

# Enabling Better Lives

APM Group Global  
Code of Conduct



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# A Message from Group CEO and Executive Chair

Working as part of the APM Group, you are helping to make a positive and lasting difference in the lives of more than two million clients each year. APM's reputation is based on trust and integrity, which relies on all of you to do the right thing.

Our success in 'Enabling Better Lives' and as a company depends on all of us demonstrating the highest levels of integrity, respect and ethical behaviour in the way we conduct our business daily.

You also have the trust of our customers to deliver these essential health and human services to the highest standard possible. We have an even greater responsibility to act ethically given many of our programs are publicly funded.

It is the way we work with our clients, customers, stakeholders and the communities we live and work in. It is also how we work with our fellow team members and uphold our I CREATE values. Across APM, our diversity and our shared purpose are what make us unique. While the values of each of our brands hold true, our APM values are those we all share. I CREATE is the way we talk about our collective values. No matter what you do or where you are, I CREATE defines our culture and the expectations of all of us – it's the way we work together and take care of one another and the people we serve.

The APM Global Code of Conduct (the APM Code) clearly sets out the standard by which we measure ourselves and those we partner with. It is how we hold ourselves accountable.

The Code is designed as a benchmark for integrity and ethical behaviour across the 11 countries we operate in and is clear on the expectations of all of us who work for, or on behalf of the APM Group.

As a member of the APM family you play an important role in upholding the reputation of our company and building and maintaining trusted relationships with our clients, customers and stakeholders.

Thank you for your continued commitment to enabling better lives by adhering to the APM Code.

## Mike & Megan



**Megan Wynne**  
Founder and  
Executive Chair

**Michael Anghie**  
Group Chief  
Executive Officer

# About the APM Global Code of Conduct (the APM Code)

To ensure we do the right thing and continue to make a big difference, our ethical standards are the same for all of us, regardless of business, brand or geography. A shared understanding of the behaviours that support working with integrity are what support us in creating positive culture. We all have a part to play.

## The APM Code helps us do this.

### What do you need to do?

Get to know the APM Code. Refer to it whenever you need guidance in how to do the right thing, or where to get support.

**We expect that all directors and employees will act in accordance with the values in the APM Code and in the best interests of APM.**

At the foundation of the APM Code, there are some key principles to remember.



- 1 Be Honest**  
We are honest, fair and trustworthy in all our work activities and relationships.
- 2 Follow the Law**  
We are aware of and abide by all applicable laws and regulations governing our businesses in the country in which they operate.
- 3 Speak Up**  
When we see or hear something that concerns us, whether it is compliance with the law, our policies, or the APM Code, we always raise and report them.
- 4 Ethics & Integrity: Expect the Best**  
We deliver our services to the highest standards of ethics and integrity. Our people, partners and suppliers can expect the best from us, and we act ethically and responsibly.

We follow the APM Code and foster a culture of integrity and the highest ethical standards, so our partners and suppliers want to work with us to enable better lives for our clients.

