

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

For the Financial Year Ending December 31, 2024

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 31 December 2024. It sets out the steps that **Epignosis UK Ltd** (hereinafter “**Epignosis**” or “the Company”) has taken during this financial year to ensure that modern slavery and human trafficking are not taking place in any part of its business or supply chains.

1. Our Business and Organizational Structure

Epignosis is committed to the prevention of modern slavery, servitude, forced labour, and human trafficking in all aspects of its operations and supply chains. We operate in the learning technology section, providing eLearning solutions including Learning Management Systems (LMS), such as TalentLMS, eFront, and TalentLibrary, to businesses, Non For Profit Organizations and educational institutions. Our business activities are conducted primarily in the United Kingdom and the European Union, with additional operations in other international markets.

Our operations involve working with a diverse range of suppliers, contractors, and partners in the UK, the European Union, and globally.

2. Our Policy on Modern Slavery and Human Trafficking

We maintain a strict Anti-Slavery and Human Trafficking Policy, which reflects our commitment to acting ethically and with integrity in all our business relationships. Key elements of our policy include:

- A zero-tolerance approach to all forms of modern slavery.
- Expectations that our employees, contractors, suppliers, and partners uphold these values.
- Proactive risk assessment and due diligence processes to monitor compliance.
- Transparent and enforceable supplier relationships.

Our policy defines modern slavery broadly, including slavery, servitude, forced or compulsory labour, and human trafficking. The policy applies to all persons working for or on behalf of Epignosis, including employees, contractors, agency workers, interns, and consultants.

The Company's Management Team has overall responsibility for this policy and its implementation. The Chief Operating Officer is primarily responsible for day-to-day implementation, including monitoring effectiveness and ensuring staff awareness and compliance.

3. Due Diligence and Risk Management

Epignosis is committed to identifying and mitigating risks of modern slavery across its operations and supply chains. Our due diligence efforts include:

- Periodic assessment of our supply chain and operational risks related to modern slavery.

- Engagement with suppliers and contractors to confirm compliance with our anti-slavery expectations.
- Where necessary, conducting audits to validate supplier practices.

Where risks are identified, we work collaboratively with partners to implement appropriate and timely remedial measures. In cases of serious breach or non-cooperation, we reserve the right to suspend or terminate the relationship.

4. Training and Awareness

To maintain a high level of understanding of modern slavery risks:

- Targeted training is provided to key employees in supply chain management, compliance, and human resources.
- Employees are informed of how to raise concerns confidentially and encouraged to report suspected violations.
- We expect our suppliers and business partners to provide similar training to their staff and uphold the same standards.

5. Effectiveness and Monitoring

To assess the effectiveness of our approach, we monitor:

- Reports of suspected modern slavery from within our operations or supply chain.
- Results of supplier audits or assessments.
- Completion of employee training on modern slavery awareness.
- Feedback from partners.

6. Reporting and Whistleblowing

Epignosis supports a culture of openness. All staff are encouraged to raise concerns about modern slavery through internal reporting channels, including their line manager, the Legal Representative or Director/s of the Company or any of Epignosis' COO, HR Director or any Compliance team member. All reports are treated confidentially, taken seriously, and acted upon promptly in accordance with our whistleblowing policy.

Any breach of our anti-slavery commitments by staff members may be dealt with under our disciplinary procedures and could result in dismissal. For suppliers or business partners, we may terminate or suspend relationships depending on the severity and response to identified issues.

7. Board Approval

This statement has been approved by the Board of Directors of Epignosis on December 19, 2025.

This statement is published on the Company's website in accordance with the requirements of section 54 of the Modern Slavery Act 2015 and will be reviewed and updated annually.

Signed,

Signed by:

Christos Mathiopoulos

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Chris Mathiopoulos

Director

Epignosis UK Ltd

Date: December 19, 2025