1: Introduction

This statement is made in accordance with section 54(1) of the Modern Slavery Act 2015 and constitutes our modern slavery and human trafficking statement for the financial year ended 31 March 2024 for the Insights group of companies.

2: Structure of the organisation

Insights Group Limited ("Insights") is registered in Scotland as company number SC166543, with its registered office at Terra Nova, 3 Explorer Road, Dundee, DD2 1EG. Insights Learning & Development Limited (SC107074) is the main operational trading entity of Insights and operates globally through a number of subsidiary companies. Insights provides learning and development solutions to the business community, that are designed to train and develop employees in a range of application areas including team building, leadership development, sales effectiveness and self-development. As at 30 September 2024, we have a total of 704 staff globally, employing staff in over sixteen countries. Our main operations are located in the UK, Europe and North America. Global annual turnover of the Insights Group is £97.6 million for the year ending 31 March 2024

3. Supply Chain

We are committed to ensuring our supply chain is free from any form of slavery and human trafficking. Our supply chain is centred around the purchasing of goods and services that support the provision of services to our end user clients. This includes a range of physical materials which are predominantly manufactured in-house, or by trusted third party providers.

4: Due diligence, policies and training resources

In the past few years, we have implemented robust supplier due diligence and we continue to build on this in a bid to improving transparency in our end-to-end supply chain. We seek attestation from suppliers of the steps they take to ensure their supply chains are free from slavery and human trafficking and reserve the right to audit those suppliers we deem high risk. Our Anti-slavery and Human Trafficking Policy, embedded as part of our Global Policy Framework, reflects our top-down commitments to acting ethically and with integrity within our supply chains and more widely, across all of our business engagements. We continuously review and update all our policies to uphold these values, ensuring consistency in our approach.

In this financial year, we have implemented a refreshed Delegation of Authority ("DoA"). This DoA sets out clear parameters for engaging suppliers across our global business and where our Procurement, Legal and Information Security Teams should be engaged to undertake a rigorous review of suppliers prior to appointment. This has enabled a clearer process around supplier engagement and greater visibility of our supply chain generally. Similarly, it has introduced a structure of accountability and authority in this area.

Our Whistleblowing Policy provides the process by which any employee can report concerns about wrongdoing or breach of policy which includes any reporting on forced or compulsory labour or human trafficking. Engagement and investment in our people remain critical strands in ensuring our values and approach to combatting modern slavery permeates our culture. To ensure a satisfactory level of understanding of the risks and signs of modern slavery and human trafficking in our supply chains and our business, e-learning resources are readily available to all our people, including those involved in recruitment and procurement. Further improvements will be introduced this financial year with the introduction of a suite of compulsory compliance training for all our people via our centralised learning platform.

5: Risk and compliance

Our supply chains are relatively simple, and most of our products are manufactured in jurisdictions with relatively high labour law standards, such as the UK, Europe and the USA. We do not consider that we operate in a high-risk sector for human trafficking and modern slavery. However, we do recognise that a small portion of the physical materials we provide in connection with our services, or use as promotional items, will originate from parts of the world where there is a higher risk of human trafficking and modern slavery. If we find evidence of non-compliance with the principles of the Modern Slavery Act 2015 in relation to our suppliers, we will take action to ensure such supplier remedies non-compliance (where possible). Where remedial action is not taken, we will terminate the supplier relationship.

This statement has been approved by the Board of Insights Group Limited on behalf of its members and all group entities and is signed by:

Campbell Clark

A review of this statement will next take place by <u>30 September 2025</u>.