

Economic Crime Policy Statement

Insights Learning & Development Limited is registered in Scotland as company number SC107074, with its registered office at Terra Nova, 3 Explorer Road, Dundee, DD2 1EG. Insights has a presence in most parts of the world through all its subsidiaries (together “**Insights**”).

We are committed to high ethical standards and has zero tolerance towards corruption, financial crime and criminality (including fraud), and the giving or receiving of bribes for any purpose (“**Economic Crime**”). This type of conduct is absolutely prohibited whether committed or facilitated by employees or anyone else acting on behalf of Insights.

The purpose of this policy statement is to ensure that we continue to have high standards and clear guidance on Insight’s organisational approach addressing the risks of Economic Crime and set out our responsibilities for prevention.

1. Anti-Bribery and Corruption

Insights maintains a zero-tolerance approach to bribery and corruption in all forms. These practices undermine fair business competition, violate our core values, and constitute serious criminal offences under applicable laws including the UK Bribery Act 2010 and the U.S. Foreign Corrupt Practices Act.

In addition to setting out the obligations and guiding standards for all our employees to comply with applicable anti-corruption and anti-bribery laws and regulations, the Insights Anti-Bribery and Corruption Policy sets out and provides practical measures and guidance to help Insights employees interact properly with customers and other third parties.

The Anti-Bribery and Corruption Policy also details Insight’s approach towards the provision or receipt of gifts and hospitality. All staff are required to report such gifts and hospitality via the Gift & Hospitality Register for oversight and monitoring by the Legal & Risk team.

The Insights Anti-Bribery and Corruption Policy compliments the Code of Conduct & Ethics Policy, which sets out the expectations of all Insights staff members and any other third parties that engage with Insights, such as contractors, suppliers, agency workers, consultants, professional advisers and any subcontractors. We also conduct appropriate due diligence on third parties, including suppliers and business partners, to ensure they share our commitment to ethical business practices and comply with applicable anti-corruption laws.

All employees must report any suspected bribery or corruption incidents to their line manager, the Head of Legal & Risk or in accordance with Insight’s Whistleblowing Policy without delay. Insights provides regular training to ensure all employees understand their obligations under this policy and can identify and respond appropriately to bribery and corruption risks.

2. Anti-Facilitation of Tax Evasion

Insights take a zero-tolerance approach to the facilitation of tax evasion, whether under UK law or under the law of any foreign country.

We are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate, and to implementing and enforcing effective systems to

counter tax evasion facilitation. In addition, we take our legal responsibilities very seriously and we will uphold all laws relevant to countering tax evasion in all the jurisdictions in which we operate, including the UK Criminal Finances Act 2017, EU Anti-Tax Avoidance Directive and US internal Revenue Code.

Any concerns about any issue or suspicion of tax evasion or foreign tax evasion should be raised at the earliest possible stage in accordance with the Insights Anti-Facilitation of Tax Evasion Policy.

3. Anti-Fraud culture (External and Internal)

Insights maintains a robust fraud risk framework, which includes appropriate measures to detect and prevent fraudulent activity.

We have a zero-tolerance approach towards fraud, whether it is attempted from the outside or conducted internally, and we are committed to an effective and pro-active Anti-Fraud culture designed to:

- Encourage prevention.
- Promote detection and reporting.
- Identify a clear pathway for thorough investigation.
- Take firm action against any individual or associated person (e.g. third-party distributors, agents, consultants etc.), wherever they are located.

Where any employee suspects that a fraud has been attempted, or is being perpetrated, this must be reported immediately to their line manager, the Head of Legal & Risk or in accordance with Insight's Whistleblowing Policy as soon as possible. All cases of irregularity will be investigated and dealt with appropriately. In tandem, if applicable, Insights will work closely and collaboratively with relevant authorities.

If an investigation relates to a suspected criminal offence, the Head of Legal & Risk will need to consider (in conjunction with the Executive team, including the Chief Financial Officer) whether to inform police. If they decide that a formal police investigation is necessary, then liaison with policy will normally be via the Head of Legal & Risk.

4. Sanctions

Sanctions refer to restrictive measures imposed by governments to influence foreign governments, entities, or individuals through various actions including denying access to key resources, increasing costs of unwanted actions, and signalling international disapproval. These measures are implemented by bodies such as the United Nations ("**UN**"), the European Union ("**EU**") and individual countries including the UK through the Office of Financial Sanctions Implementation ("**OFSI**") under the Sanctions and Anti-Money Laundering Act 2018 ("**SAMLA**"), and the US through the Office of Foreign Assets Control ("**OFAC**").

Insights' Country Risk Assessment Guide sets out current high-risk and amber-risk countries, provides live monitoring resources, and establishes consultation protocols for risk assessment and management.

5. Anti-Money Laundering ("AML") & Counter-Terrorist Financing ("CTF")

Insights are committed to preventing the use of our services and systems for money laundering, terrorist financing, or other illicit financial activities. We comply with applicable AML/CTF legislation in all jurisdictions where we operate.

We must verify the identity of corporate clients, understand the nature of business relationships, and conduct enhanced due diligence for high-risk clients and jurisdictions. All employees are required to monitor for and report suspicious activities including unusual payment methods, transactions involving high-risk countries, or clients reluctant to provide standard information. We must maintain adequate records of client identification and transactions for prescribed periods, ensure staff receive regular AML/CTF training, and immediately report suspected money laundering or terrorist financing to the Head of Legal & Risk or in accordance with Insight's Whistleblowing Policy as soon as possible. These obligations operate on a risk-based approach and integrate with our existing sanctions compliance and economic crime prevention procedures.

6. Whistleblowing

The Insights Group is committed to conducting its business in a safe, honest and ethical way, and we want to encourage a culture of trust and openness where employees feel safe to speak out.

Our Whistleblowing Policy provides the process by which any employee can report concerns about wrongdoing or breach of policy which includes any reporting on economic crime.

Employees may raise any concerns with either their line manager or the Designated Whistleblowing Officer (“**DWO**”) in accordance with Insight's Whistleblowing Policy as soon as possible.

We will take all allegations seriously and investigate matters appropriately and as far as is possible confidentially. Those who raise genuinely held concerns under the Whistleblowing Policy will not be subjected to any detrimental treatment or retaliation as a result.

Insight's policies and guidelines provide a structure and roadmap to address situations. As the business and employment legislative environment change, Insights reserves the right to revise these policies. If you have any questions about this policy or if any aspect of this policy causes you difficulty on account of a disability, please contact legal@insights.com

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