

Ethics Group Policy

APEM Group is fully committed to support a culture of openness, trust, and integrity in all management and business practices and to conduct its affairs and activities with the highest standards of ethical conduct. All employees have an obligation to adhere to this policy and encourage others to do the same.

The summary code of ethics includes the following provisions:

- Proactively promote ethical behaviour as a responsible partner among peers in the work environment;
- Deal fairly with APEM Group customers, suppliers, competitors, volunteers, and employees.
- Provide clients with information that is accurate, completely objective, relevant, timely, and understandable;
- Always conduct ourselves in a professional manner;
- Comply with applicable government laws, rules and regulations;
- Maintain the confidentiality of information entrusted to them by APEM Group or its clients except when authorised or otherwise legally obligated to disclose;
- Accept responsibility for preventing, detecting, and reporting all manner of fraud;
- Be honest and ethical in APEM’s conduct, including ethical handling of actual or apparent conflicts of interest between personal and professional relationships;
- Protect and ensure the proper use of company assets;
- Prohibit improper or fraudulent influence on external auditors.

APEM Group’s ethics policy is supported by the following APEM Group policies: ESG Policy, Equal Opportunity Policy, Data Privacy policy and Conflict of Interest.

All staff will be made aware of this statement as part of their induction on appointment and subsequent on-going training. This policy is communicated and published on the company website for all interested parties.

It is the responsibility of all APEM Group employees to comply with this policy and to report concerns. APEM Group prohibits any form of retaliation for the reporting of such matters.

Reference	Version	Date released	Approved by
T1-GP-019	2	01/08/2023	Leah McGimpsey, Chief Executive Officer, APEM Group
This policy is communicated and published on the company website for all interested parties.			
This policy is subject to periodic review and change to ensure it remains valid. The review period is annotated within the Version Control section, or the policy may be reviewed prior to this date when prompted by context, such as developments in legislation, industry practice, or the organisation.			
This Policy has been Equality Impact Assessed and no adverse impact has been identified.			