

Code of Conduct Policy and Procedure

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Introduction

Realise Training Group and its subsidiary companies are committed to ensuring that our business is run in a responsible and ethical way. This means that all Company decisions must be made for justifiable business reasons, honestly and in accordance with any applicable codes, laws, and regulations.

Purpose

This Code of Conduct sets out the expectations for all employees during their employment with the Company. We strive to maintain a work environment where honesty, integrity, and respect for colleagues and clients are reflected in everyone's personal behaviour and conduct.

This Code focuses on promoting best business practices and responsible employee behaviour for the benefit of the Company, our employees, stakeholders, and customers.

We commit to our customers, clients, and each other, not only out of legal obligation but because it's simply the right thing to do. Our Company's success depends on a reputation for integrity and quality in everything we undertake.

Scope

This policy applies to Realise Training Group Limited "the Company", "Realise", "Smart Gas" and all of its subsidiary companies. It sets out the standards and expectations that apply across the Group and is relevant to all employees, contractors, and officers. This policy does not form part of any individual's contract of employment or terms and conditions, and the company may amend it from time to time.

This policy and procedure is non-contractual and may be updated periodically to reflect best practice and changes in legislation. However, it clearly outlines the standards and behaviours expected by the Company. Breaches of this Code could be deemed as misconduct or gross misconduct, leading to the Company's disciplinary procedure being invoked.

All employees and contractors are expected to take individual responsibility for upholding the highest standards of personal conduct and must comply with this Code of Conduct. Employees with management responsibilities are specifically required to support the Code by demonstrating exemplary personal conduct and ensuring all team members are aware of and comply with it.

Failure to comply with any area of this Code of Conduct may result in disciplinary action, which will be handled in accordance with the Company's disciplinary procedure.

All employees are expected to conduct their day-to-day work, when representing the Company, in line with the Company's values, aims, and objectives.

Company Policies and Reporting Concerns

The Company has a series of policies and procedures available on PeopleHR and Blink. All employees must read, fully understand, and comply with these.

Any employee who believes they are being required to act in a way that is:

- Improper, inappropriate, illegal, unethical, or discriminatory
- In breach of a professional code
- Potentially involves maladministration, fraud, bribery, corruption, or misuse of funds
- Otherwise not in line with this Code

They must raise this matter immediately with their line manager or the People team. Alternatively, they can refer to the Whistleblowing Policy, which is also available in the Hub on Blink or in the documents section on PeopleHR.

Standards of Behaviour

Health & Safety

It is the responsibility of individual employees to ensure they operate in a safe working environment. All employees should:

- Read and fully understand all available Health and Safety information.
- Be, and remain, fully familiar with all Health and Safety information.
- Conduct their day-to-day work in line with Health and Safety guidelines.
- Never jeopardise the Health and Safety of any other employee, customer, visitor, or stakeholder.
- Report any breach of Health and Safety policy to the Facilities Coordinator immediately.
- Take appropriate action and responsibility to ensure a safe working environment for all.

All Company activities must fully comply with applicable laws and policies relating to health and safety. You are responsible for knowing the laws and policies relevant to your role. Furthermore, you must ensure all customers, clients, and visitors comply with applicable health and safety regulations. For more information, contact our Facilities Coordinator or refer to the Health and Safety Policy available on the intranet.

Equality, Diversity and Dignity at Work

The Company is committed to providing equality of opportunity in all aspects of work. We are also committed to creating an environment free from bullying and harassment, where

everyone is treated with dignity and respect. This includes a commitment to making reasonable adjustments for employees with disabilities.

Any employee witnessing any disrespectful or discriminatory behaviour from another employee should report this to their line manager or the People team.

The Company has a zero-tolerance approach to bullying and harassment of any kind. All allegations will be investigated, and if appropriate, disciplinary action will be taken. The Company will also not tolerate victimisation of a person for making allegations in good faith or supporting someone making such a complaint. Please refer to the Equality and Diversity Policy for further information.

Performance

The Company expects employees to follow all reasonable rules and instructions given by those in a supervisory or management role.

Timekeeping and Attendance

You are expected to be ready and able to carry out your duties within your working hours.

Respect for the Property of Others

All employees must respect the property of others. Disciplinary action may be taken against any employee found to have stolen or intentionally abused the property of the Company or another Realise employee.

