



Anti-Slavery and Human Trafficking Policy

Apo Group Ltd

Effective Date: 12th September 2025

Review Date: 12th September 2026

1. Policy Statement

At APO Group Limited (“APO”), we are committed to conducting business ethically and with integrity. We have a zero-tolerance approach to modern slavery and human trafficking. We are committed to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our business or in any of our supply chains.

This policy sets out our commitment and the steps we take to ensure that slavery and human trafficking does not occur in our operations.

2. Purpose

This policy aims to:

- Prevent modern slavery in our business and supply chains.
- Educate staff on the risks and signs of modern slavery.
- Outline the responsibilities of APO and its employees.
- Promote transparency in our supply chain.

3. Scope

This policy applies to all persons working for APO or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

4. Our Business

APO provides property management services to residential and mixed-use developments. While we consider our direct risk of modern slavery to be low, we recognise that certain areas of our supply chain—such as cleaning, maintenance, construction, and facilities management—can carry higher risks.

5. Our Commitments

We will:

- Not tolerate slavery or human trafficking in any part of our business.
- Conduct risk assessments on our suppliers and contractors.
- Include anti-slavery clauses in supplier contracts.
- Ensure our recruitment processes are fair, transparent, and not exploitative.



- Train relevant staff to recognise and address modern slavery risks.
- Protect whistleblowers who report concerns in good faith.

6. Supplier Due Diligence

APO expects all suppliers and contractors to share our zero-tolerance approach. As part of our procurement process, we require:

- Confirmation of compliance with the Modern Slavery Act 2015.
- Transparent information on their own supply chains.
- The right to audit or request details on their practices.
- Evidence of payment of minimum wages /London Living wage.

Failure to comply may lead to termination of contracts or partnerships.

7. Responsibilities

- The Board is responsible for ensuring this policy is implemented and reviewed annually.
- Managers must ensure their teams understand and adhere to the policy.
- Employees must report any concerns or suspicions without delay.

8. Training and Awareness

Training is provided to all employees, particularly those involved in procurement, HR, and property management operations. Topics include:

- Identifying signs of slavery and trafficking
- Reporting mechanisms
- The role of frontline property staff in spotting risks

9. Reporting Concerns

Any employee or third party who suspects modern slavery is occurring must report it immediately to their manager or via our whistleblowing process (email: [Insert confidential email]).

Concerns may also be reported to the Modern Slavery Helpline at 08000 121 700.

10. Monitoring and Review

This policy will be reviewed annually and updated as required. We will monitor our procedures, audit our suppliers, and act upon any findings or risks.

Approved by:

Rachel Hanniquet-Brooking
Managing Director, APO Group Limited
Date: 12th September 2025