



APC ETHICS AND SUSTAINABILITY POLICY

Preface

APC is mindful of the social and environmental impact of our activities. We believe that, in line with the core values of our group, taking an ethical stance and articulating a code of conduct for our organisation will encourage both our employees and our stakeholders to embark on continued learning. This will make both our future, and the communities in which we operate, more socially and environmentally sustainable. APC reaffirms our commitment to furthering the [UN Sustainable Development Goals](#), and our alignment with the [UN Global Compact Principles](#).

Scope of Application

This Code of Ethics applies to all board members, employees and representatives of the Asia Philanthropy Circle ('APC'). It provides general guidance on the expected behaviour for APC employees and should be read in conjunction with the clauses in the applicable employment contract and other APC policies, procedures and guidelines. APC would also use it to inform how we evaluate and select vendors, based on our available knowledge, and where appropriate¹, we would ask vendors to indicate their willingness to strive towards the principles laid out in our Ethics and Sustainable Policy by signing and issuing a letter in the form of Annex A. If in doubt on the meaning or implication of any particular clause contained in this Code of Ethics, please contact the APC Director.

Code of Ethics

Group Values and Principles of Behaviour

APC adheres to the following group values and principles of behaviour. These principles guide us in working towards APC's mission and vision. Together, we aim to apply these principles in everything we do, uphold APC's mission in any initiative we engage in and protect APC's reputation and that of APC's Members, partners and beneficiaries.

- 1. We are a safe space for purposeful and open sharing.**
- 2. Working together helps us go further, even if it takes a little longer.**
- 3. Everything we do must make a real difference; good intentions are not enough.**
- 4. We are a neutral platform, so we leave our biases and personal agendas at the door.**
- 5. We welcome diversity as we believe that differences make us collectively stronger, more resilient and more innovative.**
- 6. We must be prepared to become mini-experts in any area, but not too much so that we can act quickly.**
- 7. We are bold in questioning the status quo, and have the courage to break new frontiers.**

¹ This will only be for contracts higher than SGD25,000, and in (geographical, social, physical, political) environments where APC assesses through its own judgment that the implementation of such policies will be suitable.

Stakeholder Relationships

Social responsibility is an integral part of APC's approach. We seek to uphold our values during our interactions with key stakeholders:

- Our members;
- Our business and nonprofit partners;
- Government institutions;
- Our beneficiaries and their communities;
- Our employees and representatives;
- Our Board;
- Our event participants;

as well as with service providers, event vendors and any other party we engage with in the course of our work.

Environmental and Sustainability Policy

APC aims to reduce the direct and indirect impacts that we have on the environment and strives to set an example in the promotion of sustainable business practices and the protection of the environment. We understand sustainability and sustainable development as 'development that meets the needs of current generations without compromising the ability of future generations to meet their own needs'.²

We will work towards these objectives through the following measures:

- APC prohibits work that inflicts excessive harm on the environment.
- We aspire towards ethical and sustainable practices in the running of our organisation, including in our meetings, office management, travel and in the planning and implementation of our events and programmes.
- We aim to procure our goods and services with an emphasis on supplier environmental attributes, fair employment, as well as other social and ethical criteria.
- Service providers with whom APC has regular and substantial dealings should have good management and governance processes in place. A Responsible Sourcing Supplier Commitment Letter can be found in Annex A.
- We ensure APC employees understand these objectives and encourage them to take the initiative to build upon and improve existing practices. Environmental management should be an inclusive, transparent, and ongoing process. All employees are responsible for following the policy with the support, direction, and commitment of the management team.

² Report of the Brundtland Commission, "Part I, Section 2: Towards Sustainable Development," in Report of the World Commission on Environment and Development: Our Common Future (Oxford University Press, 1987), www.un-documents.net/wced-ocf.htm.

Diversity and Anti-Harassment Policy

APC is committed to providing a safe, inclusive professional environment where people feel valued, respected and are treated fairly. Diversity entails acceptance and respect of individual differences; these can be along the dimensions of age, gender, religion, race, ethnicity, sexual orientation, national origin, physical abilities, socioeconomic status, political beliefs, pregnancy, family responsibilities and more. It also refers to diverse ways of thinking and working. Harassment includes behaviour aimed at degrading or debasing a person, conduct that creates an intimidating, offensive or hostile environment, unwelcome sexual advances, intimidating or threatening communication and racist comments. It can be verbal, physical, nonverbal or visual and can happen in person, through written communication or through online media.

We ensure these objectives through the following measures:

- APC does not tolerate employment discrimination, including in the hiring, compensation, advancement, discipline, termination or retirement of APC employees.
- APC prohibits discrimination, harassment or abuse of any kind (physical, sexual, psychological, verbal) against persons employed in APC, or other APC stakeholders. This includes attendees, speakers, sponsors, volunteers and other non-employees by anyone at an APC event, programme or online forum. For events conducted in-person, participants violating this may be sanctioned or expelled without a refund at the discretion of APC. For events conducted online, participants violating this may be subject to immediate removal or access being blocked by moderators.
- We treat all APC employees and stakeholders with respect and dignity.
- We promote a culture that values seeking and utilising the contributions of employees with diverse views, experiences and skill sets.