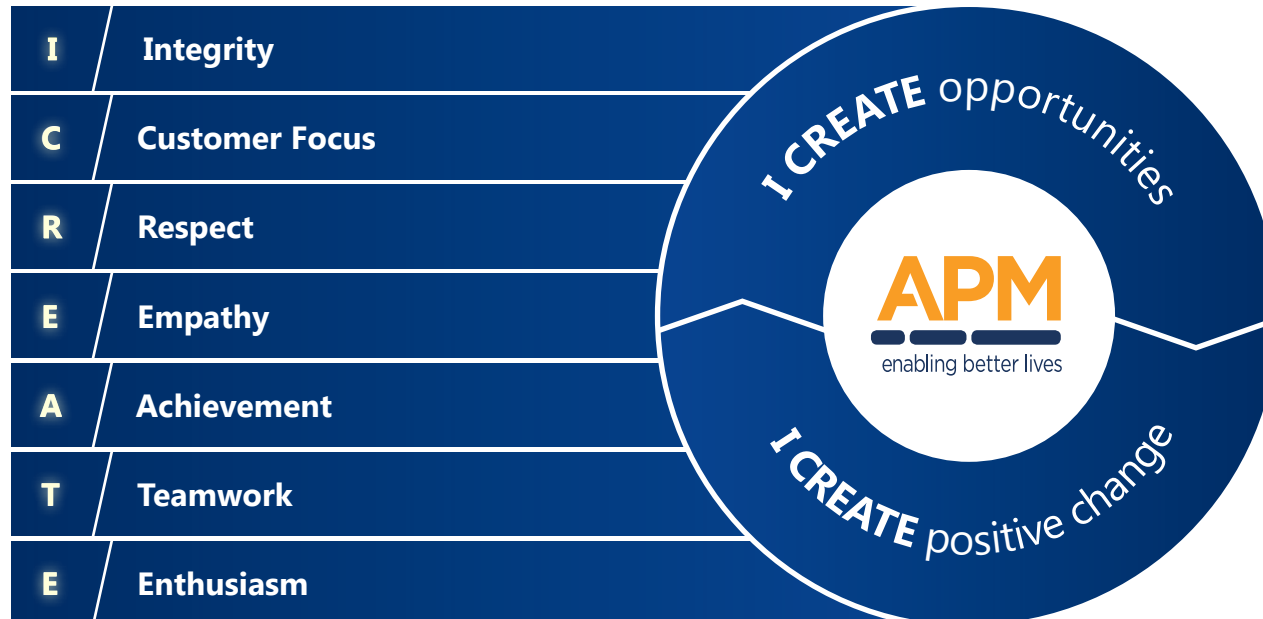
# Our I CREATE Values and the APM Code

The APM Code sets out the values we all share and how we work together with our partners, clients and individuals to make sure we are always helping people to live the best life possible.

Across APM, our diversity and our shared purpose are what makes us unique. While the values of each of our brands hold true, our APM values are values that we all share.

**I CREATE** – it's the way we talk about our collective values and how we work together.

No matter what you do or where you are, I CREATE defines our culture and the expectations of every one of us – it's the way we work together and take care of one another and all the people we serve.



# How we work together at APM

The APM Code is the foundation for how we work together and guides our interactions with partners, clients and individuals.

Every day around the world, our team develops and nurtures trusted partnerships with individuals, families, communities, local and national governments, and businesses at every level.

The strength and success of these partnerships are underpinned by our commitment to working together across all parts of the business.

By collaborating and understanding the value of teamwork, we strengthen APM and empower each other to deliver stronger outcomes for those who depend on us. We know that working together leads to innovation and fosters respect for one another.

We take our commitment to responsiveness to heart, which help us to stand out and demonstrates that we care for the needs of our fellow APMers and for those we serve. We can be depended on in times of need and trusted to deliver on our purpose of enabling better lives.



Teamwork



No hierarchy



Invest in relationships



Constant and long-term investment



Quality people



Transparency and open communication



Fast moving and make decisions



Trust based on doing the right thing



Family



Own our commitments, deliver on promises



Confidence (not arrogance)

# Putting the APM code into action

The APM Code is at the heart of our culture and how we work.

While we have many businesses and brands in different locations across the world, the APM Code outlines the standards that we all must meet, no matter where you are working.

There are a core set of APM Global standards outlined in the APM Code and there are additional policies or procedures in place to cover the specific requirements in countries where we deliver our services.

To make sure the APM Code is applied, each year we ask our team and partners to accept the APM Code, and the behaviours, standards and the ways of working it represents.

At APM, we make sure the APM Code is effective by making sure our policies and processes are current, our people (both permanent and contracted) complete regular compliance training, and that robust compliance, audit, review and reporting processes are in place across our business.

## What we expect from our leaders

Our leaders help show the way and are people we can turn to when we want to know more about the APM Code or raise any concerns.

