

LRN *Inspiring Principled Performance*

2025 Code of Conduct Report



From page to practice:
Making your code
of conduct matter



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Introduction

In an era of global disruption, rapid technological change, and evolving workplace expectations, the corporate code of conduct has evolved beyond a compliance document. A modern code reflects a company's values, culture, and ethical compass. The *2025 LRN Code of Conduct Report* offers a dual perspective of how organizations are adapting their codes of conduct by enhancing structure, clarity, delivery methods, and risk responsiveness, while also considering the experiences of the people the codes are designed to guide.

Drawing from a comprehensive review of nearly 200 global codes and new survey data from over 2,000 employees across 15 countries, this year's report explores the intersection of form and function: how codes are written, how they're used, and how they influence the daily decisions of the global workforce.

From incorporating emerging risk areas such as artificial intelligence (AI), to increased multilingual accessibility, to usage in hybrid work settings, our findings reflect a broader movement. Organizations are not merely updating their codes, they are rethinking what effectiveness truly means. This report aims to help ethics and compliance professionals, company leaders, and stakeholders understand how to close the gap between written standards and lived experience, ensuring codes remain relevant, meaningful, and aligned with organizational values.

“Updating the code is no longer the challenge, embedding it is.”

– LRN's 2025 Global Study on E&C Program Maturity

Key findings



Inclusion of artificial intelligence (AI) in codes has tripled

from **5%** of codes in 2023 to **15%** in 2025. This **3X** increase reflects a growing awareness of AI-related risks and a proactive effort to address them in codes of conduct and ethics and compliance programs. On the flip side, this means that **85%** of codes do not yet address AI, a significant opportunity for improvement.



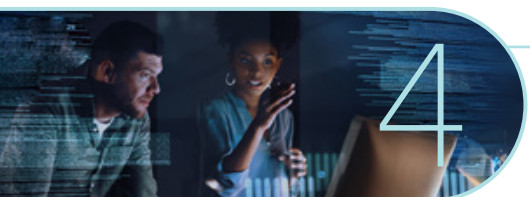
Companies strengthen reporting and accountability

elements in their codes. **98%** provide clear reporting resources and **77%** include helpline details. These updates suggest stronger protections for whistleblowers and clearer guidance for raising concerns.



Codes are becoming more user-friendly

with usability features showing meaningful gains: policy links (**+8 pts**), resource callouts (**+7 pts**), ethical decision-making models (**+5 pts**), and tables of contents (**+3 pts**). These additions help employees understand how to act ethically and where to go for more support. However, one of the most useful knowledge reinforcement aids, real-life scenarios, remained unchanged at a disappointing 30%.



Core risk topics remain a priority,

with bribery, conflicts of interest, and other core risks continuing to appear consistently across updated codes. Their steady inclusion suggests that companies are building on foundational content while layering in emerging risks like AI and cybersecurity.



Hybrid work continues to positively influence engagement

with codes of conduct, with **76%** of employees using their company's code as a resource in 2025, up from **67%** the previous year. This trend suggests that a flexible work environment supports greater access to, and application of, ethical guidance in daily decision-making.



Employees are using codes more often, likely due to organizations increasingly updating them. **45%** now make annual substantive revisions, compared to just **11%** a decade ago. This shift reflects the value of keeping codes relevant, clear, and aligned with evolving workplace realities.



Codes are being offered in more languages, with **2/3** of employees reporting having access to their code of conduct in their native language. This aligns with new DOJ guidance emphasizing language accessibility in compliance efforts and is especially important for global organizations.



Middle management lags in code communication, with only **53%** of frontline employees reporting hearing about the code from their manager, versus **85%** of executives. This reveals a communication gap at the middle-management level, underscoring the need for better support and expectations for managers to promote ethical culture effectively from the top of the organization to the front lines.



Web-based codes of conduct are gaining traction, with **32%** of survey respondents reporting that they have access to an online version. This indicates a broader shift toward digital accessibility, as more organizations prioritize making the code of conduct readily available to employees at any time, from any location, via internet-connected devices.



What's changed since the 2023 Code of *Conduct Report?*



How often are companies updating their codes of conduct?

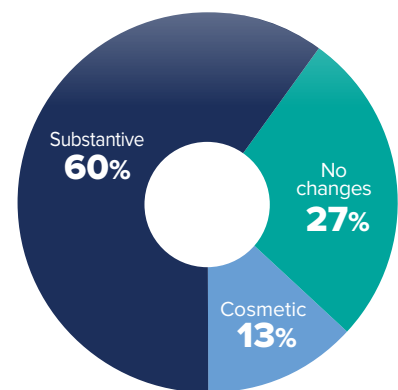
In July 2023, LRN published the *LRN Code of Conduct Report: Rules are good, values are better, design matters*. For that report, we evaluated the codes of conduct of two hundred top companies around the world. Specifically, we looked at the largest companies listed in the following stock exchange indices: CAC (France), DAX (Germany), FTSE (UK), NIK (Japan), SGX (Singapore), and S&P (US).

Codes of conduct should not be static. They should be living, breathing documents that evolve over time, as the business environment changes. We recommend that companies review and update their codes annually and do a more considerable overhaul every **3 to 5** years.

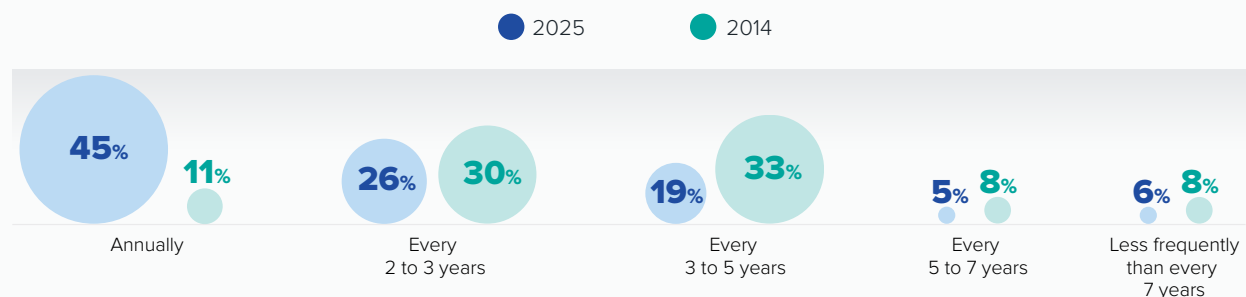
For the 194 codes evaluated in this report, we found that **141 (73%)** had been updated, while **53 (27%)** were exactly the same as they were 2-3 years ago. Broken down further, **60%** of the codes had been substantively changed, while **13%** of the changes were only cosmetic (e.g., leadership message, colors, images).

Codes updated since 2023 code report

Nature of changes



Frequency of substantial code of conduct revisions



LRN's 2025 *Global Study on Ethics & Compliance Program Maturity* found that **71%** of companies reported that they update their codes of conduct every 1-3 years. Interestingly, that report showed that **45%** of companies update their codes annually, up significantly from the **11%** reported in 2014, but still far from where it should be.

Inclusion of AI guidance grows



Let's explore some of the most significant changes from the previous versions of the evaluated codes of conduct to the current ones. As you review these insights, think about your company's code of conduct and how these findings might inform your next update.

One of the most striking developments in the updated data is the sharp increase in the inclusion of artificial intelligence and technology ethics content in the current versions of the codes, as compared to the previous ones. The percentage jumped from just **5%** coverage in 2023 to **15%** coverage in 2025, more than a **3X** increase. This surge underscores a growing recognition of the ethical implications posed by AI in business conduct, particularly as companies face pressure to manage risks around automation, data usage, bias, surveillance, and accountability in AI systems. The increase is not just a numerical adjustment but reflects a broader cultural shift where ethics and compliance programs are beginning to proactively address the complexities of emerging technologies.

This trend aligns with the rise of AI regulation globally, such as the EU AI Act and various other governmental frameworks urging responsible AI development and use. As organizations incorporate ethical guidance into their codes of conduct, it signals a readiness to confront AI risks with the same rigor historically reserved for issues such as anticorruption or conflicts of interest. The inclusion of these guidelines may also help organizations future-proof their compliance strategies, attract socially conscious talent, and assure stakeholders of their technological responsibility. This evolution also suggests that companies are beginning to equip employees with the tools to recognize and navigate ethical dilemmas tied to AI and automation.

