

Whistleblowing Policy

November 2025

Introduction

Realise Training Group Limited (“the Company”) is committed to a free and open culture in dealings between its officers, employees, customers, suppliers, and all people with whom the Group engages in business relations. Realise Training Group recognises that effective and honest communication is essential to maintain our business values and to ensure that instances of business malpractice are detected and dealt with.

Purpose

The purpose of this policy is to encourage everyone whether they are full time or part time employees, agency staff, agents, contractors, suppliers, or customers of the Company to report any business misconduct without risk to themselves.

Application

This policy will apply in cases where you are genuinely and in good faith believe that business misconduct is occurring, has occurred or may occur within Realise. This policy follows the statutory guidance of Keeping Children Safe in Education 2025. Below are some examples of business misconduct:

- Criminal activity or Persons not complying with legal obligations
- The use of deception to obtain an unjust or illegal financial advantage for the business or personally
- Miscarriage of justice
- Danger to health and safety of an individual
- Damage to the environment
- Breach of Internal controls or Policy
- Intentional misrepresentation affecting financial statements
- Non-reporting to authorities of safeguarding or Prevent Duty cases to save the Company reputation

This policy is separate from the grievance procedure. It does not form part of any employee’s contract of employment. The policy will be publicised to all employees and will be reviewed on a regular basis to be updated or revalidated as appropriate.

Reporting business misconduct

Concerns regarding business misconduct can be raised to a dedicated inbox whistleblower.submissions@realisetraining.com

Safeguards

If requested, we will take all reasonable steps to protect your anonymity. However, you should be aware that action taken because of your disclosure may lead to your identity needing to be revealed.

Any whistle-blowing employee is protected against adverse employment actions (i.e., dismissal, demotion, suspension, harassment, or other forms of discrimination) for raising

allegations of business misconduct. A whistle-blowing employee is also protected even if the allegations prove to be incorrect or unsubstantiated, provided the disclosure is made in good faith and where it is believed the information and any allegation in it are true.

Investigation

Once an allegation of business malpractice is made, the People team will agree an appropriate investigation plan with the Board. Once the investigation is complete it will be reviewed by the Board and you will be advised, where appropriate, of the results of the investigation as well as any corrective actions which are being taken.

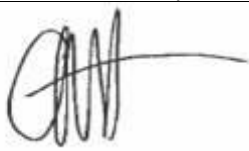
The Company is committed to running its operations without misconduct and expects its employees and other stakeholders to share this objective. However, we also recognise that whistleblowing is a potentially sensitive issue. If you believe that you are being penalised in any way for whistleblowing or if you do not consider that you have had a satisfactory response to your disclosure you should contact the Independent Helpline setting out the facts.

Disciplinary Action

If any allegation of business malpractice is substantiated, appropriate disciplinary action will be taken against the responsible individual(s), up to and including termination of employment.

Furthermore, any act of retaliation or victimisation against a whistle-blower employee will result in disciplinary action being taken against the perpetrator, up to and including termination of employment.

The malicious use of the whistle-blowing policy will result in disciplinary action against a whistle-blowing employee, up to and including termination of employment.

Version Control Number	Realise-05-PD-64
Version	4
Last Review Date	03/11/2025
Next Review Date	03/11/2026
Policy Owner	Sue Kamal Chief People Officer
Signed by CEO	 Gregg Scott Realise Chief Executive Officer