**Lead by example** and personally set the standard for integrity through their words and actions.

**Be accountable** for creating a culture of integrity and compliance at APM.

**Provide an open environment** to ensure our people feel safe raising concerns without fear of retaliation or retribution.

**Create and support processes and behaviours** to make sure the APM Code is met, and the ways of working outlined are the standard.

**Remember the APM Code** when leading teams to ensure they are up to date in ethics and compliance training, and that robust audit, review and reporting processes are in place across our business and geographies.

## For our people. The APM Code is for you.

The APM Code is for you and for the benefit of everyone you work with, both inside and outside the APM Group.

If you are part of the APM Group, you need to read, understand and accept the APM Code and follow it in all your interactions with clients, customers, stakeholders and each other.

It is always better to be open and honest. If you have questions or concerns, speak to your leader, someone in your team or raise your concern with the People & Culture or Legal teams or a senior leader. Alternatively you can raise your concern through your local Speak Up portal (see [Page 8](#) for details).



# Know the code

The APM Code sets out a standard of behaviour we must all follow in our roles. Think globally, act locally.

It is vital that we have a clear and common set of standards that outline our expectations for consistently ethical behaviours, no matter where we deliver our services around the world. The APM Code is designed as a general framework of principles, performance and conduct expectations, to be followed by **all employees** of the APM Group, or those delivering services on our behalf.

The policies, procedures and laws for each business and geography can vary. We must understand the behaviours outlined in the APM Code, as well as any local requirements. Refer to the policies, guides and instructions in your geography.

## What you need to do.

- Get to know the APM Code and understand the acceptable ways of working outlined in APM's global and local policies and procedures.
- Commit to upholding the APM Code's principles and the standards in your role.
- Speak up when you have any concerns about behaviour in the workplace or in the delivery of our services.
- Talk to your manager or a leader in the business, if anything about the APM Code is unclear, or if you are unsure how it applies to a particular situation.



# Speaking up: The Role you play

When we see something, we say something.  
Raising a concern is always the right thing to do.

Speaking up when you have concerns about behaviour in the workplace or the way our services are being delivered is actively encouraged at APM.

## How to raise a concern. Speak Up.

You can speak to someone in our organisation, such as a manager or supervisor, but we understand this is not always possible.

At APM, our *Speak Up* portal is powered by [Whispli](#), an independent platform, to help you raise concerns about potentially illegal or inappropriate behaviour in the workplace, without fear of retaliation.

From Whispli, you can raise concerns about any activity that you feel does not meet our APM Code of Conduct and the values that we uphold at APM, every day.

Within 48 hours your case will be assigned to a People and Culture Senior Leader, who will review and get back to you using the platform.

## Your identity is protected.

While knowing your identity can often help us investigate your concerns, our Speak Up portal provides a safe space to raise concerns while remaining anonymous.

The platform keeps your identity safe and protects you from potential retaliation.

The Whispli platform protects your identity by:

- Keeping the reporting process completely anonymous for the person raising the concern, unless they wish to disclose their identity
- Not capturing any potential identifying information (like IP address, personal information, language, etc.)
- Having robust information and data security in place to keep your identity safe, and full compliance with local data privacy requirements
- Giving you control over what you share and submit via the platform when raising a concern

## How to speak up across APM - [whispli.com](#)

Click on your region to connect with your APM Speak Up portal.

[Australia / New Zealand](#) [USA](#) [UK](#) [Spain](#) [Germany](#)  
[Switzerland](#) [Sweden](#) [Canada](#) [Singapore](#) [Korea](#)



# Doing business ethically

When we do the right thing in how we work, we do the right thing for the people we help and the right thing for our business.

Our individual and collective commitment to ethics and integrity, guides us in everything we do and every decision we make as we deliver best in class services. Following the Code and the law in how we work makes sure that the services we deliver are always of the highest quality.

When we are enabling better lives with integrity, employees, suppliers, partners and clients want to work with us. We cannot deliver our services without them. That's why we expect the same commitment to ethics and integrity as our own.

