

Environmental, Social and Corporate Governance

Report 2024





Contents

Qoria ESG Report 2024	4
Reporting standards	4
ESG Goals & Highlights	5
Impact	6
Our reach	7
Our impact	8
Environment	9
Major Initiative - 2024 Data Hosting Consolidation	10
Social	11
Working at Qoria - Culture & Careers	12
Talent attraction and retention	13
Diversity, equity and inclusion	16
Governance	19
Corporate governance	19
Information security	21
Data protection & privacy	23
Ethical practices in technology	25



Qoria's mission is to make an impact; to save and better children's lives; to empower parents; to deliver for tomorrow's educators and to be a global influencer in online safety and wellbeing; to deliver for our staff their best ever employment experience, doing good work, with great people and the opportunity for growth, rewards and a career; and to deliver returns for our investors.

Embedded in our mission are the fundamental goals of ESG.

Today, Qoria's solutions keep more than 24 million children safe each day. We support more than 29 thousand schools and six million parents with solutions for safety, wellbeing and security. We service more than 100 countries throughout nine office locations globally.

Our remarkable staff are engaged and passionate about what we do. In our view, we are without question one of the most dynamic and diverse teams dedicated to student safety and wellbeing in the world.

Our ESG goals are simple. We seek to:

- → Be the world's most impactful online safety and student wellbeing provider
- → Minimise the environmental impact of our products and services
- → Create a high performing and highly engaged workforce
- → Ensure all our stakeholders have trust in us and trust in what we do.

I am proud and humbled by the work we do and by the passion and commitment of our team.

None of us is as powerful as all of us.

Tim Levy

Managing Director and Founder



Qoria ESG Report 2024

The digital world, of which Qoria is a part, is moving at an increasingly fast pace. With this comes greater risks in cybersecurity and data privacy, two key elements of global ESG frameworks. Qoria's business, products and services have ESG at their heart.

This annual sustainability report aims to increase transparency and communicate the impacts we make as a company. By better understanding, managing and disclosing our impacts, we can enhance decision-making, reduce risks, identify business opportunities and strengthen stakeholder relationships.

This report outlines the results of this work. It identifies Qoria's key stakeholders, sets out what ESG topics are material to Qoria and establishes an initial suite of measures for driving ongoing action. The success of our business relies on strong, effective and long-lasting relationships with our stakeholders.

Students	Parents	Teachers	Customers
Employees	Vendors	Industry groups	Government
Investors	Regulators	Infuencers	Financiers

A materiality assessment was completed with reference to the Global Reporting Initiative ("GRI") Standards and was approved by Qoria's Senior Leadership Team. Our materiality process will continue to evolve as we review and improve our practices.

Environment	Social	Governance
Emissions & Energy	Working, Culture & Careers	Corporate Governance
Consumption in Data & Hosting	Talent Attraction & Retention	Information Security
	Diversity & Inclusivity	Data Protection & Privacy
		Ethical Practices in Technology
		Product Performance

Reporting standards





For the purposes of this report, Qoria has drawn on disclosure guidance from two leading global standards: Global Reporting Initiative (GRI) standards and the SASB standards, along with peers and common industry disclosures. This report incorporates the GRI principles of organisational context, structure and materiality assessment and prioritisation. As our ESG capacity matures, we will expand disclosures across our environmental social and governance impact areas.

We recognise that pursuing common global frameworks empowers the global community to work towards common goals. As such, we see ourselves as contributing to the following United Nations Sustainable Development Goals (SDGs):

SDG 3 - Good health and wellbeing

SDG 4 - Quality education

SDG 5 - Commitment to gender equality

SDG 8 - Decent work and economic growth

SDG 9 - Industry, innovation and infrastructure

SDG 10 - Reduce inequalities

SDG 13 - Climate action



ESG Goals & Highlights

Environmental				
Minimise the environmental impact of our products and services	157.80 tCO ₂ -e estimated identifiable Scope 3 emissions			
Social				
Create a high performing and highly engaged workforce	76% of staff are highly engaged	36% of staff are female	35% of leaders are female	
Be the world's most impactful online safety & student wellbeing provider	24 million children protected	6 million parents served	100+ countries served Every 3 minutes our solutions found a child suspected at being at risk	
Governance				
Ensure all of our stakeholders can have trust in us and what we do	Ethics in technology Ethical Framework governs development of solutions and services		Data protection Compliant with the most stringent global rules. Established Data Protection Officer; overseen by the Managing Director.	
	Governance Strong Governance and Ethical Guidelines overseen by the Board Security posture Use the NIST program & risk management to guide our security investments.			



