



Reviewer: HR

Version: 10

Review date: 01/07/2026

Next reviewed: 01/07/2027

Document Number:HR-037-R10

Whistle-blowing Policy

Applicability

This policy/procedure/process applies to all divisions, subsidiaries, departments, and associated organisations within Twin. It is binding on all employees, contractors, and stakeholders engaged in activities on behalf of Twin, regardless of business unit or location. All members of Twin are expected to adhere to the principles, standards, and requirements set out herein.

Archbury Holdings Limited has adopted the Acceptable Use Policy of Twin Training International Limited at acquisition of some of its subsidiaries. These policies remain in place until December 2026. Over this time Archbury Holdings Limited will review these arrangements and implement its own policy.

Purpose

The purpose of this policy is to provide a clear and confidential process for employees, contractors, learners, stakeholders and other individuals associated with Twin to raise genuine concerns regarding malpractice, wrongdoing, fraud, safeguarding concerns or unethical behaviour.

The policy aims to ensure that concerns are investigated appropriately, that individuals raising concerns are protected from victimisation or retaliation, and that appropriate action is taken where concerns are substantiated.

This policy supports Twin's commitment to:

- Maintaining high standards of integrity, transparency and accountability across all operations;
- Protecting learners, staff, stakeholders and organisational resources;
- Ensuring compliance with legal, regulatory and contractual obligations; and
- Supporting a culture where concerns can be raised openly and safely.

Introduction

This policy enables you to raise concerns about any financial, or other, malpractice in Twin without fear of being subject to victimisation or discrimination. Such concerns may include the following:

- conduct which is an offence or a breach of law

- disclosures related to miscarriages of justice
- health and safety risks, including risks to the public as well as other employees
- damage to the environment
- the unauthorised use of Twin monies
- possible fraud and/or corruption#
- sexual harassment
- sexual or physical abuse; or
- other unethical conduct

Concerns may relate to any Twin operation, including UK-based services, international operations, Twin English Centre Ireland Limited, delivery partners, subcontractors or associated organisations.

You may find it difficult to raise your concerns and would welcome the opportunity to discuss them with someone in confidence in the first instance.

Subject to the constraints of the General Data Protection Regulations and their implementation in each jurisdiction in which Twin operates, you will be given as much information as possible about the outcome of any investigation.

Scope

This policy applies to:

- All employees, workers, contractors, consultants, volunteers and associated persons working for or on behalf of Twin;
- All Twin divisions, subsidiaries and locations, including Twin English Centre Ireland Limited;
- All activities delivered directly by Twin or through subcontracted, partner or third-party arrangements where applicable.

The policy should be used where an individual has a genuine concern regarding wrongdoing, malpractice, fraud, safeguarding, regulatory non-compliance or unethical conduct.

1. Staff responsibilities

If you are/become aware of any type of fraud having been committed or have concern that a situation is developing where it is likely to be committed at Twin, it is your duty to “blow the whistle”.

You must only report genuine concerns and must believe the concerns to be true. You must not receive any personal gain from making the disclosure.

Disciplinary action may be taken against you if you have made a frivolous, false or malicious allegation against somebody; in particular where such allegations may ultimately result in personal gain.

Individuals raising concerns are expected to provide information honestly and cooperate with any investigation process where appropriate.

If you find yourself in the position of needing to make a disclosure – please refer to the “What do I DO?” section below.

2. Management responsibilities

As soon as a complaint or an allegation is received by a line manager or other responsible person, it is the responsibility of that person to undertake an initial enquiry to ascertain the facts. This enquiry should be carried out as quickly as possible with the objective of validating (positively or negatively) the allegation that has been made.

As a result of this preliminary enquiry, a more detailed investigation may be needed. If the allegation is substantiated, the Finance Director (or equivalent thereof, hereafter referred to as Finance Director) should be informed of the situation as soon as possible. At this stage managers should be aware that they have a prime role in securing evidence and minimising any further losses.

The Finance Director will offer advice on the most appropriate course of action. The further action may involve the commissioning of specialist services to assist with an investigation e.g. IT specialists to preserve and manipulate information held on computer systems, lawyers, surveyors to assess building works. In all cases the Finance Director in liaison with the Executive Directors will do this.

Where concerns relate to activities undertaken by Twin English Centre Ireland Limited, appropriate escalation will include relevant Ireland operational leadership and Group governance representatives where required.

In most instances the Finance Director will carry out any further investigation in conjunction with the line manager or another appropriate person. In every case, one person will be appointed as the investigating officer of the case.

