

The LRN Code of Conduct

Our Code of Conduct provides a guide for living our values and Leadership Framework each day. No matter our role at LRN, each of us has an important part to play.

We need the Code to provide guidance when we must make difficult decisions. The Code does not cover every situation or scenario we may face working at LRN—we will continue to rely on our values and the [Leadership Rubric](#) to help us.

Uncompromising leadership behavior is what our Code of Conduct is about. At LRN, each of us is a leader in delivering knowledge and solutions that inspire the business community to engage in sustainable and profitable commercial behaviors. As LRN colleagues, we are united by the desire to enlist and form trusted partnerships with our colleagues, clients, suppliers, and other stakeholders.

[Next: CEO message](#)



Message from LRN's CEO Bob Lemmond

LRN's Code of Conduct is one of the ways we codify our mission, philosophy, and values at LRN. It presents a vision for how we aim to operate, lead, and govern ourselves. It's also a framework for our behavior—both as individual colleagues and for the company as a whole. What is unique about LRN is that we work to elevate the behavior in our clients' workplaces while also committing to the highest standards of behavior in ourselves. What we hope you come to experience in the pages that follow is that we are not an ordinary company. We believe in something bigger than ourselves. We believe we can have a positive impact in the world by helping other people around the world do the right thing and by inspiring principled performance.



A mission and a purpose of this magnitude demand a set of values that allow us to tangibly bring that mission and purpose to life through consistent, inspired, and values-based behaviors anywhere and everywhere LRN operates. What is also unique about LRN is codes of conduct are a part of our service offering. At LRN we believe codes of conduct are important guides for employees seeking to understand their organization's culture and expectations for workplace conduct. We hope our Code guides you in how to live LRN's mission, purpose, and values. We hope it helps define how to translate our values into positive and elevated workplace behaviors. When faced with a tough decision, we hope our Code is a reference point that both informs and encourages ethical actions.

Each of us is personally responsible for bringing this Code to life through our mindsets, behaviors, actions, and decisions. A commitment to ensuring HOW we do what we do through our values of integrity, humility, passion, and truth is our expectation for every LRN colleague and it is critical to LRN's continued success. Thank you for your partnership and active participation in shaping and strengthening LRN's culture.

Bob Lemmond, CEO

Keep Reading

Purpose, Vision, Mission

[Next Section](#)

41 Madison Avenue | 30th Floor | New York, NY 10010

[LRN.com](#) 

©2026 LRN Corporation

[Speak Up](#)

Who we are

WHO WE ARE

Purpose, Vision, Mission



Purpose: Inspiring Principled
Performance.

We propel organizations forward
with the partnership, knowledge,
and tools to grow ethical business
culture.

Mission

Helping people around the world do the right thing.

Our actions and behavior change lives and livelihoods. LRN helps to build bonds and create connections that protect what matters and inspires ethical decision-making. This strengthens and enriches the communities where we work and live.

Vision

A world where we all thrive by acting on shared values.

People seek out employers, partners, customers, and brands who share and act on their core values. Together, they form communities that live those values and reinforce behaviors that make a better world for all of us.

Values and leadership attributes

LRN's core values are **integrity, humility, passion, and truth**. These are the essential elements that comprise our corporate DNA. They are the touchstones of who we wish to be, and the first points of reference when making business decisions or behavioral choices. In various combinations and applications, they are foundational to how we come together, how we approach our work, and how we embrace our mission and purpose.

The leadership attributes defined in the LRN [Leadership Rubric](#) galvanize and unify our culture and inform our conduct whether we're collaborating with colleagues or our clients. We believe enduring success is achieved through inspired, ethical leadership—regardless of tenure, job function, or position in an organizational chart. Over time, ethical leadership shapes a culture that governs itself according to shared corporate values.

Keep Reading

Who we are at the core

[Next Section](#)

41 Madison Avenue | 30th Floor | New York, NY 10010

[LRN.com](#) 

©2026 LRN Corporation

[Speak Up](#)

WHO WE ARE

Who we are at the core



Who we are at the core



▲ Integrity

Our company is built on values.

Society prospers when businesses embody strong values.

