

# MODERN SLAVERY ACT TRANSPARENCY STATEMENT

For the financial year ended 31 December 2020

## OPENING STATEMENT FROM SENIOR MANAGEMENT

At Pluralsight and our subsidiaries (collectively, the “**Pluralsight Group**”), we are committed to ensuring that our business and supply chain reflects our values, including a respect for human rights. We are committed to improving our practices to combat modern slavery and human trafficking.

## OUR ORGANISATIONAL STRUCTURE, OUR BUSINESS, OPERATIONS AND SUPPLY CHAINS

The Pluralsight Group is a multinational technology workforce development organization that provides its customers with technology skills and engineering insights to help businesses and individuals deliver and quickly adopt new tools by building tech skills, benchmarking expertise across roles, and improving workflow efficiency using actionable data.

Pluralsight Europe Limited is the Pluralsight Group's UK subsidiary company. Pluralsight PTY Limited is the Pluralsight Group's Australian subsidiary company. Both Pluralsight Europe Limited and Pluralsight PTY Limited are wholly-owned subsidiaries of Pluralsight, LLC. The Pluralsight Group employs 2,500 people among its four regional offices in the United States, Ireland, Australia, and India and sources goods and services from the countries where Pluralsight has offices as well as utilizing services from expert technologists around the world.

Our key supply chains are made up largely of professional technology companies located primarily in the United States and the European Union that offer services via the cloud to support Pluralsight Group's operations. Pluralsight also engages a global network of technology experts to provide content and services to our customers.

## RISKS OF MODERN SLAVERY IN OUR OPERATIONS AND SUPPLY CHAINS

We are committed to identifying possible modern slavery risks in our operations and supply chains. We have considered four key factors that elevate the risk of modern slavery in our operations and supply chains:

- Sector and Industry Risks: As a technology workforce development organisation, we understand that we are not in an identified high-risk sector or industry.
- Product and Services Risks: Whilst our cloud-based services are not considered high risk for modern slavery, we understand that the electronics that underpin our services including laptops, computers, and mobile phones are high risk for modern slavery.
- Geographic Risks: Whilst the United States, Australian, and Ireland are lower risk from a geographical perspective, we understand that India is higher risk due to socio- economic factors and less robust labor laws.
- Entity Risks: The majority of our professional technology companies are leading specialist suppliers and we are not aware of any of our suppliers' non-compliance with any human rights or labor standards.

We are committed to continuously improving our approach in identifying modern slavery risks in our supply chains and operations, including by undertaking risk assessments beyond our tier one suppliers in the future.

## **OUR ACTIONS TO ASSESS AND ADDRESS MODERN SLAVERY RISKS**

### **Our policies in relation to slavery and human trafficking**

As part of Pluralsight's commitment to combatting modern slavery and human trafficking, we have implemented the following policies:

#### *A. Internal Policy*

Pluralsight is committed to upholding fundamental human rights and we believe that all human beings around the world should be treated with dignity, fairness, and respect. We will only engage suppliers and direct contractors who demonstrate a serious commitment to the health and safety of their workers and operate in compliance with human rights laws. Pluralsight does not use or condone the use of slave labor or human trafficking, denounces any degrading treatment of individuals or unsafe working condition, and supports our products being free of conflict minerals.

This statement is included in Pluralsight's Code of Business Conduct and Ethics.

#### *B. Procurement Policy*

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Pluralsight's relationships with suppliers are based on lawful, socially responsible, and fair practices. We expect our suppliers to

obey the laws and regulations that require them to treat workers fairly, and provide a safe and healthy work environment.

Pluralsight requires all vendors contractually commit to ongoing compliance with the Modern Slavery Acts of 2015 (UK) and 2018 (AU) throughout our engagement (collectively, the "Acts")

#### *C. Whistleblower Policy*

Pluralsight also has in place a whistleblowing policy which sets out the process for our employees to anonymously raise any concerns they may have in relation to compliance with our legal obligations and to ensure that there is adequate protection for employees who make protected disclosures or "blow the whistle".

#### *D. Diversity and Belonging Report*

Creating equal access to opportunity is fundamental to Pluralsight's mission to democratize technology skills. Our commitment to growing a more diverse workforce and creating a place of belonging is reflected in our Diversity and Belonging Report, which is available [here](#).

We also ensure our suppliers are aware of, and adhere to, these policies in their own business operations.

#### *Our due diligence processes*

We have taken steps to identify, assess, and monitor potential areas of risk in relation to our supply chains. Pluralsight requires that all vendors commit contractually to adherence to the Acts themselves and that they continue to do so throughout our engagement.

Pluralsight expects all contractors and suppliers, at a minimum, will comply with all applicable local laws and regulations in relation to working conditions and the treatment of workers and operate their businesses ethically - ensuring that suppliers do not utilise forced, prison, or endangered labor, or subject workers to any form of compulsion or coercion.

#### *Training*

To ensure our employees are aware of the Acts and Pluralsight's obligations under those Acts, we share this statement with employees and a copy of this statement is available on our website. We train our team members to comply with our Code of Business Conduct and Ethics, which captures our expectation with respect to human rights, and that our team members act with honesty and integrity, comply with applicable laws,

rules and regulations, and report concerns of improper actions, wrongdoing, illegal or unethical activity.

## **OUR APPROACH TO ASSESSING EFFECTIVENESS**

We are currently developing a monitoring and reporting program to evaluate the effectiveness of our actions and to assess and address modern risks in our operations and supply chains. This will include establishing processes to regularly review our actions and solicit regular feedback and engagement among key areas in Pluralsight.

## **LOOKING FORWARD**

Following a review of the effectiveness of the steps we have taken this year to ensure that there is no modern slavery or human trafficking in our supply chains, we intend to take the following further steps to combat slavery or human trafficking:

- enhance our policies and procedures to mitigate the risk of modern slavery and human trafficking; and
- enhance our due diligence process in relation to our supply chains.

## **OUR CONSULTATION PROCESS**

Pluralsight has communicated its commitments to and actions in combatting modern slavery to the relevant entities in our operations, including entities we own and control.

We have ensured that all relevant areas of the Pluralsight Group are aware of the actions needed to identify, assess, and address modern slavery risks in our operations and supply chains.

## **OTHER INFORMATION**

### **Pluralsight One**

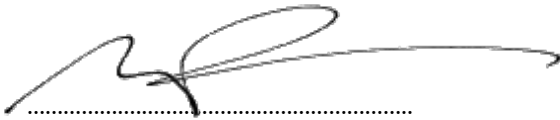
Pluralsight One is our commitment to drive significant, lasting social impact by improving equal access to technology skills and investing in catalytic solutions. In addition to offering our products to qualified nonprofit organizations, we work with the Norwegian Refugee Council, Year Up, and the Malala Fund to invest in the future of underserved, displaced, and vulnerable populations around the globe.

## APPROVAL

This statement is made for the financial year ending 31 December 2020 and pursuant to:

- section 54(1) of the UK Modern Slavery Act 2015 and constitutes Pluralsight, LLC's and its UK subsidiary Pluralsight Europe Limited's anti-slavery and human trafficking statement; and
- the requirements of the Australian Modern Slavery Act 2018 (Cth) (the "AU Act"). However, as Pluralsight is not a 'reporting entity' for the purposes of the AU Act, it has not been formally submitted to the modern slavery register under the AU Act.

This statement has been approved by and signed on behalf of the Pluralsight, LLC Chief Compliance Officer and will be reviewed and updated on an annual basis.



**Matthew Forkner**

Chief Compliance Officer

For and on behalf of Pluralsight, LLC