



# **Apex Ethics Hotline**

FAQs

OCTOBER 2022

## 1. General

### What is Apex Ethics Hotline?

Apex Ethics Hotline is a comprehensive and confidential reporting tool created by NAVEX to assist management and employees work together in addressing fraud, abuse, and other misconduct in the workplace, all while cultivating a positive work environment.

### Why do we need a system like Apex Ethics Hotline?

- Our employees are our most important asset. By creating open channels of communication, we can promote a positive work environment and increase productivity.
- Good Governance recommends an anonymous reporting vehicle to address accounting and auditing fraud directly to the audit committee.
- An effective reporting system will augment our other efforts to foster a culture of integrity and ethical decision-making.

## 2. Reporting

### How can I report a violation?

You have the ability to file a confidential, anonymous report via either the telephone or the Internet (URL: [theapexgroup.ethicspoint.com](https://theapexgroup.ethicspoint.com))\*. You may also send an email to [whistleblowing@apexfunds.co.uk](mailto:whistleblowing@apexfunds.co.uk)

### What type of situations should I report?

The Apex Ethics Hotline system is designed for employees to report any violation of our stated Code of Conduct, or other concern you may have.

### If I see a violation, shouldn't I just report it to my manager, security, or human resources?

When you observe any actions that you believe violates our Code of Conduct, we expect you to report it. Ideally, you should bring any concerns forward to your direct manager, however, should you not wish to pursue this route, given the seriousness and/or sensitivity of the issue, then you may approach either local HR department or any member of the Management team. We acknowledge, however, that there may be circumstances when you are not comfortable reporting the issue in this way.

This is why we have the Apex Ethics Hotline in case you would rather submit your report anonymously than keep the information to yourself.

### Why should I report what I know? What's in it for me?

We all have the right to work in a positive environment and with that right comes the responsibility of acting in an ethical manner and escalating a concern if someone is not acting appropriately. By working together, we can maintain a healthy and productive environment. Corporate misconduct can threaten the livelihood of an entire company.

*\* In the event a user may experience accessing this URL, kindly try access via Google Chrome.*

### **Does the senior leadership team really want me to report?**

Absolutely. You know what is going on in our company - both good and bad. You may have initial knowledge of an activity that may be cause for concern. Your reporting can reduce the potential negative impact on the Apex Group and our people. Also, offering positive input may help identify issues that can improve corporate culture and performance.

### **Where do these reports go and who can access them?**

Reports are entered directly on the Apex Ethics Hotline secure server to prevent any possible breach in security. The Apex Ethics Hotline makes these reports available only to specific individuals within the company who are designated within Apex Group to conduct an investigation, based on the type of violation and location of the incident. Each of these report recipients has had training in keeping these reports in the utmost confidence.

### **Isn't this system just an example of someone watching over me?**

The Apex Ethics Hotline system concentrates on being a positive aspect of our overall philosophy, and allows us to assure a safe, secure, and ethical workplace. You are encouraged to seek guidance on ethical dilemmas, provide positive suggestions, or communicate a concern. Effective communication is critical in today's workplace, and this is a great tool to enhance that communication.

We have carefully chosen the best reporting tool to meet our compliance obligations while maintaining a positive reporting environment.

### **3. Reporting Security & Confidentiality**

**It is my understanding that any report I send from a company computer generates a server log that shows every website that my PC connects with, and won't this log identify me as a report originator?**

The Apex Ethics Hotline does not generate or maintain any internal connection logs with IP addresses, so no information linking your PC to the Hotline is available. In fact, the Apex Ethics Hotline is contractually committed not to pursue a reporter's identity.

If you feel uncomfortable making a report on your work PC, you have the option of using a PC outside your work environment through the Ethics Hotline secure website. Many people choose this option, as industry data shows that fewer than 12% of reports are generated during business hours.

