business we work in. Keep in mind that, above all, our Code helps us to maintain the trust that we have built with our customers, fellow employees, and others who have a stake in our success – and that trust is what helps all of us succeed. It is your

responsibility to understand and follow the rules that apply to your job.

Of course, business partners and third parties are an extension of our organization, which means that their behavior can have a direct impact on our reputation. We expect that our suppliers, agents, and business partners will follow similar ethical standards when working with us or on our behalf. This means that we will consider

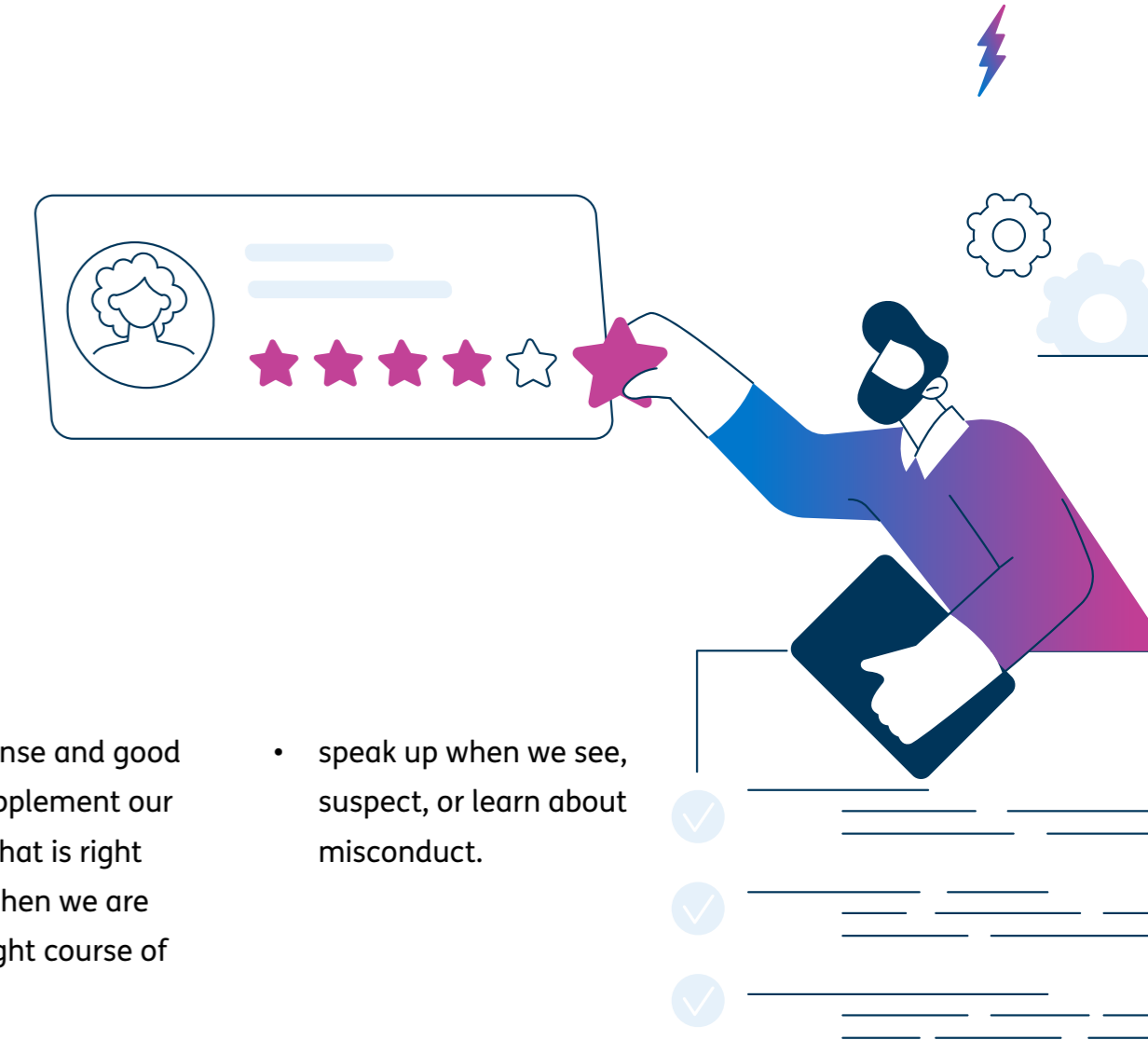
terminating contracts with vendors or partners that do not meet our high standards or contractual obligations.

Expectations

Each of us has a responsibility to live our company's values and uphold our reputation for integrity. That means we must all:

- act in a professional, honest, and ethical manner
- be familiar with the information contained in our Code as well as applicable laws and company policies¹
- use common sense and good judgment to supplement our knowledge of what is right
- ask questions when we are unsure of the right course of action
- speak up when we see, suspect, or learn about misconduct.