▼ Humility

▼ Passion

▼ Truth

Keep Reading

Leadership Rubric

[Next Section](#)

41 Madison Avenue | 30th Floor | New York, NY 10010

[LRN.com](#) 

©2026 LRN Corporation

[Speak Up](#)

WHO WE ARE

Leadership Rubric

What is the Leadership Rubric?

The Leadership Rubric operationalizes the leadership attributes by defining a spectrum of behaviors for guidance in leadership development. Here are the eight key leadership attributes upon which we are focused.

8 Key Leadership Attributes

Takes responsibility & seizes authority

Accepts full responsibility and accountability for one's own professional decisions and actions, or those delegated to others.

Reflective, especially about own nature

Comfortable and self-aware, which enables the ability to respond consistently to complex situations. High EQ, flexibility, and resilient in times of stress. Ability to see how one's own values, passions, and aspirations, fit with culture and have impact on others (and vice versa).

Embraces complexity & ambiguity

Handles challenges with grace and professionalism. Can recover from setbacks and adversity. Refers to core values to make principled decisions. Accepts and faces conflict as natural. Comfortable not having all the answers.

Vision & long-term outlook

Strives to achieve our long-term vision with each task laddering-up to our strategic and operational objectives with purpose.

Principled decision making

Decisions are consistently made based on principles with the long-term vision in mind.

Passionate & optimistic

Has a powerful and unlimiting belief in what is possible. Shows a positive attitude towards new and challenging demands, embraces lifelong learning. Passion and optimism fuels greater enlistment and embrace among colleagues and partners.

Inspires

Develops deep and lasting human relationships internally and externally. Always invests the time to understand and implement what and how colleagues are inspired. Inspire them to NOT to do the next thing right, but rather the next right thing.

Plans & implements

Consistently translates dreams into action by creating and following a plan and enlisting others along the way, and has proven and measurable outcomes.

Download the full Leadership Rubric

Leadership Rubric

Download

Supporting & Contrasting Rubrics

Follows	Unaware or in denial	Seeks simplicity & coherence only	Short-term outlook	Pragmatic decision making	Complicit & holds limiting beliefs
Follows explicit directions, does not take ownership.	Blindly practices learned or passed on behaviors.	Unable to perform tasks with focus, effort, integrity, grit, or resilience when the situation changes.	Task-oriented, sees time, and in a constant state of putting out fires.	Seeks to solve the immediate problem in the most convenient manner.	Is blind to questions and the way things have always been.
Complains about what is asked, but does not take ownership.	Openness to receive feedback, and an ability to change, improve.	Has difficulty putting work change into practice in a consistent way.	Needs to have objectives, which are always changing, to be successful.	Seeks to do what is best for the organization, often resulting in unintended consequences.	Does not fear of failure, mistakes, or being wrong.
Has the courage to make judgments about their own or others' actions, even when it is not popular.	An intentionality being on a path of reflection and self-improvement by seeking continual progress.	Willingness to adapt to change and uncertainty, which is not just a goal, but a mindset.	Requires efficiency and effectiveness through structure and a working to do in both thinking and the execution.	Recognizes the impact of decisions and the long-term effects of decisions on others.	Being honest of their own weaknesses to themselves, but not to others, and not being self-critical.
Has personal responsibility and accountability for their own actions and the actions of the team.	Is willing to receive feedback and act on it, and is open to change, improve, and self-improvement by seeking continual progress.	Understands complexity and can work with it, and is able to adapt to change and uncertainty, which is not just a goal, but a mindset.	Establishes a relationship of trust between objectives and outcomes and a working to do in both thinking and the execution.	Aims to design, construct, and implement the most effective and sustainable solutions.	Typically needs with passion and integrity planning for worst case scenarios.
Accountability for their own actions and the actions of the team.	Understands complexity and can work with it, and is able to adapt to change and uncertainty, which is not just a goal, but a mindset.	Understands complexity and can work with it, and is able to adapt to change and uncertainty, which is not just a goal, but a mindset.	Understands complexity and can work with it, and is able to adapt to change and uncertainty, which is not just a goal, but a mindset.	Understands complexity and can work with it, and is able to adapt to change and uncertainty, which is not just a goal, but a mindset.	Understands complexity and can work with it, and is able to adapt to change and uncertainty, which is not just a goal, but a mindset.