It is the responsibility of management at all levels to ensure that effective internal control systems are in place and operating to minimise the potential for fraud and corruption.

3. Asset recovery

Whenever fraud has been proved, Twin will make every effort to recover the losses. The method used will vary depending on the type of loss and the regulations and powers available. All means of recovery including recovery under social security legislation, attachments to earnings, civil court proceedings and criminal court compensation will be used as appropriate to the offence.

4. Training

Managers should ensure that all staff receives training in 'Fraud awareness'. This should include the training notes created regarding Digital Fraud in Scanned Documentation as such technology is being increasingly employed in the sector. The level and extent of this will depend on the work that individual employees carry out. When employees are an integral part of the control framework, it will be necessary for them to be regularly reminded of fraud issues. In other cases it may be sufficient to include information in an induction pack.

5. Anonymity and confidentiality – Our assurance to you

Twin encourages you to put your name to your allegation, as this gives weight to the case but you can remain anonymous if you wish. All information you provide is held in the strictest confidence.

If, however, your allegation is of such a serious nature that it is brought to court, a judge may order a name to be divulged, but Twin will do everything possible to protect your anonymity before this stage is reached.

You have nothing to fear by raising your concerns. Provided you are acting in good faith, it does not matter if you are mistaken. However, disciplinary action may be taken against any member of staff who is discovered to have made allegations frivolously, falsely or maliciously.

6. Once the whistle is blown – Twin's response

All concerns raised will be assessed and investigated. The person receiving the whistle-blowing allegation will be responsible for ensuring that it is investigated properly and that you as the whistle blower receive feedback on your referral.

Investigations will be managed in accordance with Twin's governance, HR and compliance

processes, with appropriate escalation depending on the nature, severity and location of the concern.

Some information has to be withheld because of Twin's duty of confidentiality toward the person being investigated, however Twin will keep you as well informed as possible, bearing in mind the need not to prejudice any action which may arise from the investigation.

In all cases confidentiality is maintained but if you are anonymous and want to maintain anonymity, you will not be told anything about the investigation. We would merely take the allegation from you.

The purpose of giving feedback is to assure you that Twin is properly addressing your concerns. In all cases Twin will seek the most appropriate sanction against individuals that it considers guilty of malpractice. This includes taking disciplinary action, which may include dismissal, taking civil action and, in conjunction with the law enforcement agencies, instituting criminal proceedings.

Twin reserves the right to amend/update this policy at any time, should you have any queries or questions in relation to this policy please speak with your Line Manager.

What do I DO? Step by Step:

- 1) You notice an incident
- 2) Inform your Line Manager, or if your line manager is the one potentially at fault, the Managing Director – International or Chief People Officer.
 - a. Your line manager will inform the other stakeholders above so that a log can be created for the incident. Please approach the person to which you feel most comfortable making the disclosure.
- 3) Your Line Manager or other nominated independent Manager will carry out an investigation**.
- 4) You will be kept informed as much as possible during this period.
- 5) If evidence is found, the Financial Director*** will be notified to provide support to manage the situation and minimise potential loss and inform stakeholders of the issue.

***How do I make the Disclosure?**

Maintain your duties as far as possible and at the earliest opportunity construct an email to the chosen Manager as above. This is your audit trail to demonstrate initial raising of the concern. Tell us that you:

- a. Have a concern

- b. Who it relates to and
- c. If there is a time constraint on the process (i.e. a claim is to be submitted in 3 days time) or it has already happened.
- d. If the staff member you have a concern regarding works in proximity to you, please mention this in the message and ensure the subject line of the email would not stand out to a casual onlooker.

******You will be contacted by the manager in the most discreet way available, so as not to cause any undue stress or upset to the team / ensure any allegations that subsequently prove unfounded will not destroy working relationships. The investigation will mirror a HR investigation as detailed in the staff handbook. However, the Compliance and Systems Manager may authorise and employ additional research methods to verify information using MI, Audit Process, Email Search and Centre Checks. Findings are then included in the investigation as a statement. This allows the investigation to cover:

- Evidence submitted by you via email
- Further explanatory information given as statements to the investigation manager (from you, the HoA, the person involved, and other direct stakeholders).
- The source evidence that highlights the act being investigated.

******* The investigation lead will then make a decision based on the evidence provided. If evidence has been located to support the accusation; The Finance Director, Chief People Officer are informed routinely, via email and follow up call.

They will then take action to ascertain the risk to the business raised by the act, ensure appropriate HR processes are enforced and manage the communication flow between

Twin and the effected contract holder to ensure we are able to resolve the problem in partnership with the organisation concerned.