Dress Code

All employees are required to follow the Company's "dress for your day" policy, whether working on Company premises or elsewhere.

Alcohol and Substance Abuse

Employees may not use, sell, possess, purchase, or transfer illegal drugs on Company premises, in Company vehicles, or during work hours.

Alcohol consumption during work hours or on Company premises is strictly prohibited. The only exception is alcohol consumed by individuals of legal drinking age at Company-sponsored functions approved by a Senior Manager or above.

Employees must not be under the influence of illegal drugs or alcohol during working hours, regardless of when the drugs or alcohol were consumed.

It is also a violation of this policy to sell, transfer, or distribute personal prescription drugs on Company premises, while driving for business, or during working hours.

Personal Relationships

The Company acknowledges that employees working together may form personal friendships and, in some cases, close personal relationships. While we don't wish to interfere with these, it's essential to ensure all employees behave in an appropriate and professional manner at work. Employees must use good judgement to ensure these relationships do not negatively impact their job performance, their ability to supervise others, or the overall work environment.

Any workplace conduct arising from a romantic, intimate, family, or friendship relationship between employees may be improper if it creates an uncomfortable work environment for others. Examples of inappropriate conduct include favouritism, open displays of affection, and making business decisions based on emotions or friendships rather than the Company's best interests. Employees in intimate relationships or close friendships should act with tact, good judgement, and sensitivity.

The Company does not prohibit relatives or other individuals with whom employees have a personal relationship from being employed. It is the responsibility of all employees to inform the Company of any such relationship at the time of application for employment, and during their employment, to ensure no conflict of interest arises.

Genuine relationships can occur between different levels of employees and learners/clients, but no intimate relationship should begin while an employee is in a position of trust. It is the responsibility of all employees to inform the Company of any relationships with learners/clients, including those that began before the employee was in a position of trust, to ensure no conflict of interest arises. If the older person is responsible for the younger person's success or failure to some extent, the dependency of the younger learner on the older will be increased. It is therefore essential that all employees recognise the responsibility they must exercise in ensuring they do not abuse their positions of trust.

Employees working with learners and/or clients should ensure they do not become involved in actions which could lead to harm or actions that could be misinterpreted, possibly leading to allegations (false or otherwise) being made against them.

All allegations will be managed according to the statutory guidance Keeping Children Safe in Education 2025. See 'Accusations of abuse' on pages 9-10 of the Safeguarding & Prevent Policy.

Banter

We define banter as "the playful and friendly exchange of teasing remarks." The moment someone is hurt or upset by this 'banter,' it is no longer banter but potentially bullying, harassment, and depending on the content, discrimination. Any employee affected by banter must speak immediately to their line manager or the People team.

Sexual Harassment

We define sexual harassment as "behaviour characterised by the making of unwelcome and inappropriate sexual remarks or physical advances in a workplace or other professional or social situation." The Company is committed to creating a workplace free from sexual harassment and will take all reasonable and proactive steps to prevent its occurrence, in line with our legal duties under the Worker Protection (Amendment of Equality Act 2010) Act 2023.

This includes:

- Regular risk assessments to identify and mitigate potential areas of risk for sexual harassment.
- Comprehensive and recurring training for all employees and managers on recognising, preventing, and responding to sexual harassment.
- Maintaining clear, accessible, and supportive reporting channels.
- Promoting a culture where sexual harassment is never tolerated and always challenged.

If any employee witnesses or is subjected to sexual harassment involving a learner or colleague, they must report it immediately to their line manager or People team. In the case of a learner being involved, report directly to the Safeguarding & Wellbeing Manager via Tootoot.

Please see the Anti-Harassment, Bullying and Victimisation Policy for more information.

Inappropriate Behaviour with Learners

If any employee witnesses or is made aware of any inappropriate behaviour with a learner, they must report it immediately to the Safeguarding & Wellbeing Manager or the People team.

Conduct Outside of Work

While your life outside of work is your own concern, you must not put yourself in a position where your job and personal interests conflict. This includes behaviour that might question the Company's confidence or trust in you.

Any employee who is arrested and refused bail on any charge must take all reasonable steps to inform their line manager, or in their absence, a member of the People team.