This section can help you understand what is expected and the standards for ethical business at the APM Group.



# Our Global Ethical Business Standards

These are global standards that apply to all our employees no matter where in the business they work.

A reminder: The policies, procedures and laws for each region and country can vary and the law with respect to these matters is complex. Understand the global standards, as well as your local policies, guides and instructions and speak to the Legal team if you have any concerns.

## Anti-Bribery and Corruption

**Bribery** happens when someone tries to improperly influence a decision maker's behaviour to get a business or personal advantage.

**Corruption** happens when someone misuses their position for personal or corporate gain.

They can severely harm our business, the communities we work in and the balance of commercial competition. You, our businesses, and anyone else acting for us, can be held accountable for bribery and corruption activity, and for failing to prevent bribery. This can mean fines, jail, loss of employment and other punishments.

**Donations, gifts, promotions and hospitality** can be used for bribery and corruption.

**Facilitation payments** are small payments to officials to do something they must do (such as issue a permit or allow bags through customs). These are mostly considered illegal bribes.

**To report any known or suspected bribery or corruption, use the Speak Up portal available to you** (see [Page 8](#) for details).

# Our Global Ethical Business Standards

You should never take advantage of the property or information of APM or our clients and customers, your own position or the opportunities arising from it for personal gain or to the detriment of our clients and customers.

## Fraud

Fraud happens when people intentionally lie, steal or manipulate processes for financial or personal gain. We should not assume that everyone is trying to defraud our business, but we need to put structures in place that recognise anyone could.

## Money Laundering

Money laundering is illegal. It happens when money associated with crime is moved, hidden, disguised or falsely recorded to seem legitimate and to hide its true history. We will never deal in the proceeds of crime, and we should always be alert to suspicious payments where the origin is not clear.

## Economic Sanctions

International organisations or the countries where we do business may impose sanctions on working with other countries or specified individuals or companies. We must always comply with these laws and not do business where such sanctions prevent us.

## Conflict of Interest

A Conflict of Interest is any situation that creates a conflict between our own personal interests and those of the company. Conflicts of Interest, when not openly identified, can compromise our ethics and integrity.

We are committed to ensuring any Conflicts of Interest are identified, managed and recorded in order to reduce or remove risks to our businesses.

When we realise there is a potential conflict, we must disclose it and seek approval or guidance. If you are not sure, speak to your legal team

## Modern Slavery and Labour Rights

APM is committed to eradicating modern slavery across our supply chains and ensuring that all those who work with us are given proper protection in accordance with their labour rights. We make sure that the human rights of our employees are protected wherever they work and are committed to upholding the standards set out by the International Labour Organisation.

**View the APM Group's**  
[Modern Slavery Statement.](#)

**False claims** are a type of fraud. Claiming for something you are not entitled to, misrepresenting time spent or costs, or fabricating evidence, are all examples of false claims. We can only claim for work that has been completed and can be backed by evidence and documentation.



# Our Global Ethical Business Standards

Safeguarding vulnerable people in our communities

The nature of our work means we are often working with some of the most vulnerable people in our communities. We need to do all we can to protect their welfare, human rights and safety.

Everyone has a role to play. This looks like:

- Understanding their unique circumstances
- Always prioritising their best interests
- Ensuring their welfare at all times
- Complying with relevant laws
- Following APM's policies and procedures for receiving and responding to complaints and concerns

## Your responsibility?

Understand and abide by local guides or specific requirements applicable in your geography

- Raise any concerns when these standards are not met, or you think someone is at risk



# How we work with one another

The way we work with each other sets the tone for how we work with partners, suppliers, clients and, most importantly, the people who we are here to help. Some policies and laws may differ by region or country, so in addition to accepting the Global policies, you must also be aware of any local policies or procedures.

We value every one of our team as individuals. Our diversity of thought, skills, experience and abilities is one of our strengths. That's why, no matter where you are or what role you have, we always promote a culture of fairness, respect and equal opportunity for all.