¹ Many relevant company policies will be cited in this code, but there are additional policies (found within the Staff Handbook) and procedures with which you will need to be familiar. In the event there is a conflict between your local policy and the code, the more restrictive standard will apply.

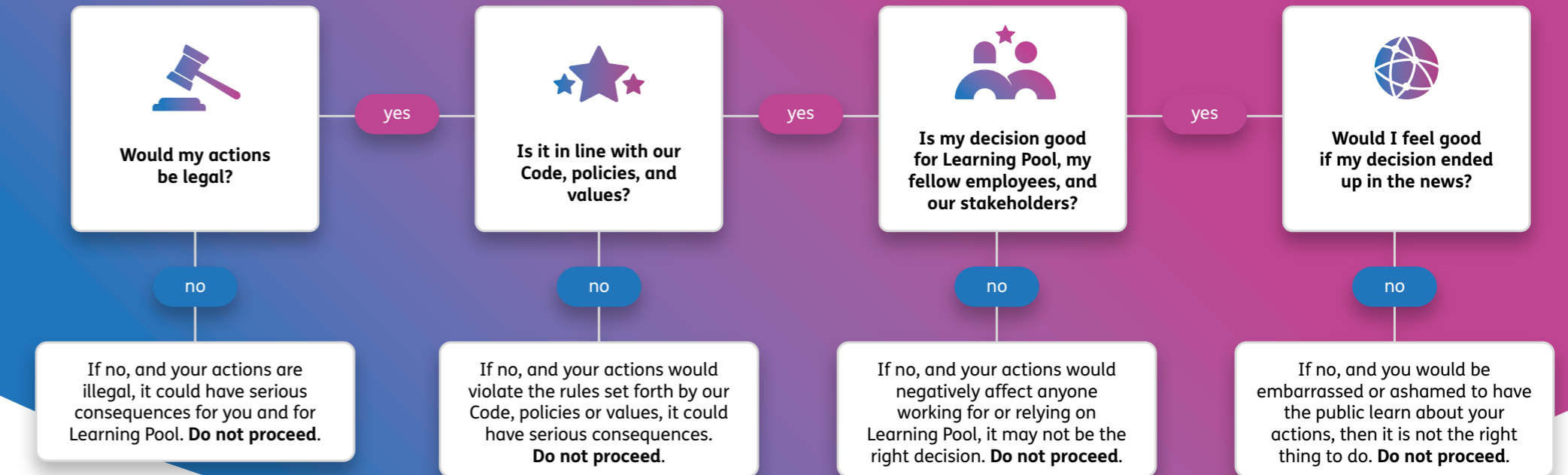


Expectations for managers

While our Code applies equally to everyone at Learning Pool, our managers have a few additional responsibilities. As part of being a people leader, each manager sets the tone for their respective group, by:

- leading by example and always choosing the ethical course of action – even if we do not think others are watching
- communicating the importance of ethical behavior to our team (do not wait for a problem to arise!)
- speaking up when we see a problem, and encouraging others to do the same
- making sure our direct reports understand this Code and what is expected of them
- promoting a speak-up culture that is open and honest, being receptive to questions, concerns or comments, and making sure that issues are directed to the people who can help
- watching for, never engaging in, and immediately addressing retributory behavior, or any deliberate adverse action taken against an employee for reporting a policy or legal concern.

A shared expectation among all employees is the need to make ethical decisions – to do what is right. Many times, the right choice is clear. At other times, we might not be so sure. That is when we should ask ourselves the following questions:



If you need help getting to a “yes” or if you do not know the answer to any of the above questions, talk to one of the resources listed in this Code.

Asking questions and raising concerns (whistleblowing)

Coming forward with questions, concerns, and reports of actual or suspected misconduct is the right thing to do – and the best way to make sure that the Learning Pool culture remains strong and positive.

When we speak up, we give Learning Pool the opportunity to investigate and resolve issues before they become more serious. We pride ourselves on being a company of problem solvers – so if you have a problem, there are

always people here who can help. If you need advice or would like to raise a concern, there are several options available to you:

- Your immediate supervisor or functional manager
- Human Resources
- Company leadership
- [The Compliance Office](#).



To learn more, please review Learning Pool's [Openness Policy](#).



If you are not comfortable using one of those resources, you can also reach out to the Learning Pool Ethics Helpline via email at accesshr@gnapartners.com or by phone at:

United States and Canada: +1 346 483 8729
United Kingdom: +44 204 571 8942

The Helpline is managed by an independent third party and is available Monday–Friday from 1:30 pm GMT/8:30 am ET to 1 am GMT/8 pm ET. Concerns can be made anonymously where allowed by local law.