Keep Reading Five Dimensions

Next Section

Speak Up

How we lead

HOW WE LEAD

Five Dimensions



Our Code is organized into five dimensions of culture in which we can live our values. These dimensions guide us through ethical behavior and set forth the expectations for our colleagues as we continue our journey.

Knowledge

Use of information

Behavior

Organizational structure

Source of behavior

Reason for behavior

Responsibility for own & others' behavior

Source of authority (Who gets to decide)

Magnitude of authority

Source of regulation

Relationships

Roles and types of skills

Personal development

Level of trust

Values vs. Rules

Nature of relationships (Employees)

Nature of relationships (Customers)

Nature of relationships (Supplier/Third party)

Accountability

Rewards & recognition

Penalties & discipline

Business

Time orientation

Mission & purpose for existence

Determination & definition of significance

Attention to regulatory & legal requirements

Attention to market & public

Keep Reading

Speaking up

[Next Section](#)

41 Madison Avenue | 30th Floor | New York, NY 10010

[LRN.com](#) 

©2026 LRN Corporation

[Speak Up](#)

HOW WE LEAD

Speaking up



Whether we're sharing ideas, expressing concerns, or standing up for what we know is right, speaking up helps build principled performance within LRN. We all have a responsibility to ensure LRN's success. Our thirst to win can never trump our commitment to acting ethically, our respect for the law, or our values. We must be energetic and vigilant in upholding the standards of our Code.

If ever we witness misconduct or suspect that someone affiliated with LRN is behaving illegally or unethically, we have an obligation to speak up.

There are a number of ways to raise issues and concerns:

- Talk to your team lead
- Report violations to any member of the People & Culture team
- Report concerns to the [LRN Helpline](#)

When a matter is reported, the People & Culture team will review the report in confidence and determine the best means of responding or investigating, if needed. The People & Culture team will resolve the matter while preserving the confidentiality or anonymity of the reporting employee.

LRN does not tolerate retaliation in any form, direct or indirect, against employees raising concerns via the Helpline or any other means.



Keep Reading

Part One— Knowledge

[Next Section](#)

Knowledge

KNOWLEDGE

Part One—Knowledge



At LRN, transparency guides how we know and how we create, communicate, and use information. Transparency means readily sharing with others what we know so that we can improve our collective knowledge behavior. By acting as exemplars, we help our clients do the same:



Share Ideas

We take time to share ideas and strategies with our colleagues, our managers, our clients and prospects, and our other stakeholders.



Stay Informed

We make the effort to keep one another informed about our actions.



Manage Expectations

We communicate our vision and our program and project goals so that all team members understand what is expected of them.



Honesty

We approach our clients and prospects honestly. We share knowledge with them, knowing that not every act of sharing needs to return as commercial advantage.

Keep Reading

Getting it right— Knowledge

[Next Section](#)

KNOWLEDGE

Getting it right—Knowledge



We handle intellectual property and confidential information responsibly.

When we handle intellectual property, confidential information, and personal information, we are aware and mindful of applicable laws but are guided by a deeper commitment to our values of integrity and truth.

We accurately manage our records.

We enter accurate and truthful information in appropriately accessible systems so those who follow us can build on our accomplishments and help correct our errors. In sharing information, we are always truthful—even when that truth is not flattering to us—so that others can pick up where we left off and build constructively on what we have learned.

Moment of Truth



Question Answer

If LRN colleagues use their Facebook or other social media accounts to share business-related good news with the public, should they disclose their LRN affiliations? And if they are active in social media forums for business purposes, should they alter or limit the personal information they disclose on those sites?