Impact

We seek to be the most impactful digital safety and student wellbeing provider globally.





Our reach

We have global reach and local presence. It's an important balance. It allows us to maximise the availability of our solutions whilst meeting the unique needs of the schools and communities we serve.



Locations

10

office locations across three continents house our passionate and engaged team Employees

500+

work hand in hand, across multiple disciplines to keep children safer.

Countries

100+

have safer children as a result of our technologies



Our impact

24 million

children worldwide (and growing) are safer in their digital lives thanks to Qoria. That's almost equivalent to the entire population of Australia.*

Every 18 minutes

Monitor alerted a school to a student at the highest possible risk, including to their health or life. That's 29,239 children who became vulnerable in their digital lives and who could have otherwise gone unnoticed - or noticed too late.*

July 2023 - June 2024

Qoria's Filter solutions alerted schools to 7,916,726 searches for suicide related terms, enabling staff to intervene on behalf of students potentially experiencing emotional distress or contemplating self-harm.

Every 90 minutes

a child used Pulse to reach out and ask for help. That's 5,840 vulnerable children who may not otherwise have had the courage to speak up - or as quickly.*

What our customers say:

"Before we found the Qustodio app I was constantly watching what my kids were watching, and manually monitoring their screen time daily. The app has given me peace of mind that my kids are safe online. I don't have to be watching over their shoulders."

Alison Lancaster

Parent to two children

"Because of Pulse we've been able to pick up on concerns we may not have seen otherwise. It's helping us with our early help, it's made pastoral staff's lives much easier because students are coming to them and asking for help, which is exactly what we want."

Paul Dugdale, Deputy Headteacher

Mount Carmel RC High School, UK

"In today's environment it is disastrous not to have some sort of early detection tool in place. There have been lives saved by this technology. Even one life potentially saved makes this product worth it tenfold."

Heather Brown, Director of Technology

Santa Fe Independent School District, US

^{*12} months to December 2023



Environment

We seek to minimise the environmental impact of our products & services.

Protecting our communities, customers & workforce

Qoria recognises that while climate change is a serious challenge for society at large, it also could have direct impacts on our communities, as well as our operations. This includes extreme weather, supply chain disruption, compliance with emerging climate-related regulations, policies and laws.

We have an important role to play in ensuring responsible use of energy consumption to protect our global communities.

Emissions & energy consumption in data & hosting

Qoria is investing in world leading cloud sustainability. Our most significant environmental footprint is in the cloud data and hosting services procured from third party cloud providers such as Amazon Web Service (AWS), Google Cloud Platform (GCP) and Microsoft Azure.

Qoria has an ongoing strategic partnership with GCP, which has strong sustainability and environmental credentials. Google has set ambitious targets to achieve net-zero emissions across their operations and value chain by 2030 and reduce 50% of combined Scope 1, 2 (market-based), and 3 absolute emissions (compared to their 2019 base year) by 2030. Google also plans to invest in nature-based and technology-based carbon removal solutions to neutralise remaining emissions.

Qoria continues to actively migrate workloads out of other cloud platforms and into GCP, and by doing so, we are improving our emissions visibility and ensuring that our workloads are taking advantage of Google's world leading emissions reduction targets.

Ben Trigger

Chief Technology Officer and Founder



Major Initiative - 2024

Data Hosting Consolidation

Over the last year Qoria has continued to grow into our key markets and expand our product capabilities. While this has taken place, internal consolidation of services has continued, contributing to reductions to our actual carbon emissions across most of our cloud platforms.

These changes resulted in a significant decrease in the amount of CO² emitted. During the period, our providers reported to us, in relation to our services, the following:

- A 68% decrease in AWS's Scope 1 and 2 carbon emissions related to our workloads
- An 8% decrease in GCP's Scope 1 carbon emissions related to our workloads
- A 34% decrease in GCP's Scope 2 carbon emissions related to our workloads

These providers are the key data and hosting suppliers for our core services. As their emissions are indirectly controlled by Qoria, they represent Scope 3 emissions to Qoria.