Good faith reporting and non-retaliation

Acting in good faith is important. Good faith means that even if you do not have absolute proof, you honestly believe that your report may be true and that it requires further investigation.

In return, Learning Pool's commitment to non-retaliation is firm. Employees should feel empowered to report concerns in good faith. Our company takes all claims of retaliation or victimisation seriously, investigating each one thoroughly and taking appropriate action.

Violations and discipline

Violations of this Code and other company policies are taken seriously. Consequences of gross misconduct may extend as far as termination of employment. Always weigh your options carefully and ask for advice when the right choice is not clear.



Let's build
to grow

04 Let's Build to Grow

Upholding our environmental, social and governance responsibility

We approach our business with a significant focus on environmental, social, and governance (ESG) pillars. This creates long-term stakeholder value by considering the external factors that affect the business environment. At Learning Pool, our ESG efforts are seen as integral to our business strategy.

As an organization, and as a group of people who care about our global communities, we support and respect efforts to

[protect human rights](#). We follow all applicable labor laws, and we expect the companies we work with to do the same. All employment at Learning Pool is voluntary, and we always comply with applicable laws and regulations relating to wages and working hours.

We also understand that social responsibility has a local component. This means being a good neighbor in the communities where we operate. While each of us

is encouraged to become involved in the life of our local communities by supporting causes and events, it is important to remember that we should not pressure others to contribute to or participate in our preferred charitable organizations.

Just as we are encouraged to engage in charitable activities, we are also encouraged to voluntarily participate in the political process. However, your personal participation is just that – personal.



Engaging with customers and third parties

You should not indicate in any way that your participation is an endorsement from Learning Pool, nor should you expect the company to reimburse you for your political activities. Like other personal activities, do not use company time or resources for your personal political activities.

company without prior permission from Legal.

Finally, lobbying activities are strictly regulated – and highly visible. Do not engage in any lobbying activity on behalf of the



To learn more, please review Learning Pool's [Corporate Social Responsibility Policy](#).



Our success is built upon our determination, every day, to serve the needs of our customers. This customer focus is at the core of what we do. It means that each action we take should be thought of through the lens of the customer – is this advancing their needs? Is this solving a problem for them?

We make business decisions based on our commitment to providing high quality services and solutions, and we never knowingly

do anything illegal or unethical in order to win or retain business.

We also seek business partnerships that align with our values and follow the highest standards of business conduct.

This means that we always perform appropriate due diligence and know our business partners, service providers, agents and representatives, and all those through whom we conduct our

business. If you become aware of any situation where you believe a third party may not be meeting our standards, raise the issue with your manager, Human Resources or any of the other contacts listed in this Code.



Protecting assets and information

Our company's assets – including our physical assets, like computers and Learning Pool facilities – are there to advance our success. When we use company assets and property, we need to do so responsibly and appropriately. We all share an obligation to protect these assets from loss or harm. Be sure that you do not misappropriate company assets or borrow, or loan them without permission.

Protecting sensitive information

In order for Learning Pool to remain competitive and successful, certain details of our operations must be kept confidential. We are all responsible for safeguarding sensitive data including (but not limited to):

- business plans or strategies
- financial results
- sales goals and marketing plans
- sensitive market data
- employee matters, including personal information and compensation details
- proprietary details about our products, methodologies, or infrastructure.

Remember: anything that is not publicly available could be considered confidential, and should be handled as such.

From time to time, we may receive requests for information from external auditors, attorneys, or national or local government and regulatory officials. If they contact you, do not handle the request yourself. Be sure to notify your manager or the legal department for assistance in handling the

request promptly, accurately, and completely.

Keeping confidential and proprietary information safe requires us to take certain precautions in our work. We must secure our computers and mobile devices, and protect our user IDs and passwords. Be sure that a signed non-disclosure agreement is in place before sharing confidential company information with any third parties. Confidential information should never be shared with anyone

who does not have a business need to know it – including fellow co-workers. Finally, remember that your obligation to protect confidential company information continues even after your employment with Learning Pool ends.



For a more detailed discussion on how we protect information, and what your specific responsibilities are, please refer to our [Confidentiality Policy](#)

Third parties' and previous employers' information

In the course of performing our work, we are obligated to and responsible for protecting information that belongs to other companies or entities with whom we interact. For example, while doing business we may learn of – or generate – confidential information about our customers or other business partners. When we collect confidential information such as names, email addresses, and personal details about our customers (and their employees)

or other companies, we have a responsibility to safeguard that information as diligently as we do our own. And when an employee joins or leaves Learning Pool, we have to respect the fact that this person cannot share confidential information about previous or with future employers or colleagues.



