



## Code Of Conduct and Ethics

June 2024



## 1. Introduction

At Apogee, our reputation is built on trust, integrity, and ethical behaviour. This Code of Conduct and Ethics (the "Code") outlines the standards of professionalism and ethical conduct we expect of all individuals representing Apogee. It complements our existing Integrity Policy, Whistleblowing Policy, and Gifts and Hospitality Policy, and aligns with industry expectations, particularly for FCA-regulated firms.

## 2. Scope

This Code applies to Apogee Corporation Limited and all of its subsidiaries and affiliates, collectively known as the "Apogee Group." It encompasses all individuals acting on behalf of the Apogee Group, including but not limited to:

- **Employees:** Permanent, fixed-term, temporary, and casual.
- **Directors and Officers**
- **Consultants and Contractors**
- **Interns and Volunteers**
- **Agents and Sponsors**
- **Any other person acting on behalf of Apogee**

## 3. Ethical Principles

- **Honesty and Fairness:** We act with integrity in all interactions with clients, colleagues, and the wider community. We prioritise the best interests of our clients and treat them fairly.
- **Regulatory Compliance:** We adhere to all applicable laws, regulations, and professional standards governing our activities. We work closely with the Statutory Governance Group (which has oversight responsibilities regarding legal and regulatory compliance) to ensure our practices align with legal requirements.
- **Client Focus:** We provide suitable and appropriate advice that puts the client's interests first. We prioritise the principles of Treating Customers Fairly (TCF) and the FCA's Consumer Duty in our client interactions.
- **Competence and Professionalism:** We maintain the highest levels of professional competence and continuously develop our skills and knowledge.
- **Confidentiality and Data Protection:** We safeguard confidential client and company information in accordance with the guidance provided by the Data Security Group and all applicable data protection laws and regulations. We respect the privacy of our clients and colleagues.
- **Conflict of Interest:** We disclose actual or potential conflicts of interest and take steps to manage them effectively, adhering to the standards outlined in our Gifts and Hospitality Policy.

- **Market Integrity:** We uphold market integrity and avoid any actions that could manipulate or distort markets.
- **Diversity and Inclusion:** We foster a culture of diversity, inclusivity, and respect for all individuals.
- **Environmental, Social, and Governance (ESG):** We are committed to responsible business practices and consider the impact of our decisions on environmental, social, and governance factors, working closely with the ESG Group (focused on environmental, social, and governance issues) to align with our sustainability goals.
- **Anti-Bribery and Corruption:** We maintain a zero-tolerance approach to bribery and corruption. We uphold all laws and regulations related to anti-bribery and corruption, and we report any suspected violations promptly.

## 4. Partnerships and Alliances

Apogee recognises the importance of strong, ethical partnerships in delivering exceptional service to our clients. We are committed to aligning ourselves with organisations that share our values of integrity, professionalism, and client-centricity.

### 4.1. Selection of Partners:

We conduct due diligence when selecting partners to ensure they uphold high ethical standards and adhere to applicable laws and regulations. We assess their:

- **Reputation:** We consider their track record, industry standing, and commitment to ethical practices.
- **Financial Stability:** We evaluate their financial health and ability to fulfil their commitments.
- **Operational Practices:** We review their internal controls, risk management processes, and adherence to relevant codes of conduct.
- **Ethical Alignment:** We verify that their values and practices are consistent with Apogee's Code of Conduct and Ethics.

### 4.2. Ethical Leasing Practices:

In relation to leasing, we prioritise partnering with members of the Finance & Leasing Association (FLA) who conduct their business under the FLA's code of conduct. This ensures that leasing transactions are handled ethically and transparently, in accordance with industry best practices.

### 4.3. Monitoring of Partnerships:

We maintain ongoing communication with our partners and monitor their performance to ensure continued alignment with our ethical standards. This includes:

- Regular reviews of their business practices and adherence to relevant laws and regulations.
- Assessment of their ongoing commitment to ethical conduct and social responsibility.

- Open dialogue and feedback regarding any concerns or potential conflicts of interest.

We address any concerns promptly and professionally, working collaboratively with our partners to resolve issues and maintain a strong, ethical relationship.

#### **4.4. Termination of Partnerships:**

We will terminate partnerships with any organisation that demonstrates a pattern of unethical behaviour, non-compliance with laws and regulations, or actions that could damage Apogee's reputation.

#### **4.5. Commitment to Ethical Partnerships:**

By adhering to these principles, we ensure that our partnerships contribute positively to our business, enhance our reputation, and support the delivery of high-quality services to our clients.

### **5. Reporting Concerns**

We encourage open communication. If you have concerns about potential misconduct, report it promptly to your supervisor, the Head of Commercial Compliance, or through our confidential [Whistleblowing Policy channels](#).

### **6. Consequences of Non-Compliance**

Violations of this Code may result in disciplinary action, up to and including termination of employment.

### **7. Training and Communication**

All employees will receive training on this Code and our ethical expectations. We will communicate updates to this Code regularly.

### **8. Review and Updates**

This Code will be reviewed annually in collaboration with the Statutory Governance Group and updated as needed to reflect changes in laws, regulations, and industry best practices.

### **9. Our Commitment**

Apogee is committed to maintaining the highest ethical standards. By adhering to this Code, we protect our clients, our reputation, and our future.

## Document Control

DOCUMENT NAME	VERSION	MASTER COPY LOCATION
Code Of Conduct and Ethics	2	Compliance hub

Unless stated within the body of this document, the owner is responsible for maintaining document control and facilitating compliance, as well as the management of review, updates and changes.

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### REVISION HISTORY

Version	Date	Amended By	Summary of changes
1	2012-08-16	Company Legal Team	Original policy release 2012
2	2024-05-21	Keith Harvey	New Baseline

### DOCUMENT REVIEWS

This document has been reviewed for QC purposes by the following, in addition to those on the 'approvers' list.

Version	Date	Name	Title / Role
2	2024-6-21	Samantha Jackson	Chief Finance Officer

### APPROVALS

This document requires the following approvals for implementation and / or for any change in content.

Version	Date	Name	Title / Role	Approval Status (Pending/Approved)
2	2024-6-21	Samantha Jackson	Chief Finance Officer	Approved

