udemy

Statement Against Modern Slavery

for the fiscal year ended December 31, 2024

Introduction

This modern slavery statement is made by Udemy, Inc. and its subsidiaries for the fiscal year ended December 31, 2024 to comply with applicable law, including the *Modern Slavery Act 2015* in the United Kingdom and the *Modern Slavery Act 2018* in Australia.

Our Business and Supply Chain

We are a global learning company whose online, software-as-a-service (SaaS) platform empowers organizations and individuals with flexible and effective skill acquisition, development, and validation. Udemy's learning marketplace enables tens of thousands of instructors to develop, distribute, and enhance content that reaches a global audience of millions of learners.

Udemy operates in the education technology sector, which is not typically considered to be a high-risk industry for modern slavery practices. Nevertheless, we believe it is essential to be vigilant, to implement robust measures to identify and mitigate against any potential risk, and to be committed to ensuring fair, safe and inclusive working rights and conditions for our employees.

Our instructors, who provide educational content for our platform, represent a significant portion of our supply chain. Instructors can join our platform by agreeing to our terms and conditions, including our Instructor Terms, and may choose to offer free or paid courses. If instructor content is included in our Udemy Business offering, instructors also have an opportunity to participate in our instructor revenue sharing program. We also engage resellers and other commercial partners for certain sales and marketing efforts. Otherwise, our supply chain consists primarily of web hosting, software and related services, and professional services (e.g. accounting, legal, customer service, and other consultants).

Additional information about our business operations and structure can be found in the quarterly and annual reports we file with the U.S. Securities and Exchange Commission, copies of which can be accessed at investors.udemy.com/financial-information/sec-filings.

Our Policies

We are committed to ensuring that modern slavery is not taking place anywhere within our organization or in any of our supply chains. Our relevant policies include:

- Our ***Code of Conduct***, which provides guidance to our employees, board members, and other service providers on the policies, laws, and regulations they are expected to follow. Our Code of Conduct specifically prohibits the use of modern slavery and human trafficking in our operations and supply chain. We may terminate our relationship with a service provider that does not comply with our Code of Conduct.
- Our ***Supplier Code of Conduct***, which helps ensure that our vendors meet certain minimum standards of behavior and conduct. Our Supplier Code of Conduct requires all of our suppliers to comply with all

applicable laws and prohibits the use of involuntary labor. We do not use any suppliers that engage in slavery or other forced labor, and we would terminate our relationship with any suppliers that do.
- Our ***Whistleblower Policy***, which provides a framework for our employees to report behavior that is illegal, inappropriate, or inconsistent with our Code of Conduct. We provide an anonymous hotline for reporting of potential violations, and we strictly prohibit retaliation against whistleblowers.

Our legal team, assisted by our procurement team, is responsible for monitoring and enforcing compliance with our policies against modern slavery.

Training

We provide general training to our employees regarding our Code of Conduct on an at least annual basis. This training also addresses how to anonymously report behavior that is illegal, inappropriate, or inconsistent with our Code of Conduct pursuant to our Whistleblower Policy.

Due Diligence

We subject all of our suppliers to a due diligence process through our legal and procurement teams. We use a risk-based approach to identify suppliers for enhanced due diligence by assessing the risks associated with third party suppliers, their employees, and executives. We also incorporate protections into all of our supplier contracts by requiring suppliers to comply with our Supplier Code of Conduct and to comply with all applicable laws and regulations.

Risk Assessment

We believe that the risk of modern slavery in our business and supply chain is limited:

- We do not manufacture or produce tangible products. We operate an online platform through which educational content is delivered to learners electronically.
- We directly employ or contract with most of our service providers.
- The principal components of our supply chain consist of activities with a low risk of slavery or other involuntary labor.
- Our suppliers are primarily concentrated in jurisdictions with low prevalence of slavery or involuntary labor, such as the United States.

Performance Indicators

We have a comprehensive Code of Conduct and a set of policies and procedures to address modern slavery, as discussed above, and are implementing performance indicators in 2025 to assess their effectiveness against modern slavery. We have not discovered any evidence or allegations relating to slavery or other involuntary labor within our business or any part of our supply chain.

Next Steps

We are committed to continuously improving our processes and procedures to ensure our measures against modern slavery are relevant and effective. As such, during the fiscal year ended December 31, 2025, we intend to:

- develop a set of key performance indicators to better evaluate our progress against modern slavery risks;
- raising awareness of modern slavery risks; and
- further improve our procurement and vendor due diligence processes.

Approvals and Consultation Process

A cross-functional team of representatives from our legal and procurement teams are responsible for preparing this statement and consulting with relevant stakeholders across Udemy, Inc. and its subsidiaries, including Udemy Australia Pty Ltd (ACN 651 352 215) and Udemy UK Limited (registration no. 14121045).

This statement was approved by the Board of Directors of Udemy, Inc. on May 29, 2025.

/s/ Hugo Sarrazin
Hugo Sarrazin
President, CEO, and Director
Udemy, Inc.