Q:

A Learning Pool employee frequently travels on business. She takes many calls on the train and in airport terminals. She also uses her laptop and smart phone in public places. What precautions should she take to protect sensitive information?

A:

This employee should take particular care to be aware of her surroundings when discussing sensitive Learning Pool information on the phone or viewing it on her laptop. This is especially true in public places and in open areas at Learning Pool facilities. Remember, we never know who may be eavesdropping on our conversations or looking at our screens.

We must also follow proper security measures at all times. This means appropriately logging off our laptops when not in use and storing company devices (like laptops and smartphones) and any sensitive documents in secure places at all times.



Intellectual property

As a company, we depend on innovation and creativity to fuel our business – so it’s important to safeguard these innovations through legal protections, such as copyrights and patents. Collectively, all of this intangible property is called intellectual property (IP), and includes all copyrights, patents, trademarks, and trade secrets. Keep in mind that Learning Pool owns the rights to all IP created with company materials or on company time. Additionally, when an employee joins

or leaves Learning Pool, they cannot share the IP of previous or future employers and colleagues.



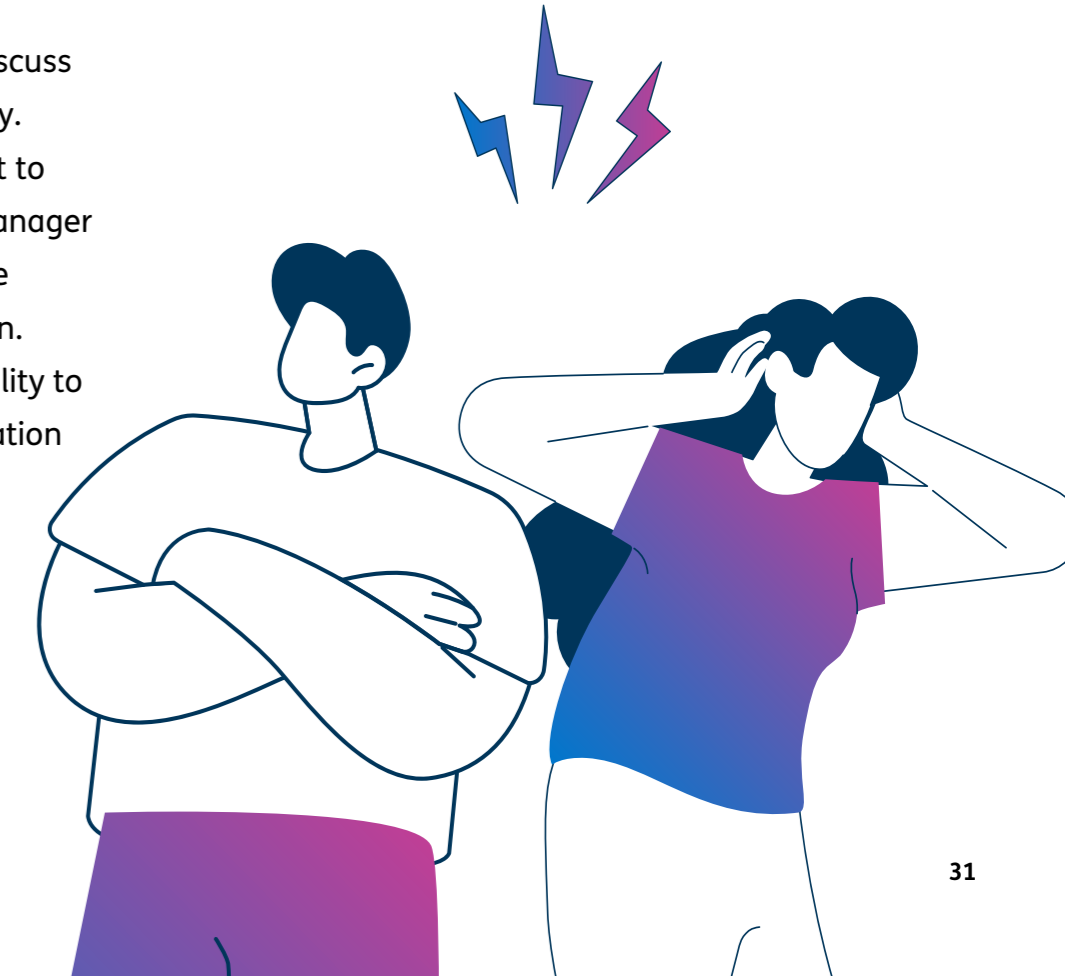
To learn more, please review Learning Pool’s [Intellectual Property Rights](#).

Avoiding conflicts of interest

When we are open about possible conflicts that can divide our loyalties, we can find a way to minimize potential problems. A conflict of interest is a situation where an opportunity for personal gain is at odds with our company’s best interests. Mishandling conflicts of interest can jeopardize both your personal and our organizational reputation.