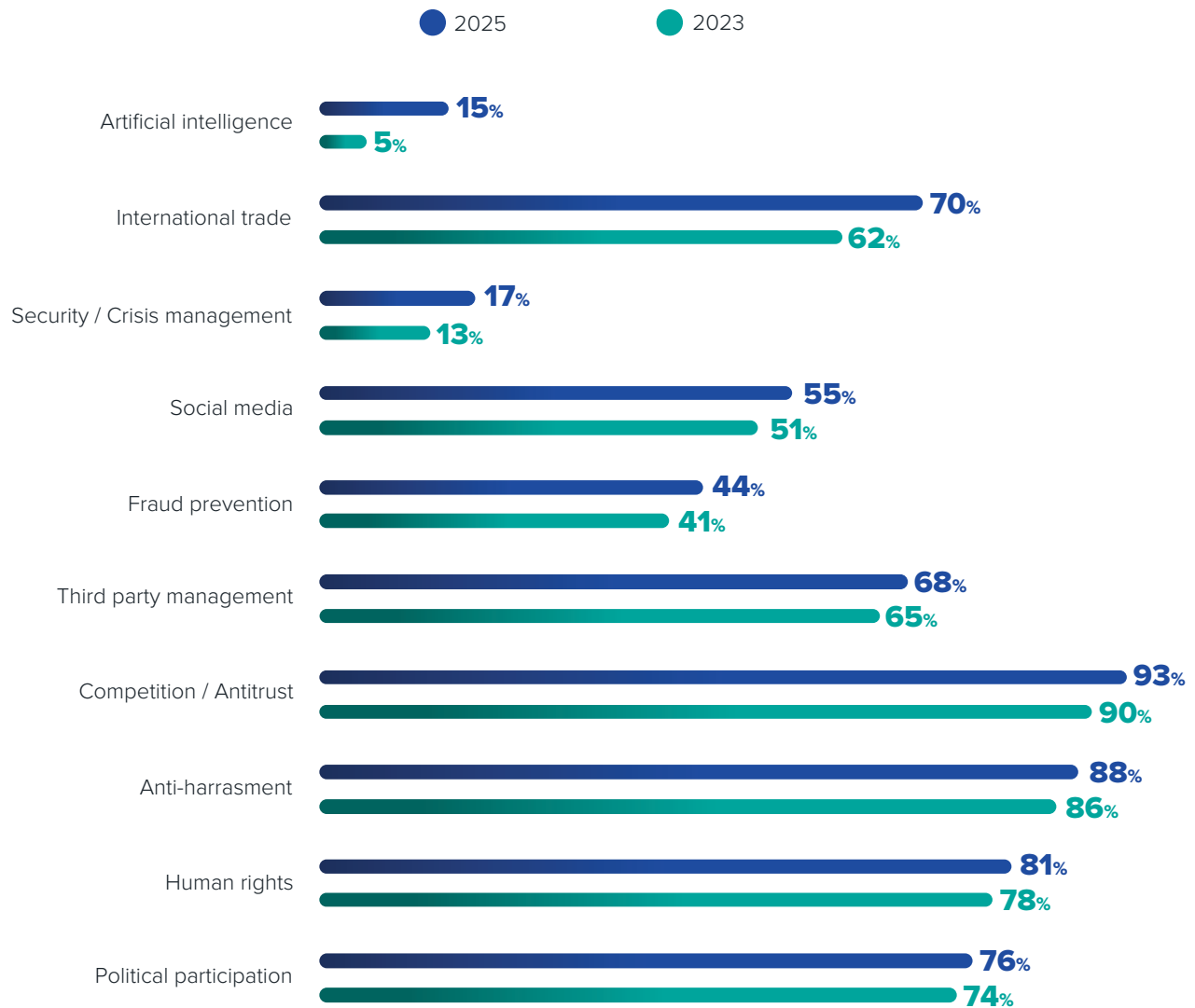
While the dramatic increase in the percentage of codes that now cover AI is encouraging, it means that **85%** of codes still do not address this important emerging risk topic. This points to the need for organizations to review their codes of conduct at least once a year and update them to account for changes in the business and compliance environment.

“Is there a process for updating policies and procedures to address emerging risks, including those associated with the use of new technologies?”

– U.S. Department of Justice Criminal Division
Evaluation of Corporate Compliance Programs
(Updated September 2024)



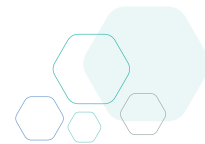
Top 10 increases in risk topic coverage (% present)



As this report shows, inclusion of topics like AI ethics has increased significantly. However, the [*2025 Global Study on Ethics & Compliance Program Maturity*](#) highlights that some key areas remain underrepresented in standalone policies: only **27%** of organizations have policies addressing non-retaliation, and just **30%** include environmental protection.

These findings reinforce the need for continued risk alignment and content expansion in code development, especially as stakeholder and regulatory expectations evolve.

Emphasis on reporting and response

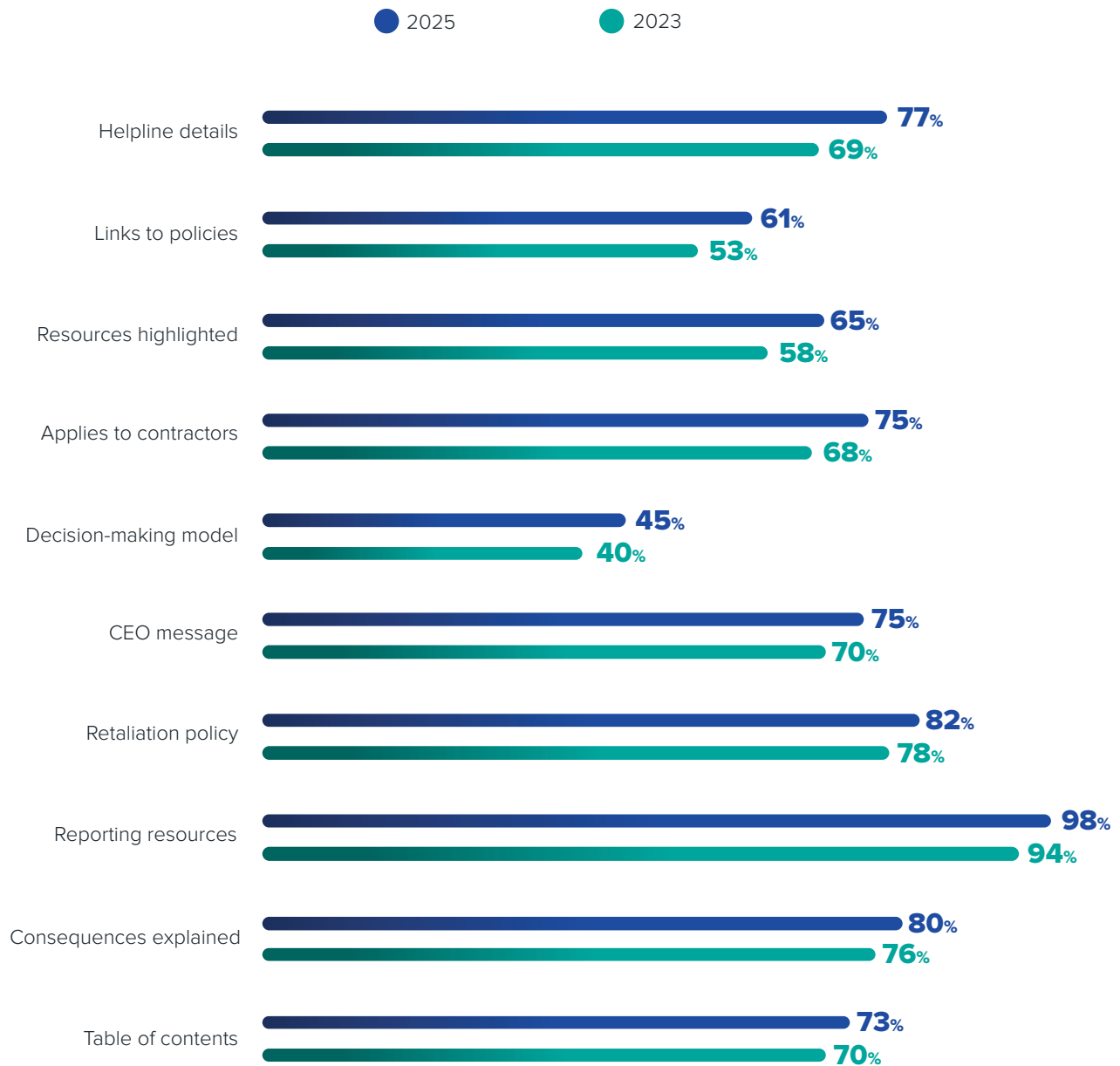


The latest codes showed notable improvements in areas critical to incident reporting and response. The inclusion of reporting resources increased by **4 percentage points** (to **98%**), while helpline details rose **8 points** (to **77%**). Retaliation discipline also saw a **6-point** increase, signaling a stronger stance on whistleblower protection. These improvements suggest that companies are refining the operational scaffolding behind their ethics and compliance programs, ensuring employees know how and where to report concerns and feel safe doing so. See [Speaking Up](#) on page 25 of this report.

