



Anti-Bribery and Corruption Policy

Apo Group Ltd

Effective Date: 3rd October 2025

Review Date: 3rd October 2026

1. Policy Statement

At APO Group Limited ("APO"), is committed to conducting business in an honest and ethical manner. We operate a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly, and with integrity in all our business dealings and relationships. We are committed to upholding the Bribery Act 2010 and all related legislation in the UK and in any jurisdiction in which we operate.

2. Purpose

This policy:

- Sets out our responsibilities and those of our staff in observing and upholding our zero-tolerance position on bribery and corruption
- Provides information and guidance on how to recognise and deal with bribery and corruption issues
- Applies to all employees, directors, contractors, consultants, suppliers, and third-party agents

3. What is Bribery?

Bribery is the offering, giving, receiving, or soliciting of something of value to influence a decision or outcome. This includes but is not limited to:

- Cash payments or incentives
- Gifts or hospitality intended to gain favourable treatment
- Kickbacks or commissions offered improperly
- Unjustified discounts or waivers of fees

Bribery is a criminal offence. It is illegal to offer or accept a bribe, either directly or indirectly.

4. Our Expectations

Employees and third parties must:

- Never offer, give, solicit, or accept bribes under any circumstances
- Refuse any opportunity that involves inducements or unethical advantages
- Record all hospitality and gifts over a nominal value (e.g. £50) in a central Gifts & Hospitality Register
- Seek written approval before offering gifts or entertainment above this value
- Report any suspicions of bribery immediately to a senior manager or compliance contact

5. Facilitation Payments and Kickbacks

Apo Group does not allow facilitation payments of any kind. These are typically small, unofficial payments made to secure or expedite routine government actions.

Kickbacks or secret commissions are strictly prohibited.



6. Charitable and Political Contributions

Charitable donations made on behalf of the company must:

- Be transparent, documented, and authorised at Director level
- Not be used as a means of securing business or influence

Apo Group does **not** make political donations.

7. Risk Areas in Property Management

We recognise that certain areas of the property sector are higher risk. These include:

- Contract awards and procurement decisions
- Lease negotiations or tenant incentives
- Planning permissions or licensing
- Hospitality offered to clients or partners

Enhanced scrutiny, clear documentation, and conflict of interest declarations are required in these areas.

8. Responsibilities

Role	Responsibility
Managing Director	Oversight of policy implementation and review
Line Managers	Promoting awareness and escalating concerns
All Employees	Compliance with the policy and reporting of any issues
Third-Party Providers	Adherence to Apo Group's ethical standards

9. Reporting and Whistleblowing

If you become aware of any actual or suspected bribery:

- Report it immediately to your line manager or the Managing Director
- Alternatively, use Apo Group's whistleblowing procedure (available on request)
- Reports will be handled confidentially and without fear of retaliation

10. Monitoring and Review

- This policy is reviewed annually by the Senior Leadership Team
- Breaches will be investigated and may result in disciplinary action, up to and including dismissal or contract termination
- Apo Group maintains a register of gifts, hospitality, and declarations of interest for audit purposes

Approved by:

Rachel Hanniquet-Brooking
Managing Director, APO Group Limited
Date: 3rd October 2025