**Can I file a report from home and still remain anonymous?**

A report will remain secure and anonymous at all times if you choose to remain anonymous. An Internet portal never identifies a visitor by screen name and the Apex Ethics Hotline system strips away Internet addresses so that anonymity is totally maintained. Plus, Apex Ethics Hotline is contractually committed not to pursue a reporter's identity.

**I am concerned that the information I provide The Apex Ethics Hotline will ultimately reveal my identity. How can you assure me that will not happen?**

The Apex Ethics Hotline system is designed to protect your anonymity. However, if you wish to remain anonymous, you - as a reporting party - need to ensure that the body of the report does not reveal your identity by accident. For example, "From my cube next to Jan Smith..." or "In my 33 years..."

**Is the telephone toll-free hot line confidential and anonymous too?**

Yes. You will be asked to provide the same information that you would provide in an Internet-based report and an interviewer will type your responses into the Apex Ethics Hotline Web site. These reports have the same security and confidentiality measures applied to them during delivery.

**What if I want to be identified with my report?**

There is a section in the report for identifying yourself if you wish.

## 4. Tips & Best Practices

**I am aware of some individuals involved with unethical conduct, but it doesn't affect me. Why should I bother reporting it?**

Apex Group chooses to promote ethical attitudes and conduct. All unethical conduct, at any level, ultimately hurts the company and all employees, including you. So, if you know of any incidents of misconduct or ethical violations, consider it your duty to yourself and your co-workers to report it.

**I am not sure if what I have observed or heard is a violation of company policy or involves unethical conduct. What should I do?**

File a report. The Apex Ethics Hotline can help you prepare and file your report so it can be properly understood. We'd rather you report a situation that turns out to be harmless than let possible unethical conduct go unchecked because you weren't sure.

**What if my boss or other managers are involved in a violation? Won't they get the report and start a cover-up?**

The Apex Ethics Hotline system and report distribution are designed so that implicated parties are not notified or granted access to reports in which they have been named.

**What if I remember something important about the incident after I file the report? Or what if the company has further questions for me concerning my report?**

When you file a report at the Apex Ethics Hotline Web site or through the Apex Ethics Hotline Call Centre, you receive a unique username and are asked to choose a password. You can return to the Apex Ethics Hotline system again either by Internet or telephone and access the original report to add more detail or answer questions posed by a company representative and add further information that will help resolve open issues. We strongly suggest that you return to the site in the time specified to answer company questions. You and the company now have entered into an "anonymous dialogue," where situations are not only identified, but can also be resolved, no matter how complex. If you forget the password, then you will have to resubmit the report as for security reasons we don't allow users to reset their passwords.

**Are these follow-ups on reports as secure as the first one?**

All Apex Ethics Hotline correspondences are held in the same strict confidence as the initial report, continuing under the umbrella of anonymity.

**Can I still file a report if I don't have access to the Internet?**

You can file an Apex Ethics Hotline report from anywhere. If you don't have access to or are uncomfortable using a computer, you can call the Apex Ethics Hotline toll-free hotline, which is available 24 hours a day, 365 days a year.



## 5. Annexure

Please find below the list of countries and their dial in nos. Kindly note, this list will be reviewed periodically for additional hotline numbers as and when they will be introduced.

<b>Country</b>	<b>Hotline Number</b>
Australia	8336410509
Bahamas	8336410509
Bahrain	8336410509
Bermuda	8336410509
Bulgaria	8336410509
Canada	8336410509
Cayman Islands	8336410509
Channel Islands	8336410509
China	8336410509
Cyprus	8336410509
Gibraltar	8336410509
Hong Kong	8336410509
Hungary	8336410509
India	8336410509
Ireland	8336410509
Isle of Man	8336410509
Israel	8336410509
Japan	8336410509
Luxembourg	8336410509
Malta	8336410509
Mauritius	8336410509
Netherlands	8336410509
New Zealand	8336410509
Russia	8336410509
Singapore	8336410509
South Africa	8336410509
Switzerland	8336410509
UAE	8336410509
United Kingdom	8336410509
United States	8336410509
Uruguay	8336410509