Any employee convicted or found guilty of any criminal offence (except minor traffic offences or fixed penalty charges), or who receives a police caution for any offence, must report this to the People team.

Any employee convicted of, or cautioned for, a criminal offence related to their work for the Company, or which may bring the Company into disrepute, is at risk of disciplinary

proceedings which may result in dismissal. This applies to offences committed both off-duty and whilst at work.

Social Media

The Company recognises that many employees use social media in a personal capacity. While not acting on behalf of the Company, employees must be aware that their actions can damage the Company's reputation if they are recognised as one of our employees. Any social media activity that causes serious damage to the Company reputation may constitute gross misconduct and will be addressed through the disciplinary process. Please seek advice from the Marketing department if you are unsure how you may use social media.

Acting in the Best Interests of the Company

When conducting day-to-day business, all employees must act with the best interests of the Company in mind. To do this, all employees should follow these guidelines:

Financial Gain

Employees should make decisions solely in the best interest of the Company, not to gain financial or other material benefit for themselves, their family, or friends. Employees must ensure they do not place themselves under any financial or other obligation to outside persons or companies that might influence their performance of duties without first agreeing this with the Company.

Conflicts of Interest

The reputation of the Company and its workers is vital for maintaining the trust and confidence of those with whom it deals, contributing significantly to becoming the Trusted Partner.

Employees may occasionally find themselves in a situation with an actual or potential conflict of interest. How these are managed will affect not only how the Company is viewed externally but also internal views and attitudes.

Employees must declare any actual or perceived conflicts of interest during the recruitment process to the Recruitment team. Conflicts of interest can include any public or private interests involving self, spouse, partner, family, or friend which may conflict with an employee's duties.

The employee must detach themselves from taking decisions or being involved in discussions that may be affected by this relationship, either informally or formally.

You must obtain written approval from a Board member before conducting Company business with parties such as relatives, friends, spouses, or life partners. The Company's interests must always remain the top priority in these interactions. Additionally, you may not

pressure others into hiring a relative or friend as an employee, supplier, or vendor of the Company.

During employment, it is the employee's responsibility to declare any change in relation to a conflict of interest to their line manager.

Fair Dealing

You should always deal fairly and honestly with the Company's customers, clients, suppliers, competitors, and employees. You should not take unfair advantage of anyone through manipulation, concealment, abuse of confidential information, falsification, misrepresentation of material facts, or any other intentional unfair dealing practice. This fair dealing provision does not alter existing legal relationships between the Company and its employees, including any at-will employment arrangements.

Bribes, Improper Payments and Fraud Prevention

It is our policy to conduct all our business in an honest and ethical manner. We maintain a zero-tolerance approach to bribery, corruption, and fraud, and are committed to acting professionally, fairly, and with integrity in all our business dealings and relationships wherever we operate.

Failure to Prevent Fraud (Economic Crime and Corporate Transparency Act 2023)

In addition to our existing commitment to deterring and addressing individual instances of fraud, the Company takes its responsibilities under the Economic Crime and Corporate Transparency Act 2023 (ECCTA) very seriously. From 1st September 2025, this Act introduces a new corporate criminal offence of "failure to prevent fraud".

This means that if an employee, agent, subsidiary, or other 'associated person' commits a fraud offence intending to benefit the Company (or its clients), the Company could be held criminally liable, unless it can demonstrate it had reasonable fraud prevention procedures in place. This applies regardless of whether senior management ordered or knew about the fraud.

To ensure compliance with this duty and to protect the Company and its employees, we are committed to implementing and maintaining robust and reasonable procedures to prevent fraud. This includes:

- Top-level commitment from senior management to foster a culture against fraud.
- Regular and thorough risk assessments to identify the nature and extent of the Company's exposure to fraud risks.
- Proportionate, risk-based fraud prevention procedures tailored to our operations.
- Due diligence on associated persons (including employees, agents, and third parties).
- Clear communication and comprehensive training for all employees on fraud risks, prevention, and reporting mechanisms.

- Ongoing monitoring and review of our fraud prevention measures to ensure their effectiveness.

Reporting and Consequences

All employees are expected to act with the highest integrity and honesty. Any instances of suspected or actual bribery, corruption, or fraud will be investigated thoroughly by the Company. Such conduct may lead to disciplinary action, up to and including dismissal, and/or reporting to the Police and other relevant authorities.