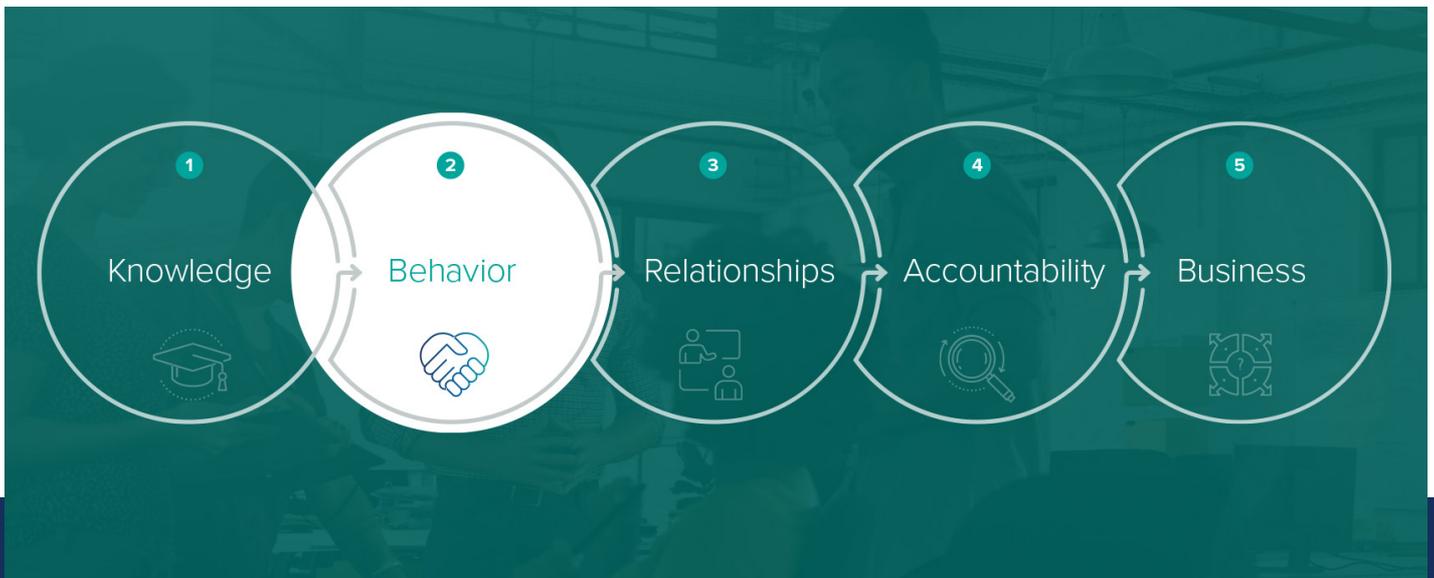
Keep Reading Part Two— Behavior

[Next Section](#)

How we behave

HOW WE BEHAVE

Part Two—Behavior



How we behave reflects our commitment to achieve a greater good—for our clients, our organization, our suppliers, our communities, and the larger society. We take personal responsibility for the organization's success and hold ourselves and our colleagues accountable for our actions.

How We Behave



▲ We Earn Trust

We seek high-trust relations with our colleagues, clients, suppliers and others—and we know that while we extend trust openly, it is also our commitment to earn trust from others.

▼ We Go Above and Beyond

▼ We Do the Right Thing

▼ We Pay Attention

Keep Reading

Getting it right— Behavior

[Next Section](#)

HOW WE BEHAVE

Getting it right—Behavior



We value diversity, inclusion, and equity.

At LRN, our people are our most precious asset. They make us who we are and how the world sees us. The more diverse, inclusive, and equitable we are, the more successful we will be as a company. We value the backgrounds and experiences of all of our people, and we take concrete steps to ensure we have diversity, inclusion, and equity throughout our company—at all levels, in all functions, and in all geographical locations.

We treat each other with dignity and respect.

We believe everyone is entitled to be treated with dignity and respect and to work in a supportive environment free from any forms of harassment and bullying. As an ethics and compliance company, each of us is expected to be a role model in how we treat each other at LRN.

We have zero tolerance for harassment and discrimination. We know that diversity of ethnicity, gender, race, religion, disability, nationality, and sexual orientation makes our workplace better. Discrimination or harassment of any colleague based on these characteristics, seen or unseen, is not tolerated. When we are subjected to, or are witnesses to, unacceptable behavior, we stand up for ourselves and for others, speak up, and [report the incident](#) to the People & Culture team.