Like us, our clients and customers come from a diverse range of cultural and socio-economic backgrounds. We are here to provide opportunities for them, regardless of their race, sexuality, gender identity, religion, age or any other characteristic. We always deal with clients and customers fairly.

It's so important that we all work together to build an inclusive and diverse workplace, to keep each other safe and to look after our wellbeing. We always seek to conduct ourselves with the highest standards of professional conduct, being aware of how our behaviours, language and appearance can affect others.



# Our Global Standard for working with each other

This section will help you understand what is expected and the standards for how we work with one another, and the treatment we and our communities can expect at the APM Group.

## **Bullying and Harassment**

Harassment and bullying are any action or behaviour that any individual or group finds unwelcome, humiliating, intimidating, threatening, violent, hostile, or discriminatory. We should treat fellow team members and our clients and customers with respect at all times. We all should be particularly sensitive to actions that may be acceptable in one culture but are not in another.

**At APM we always** speak up and do something about bullying and harassment, and we encourage and support those who challenge or report such behaviour.

## **Anti-Discrimination**

Discrimination based on things like race, religion and gender, does great harm to people and it is against the law. It also reduces the opportunities for our business and damages our culture and reputation.

**At APM we always** create safe and inclusive places to work where we welcome diversity, prioritise equity and opportunity for everyone, and do not tolerate discrimination.

## **Work Health & Safety**

We are all here to look out for each other's health and safety. Our aim is zero harm. This ambition is supported through monitoring and reporting hazards, injuries, near misses, incidents and accidents, a shared accountability, and a clear understanding of our responsibilities and policies.

**At APM we always** promote safe and healthy working and take care of ourselves, our colleagues, our clients, and the public, and challenge and report anything we feel is unsafe. You should make sure you know the process for reporting safety concerns in your region.

## **Reporting Misconduct**

Knowing what is and what is not misconduct is essential. Illegal, unethical and unacceptable behaviour harms us and everyone we deal with.

**We need you to tell us when you know or think someone has done the wrong thing, including breaching the APM Code, through the [Speak Up](#) portal.**

# What equity, diversity and inclusion means at APM

Equity, Diversity and Inclusion is at the heart of who we are and what we do at the APM Group.

We all have a duty of care to our fellow team members, and we each play a role in creating a workplace where people feel safe, both physically and psychologically.

We are here to enable better lives for our clients, regardless of race, gender, sexuality, age, religion, ability, marital or social status or any other characteristic. We play a critical role in people's lives, so we must always recognise and celebrate their uniqueness to ensure our services are best tailored for that individual.

If you are concerned about someone's safety or welfare, you should raise these concerns through the appropriate channels.



# Financial integrity at APM

The responsibility rests on all of us to make sure our money is well spent, recorded accurately, and our financial information is never used improperly or unlawfully.

Many of us, in our roles, will need to spend money, approve purchases or collect money. We should always use our best judgement but, most importantly, make sure we always follow our financial processes and comply with our financial integrity policies and guidelines.

These will vary according to your location, business, area and role. You will always need to know the relevant policies, processes, responsibilities and local laws.

It is not just for spending, collecting, recording and reporting finances. You will also need to consider financial integrity policies when you are entering a new partnership, renewing contracts or subscriptions, signing new business agreements or hiring a new employee.

We must all ensure our financial and other reports and records are complete and accurate, and that any information is not shared or used for personal financial gain.



# Our Global Standards for financial integrity

This section sets out the APM Group global standards that clarify how we work to safeguard our finances, how they should be managed and used prudently and responsibly. Some policies and laws may differ by region or country. In addition to accepting the global standards, you must also be aware of any relevant local policies or procedures.

## Internal Controls

The financial risks of intentional or unintentional harm cannot always be avoided. Our internal controls are designed to be suitable, flexible and strong, so we can protect our financial and other business systems from harm caused by misuse and error and ensure the best results for our businesses.

At APM we always follow our financial processes, and the relevant laws and policies of the region/country, as well as complying with our financial integrity policies and guidelines.