Measures	Unit	FY2023	FY2024
Estimated identifiable Scope 3 GHG emissions ¹	(tCO ₂ -e)	243.26	157.80
Percentage of energy sourced from grid	%	100	100

As Qoria is currently classified as a "Group 3" entity for the purpose of climate reporting and it is not a registered reporter under the National Greenhouse and Energy Reporting (NGER) Scheme, we will only be required to make climate-related disclosures beginning from the financial year ended 30 June 2028.

As such, the above disclosures are included on a voluntary basis and reflect Qoria's commitment to begin evaluating the environmental impact of its core service offerings in preparation for its future reporting obligations.

¹ Estimated identifiable Scope 3 GHG emissions represent only the Scope 1 and Scope 2 emissions reported to us by our key data & hosting providers (GCP, AWS and Azure). FY2023 emissions have been restated in order to align with this methodology.



Social

We're fostering a culture of collaboration, innovation, and impact.

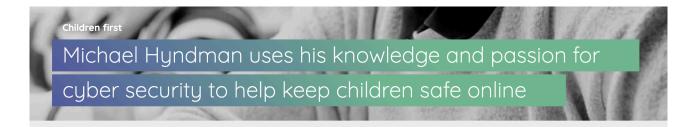
We recognise that our greatest strength lies in the diverse talents and the shared values and passion of our workforce.

Our commitment to fostering an environment of inclusivity and innovation enables us to not only excel in our industry but also make a lasting difference in the lives of children across the globe. Through strategic investment in our people, we cultivate leadership, enhance wellbeing, and drive continuous learning - all with the goal of building a resilient, empowered team.

None of us is as powerful as all of us, and together, we are more than colleagues. We are a dedicated team united by a shared purpose, driven to leave a positive imprint on the world, one child at a time.

Nadine Leary

Chief People Officer



All his life, Michael Hyndman has held an insatiable curiosity for technology. While working as an ethical hacker, Michael saw both the incredible possibilities and potential risks the Internet poses to young people. Today, as our Chief Information Security Officer, he is guided by his dedication to upholding children's safety. His inspiration? His four children.





Working at Qoria Culture & Careers

We aim to provide our staff with their best-ever employment experience.

Our culture is what gives Qoria strength. We employ passionate and skilled individuals who never think twice before supporting a colleague or going the extra mile for a customer or child in need.

Our culture is expressed in a set of values developed from the ground-up. We embed our values into all of our employment programs.

Care, always.

We remember the importance of what we do. We don't just turn up; we show up with integrity and will not give up until:

- \ The job is done
- \ The customer is happy
- The teammate is supported
- \ The child is protected

We own what we do and we stand behind it.

Learn. Solve. Repeat.

We're curious and we start with questions.

We're open to new ideas, to taking risks, and to learning from our mistakes.

We want to be challenged in an ongoing pursuit of excellence.

Win together.

We want others to win. So we support, challenge and champion them.

We play our own part, with the team, customers and community front of mind.

We're transparent and we communicate openly.

We trust and believe in each other. So we ask for help, and we get it.



Talent attraction and retention



Adam Lee lives and breathes sales. As our VP Sales, West and Business Development, Adam spends his days coaching our representatives and showcasing our products to potential customers. Motivated to make a lasting impact through his career, Adam says he's never felt more at home than he does at Qoria.



Make an impact. A career with purpose

Our solutions change, enhance and save the lives of children every single day. And that can only happen when the world's most talented and determined people work together to make it so.

Whilst we are a relatively new company we have purposely developed a progressive suite of programs to enhance the employment experience and make Qoria an employment destination.

Employee engagement

Employee engagement is a key driver of our organisational success, reflecting the enthusiasm and connection our employees have with their roles and the company. Research consistently shows that strong employee engagement directly correlates with higher business productivity, improved work quality, and better staff retention.

In 2024, Qoria conducted its annual staff engagement survey, supported by a biannual "pulse" survey. These surveys help track engagement levels and highlight specific areas for improvement. We utilise a specialist third-party tool to run these programs, ensuring our progress is benchmarked against relevant industry peers and best practices.

86%

of employees are aligned with our values

76%

of responding employees are highly engaged

Qoria Limited 2024 staff engagement survey results.



Career development

Qoria is committed to fostering career growth and development for all employees. We conduct biannual performance evaluations alongside regular one-on-one coaching sessions, achieving near 100% participation. These initiatives are designed to enhance job performance, improve engagement, and identify pathways for career progression, skill development, and personal achievement. Through these programs, we aim to empower our employees to grow and succeed within the organisation.

