

Whistleblowing Policy

Reviewed September 2025

Date of next review September 2026

The Company: Refers to Network Group Holdings Plc and all of its subsidiary and associated companies including The Graduate Network.

All employees of the Company are under an obligation implied in their Contract of Employment to provide an honest and faithful service to the Company. This includes an obligation not to disclose any Company information or secrets to external sources that will undermine the mutual trust and confidence on which the employment relationship is based. The Public Interest Disclosure Act 1998 complements those obligations by affording protection to those employees who, in defined circumstances, act in good faith and without malice, to disclose certain specific confidential information to a third party.

This policy applies to all employees of the Company. Other individuals performing functions in relation to the Company such as contractors are encouraged to use it.

Purpose and Scope

The purpose of this policy is to provide employees a means by which they are able to raise concerns if they have reason to believe there is serious malpractice or dishonesty within the Company. It is designed to protect employees wishing to raise specific serious concerns that may be in the public interest and may include:

- A serious risk to the health and safety of any individual
- Improper conduct or unethical behaviour
- Environmental damage
- Financial or non-financial mal-administration
- A criminal offence
- Failure to comply with legal obligations or with statute

If, during any investigations, it becomes evident to the investigator that the concern raised is more related to grievance, harassment or discipline, then the appropriate procedure will be invoked.

Concerns must be raised without malice and in good faith and the individual must have at least a reasonable belief that the information disclosed, and any allegations made, are substantially true.

The Company will ensure that any employee who makes a disclosure in such circumstances will not suffer any detriment. However, any employee not acting in good faith or who makes an allegation frivolously, without having reasonable grounds, or for personal gain, may be subject to disciplinary proceedings.

The individual raising a concern under this policy is afforded with protection from the Company and also in accordance with the Public Interest Disclosure Act 1998 and, therefore, it is preferable that the individual puts his/her name to any disclosure. Confidentiality will be afforded to the individual provided that this is compatible with a proper investigation.

Procedure

Any disclosure or concern under this procedure should be made in the first instance to their immediate Senior Manager or Director.

If the disclosure concerns either of these individuals, the employee may raise the concern with a Director, Senior to their own Manager, or Director and/or the HR function.

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You should put your concerns in writing and provide as much information as possible - including any relevant names, dates, places etc. The earlier you raise a concern, the easier it will probably be to take effective action.

Although you are not required to prove beyond the shadow of a doubt that your allegation is true, you will have to show that there are good reasons for your concern.

Process

The person to whom the disclosure is made will decide whether the matter should be dealt with under this procedure. Should they consider the matter should be dealt with under a different procedure, they will advise the individual making the disclosure as to the appropriate steps that should be taken.

Within 3 working days of the concern being raised, an acknowledgement will be sent to the person raising the concern, together with an explanation of how the matter will be handled.

Timescales will depend on the nature of the allegation and the type of investigations needed. Investigations will be conducted as quickly and sensitively as possible.

Investigation

In the first instance, enquiries will be made to determine whether the Company should carry out an investigation and, if so, how it will be done.

It is the responsibility of the person to whom the disclosure is made to consider the information and decide whether there is a case to answer. He/she will decide what form the investigation (if there is to be one) should take. This will depend upon the nature of the issue raised and may be

- investigated internally
- be the subject of an independent enquiry - referred to external legal adviser

It may be necessary to refer some matters to the relevant outside body e.g. the Police.

Should the person to whom the disclosure has been made, decide not to proceed with any investigation, then an explanation must be given in writing in full of their reasons to the individual who raised the concern. It is then the choice of that individual to make the disclosure known to any other person specified in this policy.

An official written record will be kept of each stage of the procedure.