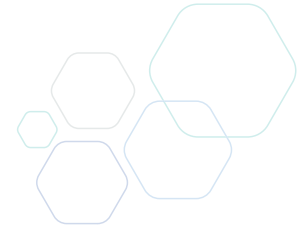
What's significant is not just the presence of these resources, but the breadth and consistency with which they now appear across organizations. The clarity and availability of channels for reporting misconduct are foundational to an effective culture of ethics and compliance. They signal institutional willingness to listen and respond, which can increase trust and help surface issues before they escalate. These changes likely stem from lessons learned in prior years, especially in light of high-profile scandals, where the absence of clear reporting structures was seen as a systemic failure.



Top 10 increases in code elements (% covered)



Improved usability and knowledge reinforcement



Improvements in usability were a prominent theme in the updated codes we analyzed. Key learning aids like links to policies (+8 pts), resources displayed (+7 pts), ethical decision-making models (+5 pts), and a table of contents (+3 pts) all increased meaningfully. These features guide employees toward making ethical decisions and understanding how the code connects to more detailed internal resources. Together, they indicate a shift from passive reference material toward active, navigable frameworks for better decision-making and action-taking.

These enhancements are particularly relevant as companies aim to drive greater engagement with their codes of conduct. A well-structured document is more likely to be read, understood,

and applied. It also aligns with digital design best practices, where information architecture and accessibility are prioritized. By making ethics and compliance materials more user-friendly, companies can close the gap between policy and practice, enabling employees to find relevant guidance at the moment they need it. See [Usability](#) and [Look and Feel](#) on page 27 of this report.

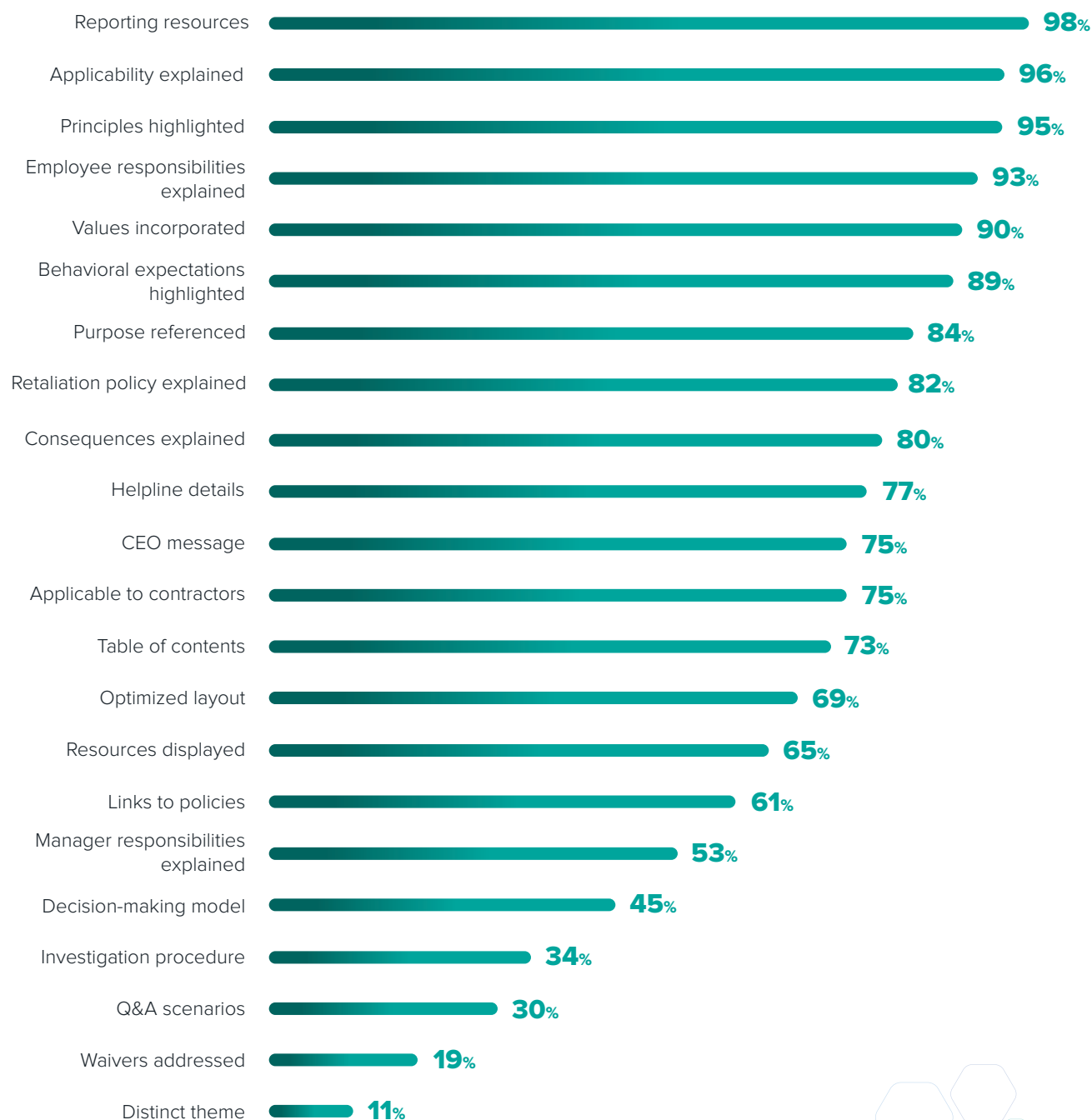
One notable area of concern is that the percentage of codes that include real-life question-and-answer scenarios remained unchanged at **30%**. Scenarios are one of the most effective tools for reinforcing the standards outlined in the code and bringing them to life for employees. See [Knowledge Reinforcement](#) on page 26 of this report.

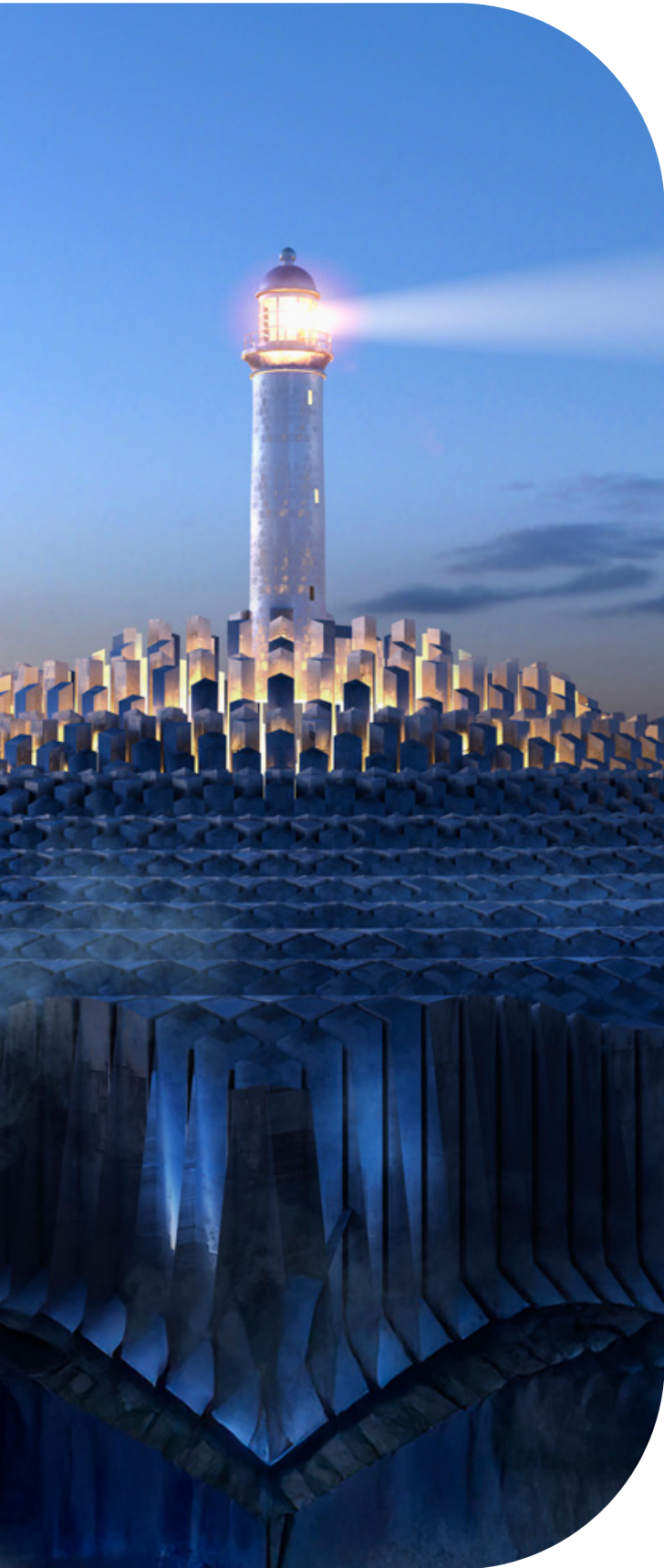


While more organizations are updating their codes of conduct and improving usability, the [2025 Global Study on Ethics & Compliance Program Maturity](#) notes that only **44%** measure training effectiveness and just **37%** track misconduct trends after training.