Full details of our commitments and your responsibilities can be found in the Company's comprehensive Anti-Fraud and Bribery Policy, which all employees, contractors, or any other person associated with Realise Training Group are required to read and adhere to.

Accepting Gifts and Hospitality

Employees may be offered gifts and hospitality due to their dealings with external companies/employers or persons. Employees must always be cautious about accepting gifts and hospitality, and the following guidelines must be adhered to: No employee should accept gifts or hospitality from a supplier involved in a live tender exercise.

Additionally, personal gifts must not be given to learners or employers. This could be misinterpreted as a bribe or an attempt to single out the learner/employer, or that a 'favour' of some kind is expected in return.

Invitations to events with other colleagues may be accepted if it can be demonstrated that there are benefits to the Company and if they do not compromise the integrity of the Company/supplier relationships. These must be approved by your line manager before being accepted.

Invitations to exclusive and/or expensive events (e.g., where the employee and their partner would be the only guests, or the value of the hospitality is significant) must not be accepted.

The appropriate value of gifts given and received, and of received hospitality in an international context, will vary according to cultural differences. Colleagues should contact the Company's Chief Executive Officer in the first instance if wishing to give or receive hospitality or gifts of a large value.

Any employee receiving gifts or hospitality must notify their Line Manager. Any gifts other than branded calendars, diaries, and stationery, and all hospitality, must either be not accepted or advice should be sought from our Finance Department. Any unacceptable gifts should be returned by recorded delivery.

Purchasing Gifts for Employees

The ability to purchase gifts for employees does not replace the current practice of collecting from colleagues who wish to contribute to a gift for a particular occasion. The following

guidelines should be followed when determining if a gift purchased on behalf of the Company is appropriate:

- Gifts may be sent in the following circumstances: long-term sickness (usually after four weeks); the birth of a child where the employee is the parent (including adoptive parents and/or parents in a civil partnership); the death of an immediate relative.
- The following types of gifts are appropriate: a bouquet of flowers or wreath, a basket of fruit, an appropriate voucher.
- The purchase of a gift must be approved in advance by the employee's Line Manager.
- No gift should exceed £30.

Please liaise with Operations Support who will help you if you wish to purchase a gift for an employee.

Outside Employment

The Company is committed to retaining the highest degree of trust and confidence amongst its employees. It is therefore important that employees maintain the highest standards of conduct and avoid any activities, whether paid or unpaid, that may cause a conflict of interest between outside work activities and the Company's core organisational activities.

To enable the Company to comply with its obligations under the Working Time Regulations 1998, you should not engage in any work of any nature (including voluntary work) for any other employer whilst you are employed by the Company without first obtaining the Company's consent. When seeking Company consent, you will need to provide details of the hours you intend to work for the other employer.

Outside employment is defined as:

- a) Holding any other office or employment, whether paid or unpaid.
- b) Carrying on any trade or business or any type of self-employment. Examples include additional employment and/or voluntary work.

The Company does not prohibit employees from taking secondary employment and/or non-executive Directorships, whether paid or unpaid, and will not unreasonably withhold permission for an employee to undertake outside employment, provided that the employment does not interfere, and is not likely to interfere, with the employee's performance in their current role.

The Company reserves the right to refuse an employee's request to take outside employment if the:

- Role is with a competitor organisation, or an organisation engaged in the same type of business.
- Role is with a customer or client of the Company.
- Role is with an organisation that provides goods or services to the Company or has any other type of contractual arrangement with the Company.

- Role or the type of work involved might, in the Company's opinion, represent a conflict of interest or might reflect badly on the Company's reputation.
- Hours of work would likely, in the Company's opinion, interfere with the employee's performance, attendance, and/or timekeeping.
- Total number of hours worked in both jobs would likely, in the Company's opinion, impact on health and safety, or contravene any of the provisions of the Working Time Regulations 1998.

Equipment provided by the Company must not be used whilst undertaking outside employment. Employees should also not give the impression that such activities are in any way associated with and/or endorsed by the Company.