We avoid conflicts of interest.

While we are at work, we are expected to put LRN's and our clients' interests before our own personal gain. Doing this helps us make smart, unbiased decisions that will benefit our business.

We don't solicit or accept gifts in connection with company business. Even the appearance of a conflict of interest can leave others thinking we are acting improperly. If you believe you may have an actual, potential, or apparent conflict of interest, please discuss it with a trusted member of the Leadership Team.



We protect LRN's financial, information, and physical assets.

Our assets are the building blocks for our future, helping us better serve and create value for our clients. We treat LRN's assets as if they are our own. We do everything we can to protect our assets from loss, damage, waste, and improper use.



Moment of Truth

Protecting our assets comes in many forms. While there are physical assets to be protected at our office locations, each and every colleague has a role in ensuring asset protection from wherever they work. Each of us can contribute by:

- **Ensuring security**

Carrying our key cards to ensure security in our physical offices. Don't let in anyone who doesn't have a key card and direct all scheduled visitors to the front desk.

- **Communication**

Letting the appropriate parties know if a security mechanism is not functioning so it can be fixed.

- **Security updates**

Updating security systems on our computers as soon as possible when corporate IT reaches out so that we can ensure company cybersecurity.

- **Using the LRN VPN**

Using the LRN VPN (Virtual Private Network) when working remotely.

- **Caring for equipment**

Taking care of equipment and backing it up regularly, using the approved systems from corporate IT.

Keep Reading

Part Three— Relationships

[Next Section](#)

41 Madison Avenue | 30th Floor | New York, NY 10010

[LRN.com](#)

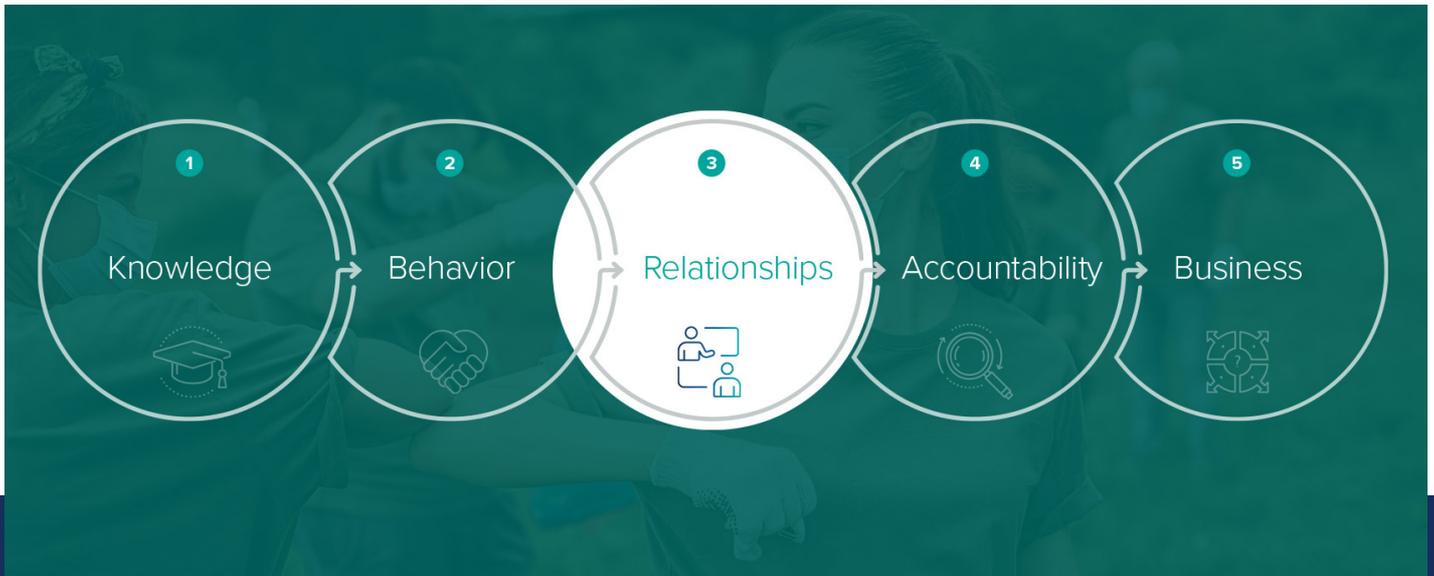
©2026 LRN Corporation

[Speak Up](#)