This suggests that many companies continue to focus on awareness and completion rather than outcomes. As a result, even well-designed codes may fall short of their potential impact unless organizations invest equally in measuring understanding and behavioral change.

Code elements (% covered)





Consistent core risk topic coverage

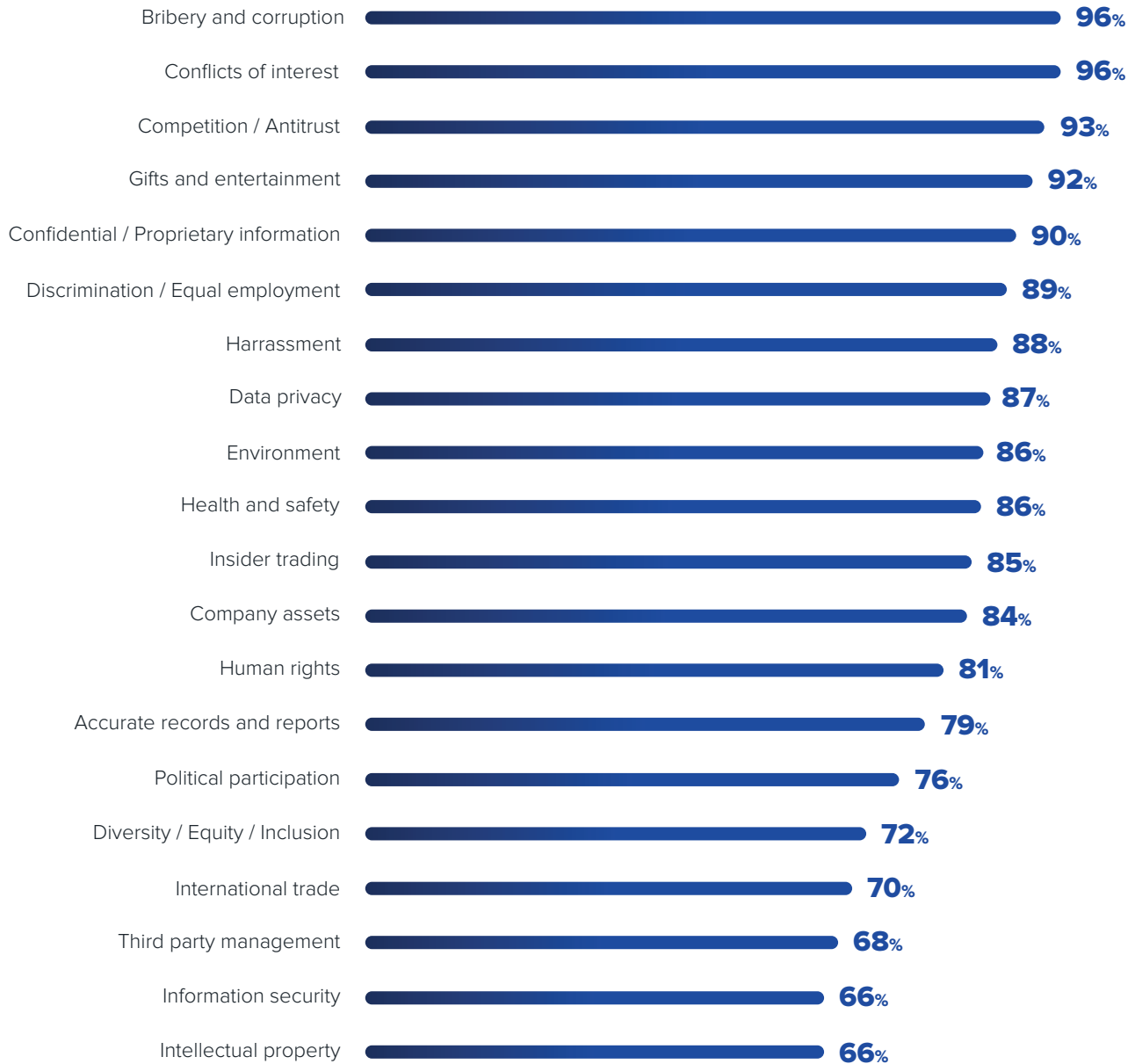
Despite various changes, the presence of foundational risk topics remained steady and strong. Bribery and corruption held at over **96%** inclusion, and conflicts of interest rose to **96%**. Company assets and competition/antitrust also ticked upward. These areas represent the non-negotiables of corporate compliance topics that regulators expect to be consistently addressed in every code of conduct and ethics and compliance program.

This continuity highlights the maturity and institutionalization of key compliance topics within codes of conduct. It demonstrates that while companies are evolving and modernizing their materials, they are not losing sight of foundational risks. Instead, the evolution is additive: layering in new challenges like AI, while reinforcing long-standing commitments to areas that have historically posed the greatest legal and reputational risk. These topics form the backbone of trust for investors, regulators, and employees alike, and their consistent treatment across versions is a sign of organizational resilience and integrity. See [Risk topics](#) on page 26 of this report.



Top 20 risk topics (% present)

● 2025





 What do
employees think?

Insights from the 2025 survey on code of conduct engagement



Building on the findings from our 2024 *Code of Conduct Report*, we sought to deepen our understanding of how employees engage with their organizations’ codes of conduct.

This year, we expanded the survey to capture broader perspectives, given the growing emphasis on accessibility, communication, and cultural alignment within ethics and compliance programs.

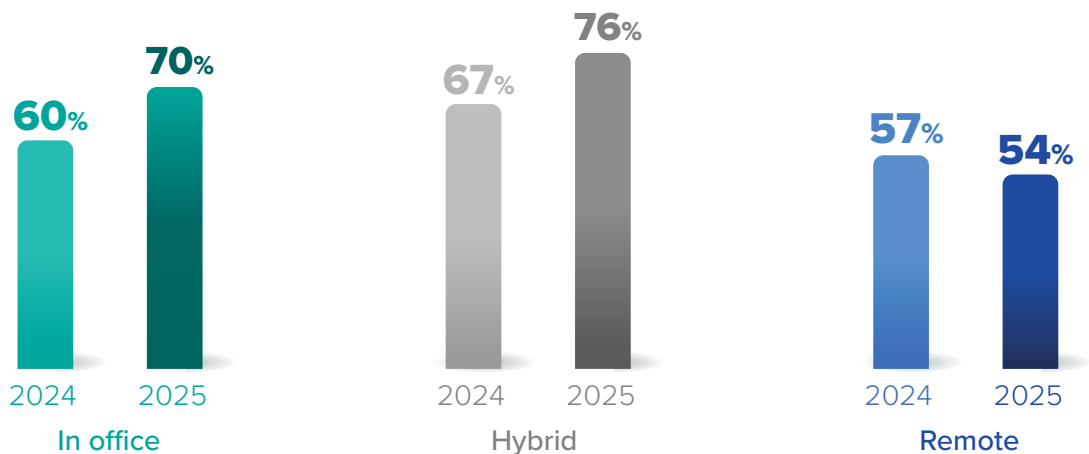
Hybrid work and code engagement: A sustained positive trend

One of the most significant findings from this year’s research is the continued success of supporting code of conduct engagement in the hybrid work environment. As noted in the 2024 *Code of Conduct Report*, hybrid work emerged as a mutually beneficial arrangement for both employers and employees. This year’s data reaffirms that trend, with **76%** of respondents stating that they have used their

company’s code of conduct as a resource, an increase from **67%** in 2024.

While we have only begun tracking the relationship between hybrid work and code usage in recent years, the upward trajectory suggests that a flexible, connected workforce may be more inclined to access and apply ethical guidance in their day-to-day responsibilities. This is an area we will continue to monitor closely.

Code engagement across work arrangements
I have used my company’s code of conduct as a resource
(% agree)



Sources: 2024 Code Report and 2025 Code Survey

Increased utilization of the code as a resource



Overall, there is a promising uptick in employees turning to their codes of conduct for guidance. This finding aligns with insights from LRN's [2025 Global Study on Ethics & Compliance Program Maturity](#), which revealed that **45%** of organizations now make substantive updates to their codes on an annual basis.

This correlation suggests that when organizations regularly refresh and modernize their codes ensuring relevance, clarity, and resonance, employees are more likely to perceive them as useful tools. The data underscores the value of maintaining a living document that evolves in step with workplace realities and ethical challenges.