Requests for Information

It is Company policy to cooperate with appropriate government (or other) requests or investigations. If you are asked to provide information (either written or verbally) for a government investigation, or if a government representative appears at your workplace, notify the People department. All information provided should be truthful and accurate and must not obstruct, influence, or impede the request for information. Employees should not alter, falsify, mutilate, cover up, dispose of, or destroy any documents or records related to a government request, investigation, or legal proceedings.

If approached by the media, you must not communicate in any way to reporters on behalf of the Company. Individuals who talk directly to reporters without going through the proper channels risk providing incorrect information or revealing proprietary strategies. Please direct members of the media with enquiries to the Marketing team.

Intellectual Property Rights

Just as we expect others to recognise our legal rights in our products and services, we respect the legal rights of others in their brands, designs, software, articles, and other legally protected materials. You should never make unauthorised copies of material from copyrighted books, magazines, newspapers, videotapes, or computer programmes. While you may generally make a copy for your own business use, making multiple copies without permission violates copyright laws.

The Environment

The Company is committed to minimising the negative impact of our business activities on the environment. All employees are responsible for complying with applicable environmental laws and Company policies. Please refer to the Company's Sustainability Policy for further information.

Confidentiality

Employees should maintain all aspects of confidentiality, in line with their terms and conditions of employment. Additionally, employees should:

- Protect company information held in confidence.
- Maintain confidentiality within their job role.
- Continue to maintain confidentiality after leaving the Company.

As an employee, you may have access to information about the Company that is not publicly available. Generally, you should regard all Company information as confidential and not disclose or transmit it to anyone outside the Company. There will be occasions when disclosure is appropriate, but careful consideration should take place before disclosure. If you are in any doubt about the appropriateness of disclosure, you should consult your line manager or People team.

You may also learn information from the Company's clients, customers, or suppliers that has been disclosed to the Company on the basis that it should be kept confidential. Such information should not be disclosed to third parties without the permission of the owner of the information and/or compliance with the terms of any confidentiality agreement between the Company and the owner of the information.

In addition, an employee must not, within one year after leaving the Company:

- Try to induce away from the Company any customer or client with whom they had dealings on behalf of the Company during the 12 months prior to leaving.
- Compete with the Company or any of the Associated Companies with which you have been materially involved during the 12 months preceding your leave date.
- Try to entice away any employee of the Company.
- At any time during or after leaving the employment of the Company, employees will not, in any way, disclose any business-related information concerning any of the above-mentioned companies, their employees, their vendors, or their customers, except when required or authorised to do so by the Company or by Law.

Confidentiality of Personal Data

The Company holds and processes information about employees and customers for administrative and commercial purposes. When handling such information, the Company and all employees who process or use any personal information must comply with the Data Protection Principles as set out in the Data Protection Act 2018.

As an employee, it is your responsibility to respect the privacy of fellow employees and our customers. You should use and maintain personal data with care and respect, while guarding against inappropriate access and disclosure. You should not use any personal data for personal benefit or in any other inappropriate way.

For further information, please refer to the Data Protection Policy in the Hub in Blink.

Accuracy of Company Records and Integrity in Reports and Communications

Accurate records are essential to the successful operation of the Company. Employees are responsible for ensuring the accuracy of all Company records, information, and accounts. For

example, claims on an expense report or time record, payments, and other transactions must be correctly recorded and accounted for, and properly authorised in accordance with Company policies.

All business records should be clear, truthful, and accurate. Keep in mind that business records and communications may become subject to public disclosure through government investigations, litigation, or the media. Business records are Company assets and must be retained or destroyed in compliance with the applicable records retention schedules. In accordance with that policy, in the event of litigation or a government investigation, relevant records must be retained and preserved.

We are required to file periodic reports and make certain public communications.

Employees must act to ensure full, fair, accurate, timely, and understandable disclosure and reporting of Company information, including the Company's financial results and financial condition. All employees must comply with Company policies, procedures, and controls. Accounting and financial reporting of actual transactions and forecasts must follow the Company's accounting policies as well as all applicable generally accepted accounting principles and laws.

Improper Influence on Audits

You are expected to cooperate fully with our internal and external auditors. You must not directly or indirectly take any action to coerce, manipulate, mislead, or fraudulently influence any public accountant engaged in the performance of an audit or review of the Company's financial statements.

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Policy Owner	Sue Kamal Chief People Officer
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