



Anti-Bribery and Corruption Policy

APEM Limited is committed to ensuring that all those associated with APEM uphold the highest standards of integrity. APEM has a zero tolerance policy towards acts of bribery and corruption. All of APEM's 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.

Directors, employees and associates of APEM 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;
- 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 will ensure that its processes, procedures and records limit the risk of direct or indirect bribery.

Any allegations of bribery or corruption will be investigated thoroughly and APEM will cooperate with any investigations undertaken by police or other relevant authorities.

APEM will promote awareness of this policy among employees, anyone acting or providing services on APEM's behalf and organisations with which APEM has commercial dealings.

APEM will endeavour to avoid doing business with others who do not accept its values and who by association may harm its reputation.

Members of staff who contravene this policy or their statutory requirements will face disciplinary action.

Signed

Adrian Williams (Managing Director)

Reviewed: 16/06/2021

Revision	Date	Approved by	Comments
5	24/06/2020	Adrian Williams	Next Review: June 2021
6	16/06/2021	Adrian Williams	Next Review: June 2022