Code engagement overall

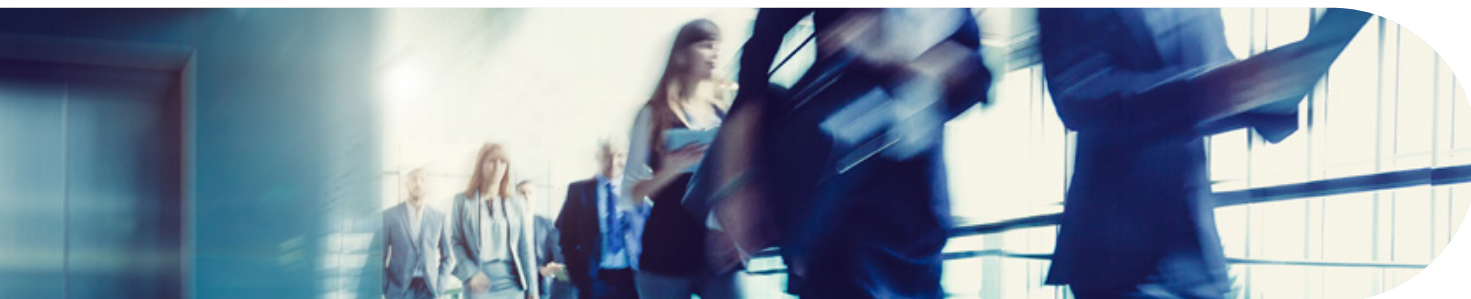
I have used my company's code of conduct as a resource
(% agree)



Source: 2025 Code Survey

*Encouragingly, **45%** of organizations now update or substantially revise their code of conduct annually, up from just **11%** a decade ago.*

Source: 2025 Global Study on Ethics & Compliance Program Maturity



Access in native languages: A new benchmark

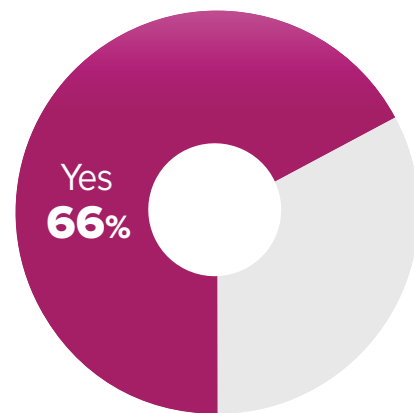


For the first time, our survey included questions about the linguistic accessibility of codes of conduct. Encouragingly, **two-thirds** of respondents reported that they can access the code in their native language.

This finding is particularly salient in light of the U.S. Department of Justice’s September 2024 Evaluation of Corporate Compliance Programs (ECCP) guidance, which emphasized the critical role of language accessibility in ethical and compliance documentation.

Organizations should evaluate whether their own programs meet the latest regulatory expectations, especially in multilingual or multinational contexts.

If English is not your first language, is the code available in your native language?

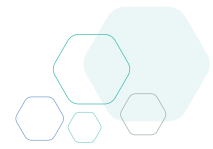


“How has the company communicated its policies and procedures to all employees and relevant third parties? If the company has foreign subsidiaries, are there linguistic or other barriers to foreign employees’ access?”

— Source, Department of Justice Evaluation of Corporate Compliance Programs, Updated September 2024



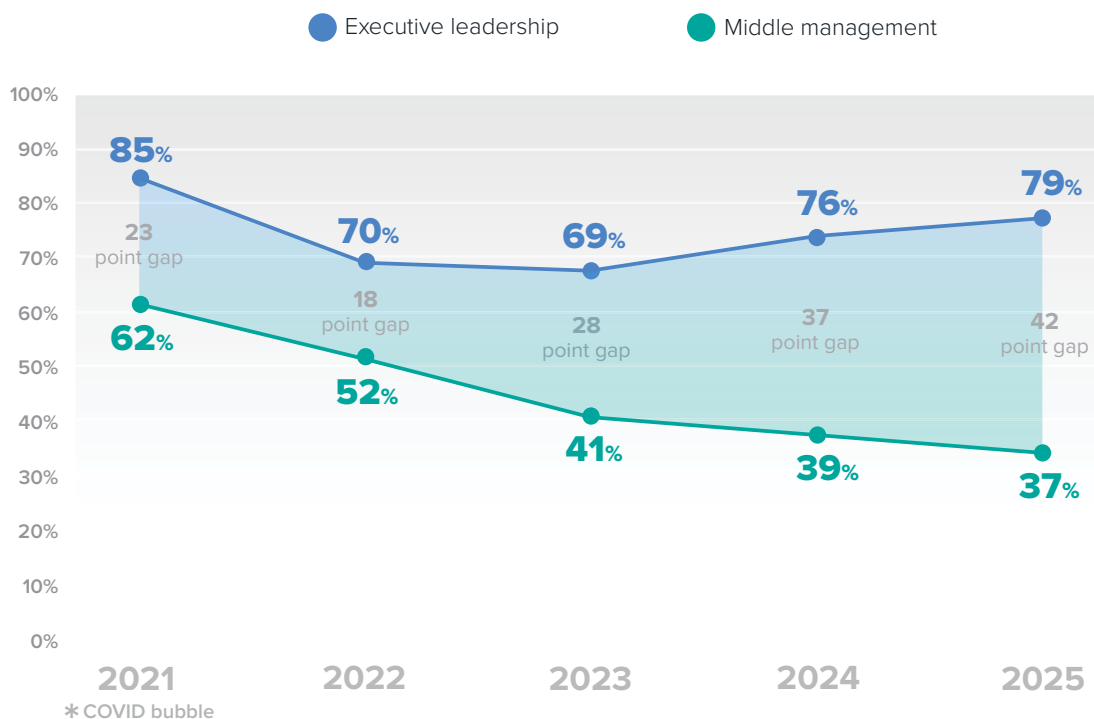
The middle management messaging gap



Despite overall positive trends, a persistent concern has emerged around the role of middle management in promoting the code of conduct. We saw examples of this in our [2025 Ethics and Compliance Program Effectiveness Report](#), wherein we observed a large variance between executives and middle managers when it came to observations of ethical conduct.

What steps have your organization's leaders taken to respond to compliance risks and challenges in the past 12 months?

Made difficult decisions consistent with our company values and purpose

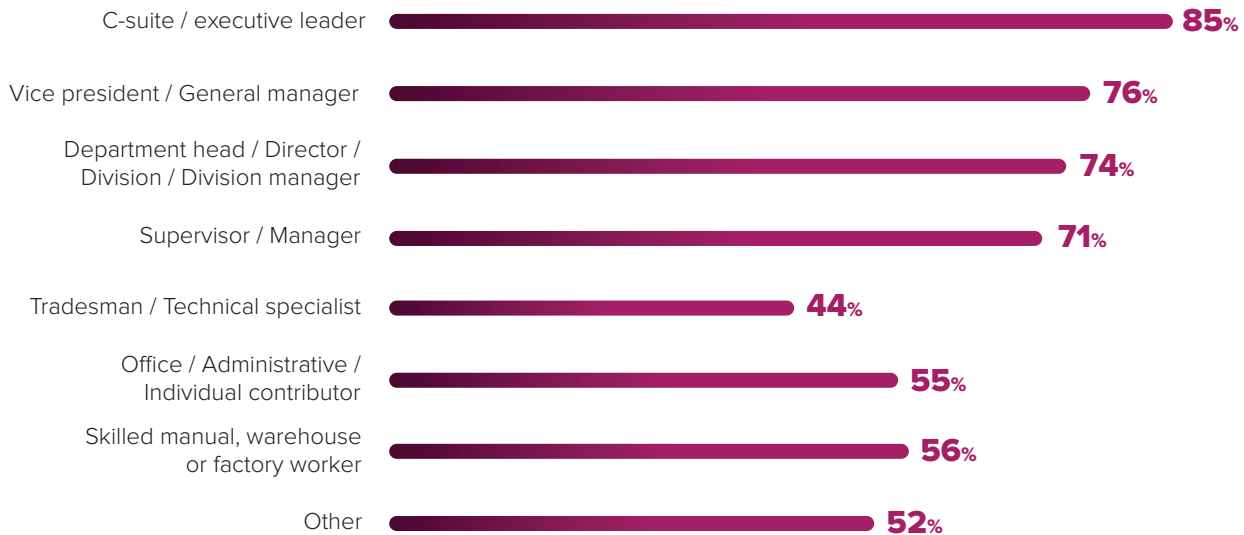


Source: 2025 Ethics and Compliance Program Effectiveness Report

In our code survey, a similar disconnect appeared most notably when we focused on managers speaking about codes of conduct. While **67%** of employees overall agreed with the statement, “*My manager talks about our code of conduct,*” a closer examination revealed a stark stratification by role:

My manager talks about our code of conduct

Percent who answered “Yes”



Source: 2025 Code Survey

This disparity highlights a breakdown in ethical communication and modeling as messages move down the organizational hierarchy. While executive leadership has increasingly demonstrated visible commitment to ethics and compliance and embraced the code of conduct as a core element of organizational culture, middle management has struggled to translate this commitment into day-to-day practices. This misalignment is not simply a matter of tone or intention - it reflects a structural challenge within organizations. Middle managers play a critical role in reinforcing ethical culture, and this data suggests that more targeted efforts are needed to ensure they are empowered and expected to communicate clearly and consistently about the code of conduct.



