

Anti-bribery & Corruption Policy

APEM Group is fully committed to conducting business in accordance with the highest ethical standards and prohibits all forms of bribery and corruption. APEM Groups business with individuals, companies or other organisations will be conducted professionally and transparently and be compliant with the applicable legislation governing bribery and corruption of the countries in which it does business.

APEM Group employees, or persons working for us in any capacity, must comply with all applicable anti-bribery and corruption laws in every country in which we do business.

What is Bribery?

Bribe means a financial or other inducement or reward for action which is illegal, unethical, a breach of trust or improper in any way. Bribes can take the form of money, gifts, loans, fees, hospitality, services, discounts, the award of a contract or any other advantage or benefit.

Bribery includes offering, promising, giving, accepting, or seeking a bribe.

All employees, or persons working for APEM Group, are prohibited from:

- Bribing another person. A bribe includes the offering, promising or giving of any financial or other type of advantage when dealing or negotiating on behalf of APEM Group;
- Accepting a bribe. This includes requesting, agreeing to receive or accepting any financial, or another kind of incentive; and
- Condoning the offering or acceptance of bribes.

APEM Group will:

- Ensure that its processes, procedures, and records limit the risk of direct or indirect bribery.
- Promote awareness of this policy among employees, anyone acting or providing services on the company's behalf and organisations with which it has commercial dealings.
- Endeavour to avoid doing business with others who do not accept its values and who by association may harm its reputation.
- Investigate any allegations of bribery or corruption and will cooperate with any investigations undertaken by other relevant authorities.

All forms of bribery are strictly prohibited. If you are unsure about whether a particular act constitutes bribery, raise it with your manager.

Gifts and hospitality

This policy does not prohibit the giving or accepting of reasonable and appropriate hospitality for legitimate purposes such as building relationships, maintaining our image or reputation, or marketing our products and services.

A gift or hospitality will not be appropriate if it is unduly lavish or extravagant or could be seen as an inducement or reward for any preferential treatment.

Gifts must be of an appropriate type and value depending on the circumstances and taking account of the reason for the gift. Gifts must not include cash or cash equivalent (such as vouchers) or be given in secret. Gifts must be given in our name, not your name.

Promotional gifts of low value such as branded stationery may be given to or accepted from existing customers, suppliers and business partners.

Record-keeping

You must declare to both the People and Finance teams all hospitality or gifts given or received. You must also submit all expenses claims relating to hospitality, gifts or payments to third parties in accordance with our expenses policy and record the reason for expenditure.

Members of staff who contravene this policy or their statutory requirements will face disciplinary action which could result in dismissal for gross misconduct. Any non-employee who breaches this policy may have their contract terminated with immediate effect.

How to raise a concern

If you are offered a bribe, or are asked to make one, or if you suspect that any bribery, corruption or other breach of this policy has occurred or may occur, you must notify your Manager as soon as possible.

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.

All staff will be made aware of this statement as part of their induction on appointment and subsequent on-going training.

This policy does not form part of any employee's contract of employment.

Reference	Version	Date released	Approved by
T1-GP-004	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.			