Competitive compensation

Qoria is committed to offering market-competitive compensation packages that include salary, benefits, and incentives. We leverage a specialist third-party platform, to ensure our compensation decisions are transparent, data-driven, and aligned with global market standards.

Our Employee Share Scheme (ESS) is a cornerstone of Qoria's commitment to fostering ownership and long-term engagement. By offering shares to employees, we empower them to take an active role in the company's success and align their personal growth with the broader impact we aim to achieve as an organisation. Participation in the ESS program is close to 100%, demonstrating a strong alignment between our employees' goals and Qoria's long-term vision.

Learning, development and leadership

Empowering our employees to shine and excel is at the heart of our mission. We understand that when our team members thrive and find fulfilment in their roles, they go the extra mile to support our customers and drive positive outcomes for our company. That's why each year, we focus on providing opportunities and resources for our employees' personal and professional growth.

Leaders establish learning and development plans for all staff so they take advantage of our learning and development allowance scheme to enable professional development and career progression.

We place high value on our leaders and their development. We support them through various global initiatives, such as team health checks to enhance their people management skills. Our leaders have access to free management and people-leading courses via our performance and engagement platform. Additionally, they can tap into a wealth of tools, resources, company-lead training, a manager toolkit, and learning opportunities to embody our values effectively.

Our commitment to leadership development is reflected in our successful increases in staff engagement scores across executive leadership, senior leadership.

Due to the self-directed nature of the programs, currently participation in learning and development is not tracked.

Flexible work arrangements

To support work-life balance, we offer flexible work schedules (hybrid first and remote-friendly). 87% of all staff agree that we offer a great work-life blend.

Internal mobility

We are committed to fostering internal mobility as a key driver of career development. We believe in providing opportunities for employees to explore new roles and departments within the company,



encouraging growth from within. This not only supports personal development but also strengthens our teams with diverse skill sets and experiences, it allows employees to advance their careers while contributing to new areas of the business.

Internship and apprenticeship programs

Qoria partners with external educational providers to offer practical career development opportunities through internships and apprenticeships. These programs provide students and graduates with real-world experience in our industry, preparing them for future careers. In the UK, we support apprentices through the UK Government Apprenticeship Program.

Employee referral program

We reward our current employees for identifying and recruiting potential candidates, recognising that our staff's networks can introduce us to exceptional talent, enhancing not only our workforce but also our long-term success and community impact (24% of all hires are referrals).

Inclusive hiring practices

We are committed to building a diverse and inclusive workforce that reflects the global communities we serve. This year we formalised our diversity, equity and inclusion policy and our overarching hiring strategy is guided by the principles of equal opportunity and fairness for all candidates.

Employee wellbeing

Our ongoing commitment to employee wellbeing is integral to our mission of creating an agile, inclusive, and sustainable workplace. Our approach to wellbeing is multi-faceted, grounded in data from regular surveys and one-on-one feedback, ensuring our offerings meet the evolving needs of our team. Our health initiatives are aimed at enhancing physical wellbeing. This includes fitness challenges and healthy office nutrition, empowering our team to prioritise their physical health.

Understanding the importance of mental health in overall wellbeing, we have an Employee Assistance Program (EAP) available for all staff globally. The EAP offers a range of resources for stress and anxiety management. Staff, particularly those that are exposed to harmful material, have access to additional counselling and support services.

Recognising the critical role mental health plays in overall wellness, our Employee Assistance Program (EAP) is available globally, offering resources for managing stress and anxiety. For employees exposed to sensitive material, we provide additional counselling and support services.

Community is at the heart of our culture. Through cultural and milestone celebrations, we create an environment where everyone feels a strong sense of belonging and engagement. Our wellbeing offerings adapt regionally to meet the unique needs and challenges faced by our diverse team across various geographies.

Measures	Unit	FY2023	FY2024
Staff participation in engagement surveys	%	87%	88%
Engagement survey score	%	76%	76%
Staff with access to wellbeing programs	%	100%	100%
Staff with access to help services	%	100%	100%



Diversity, equity and inclusion



As a teacher, Katherine Howard witnessed the early stages of digital technology and its impact on student learning. Since then, tech capabilities have skyrocketed, transforming the way we live, work and learn. Katherine is a strong advocate of digital tech in a child's learning. But she also knows that without boundaries, the risks are significant. Our Training Lead ensures children's safe use of tech while accelerating her career with people who care.