Web-based code of conduct access



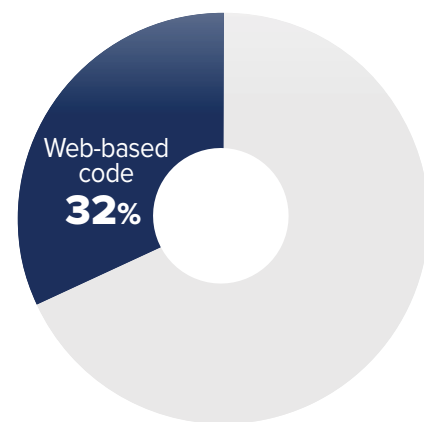
A notable **32%** of survey respondents reported having access to a web-based version of their organization's code of conduct. This finding signals a meaningful shift toward digital-first approaches in compliance communication, reflecting broader trends in workplace technology adoption and employee engagement strategies.

Web-based codes offer several key advantages over traditional formats. They allow for real-time updates, ensuring that employees always have access to the most current policies without the need for manual redistribution. Interactive features, such as embedded multimedia, searchable content, and links to related policies or reporting channels enhance usability and understanding, especially for employees navigating complex compliance topics.

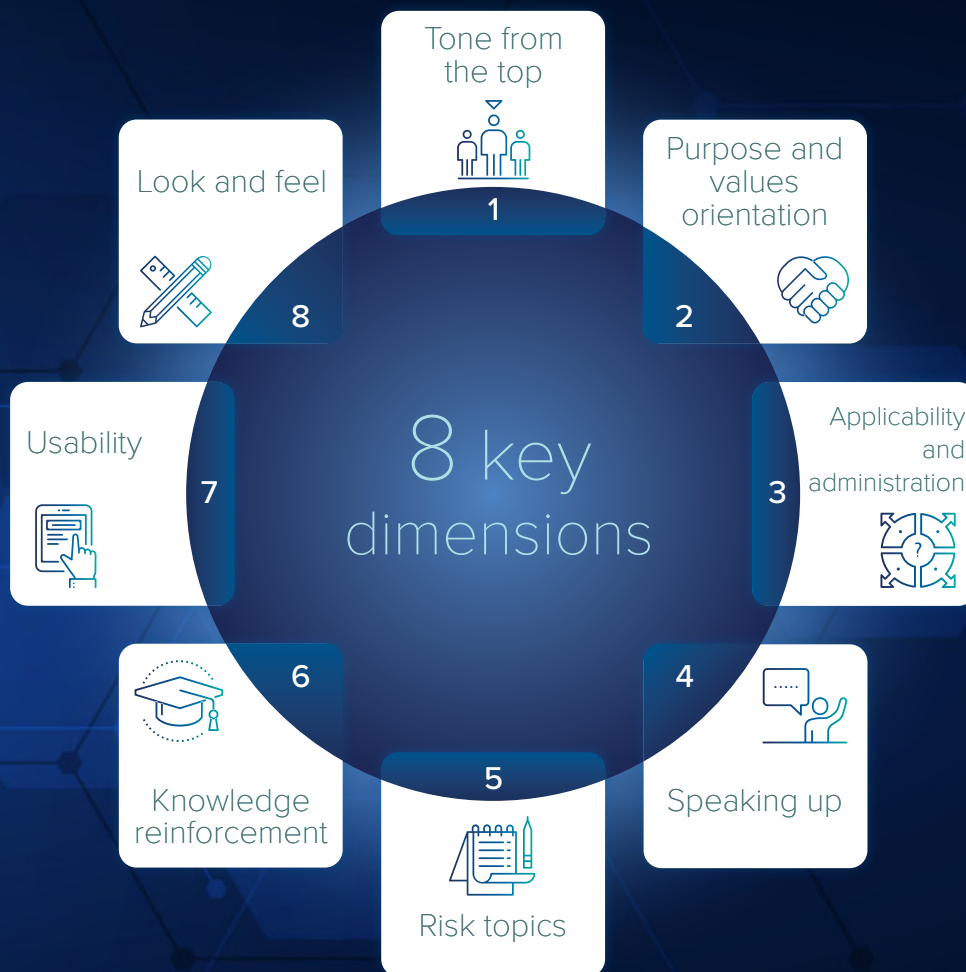
This format also supports accessibility across a wide range of roles and settings. Whether employees are working remotely, on-site, or in frontline environments, a web-based code ensures that the information they need is available anytime, anywhere, via any internet-connected device. For global organizations, this also presents opportunities for streamlined language localization, content customization, and integration with broader learning and ethics platforms.

The growing adoption of web-based codes reflects an increasing recognition that how a code is delivered can be just as important as what it says. By investing in modern, accessible formats, organizations are not only promoting awareness and understanding but also reinforcing a culture of ethics and compliance through greater reach and responsiveness.

In what format does your company provide the code of conduct to you?



What does good look like?



Eight dimensions of an effective code of conduct

To ensure a consistent, objective, and comprehensive evaluation of what “good” looks like in leading codes of conduct, LRN uses its proprietary Code of Conduct Assessment methodology. First launched in 2015 and continually refined to align with evolving regulatory expectations and best practices, we

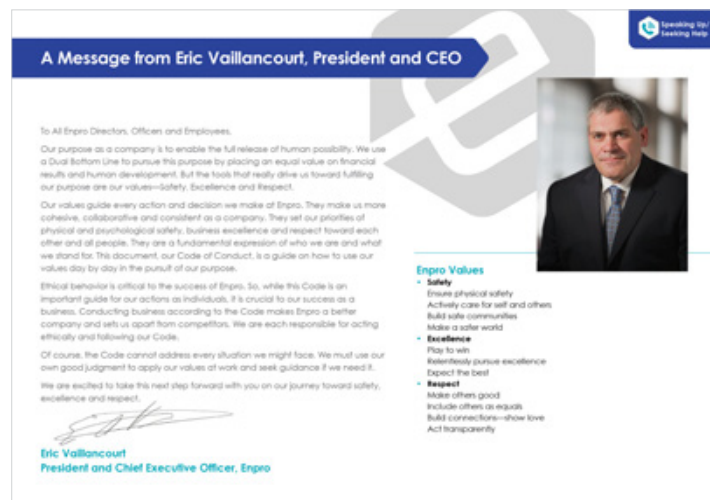
use this framework to evaluate codes across 47 targeted questions spanning 8 dimensions of effectiveness. We also look at key readability metrics such as number of pages, word count, estimated reading time, tone, and the Flesch-Kincaid Grade Level, a standard measure of reading complexity.

Our comprehensive research and extensive experience informs us that the most impactful codes of conduct perform better when they score high in all 8 dimensions of an effective code of conduct. Over the next few pages, we will provide examples of publicly available codes of conduct that exemplify “what good looks like” for each of the 8 dimensions.



Example: Enpro

What works: Enpro leans into values in their leader message, even including the values on the same page as a way to integrate what the company stands for.



Example: Constellation Energy

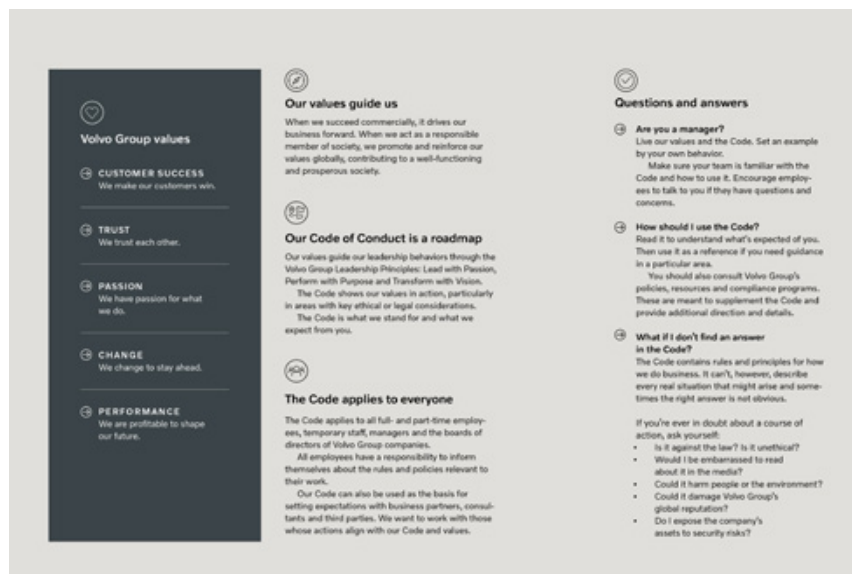
What works: Values are clearly stated, and behaviors behind those values are included.





