



Policy Title	Non-Retaliation Policy	Policy Version	1.0
Policy Approver	API Group Chief People Officer	Effective Date	September 1, 2023
		Last Update	

1. Purpose

Any form of retaliation against team membersⁱ or our partners who bring up concerns, participate in investigations or support others who bring up concerns is not tolerated. If retaliation occurs, those individuals and/or partners who violate this Policy are subject to disciplinary action, up to and including termination of employment or other business relationships with the Company.

2. Scope

This Policy applies to API Group Corporation, all its subsidiaries and operating companies ("API" or "Company") and it extends to third parties who seek, in good faith, to report misconduct to the Company, or who retaliate against API team members or others for having done so.

3. General Principles

- a) We expect team members to speak up in good faith when they observe actual or suspected violations of the API Code of Business Conduct and Ethics, Company policy or procedure, or the law (as used throughout this Policy, "misconduct"). We also encourage third parties to report API-related misconduct to the Company.

"Good faith" means a report made with the honest and reasonable belief that misconduct may have occurred.

- b) We prohibit any retaliation, subtle or overt, against anyone who, in good faith, reports or participates in the investigation of actual or suspected misconduct, whether or not the allegation is substantiated.

"Retaliation" means an adverse action against an individual (team member or third party) because that individual made a good faith report of misconduct, supported an individual who made such a report, or cooperated in the investigation of reported misconduct.

- c) We take all reports of retaliation seriously and investigate alleged retaliation. Any person or third party found by the Company to have engaged in retaliation may be subject to discipline, up to and including termination of employment, or termination of such third party's business relationship(s) with the Company.



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4. Reporting Concerns & Violations

The prevention, detection and reporting of potential violations under this Policy are the responsibility of all those working for the Company or under its control. Everyone is expected to report any action that might give rise to a violation of this Policy.

Reports should be made as soon as possible and in any manner in which the reporter is comfortable. You have the option of reporting concerns relating to this Policy to your supervisor, to Human Resources (or the equivalent), and in many cases to the APi Group Ethics Helpline at www.apigroup.ethicspoint.com, through which reporters have the option of submitting reports anonymously. Additionally, you may make a report to the APi Compliance Department at the following email address: compliance@apigroupinc.us.

While reporting is expected, it does not exempt team members or third parties from accountability for their involvement in misconduct.

5. Questions?

It is your responsibility to understand and follow this Policy. You should always feel free to ask questions if you have any doubts or concerns. Questions should be raised with the APi Group Legal Department or, as applicable, any operating company's Legal Department.

SUPPORTING DOCUMENTS

Document Name
APi Code of Business Conduct and Ethics
APi Employee Handbook

DOCUMENT HISTORY

Document all changes to this Policy in descending order (most recent to oldest).

Version	Date	Modifications	Prepared/Revised by	Executive Sponsor

ⁱ Employees of APi are referred to in this Policy as "team members"