

CSR, Ethics, Diversity and Environmental Policy

The Mews | 6 Putney Common | London | SW15 1HL | United Kingdom
+44 (0)20 8246 4050 | enquiries.global@aptlimited.co.uk

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| Originator: | Andrew Clementson | Director of Operations | November 2018 |
| Approved: | Charles Jamieson | Managing Director | November 2018 |

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1. Overview

APT endeavours to adhere to its values in all activities and strives to be an example of good practice. Furthermore, APT encourages its employees and communities to adopt appropriate socially responsible policies and practices.

2. Compliance, Monitoring and Reporting

Compliance with this policy is continuously monitored and subject to review by the management at APT.

The Managing Director is responsible for the implementation of this policy and will make the necessary resources available to realise our corporate responsibilities. The responsibility for our performance of this policy rests with all employees throughout the company.

If an employee reasonably suspects there has been a breach of this policy, they should report it to their manager.

3. Standards of Conduct

We request and expect each employee to use sound judgement to help the company maintain appropriate compliance procedures and to carry out our business in compliance with laws and high ethical standards. Each employee of our company is expected to read this code and demonstrate personal commitment to the standards set forth in our Code of Conduct.

All employees are expected to report appropriately any indications of illegal or improper conduct.

Our Code of Conduct details that all Employees sign a confidentiality agreement which protects the company's customers. Content that is received for translation by such customers is protected under confidentiality at all times.

An employee who does not comply with the standards set out in the code may be subject to discipline in light of the nature of the violation, including termination of employment.

Our Code of Business Ethics adheres to the following:

- We comply with the law
- We act with integrity with all our dealings
- We compete fairly
- We treat suppliers, customers and partners appropriately and with respect
- We treat our employees respectfully
- We maintain a healthy, safe and secure workplace
- We respect the environment
- We maintain high standards of financial reporting and record keeping

4. Employees

The company:

- will create and maintain a safe and healthy working environment for its employees.
- will strive to create a workplace in which there is mutual trust and respect and where every person feels responsible for the performance and reputation of our company.
- will respect the individual and each other's rights, customs and traditions.
- will work towards achieving a diverse workforce, recruiting, employing and promoting employees only on the basis of objective criteria and the qualifications and abilities needed for the job to be performed.

- will maintain good communications with employees through our information and consultation procedures.
- will assist employees in realising their potential.

5. Clients

APT is committed to providing value for money, high quality, consistent, accessible and reliable services to its clients.

6. Business Partners and Suppliers

We aim to develop strong relationships with our suppliers and others with whom we have dealings, based on mutual trust, understanding and respect.

In those dealings, we expect our partners to adhere to business principles consistent with our own.

We will conduct our operations in accordance with the principles of fair competition and applicable regulations.

We purchase a wide range of goods and services required in the operation of our business and we also rely heavily on a number of key suppliers for the delivery of our core services. Good working relationships with our suppliers are therefore central to the success of our business.

More specifically we expect our suppliers to:

- Adhere to business principles consistent with our own.
- Ensure that their products and services are produced and delivered to comply with all legislation relevant to their business.
- Seek to maintain continuous improvement in their supply chain relationship with us.
- Ensure they adopt and implement acceptable safety, environmental, product quality, product stewardship, labour, human rights, social and legal standards in line with our own code and to ensure these issues are acceptably managed within the supply chain for any products or services supplied to us.

We will seek to work with our key suppliers to:

- Develop long-term meaningful relations to the benefit of both parties.
- Improve the quality, environmental performance and sustainability of goods and services where this can be achieved to the benefit of both parties.

7. Compliance with Law

All APT staff will comply with the laws and regulations applicable wherever they do business.

8. Business Integrity

We shall not offer, give, seek or receive, either directly or indirectly, inducements or other improper advantages for business or financial gain and no employee may offer, give, seek or receive any gift or payment which is, or could be construed as such. If an employee is in any doubt as to whether he or she may accept an offer, that employee should discuss the issue with his or her manager.

APT accounting and other records and supporting documents must accurately describe and reflect the nature of the underlying transactions.

No undisclosed or unrecorded account, fund or asset will be established or maintained.

9. Conflicts of Interest and Confidentiality

All APT employees are expected to avoid personal activities and financial interests, which could conflict with their responsibilities to APT.

APT employees and consultants must not seek gain for themselves or others through misuse of their positions or company property.

Information received by anyone in the course of his or her employment must not be used for personal gain or for any purpose other than that for which it was given.