How we relate

HOW WE RELATE

Part Three—Relationships



The quality of our relationships with clients, partners, colleagues, and others profoundly affects our journey. We foster networking within LRN and in the marketplace. At LRN, we seek to make one another better, knowing that in so doing, we are also improving ourselves.



Develop

We develop ourselves and our colleagues.



Trust

We strive for relationships of high trust.



Do the right thing

We are guided by what is right to do.

Our Relationships

In our relationships, we seek to create meaningful, mutual value for all parties through partnership and collaboration.



Clients

We want our clients to obtain genuine value from their work with us. We deliver a level of service beyond our formal commitments, ensuring that we put their long-term interests above our desire to enlist them in our solutions.



Others



Colleagues

Keep Reading

Getting it right— Relationships

[Next Section](#)

HOW WE RELATE

Getting it right—Relationships



We maintain a safe, healthy, and secure workplace.

We take responsibility for keeping ourselves and each other safe, healthy, and secure in the workplace, and for protecting our visitors and communities from harm. Nothing is more important than the safety, health, and security of our people. We take the time to learn and follow all applicable safety and emergency rules and procedures. We immediately report any unsafe or unhealthy situations to a member of the People & Culture team.

We embrace environmental sustainability.

We take responsibility for minimizing the environmental impact of our facilities and operations. We look for opportunities to make the most efficient use of energy, water, and other natural resources. We minimize our environmental impact by reducing waste and recycling materials as much as possible.



We support the communities in which we live and work.

LRN recognizes that we are part of a connected and interdependent world. We contribute to our local communities and the world at large by volunteering and making charitable contributions to organizations and causes that align with our values. We encourage and support each other in speaking out and taking a stand on the ethical and moral issues of our time.

Moment of Truth

A sales executive pursued a new prospect with a US \$1M+ opportunity. The sales executive knew that the prospect's requirement of launching a custom code of conduct course two months after contract signing was not likely to be met, but she didn't want to shake the prospect's confidence in LRN or the likelihood of closing the deal, so she did not express the LRN team's reservations.

The prospect became a member of LRN's client community, and work began. The project manager found it almost impossible to build a project plan that met the expectations set during the enlistment process. In addition, delivery—even if possible—would have required that other clients' projects be delayed. Trust eroded quickly, tension characterized the relationship, and the unrealistic deadlines for production and review were missed on both sides.

If the sales executive had applied our core values of integrity and truth, she could have helped educate the prospect about the time it would take to create an education and engagement experience that would bring its code to life. The client, while still a prospect, would probably have appreciated advice, guidance, and honesty from LRN, which would have highlighted LRN's depth of knowledge and unique point of view. We should never make promises, whether implicit or explicit, that we aren't sure we can keep. The benefits of a relationship built on earned and mutual trust should far outweigh the momentary satisfaction of winning a sale.

Keep Reading

Part Four— Accountability

[Next Section](#)



How we recognize

Keep Reading

Next Section

HOW WE RECOGNIZE

Part Four—Accountability



We hold our colleagues accountable for their actions, appreciating that we can and should learn as individuals, and as a company, from our personal and collective mistakes. Our consistent behavior reveals us to have integrity and be authentic, both as individuals and as a company. We take personal satisfaction in achieving the LRN mission and finding significance for our clients and ourselves.

We proclaim our achievements and failures with the intent to learn from them:

We recognize ours and others' right behaviors.

We address behaviors that are contrary to what we believe in.

We model meaningful acknowledgement of actions and individuals.

Keep Reading

Getting it right— Accountability

[Next Section](#)

41 Madison Avenue | 30th Floor | New York, NY 10010

[LRN.com](#)

©2026 LRN Corporation

[Speak Up](#)

HOW WE RECOGNIZE

Getting it right—Accountability



We acknowledge and celebrate.

