



APOLLO RECRUIT

Issue Date: January 2024

Most Recently Reviewed : January 2025

Next Review: January 2026

ETHICAL BUSINESS POLICY STATEMENT

The Company, Apollo Recruitment Solutions Ltd, is committed to the highest standards of ethical conduct and integrity in its business activities in the UK and overseas. Every employee and individual acting on the Company's behalf is responsible for maintaining the Company's reputation and for conducting company business honestly and professionally.

This policy outlines the Company's position on prohibiting and preventing bribery, fraud, dishonesty, and illegal activity. The Board of Directors and Senior Management take a zero tolerance approach and are committed to enforcing effective systems throughout the company to prevent, monitor and eliminate any form of dishonesty and consider that such activities have a detrimental impact on business by undermining good governance and distorting free markets.

This policy applies to all employees of the Company, and to temporary workers, consultants, contractors, acting for, or on behalf of, the Company within the UK and overseas. Every employee and associated person acting for, or on behalf of, the Company is responsible for maintaining the highest standards of business conduct. Any breach of this policy will be treated as grounds for serious disciplinary action, and / or constitute a contractual and criminal matter for the individual concerned. The Company is committed to transparency and believes that fair conduct helps to foster deep relationships of trust between the Company and our business partners and customers and as such a breach of this policy may also cause serious damage to the reputation and standing of the Company.

In compliance with statutory legislations and to embed commitment to integrity and honesty the Company will not sanction the following: –

- Give or offer any payment, gift, hospitality, or other benefit in the expectation that a business advantage will be received, or to reward any business received.
- Accept any offer from a third party that is known or suspected to be made with the

expectation that the Company will provide a business advantage for their business or anyone else.

- Give or offer any payment to a Government official in any country to facilitate or speed up a routine or necessary procedure.
- Tangible assets and intangible assets such as computer systems, bespoke processes, software, intellectual property, trade secrets and confidential information shall not be used for unauthorised or unlawful purposes or for personal gain.
- Engage in any business practice which is unethical or amounts to unfair competition.
- Unlawfully or inadvertently acquire, use or disclose to any third party any proprietary information or intellectual property of another party.
- Engage in any activity or business practice whether unilaterally or in conjunction with any other party which is in breach of any applicable competition and/or anti-trust law in the relevant jurisdiction.
- Unlawfully induce any party to breach a contract with any third party. •

Make false statements about a competitor's products and/or services.

- Engage in business with service providers, agents or representatives that do not support our ethical business objectives.

The success of the Company's measures depends on all employees, and those acting for the Company, playing their part in helping to detect and eradicate dishonesty. Therefore, all employees and others acting for, or on behalf of, the Company are encouraged to report any suspected dishonesty in accordance with the procedures. The Company will support any individuals who make such a report, if it is made in good faith.

Managing Director,

Sam Stapleton