Where information is confidential, that confidentiality must be respected.

10. Employment

Equal Opportunities

APT is an equal opportunities employer. This means that it is APTs policy that there should be no discrimination against, harassment or bullying of any employee or job applicant either directly or indirectly on the grounds of:

- Race, colour, nationality or national or ethnic origin; Sex or marital status.
- Disability (e.g., a long term mental or physical impairment); Gender reassignment.
- Sexual orientation.
- Religion or philosophical belief; Political belief.
- Caring responsibilities.
- Age.

APT's policy is aimed at:

- Encouraging and promoting diversity and inclusion among its employees.
- Eliminating discrimination, bullying and harassment from the workplace.
- Encouraging all its employees to take an active role against all forms of discrimination, bullying and harassment.
- Deterring employees from participating in discriminatory behaviour, bullying or harassment.
- Demonstrating to all employees that they can rely upon APT's support in cases of discrimination, bullying or harassment at work.

APT is fully committed to providing a good and harmonious working environment that offers equal treatment and equal opportunities for all employees and where every employee is treated with respect and dignity. APT's aim is that remuneration, recruitment, promotion and retention should not be affected by irrelevant considerations and stereotyping.

Employees should ensure that:

- They co-operate with any measures introduced to develop equal opportunities.
- They respect the diversity of others.
- They refrain from taking discriminatory actions or decisions which are contrary to either the letter or spirit of this policy and, for employees of managerial status, that they ensure that those who report to them also comply with the policy.
- They do not instruct, induce, or attempt to induce or pressurise other employees to act in breach of this policy.
- Employees who make complaints of breaches of this policy in good faith are treated fairly and responsively both when the complaint is made and thereafter.

Breaches of APTs equal opportunities policy and procedures and any unfair or unlawful discrimination will not be tolerated and will be dealt with under the disciplinary procedures. In serious cases, this could lead to dismissal of the relevant individual.

We also require contractors to comply with this policy whilst they are working at our premises.

Recruitment and Selection

Recruitment and selection must be carried out according to objective job-related criteria which must be subject to regular review. The Company will endeavour through appropriate training to ensure that employees making selection decisions will not discriminate whether consciously or unconsciously in making these decisions.

Training

Equal opportunities must be integrated into all training concerned with selection skills, staff assessment, counselling, staff development and the management or supervision of staff.

The Company's policy will form part of the induction training of all staff.

Promotion

It is in APT interest to provide equal opportunities when promoting employees. Managers must continually assess the promotion potential of all employees and all promotion decisions must be made in accordance with objective selection criteria.

Grievance and discipline

Employees who believe that they have experienced unfair or unlawful discrimination, bullying or harassment should raise their concern through the applicable grievance procedure.

11. Community

Our relationships with the local communities are very important to us and are an essential part in the growth of our business. When developing our services, we have a role to play in improving services for the community as a whole and not just our individual clients.

In line with our core values, we incorporate the following elements:

- Offering employment opportunities to all sectors of the community through nondiscriminatory policies and promoting opportunities to disadvantaged and vulnerable groups
- Promoting engagement between our staff and the community
- Supporting local community groups and charities
- Improving the environment in and around our operations
- Promoting broader opportunities for workplace learning
- Working with local law enforcement agencies to address anti-social behaviour, crime and vandalism

12. The Environment

APT is committed to making continuous improvement in the management of its environmental impact.

We will work with our partners to promote environmental care, increase understanding of environmental issues and disseminate good practice.

Our policy is to strive to achieve continual improvement in environmental performance.

We are committed to:

- preventing pollution and reducing the overall impact of our operations on the environment.
- maintaining an internal management structure for the management of environmental issues which includes clearly defined responsibilities for environmental management capable of delivering this policy commitment.
- complying with, and where possible exceeding applicable legal and other requirements relating to the organisation.
- monitoring our environmental performance and setting objectives and targets for improvement.
- providing appropriate training and awareness programmes for our staff.

We recognise the key role we have to play in both reducing and contributing to greenhouse gas emissions, our commitment in this area is set out in our Climate Change Policy.

13. Climate Change Policy

We are committed to reducing the greenhouse gas emissions from our operations in a way which supports national government strategies.

Our key climate change commitments are:

- To assess the potential impact to our business from evolving climate change policies as part of our on-going risk management processes.
- To actively promote improved energy efficiency and fuel efficiency within our business.
- To stay abreast of alternative fuel developments and continue to assess their commercial viability.