Example: Volvo

What works: The responsibilities of all employees and stakeholders in relation to the code are clearly defined and effectively communicated.



Example: Howard Hughes

What works: The reporting procedure is clearly defined and outlined, confidentiality and anonymity are covered, and multiple resources are given to cover all the potential questions a reporter might have.





Example: **PG&E**

What works: Topics are listed clearly and grouped in a logical way. Emerging risk topics, such as AI, are included and enhance the content so that it is relevant and timely.

TABLE OF CONTENTS	
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	Participating in the Political Process 33
34	Policies and Standards Links



Example: **Western Union**

What works: There are callout boxes that both call attention to a definition for a specific and important term and a Q&A linking behavior to a common scenario an employee might face on the job.

1 Our Code
2 Each Other
3 Customers
4 Communities
5 Company

Preventing Discrimination, Harassment, and Bullying

What we do

- Promote a positive environment.** We work to build a supportive, professional environment and to prohibit discrimination. Any form of discrimination, harassment, or bullying violates this Code, whether it occurs at a business location, a Company-sponsored off-site activity, or another workplace connection.
- Be professional.** Unprofessional conduct is not allowed in our workplace. We prohibit unwelcome conduct based on any characteristic protected by antidiscrimination laws.
- Support each other.** We stand up for coworkers who experience discriminatory, harassing, or bullying behavior and report it.
- Include each other.** We want everyone to feel they belong, and we do not exclude them from participating fully, especially due to a protected status.
- Ask for help.** For questions about discriminatory, harassing, or bullying behavior, contact your manager or any senior leader, your Site Leader, or People Relations.

What is discrimination?

Discrimination may be any kind of negative, punitive, or restrictive employment decision or conduct that is based on any trait or characteristic protected by law, including, but not limited to, race (including traits associated with race such as hairstyle), color, religion or religious creed, national origin or ancestry, citizenship status, sex or gender (including pregnancy, childbirth, and related medical conditions), gender identity or gender expression (including transgender status), sexual orientation, marital status, age, physical or mental disability, military and veteran status, genetic information, and protected medical condition.

Harassing behavior could include:

- Using a discriminatory nickname.
- Telling jokes related to race, sex, gender, or other category protected by law.
- Distributing objectionable emails, pictures, or other materials.
- Pressuring a coworker to have an unwanted social or romantic relationship.
- Sending profane or sexually explicit messages or content.

Why we do it

Discrimination is not only wrong, but it also undermines productivity and performance. We want to build a supportive environment, so everyone can thrive at Western Union.

Q&A

Q: During an online team presentation, a colleague said that the text was too small for her to read. After she commented on the size of the text a few more times, her engagement dropped. If she is not saying anything, who am I to interfere? Am I right?

A: No. It is entirely appropriate to say something in her support. We want everyone to participate fully. You can talk with the presenter or report the situation to a manager or People Relations.

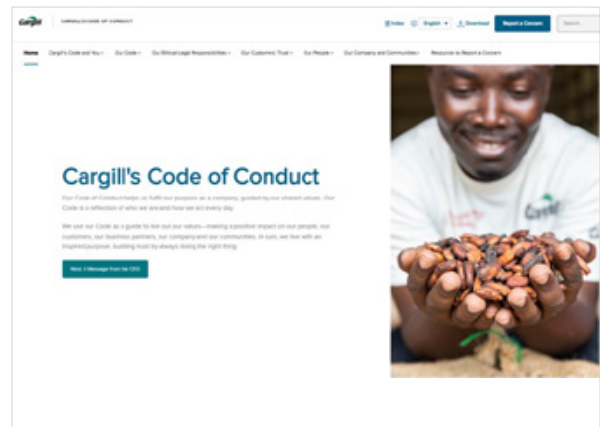
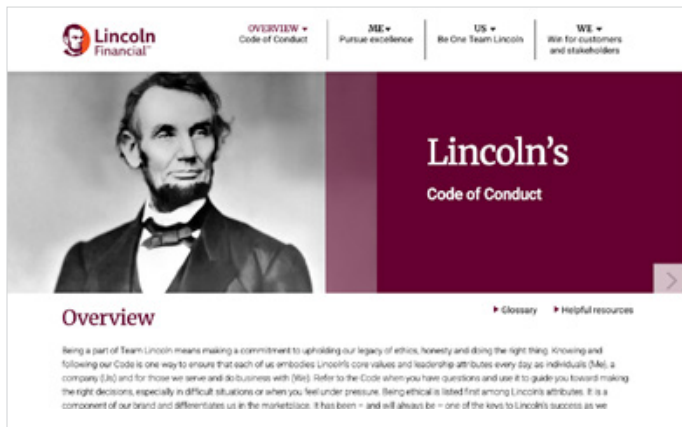
Usability



7

Example: Lincoln Financial Group, Cargill

What works: The codes are web-based, which means they can be accessed from any device as one would a website. The experience is interactive, which helps the reader get the information they need quickly and easily. Critically, ethics and compliance teams can get valuable insights from data analytics of user engagement with the code.



Look and feel



8

Example: Snap, Inc

What works: The visual design of the code grabs your attention with smart use of design elements that reinforce the brand identity as it aligns with ethical principles.





Conclusion

Organizations are evolving their codes of conduct to be clearer, more inclusive, and technologically relevant. At the same time, too many companies are not updating their codes fast enough to keep pace with sweeping business, compliance, and technological developments, including the emergence of artificial intelligence (AI) as a significant risk area. While structural improvements and employee engagement are rising, gaps in communication, especially among middle managers, persist. Embedding codes into daily behavior remains the next frontier for ethics and compliance leadership in a changing global workplace.



Methodology



Employee survey

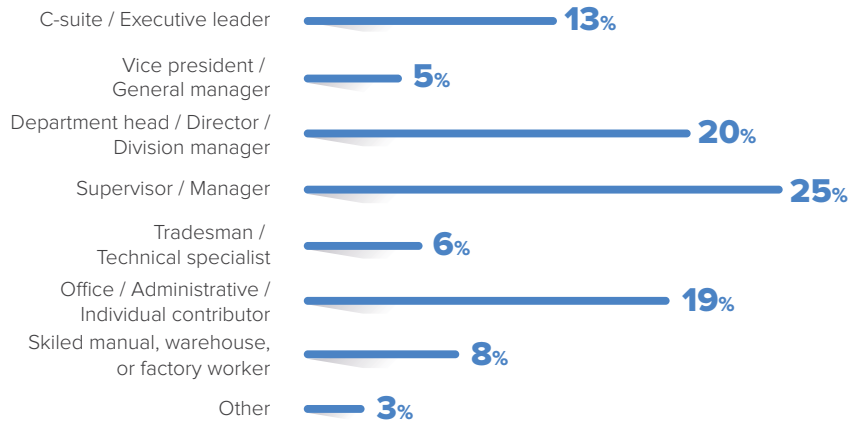
LRN partnered with Sago (a leading global research partner) to conduct a comprehensive survey on employee use of codes of conduct, an expansion on our *2024 Code of Conduct Report* which had used validation data from our 2021 and 2024 *Benchmark of Ethical Culture* reports. Previously validated through our LRN Ethics & Compliance Culture Assessment, the survey questions encompass the characteristics of ethical culture and engagement with codes of conduct, informed by our 30 years of work and previous research on and frameworks of ethics, culture, leadership, values, and compliance.

The data published in our *2025 Code of Conduct Report* was collected from 2,001 full-time employees, spanning individual contributors to the C-suite across 16 industries and 15 countries, representing Asia-Pacific, Europe, North America, and South America. The study was provided in 11 languages: English, Brazilian Portuguese, Chinese (Simplified), Dutch, Canadian French, French, German, Japanese, Latin American Spanish, Polish, and Swedish. Quota sampling methodologies were employed to ensure that all groups were equally represented and statistically valid.