Cultivating a positive, inclusive culture

At Qoria, we are proud to be a global organisation. Our 10 offices, across three continents employ individuals from a wide range of nationalities, ethnicities, and perspectives. Our commitment to diversity is evident, with one of the most diverse workforces in the digital safety and student sectors.

We passionately believe that our diversity is a strength - one that must be nurtured through a positive, inclusive, and supportive culture. Pleasingly, 88% of our staff feel they make a positive difference.

We are driven by the belief that diversity and inclusion are key to fostering innovation and ensuring that our products remain relevant to the communities we serve. Our values of equity and inclusion extend to every level of the organisation, from our daily operations to the strategic goals set by our leadership.

Social equity and inclusion

Our Board has committed to the 40/40 gender balance initiative, aiming for 40% women, 40% men, and 20% discretionary representation. We are pleased to report that we are currently tracking at 36% female staff, reflecting steady focus on this target.



Key Diversity, Equity and Inclusion metrics

Measures	Unit	FY2023	FY2024
% of our staff are based outside of Australia	%	66%	67%
% of our leaders are held by individuals outside of Australia	%	60%	64%
% of our workforce who are female	%	36%	36%
% of leadership roles held by women	%	33%	35%
% of female Directors on the Board	%	17%	17%
% of new hires that are female	%	36%	43%
% of staff in full time employment	%	93%	89%
% of staff <36 years of age	%	54%	53%
% of staff 36-55 years of age	%	44%	44%
% of staff 55+ years of age	%	2%	3%

Respect@Qoria

At the heart of our commitments to Diversity, Equity & Inclusion are our new Respect@Qoria initiatives.

Respect@Qoria is a new series of initiatives designed to help employees recognise what respect looks like in the workplace, understand what that means for each of us, and help us strengthen our culture by ensuring it is safe and inclusive for all.

Our Respect@Qoria initiative is central to creating a culture of inclusion and respect. It ensures that all employees, regardless of background or role, feel valued, heard, and supported. The initiative focuses on fostering a positive and inclusive environment where every team member is empowered to contribute meaningfully to the organisation and is treated with dignity.

Key elements of Respect@Qoria:

- **Training and development:** Continuous respect training for all staff, with a focus on creating safe and inclusive environments.
- **Leadership commitment:** Managers and leaders receive targeted training to proactively promote respect and handle issues of inclusion.
- Feedback and accountability: Employees are encouraged to provide feedback on workplace culture through anonymous channels, ensuring that concerns related to respect and inclusion are addressed promptly.

By fostering respect in every aspect of our work, we strengthen our ability to create a supportive environment where diversity thrives, and every voice is valued.



Key Respect@Qoria metrics

Measures	Unit	FY2024
% of staff feel respected at Qoria	%	89%
% of staff treat each other with integrity and respect	%	95%
% of staff feels their manager genuinely supports equality among all genders	%	93%

Whistleblower policy

Ensuring ethical conduct and transparency, Qoria's whistleblower policy provides a secure and anonymous mechanism for employees and partners to report any ethical or policy violations.

Since the 2023 upgrade, this system continues to ensure that concerns are raised confidentially, reaffirming our commitment to maintaining the highest standards of ethical conduct and transparency. Regular reviews and updates ensure the policy remains robust and responsive to the needs of our global workforce.

Parental leave

Supporting work-life balance for all employees, Qoria is dedicated to supporting the wellbeing of its employees through enhanced parental leave policies that go beyond the standard legal requirements.

Our policies include both paid and unpaid maternity and paternity leave, ensuring that employees have the flexibility and support they need to balance work and family responsibilities. We are committed to providing a workplace that values and respects the needs of all parents.

Our enhanced parental leave options are designed to provide additional support and flexibility, empowering employees to navigate parenthood while maintaining their careers.



Governance

We seek to ensure all of our stakeholders can have trust in us and what we do.

Qoria services are entirely focussed on supporting and protecting children. We are committed to ensuring our customers and all stakeholders can have trust in us and in what we do. This includes matters of ensuring the security of the data entrusted to us and that we exercise good judgement when dealing with the ethical matters touched by our product areas.

We embed trust in our practices through strong and effective governance structures, educational programs and a commitment to an ethical culture. The Board is responsible for the Group's ESG reporting and outcomes.

Tim Levy

Managing Director and Founder

Corporate governance

A key pillar in establishing trust is our framework for Corporate Governance. It represents the structure of rules, practices, and processes used to direct and manage the company.

