



HILLBREAK

[www.hillbreak.com](http://www.hillbreak.com)



APC SUCCESS

[www.apcsuccess.co.uk](http://www.apcsuccess.co.uk)

## Anti-Bribery

Bribery is defined as the act of offering, giving, promising, asking, agreeing, receiving, accepting, or soliciting something of value or of an advantage so to induce or influence an action or decision in order to gain commercial, contractual, regulatory, or personal advantage.

Hillbreak and APC Success, which are separate companies under common control and ownership, will not engage in bribery and this Anti-Bribery Policy applies to both equally.

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### About Hillbreak

Hillbreak Limited, trading as Hillbreak, provides a blend of strategic consultancy and training services through which we seek to empower our clients to manage risk and achieve competitive advantage in a rapidly-changing, urban world.

Our consultancy services focus on responsible investment and sustainability; they combine strategy, advice and advocacy to deliver the intelligence, insight and narratives needed for organisations and their leaders to address and embrace changing market, societal and regulatory demands, all the while engaging positively with their myriad stakeholders.

Our consultancy services are blended with and complemented by our training expertise. We provide education and

professional development services for real estate professionals and their employers, from graduate to Board-level, enabling people to fulfil their career potential whilst at the same time benefitting their business and society more widely.

### About APC Success

Hillbreak (APC Success) Limited, trading as APC Success, offers bespoke, in-house APC training to a number of real estate organisations and professional surveying firms, as well as for individual candidates that are typically sponsored by their employer.

This includes training on the importance and detail of the RICS Rules of Conduct and Professional Standards and the related RICS Ethics Assessment.

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Our clients are, in the main, highly professionalised organisations that have an active interest in the built environment and real estate sectors, either as investors, owners and asset managers, developers, occupiers, public authorities and service providers.

We are committed unreservedly to the principles of responsible business and are prominent advocates within the real estate industry in this regard. Thus, we have no hesitation in stating publicly our commitment to combatting bribery and our support for the principles of the Bribery Act 2010.

### Our commitment

Hillbreak and APC Success are committed to conducting business in an ethical and honest manner, and are committed to implementing and enforcing systems that ensure bribery is prevented. We have zero-tolerance for bribery and corrupt activities and are committed to acting professionally, fairly, and with integrity in all business dealings and relationships.

We shall constantly uphold all laws relating to anti-bribery and corruption in all the jurisdictions in which we operate. We are bound by the laws of the UK, including the Bribery Act 2010, in regards to our conduct both at home and abroad.

Any arrangements our companies makes with third parties are subject to clear contractual terms, including specific provisions that require third parties to comply with minimum standards.

### Gifts and hospitality

In line with our approach to ethical business practises, we accept normal and appropriate gestures of hospitality and goodwill so long as the giving or receiving of gifts is not defined as a bribe, is of an appropriate type and value and given at an appropriate time, taking into account the reason for the gift.

### Charitable Contributions

Hillbreak and APC Success accept (and indeed encourage) the act of donating to charities – whether through services, knowledge, time, or direct financial contributions (cash or otherwise) – and agrees to disclose all charitable contributions they make. We shall ensure that all charitable donations made are legal and ethical under local laws and practices.



Jon Lovell  
Director, Hillbreak Limited | Director, Hillbreak (APC Success) Limited

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