Labour Policy

APC adopts conditions of employment that respect workers and, at a minimum, safeguards their rights under national and international labour laws.

- APC prohibits the use or engagement in all types of slavery, human trafficking, forced labour, bonded labour and child labour. No person shall be employed under the age for completion of compulsory education.
- We treat the health and safety of our employees seriously and will avoid unnecessary risks.
- We recognise and respect the right of employees to freedom of association and collective bargaining.
- We encourage our employees to have work-life balance and respect employees to manage their own work in line with the demands of their personal lives.
- We recognise that every employee has a right to compensation for a regular work week that is sufficient as a living wage, i.e. to meet their basic needs, and provide some discretionary income. APC complies with all legal requirements on wages and any fringe benefits.
- We are supportive of flexible work practices, as long as predetermined goals can be met and assigned tasks adequately completed, and adequate culture and capability building can be grown and sustained within the organisation.

Anti-Corruption Policy

APC has a zero-tolerance approach towards corruption, self-dealing and fraud.

- APC is committed to running our business on a foundation of integrity, transparency and honesty. We will devise and improve our processes continuously to prevent direct or indirect bribery, in order to safeguard and uphold our values.
- We adopt a zero-tolerance policy towards any forms of corruption and bribery in our business. Our employees must observe the anti-bribery and anti-corruption regulations in the countries where we have business activities in, and undertake ourselves to not engage in any corrupt or improper practices. In Singapore, these include but are not limited to the Prevention of Corruption Act, the Penal Code and the Corruption, Drug Trafficking and Other Serious Crimes (Confiscation of Benefits) Act.
- APC employees must not solicit, accept, promise nor offer any person, company or organisation (including any government, regulatory authority or public body official) any bribe, 'kickback', gratification, facilitation payment or other corrupt payment as an inducement to, payment or reward for a decision or conduct in respect of any transaction. These payments may include: commissions, gifts in cash or kind, gifts that are more than nominal value, contracts of employment offers, or any other service, favour or advantage.
- On a risk-sensitive basis (i.e. proportionate to the level of risk of bribery), APC employees must conduct an appropriate level of due diligence before engaging, hiring or contracting with Third Parties. Due diligence involves the investigation and evaluation of prospective Third Parties by way of background checks and research to assess the risk of their engaging in bribery.
- We recognise that the exchange of business courtesies, such as modest gifts, and entertainment (including meals, invitations to attend promotional events or parties) particularly during festive periods is customary and legitimate to create goodwill, and/or strengthen relationships. Such courtesies are allowed if they are not lavish in the light of accepted business practices of the relevant businesses that it operates in and is not intended to improperly influence the decisions of the person involved.
- APC employees and Board members must disclose any actual or perceived conflicts of interest.
- If our employees are established to have been involved in the above prohibited practices, they may be subjected to disciplinary actions, including immediate dismissal of employment and/or referral to relevant law enforcement authorities.
- We will also strive to ensure that our business partners share our zero-tolerance policy against corruption and bribery. We will avoid engaging in business dealings with those known or reasonably suspected to be engaging in corruption and bribery.

This Anti-Corruption Policy does not and cannot reasonably cover every situation that APC employees may face in the course of their employment. If employees are in any doubt as to how they should apply any of these provisions, they should seek guidance from your immediate supervisors, or, where appropriate, the Company's management team.

Accountability

The APC Board is responsible for approving the above policies. The Board will review these policies on a yearly basis, to take account of evolving policies, standards, best practices, and technology.

- The CEO is responsible for ensuring that workplace practices are in place to give effect to the Diversity and Anti-Harassment Policy, the Labour Policy, the Anti-Corruption Policy and the Environmental and Sustainability Policy.
- APC's annual report will contain information on the most material areas of our impact, what we have done in each area to further these policies, and future areas for improvement.

Communication, Infringements and Sanctions

The policies under our Code of Ethics will be communicated to every APC employee at the commencement of their employment, and whenever the code is updated. Every APC employee is personally responsible for compliance with this Code within their sphere of responsibility and influence. Violations of this Code may lead to disciplinary action, up to and including termination of employment, as well as civil and/or criminal proceedings.

If you reasonably believe that a policy, practice or activity may represent a violation of this Code, you should raise the issue to the Director or CEO of APC. If you do not feel comfortable raising your concerns to the Director or CEO, you may raise the issue to an APC Chairperson.

APC prohibits the retaliation or reprimand, including threatening an individual or taking any adverse action against an individual who, in good faith, seeks advice or reports a possible violation of this Code. Retaliation against an individual who has reported a violation in good faith will lead to disciplinary action, up to and including termination of employment.