

Modern Slavery Act 2015 statement

For the year ended 31 December 2021

Introduction from Senior Management

MasterControl and our subsidiaries (collectively, the "MasterControl Group") 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 MasterControl Group is a multinational compliance software provider for businesses in heavily regulated industries, primarily in life sciences and medical device manufacturing.

MasterControl Global Limited is the MasterControl Group's UK subsidiary company. MasterControl PTY LTD is the Pluralsight Group's Australian subsidiary company. Both MasterControl Global Limited and MasterControl PTY LTD are wholly-owned subsidiaries of MasterControl, Inc. The MasterControl Group employs 650 people among its offices in the United States, the United Kingdom, Japan, Australia, and Singapore, and sources goods and services from the countries where MasterControl has offices.

Our key supply chains are made up largely of professional technology companies located primarily in the United States, the UK, and the European Union that offer services via the cloud to support the MasterControl Group's operations.

Our policies on slavery and human trafficking

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. Our Modern Slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our 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 compliance software service provider, we understand that we are not in an identified high-risk sector or industry.
- Product and Services Risks: Although our cloud-based services are not considered high risk for modern slavery, we understand that the electronics that are utilized in our services, including laptops, computers, and mobile phones, are produced in industries that are high risk for modern slavery.



- Geographic Risks: We understand that the United States, Australia, and the UK are lower risk from a geographical perspective. We also understand that that Singapore is in a region that is higher risk due to conflict issues or poor governance of certain surrounding countries.
- Entity Risks: The majority of our professional technology suppliers are leading specialist companies, and we are not aware of any of our suppliers' non-compliance with any human rights or labor standards.

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

Due diligence processes for slavery and human trafficking

As part of our initiative to identify and mitigate modern slaver risks, we have taken the following actions:

A. Internal Policy

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labor, and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. MasterControl is committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

We are committed to transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under applicable laws and regulations in the jurisdictions in which we operate, including the UK Modern Slavery Act 2015 and the Australian Modern Slavery Act 2018 (the "Acts"). We expect the same commitment from our contractors, suppliers and other business partners, and as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

This statement is included in our internal Anti-Slavery Policy.

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. Our relationships with our 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 to provide a safe and healthy work environment.

C. Complaint Policy



We have in place a compliant reporting policy that sets out the process for our employees to raise any concerns they may have in relation to compliance with our legal obligations.

Due Diligence Processes

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

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

Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to our staff.

Approval

This statement is made pursuant to:

- Section 54(1) of the UK Modern Slavery Act 2015 and constitutes MasterControl, Inc.'s and its UK subsidiary, MasterControl Global Limited's, anti-slavery and human trafficking statement; and
- the requirements of the Australian Modern Slavery Act 2018 (the "AU Act"). However, as MasterControl is not a 'reporting entity' for 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 and signed on behalf of MasterControl, Inc. and will be reviewed and updated on an annual basis.

Matthew Tenney

Matthew Tenney

General Counsel

For and on behalf of MasterControl, Inc.