## Financial Reporting & Proper Accounts

Across the APM Group, we have put in place the appropriate financial policies to make sure our finances are managed in the most prudent manner. We effectively manage risks by complying with the relevant local legislation and through a practical approach to carefully plan and prioritise risks and balance the costs and benefits of action.

### Continuously improving how we protect our business.



#### Audit and Review at the APM Group

We always look for areas of service improvement and review our controls. This is done by internal and external audit, setting strategic planning objectives, and training. We continually review our processes and conduct internal audits to meet our contractual requirements, identify areas of weakness and find opportunities to improve our services.

We periodically review the APM Code to confirm that it is operating effectively and will make changes if required.

# Protecting our data, information and intellectual property (IP)

It is essential that the computers we work on every day, and the valuable information our business systems store, are always protected and never used for improper or illegal purposes.

The information stored or processed by our company computers, storage devices, mobile phones and applications is considered company property.

This is why we must protect this information and act with proper ethics and integrity whenever we are sharing information and communications and using our computers. Our clients, and the individuals we help, trust us with their business and personal information. This trust must never be broken.

To ensure this happens, you need to follow all our global information security and acceptable use standards when using company computer systems for work-related or personal use, including on all social media sites.

We all must take the proper precautions to protect company computer systems against loss, damage, or theft, and immediately tell someone when we think the security of our systems may be compromised.



# Our Global Standards to protect our data, information and intellectual property (IP)

This section sets out the proper use of our computers, technology, memory sticks and smart devices, and how we protect our systems and the information we store on them.

A reminder: The policies, procedures and laws for each region and country can vary. Understand the requirements in the global standards, as well as your local requirements

## Information Security

The information we collect and store on our systems (including portable devices such as memory sticks and mobile phones) is not just private or sensitive, it is an important asset. We are committed to protecting it against unauthorised access and use, theft, modification, destruction and unauthorised disclosure through adopting a consistent, effective, integrated risk-based approach. If you have any concern that someone has breached our information security systems, contact your information security team immediately.

## Social Media

You need to be aware that all APM employees and our contractors are restricted from making comments on behalf of APM or using APM's branding in any social media platform unless authorised. Sometimes you might mention APM in social media, but unless authorised, you will need to add the appropriate disclaimer that you are not representing APM.

## Data Privacy

Data protection and privacy laws regulate the treatment of personal information. Wherever we hold and use personal information, we always need to comply with relevant data protection laws and consider commercial sensitivity while also following our standards and policies on storing and protecting personal information. Because we hold sensitive personal information about citizens in every country we operate, we all need to make sure we understand the data privacy obligations that apply to us and immediately report to our leaders if we feel there might have been an inappropriate disclosure.

## Intellectual Property (IP)

Service delivery knowledge is one of our most valuable assets and comes from years of experience and developed expertise. This 'Intellectual Property' provides the APM Group with a unique, competitive advantage in our markets, and we need to identify, manage, and always protect it.

# We all have a role to play

Everyone has a role to play in upholding our ethical and integrity standards.

The Global Code of Conduct cannot cover everything and guide you in every situation. Always be guided by your leaders and our processes, guides and instructions and your own good judgement.

**We know you can work the APM way, but if you are unsure, ask yourself three questions:**



1. What would other people think about your actions?
2. Are you prepared to be accountable for your actions?
3. Are your actions consistent with the APM Code?



## Document Details

Version	Change type and description	Approver role and change date
7.0	Major update to Master English Version. French, German, Swedish, and Spanish versions created.	APM Board, 29/05/2024
7.1	French version	As per Master Version 7.0. Must be updated if Master Version 7.0 is updated.
7.2	German version	As per Master Version 7.0. Must be updated if Master Version 7.0 is updated.
7.3	Swedish version	As per Master Version 7.0. Must be updated if Master Version 7.0 is updated.
7.4	Spanish version	As per Master Version 7.0. Must be updated if Master Version 7.0 is updated.