

Conflict of Interest Policy

APEM Group is fully committed to ensuring that its employees and others acting on APEM's behalf are free from conflicts of interest which may affect their judgment or ability to behave with impartiality; or which might conflict with their responsibilities or the interests of APEM Group.

This policy applies to circumstances that may give rise to a material risk or damage to the interests of APEM or one of its clients. Conflicts of interest may potentially arise between:

- APEM Group employees or associates and APEM Group;
- APEM Group employees or associates and a client;
- two or more clients of APEM Group in the context of the provision of services to those Clients;

APEM Group expects all those working for or with them to recognise that it is possible for the perception of a conflict of interest to occur and that it is equally important to prevent this. Employees and associates are required to declare and obtain management approval when there are relationships and financial interests which could lead to conflicts of interest with their role or the interests of APEM Group.

APEM Group is particularly aware of its obligations in respect of its clients and potential clients and will manage its relationships with all external organisations in such a way as to ensure that procedures are in place which help identify potential conflicts. APEM Group senior management are aware of all the relationships with external organisations and they will ensure that all necessary steps are taken to segregate responsibilities should occasions arise when APEM Group undertakes work for two or more clients who may have competing interests.

APEM Group staff should:

- Keep confidential any information provided during the course of their work for clients.
- Act in the best interests of their clients when providing services.
- Notify senior management before commencing work with a client if they consider that there are any potential conflicts.
- Alert senior management if during the course of their relationship with the client they become aware of an actual or perceived conflict arising.

If necessary, an employee or associate may be withdrawn from providing services until APEM Group is satisfied that it is confident that the client's interests will not be damaged. Subject to the nature of the potential or actual conflict APEM will notify the client.

APEM also has an Anti-Bribery and Corruption Policy which provides further guidance to employees and associates as to their obligations when dealing with clients and potential clients.

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 is communicated and published on the company website for all interested parties.

Reference	Version	Date released	Approved by
T1-GP-005	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.			