It is best to avoid conflicts of interest altogether, but if you cannot avoid

one or are not sure whether a situation presents a conflict, discuss it with your manager right away. When in doubt, it is always best to disclose your situation. Your manager can work with you to determine the appropriate course of action. Remember, it is your responsibility to act appropriately until the situation has been addressed.



Outside work and board memberships

We are all expected to devote our full professional energies to our work here; after all, we cannot make objective decisions for Learning Pool if we are competing with our own company. That is why any work we perform or positions we hold outside of Learning Pool must not interfere with our duties at our company. However, every individual situation is unique, and Learning Pool will take that into account when deciding whether to approve an outside activity.

For outside activities related to part-time work or serving on a board, you must seek prior approval from your manager.

Family and personal relationships

When we interact with family members as part of our work, it is easy to create an appearance of favoritism. Addressing these situations proactively can prevent any problems or poor perceptions of Learning Pool by the public. For this reason, we may not improperly influence or direct Learning Pool business to a company in which any family member or person with whom we have a close personal relationship has an interest.



Q:

A contractor works in the procurement department at Learning Pool. A potential supplier is owned by the contractor's brother-in-law. The contractor does not see any issues with this situation. He and the potential supplier are not especially close, and the contractor knows it is his job to pick the best supplier possible. If that happens to be his brother-in-law's company, does it really matter?

A:

Yes. Even if the relationship is not a close one, the potential supplier is still considered a family member. That means the Learning Pool contractor must disclose this relationship to his manager. His manager can then determine if there is a conflict of interest and decide how to best navigate the situation.

Investments

Having ownership or other financial interests in one of our company's competitors, customers, or suppliers could create a divided loyalty and should be disclosed. This way, the conflict can be addressed appropriately. Investments in mutual funds or other material financial interests do not need to be disclosed. Financial interests in a competitor, customer, or supplier held by a member of your household or immediate family could be a conflict and must be disclosed.

Corporate opportunities

We also cannot personally take advantage of business or investment opportunities that we discover using company property or information. If you become aware of any business ventures, investments or other opportunities you think Learning Pool might be interested in, tell your manager. If you are personally interested in the opportunity, you should not act on it unless specifically informed that Learning Pool plans to pass it up and permits you to proceed with the opportunity.

Remember, there is no substitute for good judgment and common sense. If you are ever in doubt about a relationship, opportunity, or situation that may present a conflict of interest, speak with your manager.

Exchanging business gifts and entertainment

In the right circumstances, gifts and entertainment can foster goodwill between the company and our partners. However, if not handled carefully, the exchange of gifts and entertainment can damage our reputation. Such exchanges might also create the appearance of a conflict of interest, especially if they happen frequently, are extravagant, or give the appearance that our judgment is being clouded.

To sustain the health of our key business relationships, do not accept any gift, entertainment or travel expense that might influence – or appear to influence – your ability to make objective business decisions. Take a moment to ask your manager if you are not sure.



- gifts are usually goods or services but can be any item of value
- entertainment includes events such as meals where both the giver and the recipient attend
- travel applies to offers of transportation and lodging.



To assist in determining whether a business gift or entertainment is acceptable, ask yourself the following questions:

- Is the cost reasonable and allowable under company policy?
- Is it directly related to company business?
- Was it solicited?
- Is there any chance it could create an appearance of impropriety?
- Is the recipient a government official?

If you are offered a gift or entertainment and feel it would be impractical or harmful to refuse or return it, discuss the situation with your manager or a member of the legal department.

Be extra careful when working in countries with cultures and laws that are different from your own. If you are interacting with government officials, be sure to familiarize yourself with and follow the [Preventing Bribery & Corruption](#) section of this code.



Q:

A Learning Pool employee has made some recent connections through her son's after-school program. In fact, one of the parents she meets works for a prospective Learning Pool customer. The employee thinks that starting up a friendship would be professionally beneficial and feels like a few extra gestures could help our company win business. At one of the kids' events, she gives the prospective customer a brand-new tablet, mentioning that she gets high-end gadgets for free due to her husband's job. Has she done anything wrong?

A:

Yes. Though Learning Pool always welcomes new business, we never solicit it through inappropriate gifts. Because the employee's gift is designed to unfairly influence business decisions and is extravagant and costly – even if she is getting it for free – it could appear to be a bribe.

Preventing bribery and corruption

We are committed to carrying out business fairly, honestly and openly. This means we have a zero tolerance policy towards bribery. We never permit or authorize offering or accepting a bribe or any “item of value,” either directly or indirectly, with the intent of helping Learning Pool obtain an unfair advantage. This includes offering, providing, or accepting excessive gifts and entertainment.