We apply the screen of our values and principles when we decide what to acknowledge and celebrate with others. It is not always the end result that is the achievement; sometimes how a colleague pursued a challenge, even if the end result was not successful, is more meaningful.

We give due credit.

We give credit to those who have earned it, regardless of level or placement in the organization. We celebrate those who have solved problems or fixed errors, even when we or our organizations are responsible for those problems.

We take responsibility.

We acknowledge individual or collective behavior that is not consistent with the principles we share. We counsel our clients in prudent and enlightened methods for effectively acknowledging and resolving errors which they may have made in their own business operations.



Moment of Truth

We endeavor to recognize our colleagues at LRN. Each quarter, we recognize colleagues who have demonstrated, both in spirit and in action, attributes most in line with our values and leadership attributes.

These attributes include:

- Committing to living our values and embodying the Leadership Rubric
- Demonstrating other leadership attributes, such as humor, professionalism, perseverance, and service and commitment to clients and colleagues
- Inspiring our culture and point of view in everything they do
- Being admired and respected by friends and colleagues
- Pursuing the success of LRN's mission of inspiring principled performance

Keep Reading

Part Five— Business

[Next Section](#)

41 Madison Avenue | 30th Floor | New York, NY 10010

[LRN.com](#) 

©2026 LRN Corporation

[Speak Up](#)

How we pursue

Keep Reading

Next Section

HOW WE PURSUE

Part Five—Business



We serve our mission and purpose

Helping people around the world do the right thing by inspiring principled performance.

Significance may not always be immediately profitable, but over the long term it will lead to strong financial and reputational success. In making this journey, we recognize and aspire to higher standards of conduct.

We keep ourselves knowledgeable about the market so that we can transcend it for the benefit of our client partners and stakeholders:

- We work for the long term.
- We pursue significance.
- We have deep respect for the spirit and letter of the law and view it as a starting point.
- We pursue business as leaders in our field.
- We are guided by our desire to serve our clients.

Keep Reading

Getting it right— Business

[Next Section](#)

41 Madison Avenue | 30th Floor | New York, NY 10010

[LRN.com](#) 

©2026 LRN Corporation

[Speak Up](#)

HOW WE PURSUE

Getting it right—Business



We compete ethically and legally.

We believe in healthy competition. Competition fuels innovation and helps make us better at what we do. We compete based on the quality of our solutions and the professionalism of our people. As such, we do not engage in bribery, anticompetitive practices, or unethical means of gathering competitive information.

We safeguard confidential, proprietary, and private information.

Information is a vital business asset. Our proprietary information and intellectual property hold the keys to our success. We protect our own confidential, proprietary, and private information as well as that of others. We follow all recommended practices and procedures to keep them safe from unauthorized disclosure or misuse.

We engage in honest marketing practices.

It is critical that we communicate our thought leadership and the value of our products, services, and solutions. We speak about LRN with pride, honesty, and transparency. We never misrepresent our capabilities, nor do we denigrate our competitors.



We choose business partners who share our commitment to the highest ethical standards, while also ensuring the best value for LRN and our clients.

We are equitable and transparent in our dealings and associations with contractors, suppliers, and other third parties who form our extended business network. We follow the LRN procurement process to ensure that no third party is either advantaged or disadvantaged before, during, or after an engagement.

Moment of Truth

The product team is working on some new developments for the certification manager. This new feature is exciting and will surely bring in some interest from clients and prospects. The marketing team is excited to announce this new feature. With a big conference coming up, the marketing team is considering announcing this new feature early to start drumming up some sales interest, even though it won't be ready for another 2 months. The product team reviewed the slide deck for the conference, and felt the slides were misleading by implying that this feature was already in place.

One of the developers discusses this miscommunication with the product team and they decide to let marketing know it isn't in the company's best interest to announce the feature with the current slide deck. The team is concerned that misrepresenting the feature before it's ready could affect trust between clients and LRN. The marketing team decides that they could reveal the new feature at the conference, as long as they clearly state that it would be ready later in the year.