Board of directors



Independent Non-Executive



Managing Director



Independent Non-Executive Director
Independent Non-Executive Director





Non-Executive Director



Independent Non-Executive Director



Our Corporate Governance Framework is overseen by the Board and is based on the ASX Corporate Governance principles:

- **Board leadership and accountability.** The board of directors is responsible for the overall governance of the entity and must exercise its powers in the best interests of shareholders.
- **Board composition and structure.** The board should be composed of a balance of skills and experience, and should have a diversity of views.
- **Board processes and performance.** The board should have effective processes in place to discharge its duties, and should regularly review its own performance.
- **Remuneration and nomination committees.** The board should establish separate remuneration and nomination committees where appropriate to oversee these important areas.
- **Risk oversight.** The board should ensure that the entity has effective risk oversight processes in place.
- **Internal controls and compliance.** The board should ensure that the entity has effective internal controls and compliance procedures in place.
- **Engagement with shareholders.** The board should engage with shareholders in a timely and transparent manner.

Our Corporate Governance policies are set out on the Qoria website and include:

- Board Charter
- Code of Conduct
- Audit & Risk Committee Charter
- Remuneration Committee Charter
- Nomination Committee Charter
- Disclosure Performance Evaluation
- Disclosure Continuous Disclosure Policy
- Disclosure Risk Management
- Securities Trading Policy
- Diversity, Equity & Inclusion Policy
- Shareholder Communications Strategy
- Procedures for Appointment and Selection of Directors
- Whistleblower Policy
- Anti-Bribery and Anti-Corruption Policy

Ben Jenkins

Chief Financial Officer



Information security

Qoria's technology platforms now service in excess of 24 million students and 29 thousand schools across the globe. Most of our education clients are in the public sector with procurement processes governed by modern and rigid requirements for security and data protection.

Security is fundamental to our business and values. We understand that a breach or exposure of student data could have devastating consequences on an individual, a school and our business. To address this, we have established a world-class team to ensure our security capability is industry grade.

Security governance and investment

Security is a meaningful and purposeful investment in our business and products. We employ dedicated security teams, work with a range of external security partners and invest in a range of security controls to actively protect and defend our employees, enterprise, cloud environments and applications.

The Chief Information Security Officer is responsible for defining and delivering the security and data privacy strategy for the organisation. Reporting into the Chief Information Security Officer are the data protection and privacy, product security, enterprise security and security assurance teams. The teams consist of experts in application security, cloud security, penetration testing, data privacy, infrastructure security and operational security.

Throughout the year, the Chief Information Security Officer reports on key security performance indicators to the Executive Leadership Team, the Qoria Risk and Audit Committee, and the Qoria Board of Non Executive Directors on the state of security. The Director of Data Privacy & Protection also reports on the state of privacy to the Global Data Privacy Committee on a quarterly basis.

Industry standards and external audits

Our security strategy is driven by our internal NIST (The National Institute of Standards and Technology) Cyber Security Framework which ensures that we take both an industry standard and risk-based approach to strategic and tactical investments in security. Our products are also audited externally against either ISO 27001 framework or the SOC 2 security criteria, demonstrating that our product and organisational security satisfies external scrutiny on an ongoing basis.





Threat aware

Security compliance and external audits are not enough. Security strategy needs to be eyes open to the threat landscape and able to identify and harden against contemporary and emerging threats. Qoria works with its partners to perform cyber threat assessment to understand the key threats we face, allowing us to build our security strategy with those key threats in mind.



Security by design

Our products are designed to be secure from the outset. Our product development life cycle has security checks built-in from the beginning and our security team is engaged upfront in all product initiatives. Throughout the development of initiatives, threat modelling, technical assessment and privacy reviews take place which allow us to identify and manage threats, vulnerabilities and risks.

Ongoing testing, scanning and monitoring

We actively identify and manage vulnerabilities across our stack. Our products undergo regular scanning across our code, cloud systems and external assets and we routinely perform penetration testing on all our products to identify security vulnerabilities that need to be managed. Our Vulnerability Management Policy sets the standard for how these should be discovered and remediated across the business.

We actively monitor for security events throughout our environments. We have a security operations centre and industry leading endpoint detection and response to monitor for threats across our cloud environments and endpoints.

To ensure that our cyber incident response capability is effective, we have a documented Incident Response Plan and we perform annual table top training or exercises for both technical and executive teams to test our incident response and crisis management preparedness.

