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About EthicsPoint

What is EthicsPoint?

EthicsPoint is a comprehensive and confidential reporting tool that helps APi Group Corporation (“APG” or the “Company”) maintain an ethical work environment by providing enhanced options for employees to report potential policy violations and/or misconduct in the Company.

Why do we need a system like EthicsPoint?

- At APG, our employees are our most important asset. By creating multiple channels of communication, we promote a positive work environment and maximize engagement and productivity.
- Publicly-traded companies are required by law to have an anonymous reporting vehicle to report accounting and auditing fraud directly to the audit committee of its board of directors.
- An effective reporting system augments our other efforts to foster a culture of integrity and ethical decision-making.

Reporting – General

May I report using either the Internet or the telephone?

Yes. EthicsPoint enables you to file a report via either the telephone or the Internet.

What types of situations should I report?

The EthicsPoint system allows employees to report any violation of our Code of Conduct, or other concern employees may have of potential violations of Company policy and/or other misconduct.

If I see a violation, shouldn't I just report it to my manager, security, or human resources and let them deal with it?

When you observe behavior that you believe violates our Code of Conduct or other Company policies, we expect you to report it. If you are comfortable, we encourage you to bring your concerns forward to your supervisor, another member of your management team, or your human

resources team. The EthicsPoint platform simply provides an alternative avenue to report your concerns to APG.

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 responsibility. Under our Code of Conduct, each employee has a responsibility not only to adhere to the Code and other Company policies, but to notify APG when they believe that others may not be doing so. By working together, we can maintain a healthy and productive environment.

Does management really want me to report?

We certainly do. In fact, we *need* you to. Our company acts through our employees and, through their day-to-day work, it is also our employees who are best positioned to recognize activity that may be cause for concern. Your reporting can minimize the potential negative impact of wrongful conduct on APG and our people.

Where do these reports go? Who can access them?

Reports are entered directly on the EthicsPoint secure server. NAVEX Global makes these reports available only to specific individuals within the Company who are charged with reviewing the report, based on the type of violation and location of the incident. Each of these report recipients has duties to maintain the reports as confidential to the greatest extent possible.

Reporting Security & Confidentiality

Can I file my report anonymously?

Yes. You have the option of identifying yourself or remaining anonymous. We respect your choice in this matter and, irrespective of how a concern is reported, it will be reviewed by the Company. It is important to understand, however, that the Company's ability to meaningfully review your concern may be impacted if, due to the anonymous nature of your report, we are not able to interview you to seek additional relevant information from you as the reporter.

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. If I submit my report anonymously, won't this log identify me as the report originator?

NAVEX Global does not generate or maintain any internal connection logs with IP addresses; therefore, no information linking your PC to EthicsPoint is available.

If you feel uncomfortable making a report on your work or personal PC, you have the option of using a PC outside your work environment or a PC not associated with you (such as one located at a public library or friend's PC) to submit your online report through the EthicsPoint secure website.

I am concerned that the information I provide EthicsPoint will ultimately reveal my identity. How can you assure me that will not happen?

The EthicsPoint system protects your anonymity. When you wish to remain anonymous, you should take care to avoid providing details that may reveal your identity inadvertently. For example, you may wish to avoid details like: “From my cube next to Jan Smith...” or “In my 33 years...”.

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

If you submit your report by phone, you will be asked to provide the same information that you would provide in an Internet-based report, including whether you wish to provide your name or remain anonymous. An interviewer will type your responses into the EthicsPoint Web site, and your report will likewise be maintained as confidential to the greatest extent possible.

Tips & Best Practices

I am not sure if what I have observed or heard is a violation of company policy, or involves unethical conduct, but it just does not look right to me. What should I do?

File a report with your concern. It is perfectly acceptable to include in your report that you are not certain if the behavior is wrongful or not. We'd rather you report a situation that turns out to be harmless than let possible unethical behavior go unreported.

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

The EthicsPoint system and report distribution ensure that implicated parties (those named in a report as potentially being involved in a violation of policy or other misconduct) are not notified of or granted access to the report. In this way, the Company will be able to take any actions necessary to ensure the integrity of the review process before beginning that process.

Implicated parties are likely to be interviewed during the Company's review of your report, and at that point will become aware of the concerns raised, in order that they have an opportunity to respond. During those interviews, implicated parties will be reminded that retaliation is a violation of company policy and warned that retaliation will not be tolerated. You should immediately report retaliatory conduct, if any, to the Company.

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 EthicsPoint Web site or through the EthicsPoint Call Center, you receive a unique, randomized number called a “Report Key” and will create a password. (Only you will know your password; even EthicsPoint cannot retrieve it for you. Accordingly, it is critical to store your password in a secure location, where you will not lose it.)

Using your password, you can return to the EthicsPoint system again either by Internet or telephone and access the original report to add more detail at any time. Additionally, if you file your report anonymously, the Company may post additional questions for you in the website via an “anonymous dialogue.”

What if I do lose my Report Key or forget the Password I created?

To ensure that security and confidentiality is maintained, if you lose your report key or password, you will need to file a new report. We recommend that you state in the new report that it is related to a report you previously submitted.

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

All EthicsPoint correspondence is governed by the same commitment to maintain confidentiality to the greatest extent possible. Additionally, if you filed your report anonymously, all correspondence will remain anonymous, unless you later notify EthicsPoint you wish to provide your name.

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

Yes. You can call the EthicsPoint toll-free hotline to submit your report by phone, which is available 24 hours a day, 365 days a year. The telephone number applicable to your location can be found on this website, at the “Report By Phone” link.

However, internet access is necessary to file a report online.