Certain payments can violate anti-corruption laws or regulations in the

countries where we operate. When considering whether a payment is or might appear to be a bribe, look for red flags such as:

- requests that a service be paid in cash, in another name, or to an address in another country
- large, unexplained or vague expenses on a travel and entertainment expense report
- an agent demanding an unusually high commission for a transaction
- any agent or salesperson who says they are working directly with a government official to give our Company a contract.

Relationships with government officials and third parties

We are also responsible for the actions of third parties working on our behalf. The way that they interact with government officials when representing Learning Pool is just as important as the way we ourselves carry out these interactions. Before retaining a third party to do work for us, be sure you have followed all applicable due diligence processes and be certain that the third party is an appropriate business partner for Learning Pool.

If you suspect something’s not right – even if you don’t have absolute proof of wrongdoing – we encourage you to raise your concerns with your manager, HR, compliance, or legal.



To learn more, please review Learning Pool’s [Anti-Bribery and Anti-Corruption Policy](#).

A government official can be a national or local government employee, a political candidate, a party official, a member of a royal family, or an employee of a government-controlled entity. If you interact with government officials on Learning Pool’s behalf, be particularly careful about offering or accepting gifts and entertainment.



Competing fairly

We believe in fair and open competition. That is why we compete vigorously to be an industry leader, and maintain high standards of integrity when doing so. When looking to gain a competitive advantage, we do so through our superior performance, reliability and quality – not through unethical or illegal business practices. We will not enter into any arrangement with competitors that is unlawful or could harm our reputation.

Competition laws are complex and compliance requirements can vary depending on the circumstance. In general, the following activities should be avoided. And when they cannot be avoided, they need to be reported to the legal department:

- Entering into anti-competitive agreements with competitors, including price fixing, bid rigging, and market allocation or segmentation.
- Exchanging competitively sensitive information with competitors. Be particularly careful at conferences and trade shows where we often spend time with our competitors in exhibit halls.
- Imposing restrictions on clients or suppliers.



If you are in a meeting with competitors and a questionable discussion begins, make it clear that you believe the discussion is inappropriate, break away from the discussion and promptly inform the legal department.

Q:

A Learning Pool employee and a few of his colleagues are attending a conference, along with some of our competitors. During lunch, a representative of a key competitor sits at the Learning Pool employee's table and starts discussing his company's upcoming bids with a few other attendees. He does not speak directly to the employee or ask any of the Learning Pool team members to do anything, but the Learning Pool employee still overhears him talking to the others. What should he do now?

A:

The employee needs to take control of the situation and speak up. Even if we are not directly participating in an anti-competitive discussion, we can still be guilty by association. The mere appearance of competitive collusion can mean serious consequences for our company and those involved – or seemingly involved. The Learning Pool employee needs to make it clear that he will not participate in this conversation, remove himself if the conversation continues, and then report the situation to the legal department to ensure it is properly documented.