Security training

Our staff and contractors undertake security training every year. The training covers topics such as how to identify and respond to threats such as phishing, how to secure devices and how to secure user accounts. In addition to security training, all new staff participate in face to face security briefings which are an opportunity to personally meet someone in the security team. This allows the security team to build positive personal connections with all staff across the business and set the tone for the security culture at the beginning of each employee's journey.

Michael Hyndman

Chief Information Security Officer



Data protection & privacy

Data protection & privacy are core to our offerings and our values. Protecting the privacy of the data we hold drives our decision making processes. Our practices are designed to comply with the strictest global legislation, specifically:

- → EU's General Data Protection Regulations (GDPR)
- → UK's General Data Protection Regulations (UK GDPR)
- → Australian Privacy Act and Privacy Principles
- → New Zealand Privacy Act and National Administrative Guidelines
- → USA's Children's Online Privacy Protection Act (COPPA)
- → USA's Family Educational Rights and Privacy Act (FERPA)

Our platforms hold multiple accreditations that represent the 'gold standard' for student data and privacy protections.









Data protection organisation

Data protection is imperative to our customers and fundamental to our business. We have established a world class team and processes to ensure our data practices are industry grade, and it is a core and demonstrable competency.

Data governance

Our Director of Data Protection & Privacy performs the role of Data Protection Officer (DPO) and facilitates our global Data Protection Committee, which brings together each strategic business leader on a quarterly basis to assess risks, instil privacy by design and help drive data protection initiatives. External data protection counsel and advisors are engaged regionally to ensure ongoing compliance in a dynamic global data protection landscape.

Customer agency

Privacy is about ensuring that our customers have agency over their data. In practice this means giving thorough consideration to what data is collected, why it is collected, how it is used and for how long it is kept. It also means that we are transparent about how we process data, that we secure it appropriately and that customers can access and request their data at any time.

Privacy by design

Our product development life cycle ensures that privacy is a key consideration factor in the development of each new initiative and the privacy team is engaged upfront to support this. Data



privacy, ethics and security reviews are conducted before investments are made in new product initiatives.

Policies

Our privacy policy applies globally and has been designed to meet the highest level of data protection and privacy legislation.

Children

Children are at the centre of what we do. Our privacy policy is available in a child-friendly version and our products and training are designed with both teachers and students in mind.

Brice Schwey

Director of Data Protection & Privacy

Key data protection metrics

Measures	Unit	FY2023	FY2024
Material data breaches	#	0	0
Total monetary losses as a result of legal proceedings associated with user privacy	\$	0	0



Ethical practices in technology

Qoria's mission is to help keep every child safe and thriving in their digital life. To that end, ethics cannot be an academic concern for us as our solutions impact lives. Our platforms globally capture insights that directly lead to potentially life-saving interventions, every day.

Edutech, safety tech and ethics

Ethics in safety and wellbeing technology are complex and fundamentally different to the ethical challenges of other enterprise software developers or for general technology, gaming or social media providers. The delivery of safety, wellbeing and safeguarding solutions to schools means capturing sensitive data. This must, of course, be done securely and privately. But critically, this data has an ethical dimension, as it can guide the decisions made by administrators, educators and parents in relation to the child. We must (and do) ensure our practices are sound.

Our approach to ethical technology

At the heart of our approach is our Ethical Practices Framework. It is governed by a working group of psychologists, technologists and privacy and safeguarding experts and overseen by our Managing Director.

The framework draws on peer-reviewed research and best practices related to edtech privacy, consent, and ethical standards for children. It has been embedded in our product development and feature process, and ensures a robust process for protecting student safety and wellbeing.

The aim of the framework is to ensure throughout concept, design and delivery that our solutions:

- Meet all applicable legal, regulatory and compliance standards
- Ensure our customers can similarly meet their obligations
- Put child wellbeing at the core of all of our decisions
- Respect and appropriately balance the rights and obligations of all stakeholders.

Teodora Pavkovic

Director of Wellbeing Qoria Ethics Working Group Co-chair

Contact

Tim Levy

Managing Director tim.levy@qoria.com

Ben Jenkins

Chief Financial Officer ben.jenkins@qoria.com

Qoria is a global technology company, dedicated to keeping children safe and well in their digital lives. We harness the power of connection to close the gaps that children fall through, and to seamlessly support them on all sides - at school, at home and everywhere in between.

Find out more www.qoria.com