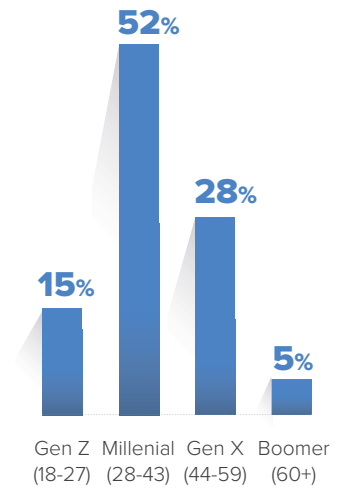


Participant demographics

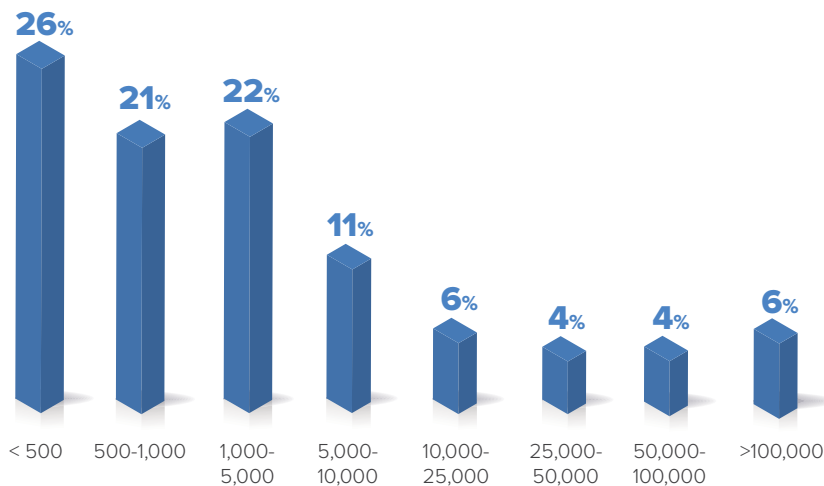
Title



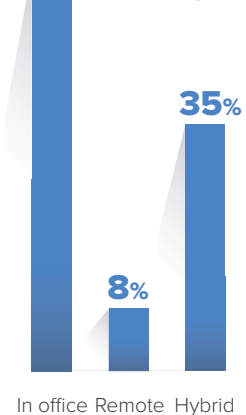
Generation



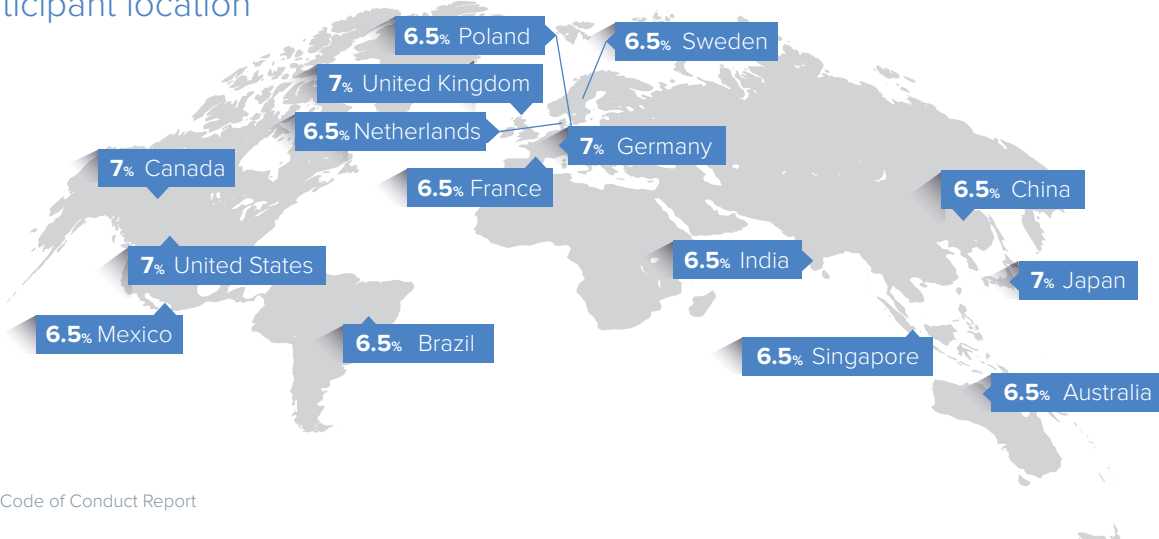
Company size (# employees)



Work arrangement



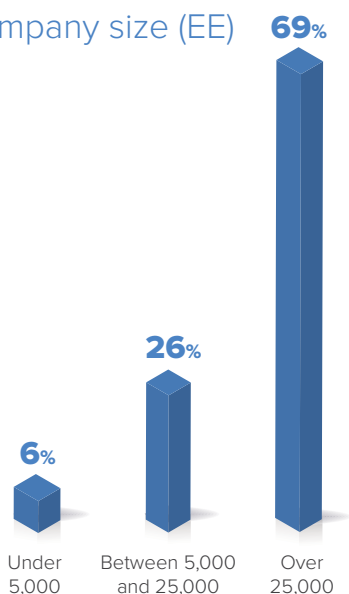
Participant location



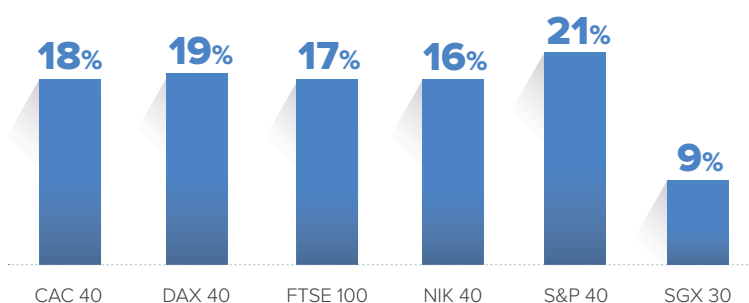
Company demographics of the code comparison

We used an artificial intelligence tool to conduct the comparison between the codes of conduct analyzed in the 2023 *Code of Conduct Report* and the current versions of those same codes. We looked at both code of conduct elements and risk topics covered. The criteria are based on LRN's proprietary code of conduct assessment framework, which align with the 8 Dimensions of Code of Conduct Effectiveness outlined in this report.

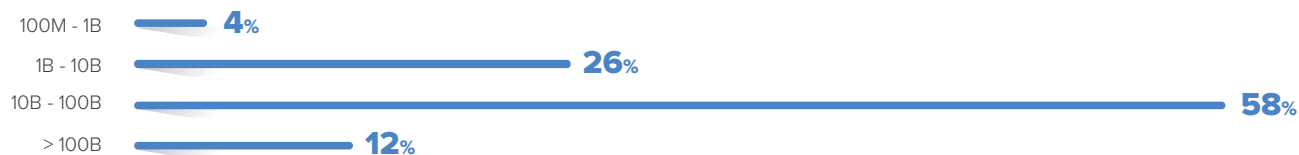
Company size (EE)



Primary listing



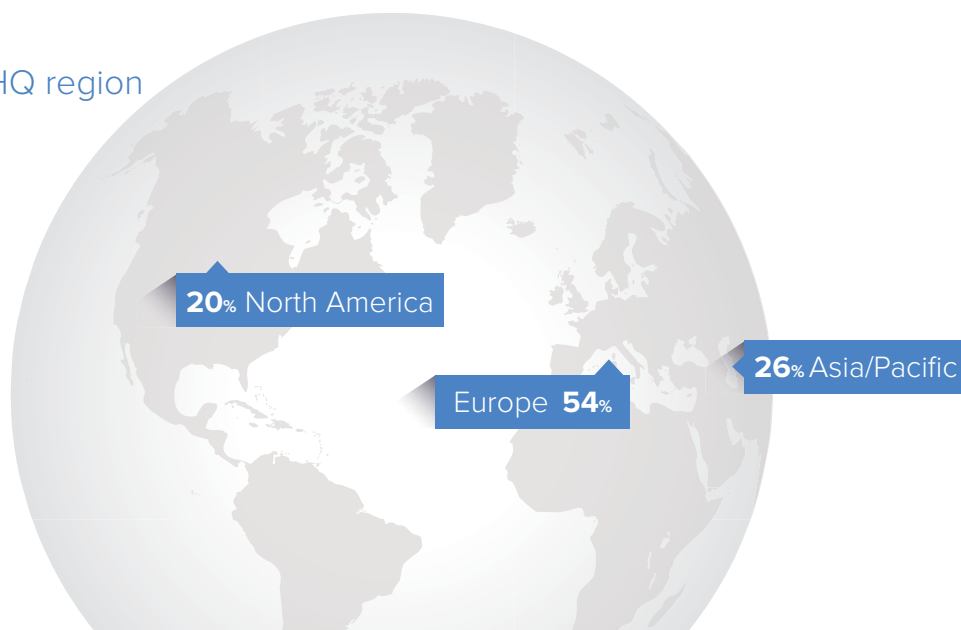
Annual revenue (USD)



HQ country

Australia: 1%
China: 1%
Czech Republic: 1%
France: 17%
Germany: 18%
Ireland: 3%
Japan: 16%
Luxembourg: 1%
Philippines: 1%
Singapore: 6%
Switzerland: 2%
Thailand: 1%
UK: 14%
US: 20%

HQ region





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