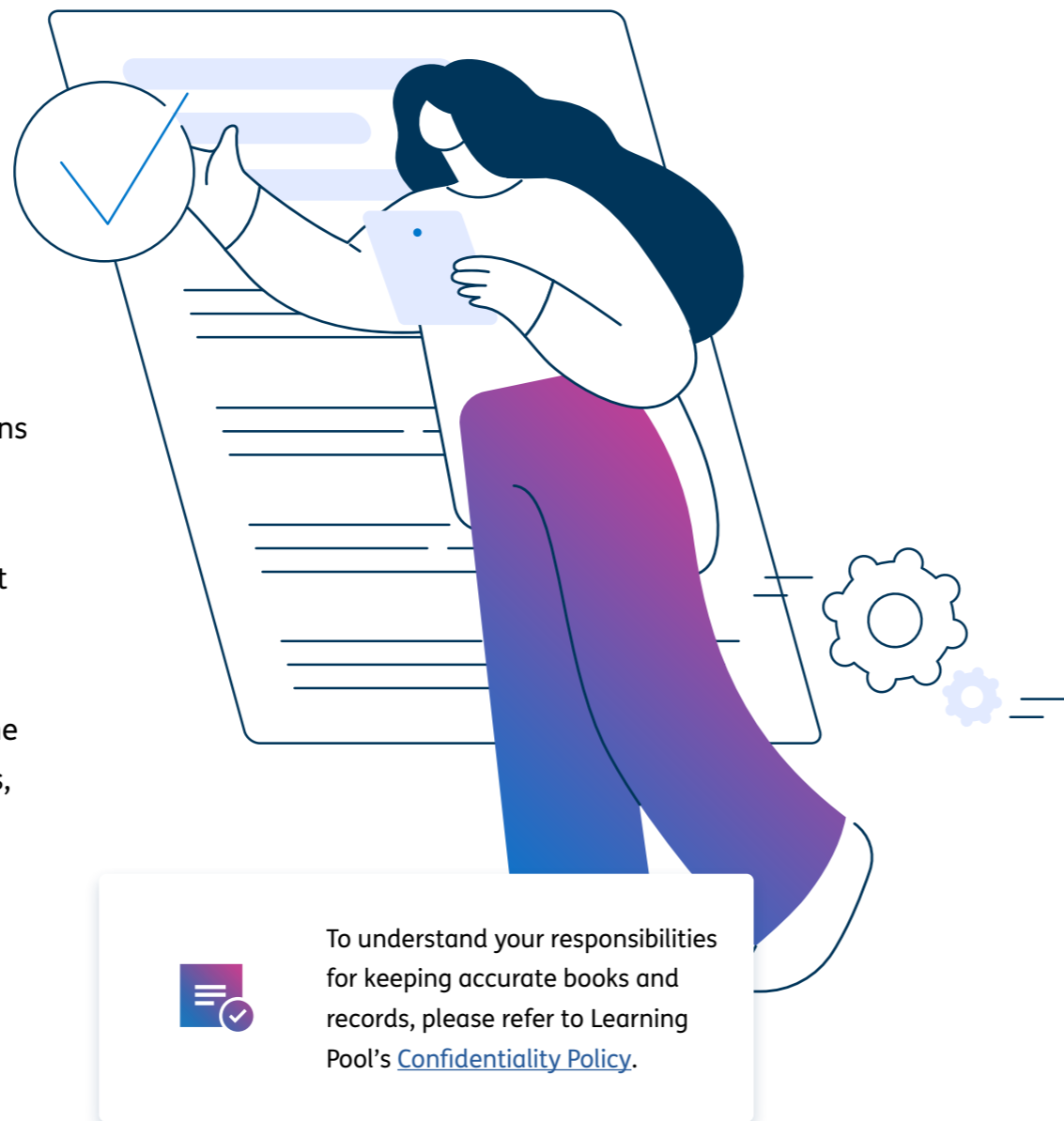


Keeping accurate books and records

Our commitment to professionalism and integrity is visible in our documentation. That is why all the records we create have to be kept accurately and in reasonable detail. We all record information of some kind, whether it is tracking work hours, expenses or sales contracts. When these are accurate, our company can make informed decisions about how to run our business and plan for the future. Our collected records, such as financial disclosures and other

filings, also help us fulfill obligations to external stakeholders. It is crucial that our accounting functions always meet the highest standards.

If you have any concerns about the accuracy of our books and records, raise them immediately.



To understand your responsibilities for keeping accurate books and records, please refer to Learning Pool's [Confidentiality Policy](#).

Safeguarding systems and technology

We all have a responsibility to safeguard our systems and networks, including our email system and intranet. A certain amount of personal use is okay, but company technology should primarily be used for business purposes. This is why, when communicating through Learning Pool networks, we must always maintain a professional tone and keep our comments appropriate.

Any time that we are using company

equipment or systems, we should not expect privacy. Learning Pool may monitor anything we create, store, send, or receive on company technology, to the extent allowed by law. We also should not create, store, or send content that others might find offensive – it is not professional and could reflect poorly on our company. Finally, we must avoid any usage that might lead to loss or damage, such as a leak of confidential company information or a breach of our IT security.



To learn more, please review Learning Pool's [Technology Policy](#).



Anti-money laundering and global business

In the United Kingdom, United States, Europe, and other places where our company conducts business, there are strict laws in place around financial crime. Such crimes include money laundering, terrorist financing, violation of sanctions laws, and bribery offences.

Learning Pool is firmly committed to conducting business in full compliance with all applicable import, export, sanctions, and anti-money laundering regulations. Sanctions laws generally impose economic and trade sanctions against particular

persons, entities, countries, and territories. These include persons and entities identified on sanctions lists maintained by various jurisdictions. You should consult with the legal department immediately if you have questions as to whether a specific entity or individual may be on a restricted list.

Failing to comply with these laws and regulations harms our reputation and may subject individuals involved or the Company to significant penalties, including imprisonment and fines. The bottom line

is: know your customers and suppliers, and verify their identities and that of any beneficial owners. Identify and escalate to your manager, Legal, or Compliance as soon as possible any unusual activity you believe may potentially be related to money laundering or terrorist-financing activity.

For more information on what you should do when engaging with our clients, prospects, and others conducting business on our behalf, see Learning Pool's Position on Global Sanctions.



We've got
your back

05 We've Got Your Back

Operating as “one company”

Our success has been built by operating as one company – one culture and team, one focus on growth and innovation, and one measure of success that focuses on serving customers and delivering value to our shareholders.

The company's priorities include identifying new challenges that our customers might be facing, and spotting new opportunities in the markets we serve. Every individual at Learning Pool is an important

member of our team, it is important that we all live up to the following principles:

- Treat each other with respect.
- Keep an open mind to new ideas and points of view.
- Value and incorporate the differences each of us brings to Learning Pool.



To learn more, please review Learning Pool's [Dignity at Work Policy](#).





All this may seem obvious, but keeping these guidelines top of mind is key to maintaining a productive workplace.

- base employment decisions on qualifications, demonstrated skills and achievements
- set the expectation with our business partners that we believe they should act in a way that is consistent with our sense of fair treatment and equal opportunity.

We believe that everyone should be treated with fairness, respect, and dignity. Learning Pool complies with all applicable laws and regulations concerning non-discriminatory employment practices. While those laws can vary by location, this generally means that we:

Our commitment to diversity and equal opportunity means that harassment and bullying are not tolerated.

We define harassment as any conduct that is related to a person’s legally protected characteristics (such as race, gender and religion.) that creates an unwelcome, intimidating, hostile or offensive work environment. Harassing behavior can be verbal, physical, written or visual. It can include offensive jokes,

comments and names; displays of offensive material; repeated pressure to participate in unwanted, offensive activity; and unwanted physical activity, such as touching, pushing, or staring. We do not tolerate any form of workplace harassment, sexual harassment, or bullying.

We are all professionals. Because of this, we might not think of ourselves as the type to harass, bully, or discriminate against our colleagues. However, our commitment to

teamwork – the commitment to act as one company with common goals – demands that we remain aware of the actions we take and how they affect those around us.

Promoting health and safety

Learning Pool prides itself in promoting the health, safety and wellbeing of our colleagues. When working, we should always be alert to health and safety risks – wherever our work environment is. This includes making sure that our performance is not impaired by alcohol or drugs, including prescription or over-the-counter medication. This applies to anyone on company premises or in any other work circumstance that may jeopardize our operations, safety, or reputation.

To help keep ourselves, each other, and

our work environment safe, it is imperative to report safety concerns and incidents immediately. All incidents, threats, or anything that has the potential to cause harm should be reported to the Learning Pool HR team, Facilities, Line Management and the building security team, where appropriate.

If you are in immediate danger while in the physical workspace, report the situation to building security/Facilities. Call [999/911] for life-threatening situations, both inside and outside of the physical workspace.

As part of our commitment to providing a safe work environment, we must never engage in or tolerate any form of violence. Violence includes threats or acts of violence, intimidation of others or attempts to instill fear in others. If you know of actual or potential workplace violence, immediately report your concerns. If you believe someone is in immediate danger, please contact building security or the local authorities.



To learn more, please review Learning Pool's [Health and Safety Policy](#).





Ensuring personal privacy

The nature of our work requires us to take the utmost care with information we see, hear, or otherwise learn. When it comes to our colleagues, customers, and others, we must always respect their privacy and the confidentiality of their personal information. If you have access to personally identifiable information (PII) of colleagues or customers, be sure to keep it safe and secure, and only use it for relevant and appropriate business purposes. Do not share it with anyone inside or outside of Learning Pool who does not have a business need for access. You should only

keep private information for as long as is necessary to accomplish the legitimate purpose for which it was collected.

PII is a broad term that covers information collected to facilitate working relationships, and can include but is not limited to the following:

- Name
- Date of birth
- Postal address
- Email address
- Telephone number
- Geolocation data
- Credit card, bank, or other account numbers
- Government-issued identification numbers (e.g., passport number or driver's license number)

Many countries have their own legal requirements governing the use of PII. Be aware of and respect global privacy laws, especially when transferring personal information outside the country of origin.

We must also take steps to prevent the accidental disclosure of customer information. Familiarize yourself with our Privacy Policy and make sure to follow established company procedures in the rare event of disclosure.

Should you have any questions or are unsure of these requirements, contact dpo@learningpool.com



To learn more, please review Learning Pool's [Privacy Policy](#).

06

Contacts and Resources

In addition to your regular reporting line, you may contact these resources for information or to seek guidance:

Learning Pool's Chief Compliance Officer: compliance@learningpool.com

Human Resources: hr@learningpool.com

Environmental, Health & Safety: ehs@learningpool.com

Learning Pool's Ethics email: accesshr@gnapartners.com

Learning Pool's Ethics helpline:

- United States and Canada: +1 346 483 8729
- United Kingdom: +44 204 571 8942

The Helpline is managed by an independent third party and is available Monday - Friday from 1:30 pm GMT/8:30 am ET to 1 am GMT/8 pm ET. Concerns can be made anonymously where allowed by local law.





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