

Building Great Leaders



Code of Business Conduct and Ethics

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A MESSAGE FROM OUR CEO



At APi Group, we take pride in our work and in the relationships we build with our teammates, our customers, and the communities we serve. We've also learned that successful relationships are built on trust – one ethical action at a time.

That's how we're known at APi – as a family of operating companies that work with passion and integrity each day. We're also leaders – each and every one of us. Being a leader means being accountable – to our customers, our company, and each other, and holding ourselves to the very highest standards.

To make sure we're all working towards the same purpose and following the same rules, we follow APi's Code of Business Conduct and Ethics. The Code helps form the foundation of our culture and our commitment to Building Great Leaders®. It's a tool designed for you and your daily work, showing you how to interact ethically, follow the law and our policies, do what we say, and above all, give life to our values.

Following the Code is one of your most important responsibilities as a leader. When you commit to our Code and speak up about Code violations, you're honoring APi and the generations of leaders who came before you.

Remember our Code. Look to it for guidance in every action and at every crossroads you face. With your commitment, we'll build leaders who carry APi's legacy proudly into the future.

RUSS BECKER

Chief Executive Officer and President



WE BRING OUR VALUES TO LIFE

Every day, we have a chance to turn potential into power. APi Group’s values inspire us every step of the way. They also represent a way of living and working that shows the world who we are and what we aspire to be: The #1 people-first public company that is #1 in business results.

PURPOSE

BUILDING GREAT LEADERS

VALUES



Safety, health, and well-being of all our leaders



Caring and enduring relationships with others



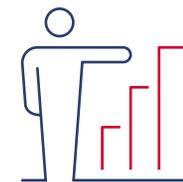
Honesty and integrity



Excellence, nothing less



Joy in our work and in each other



Combining small company agilities with large company advantages

We know the Code

Our values provide the inspiration we need to be great leaders. Our Code gives us the guidance to get there. It's the resource that helps us be our best and turn our values into actions.

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ALL ABOUT THE CODE

When companies partner with APi Group, they know they're in good hands. They can count on our world-class resources, and our ability to help them operate safely, efficiently, and effectively. More importantly, our customers can trust the way we conduct our business and ourselves – with honesty and integrity.

Our Code of Business Conduct and Ethics (“Code”) shows us how. It gives us the key information and resources we need to do what’s right for APi, our teammates, and our customers.

Look to the Code for:

- > Overviews of common situations you might face
- > Advice on how to handle those situations ethically
- > Tips to align your actions with our values, policies, and the law
- > Tools for good decision-making
- > Things you should know and do
- > Links to APi’s policies and other resources



I'm involved in a situation that doesn't seem to be covered by our Code. Should I just use my best judgment?

While we do expect you to use good judgment, we don't expect you to guess what to do in an unfamiliar situation. The Code can't cover every possible scenario, so when you can't find the answers you're looking for, reach out to your leader or any of the resources listed in the Code.

WHO FOLLOWS THE CODE? If you represent APi in any way, including at APi operating companies, or do work on our behalf, the Code applies to you – regardless of your position or where you work – whether in the field, at home, in an office, in the boardroom, or anywhere else you do your work. This applies to all full- or part-time:

- > Leaders
- > People leaders
- > Executives
- > Directors
- > Vendors and suppliers
- > Service providers
- > Contractors
- > Consultants

THINGS TO KNOW

Our business partners are critical to our business, and because they work on our behalf, we expect them to share our commitment to the highest standards of quality and integrity.

WHAT ABOUT VIOLATIONS? Unfortunately, violations of our Code and policies sometimes happen, and we take them seriously. They occur when someone:

- > Doesn't follow our Code or policies
- > Encourages someone else to violate our Code or policies

Violations can seriously damage our reputation and our relationships, and they can lead to disciplinary action – even termination. When a law is broken, it can lead to more serious consequences, like criminal prosecution, fines, or jail time.

WHAT IF THE RULES CHANGE? The laws that apply to us sometimes change. If that happens, our Code must change as well. APi may modify or update the Code or our policies at any time, so review them often to stay up to date. Any substantive changes to the Code must be approved by our Board of Directors. Any request for a waiver from this Code made by an executive officer or director of APi Group must be in writing and must be approved by the Board of Directors or its Audit Committee.

YOUR ROLE

At APi Group, we believe leadership is built on responsibility – not excuses. Our company and our customers trust us to do what’s right by upholding our shared responsibilities:



Live APi’s values – Apply them, along with the values of your business, in every decision and interaction.



Know and follow our Code – Read the Code carefully, and when you have a question, make the Code your first stop for guidance.



Follow our policies and the law – Know how laws and our policies apply to your work. Follow them and ask for help if something isn’t clear.



Speak up – If you see anything that could be violating our Code, policies, or the law, speak up immediately. Don’t ignore it!

Are you a leader of people? You have added responsibilities:



Set the right tone – Your team looks to you as an example of how to act. Show them what great leaders do by demonstrating integrity in every action.



Promote the Code – Maintain a positive attitude about our Code. That means knowing it well, following it to the letter, and encouraging your team to do the same.



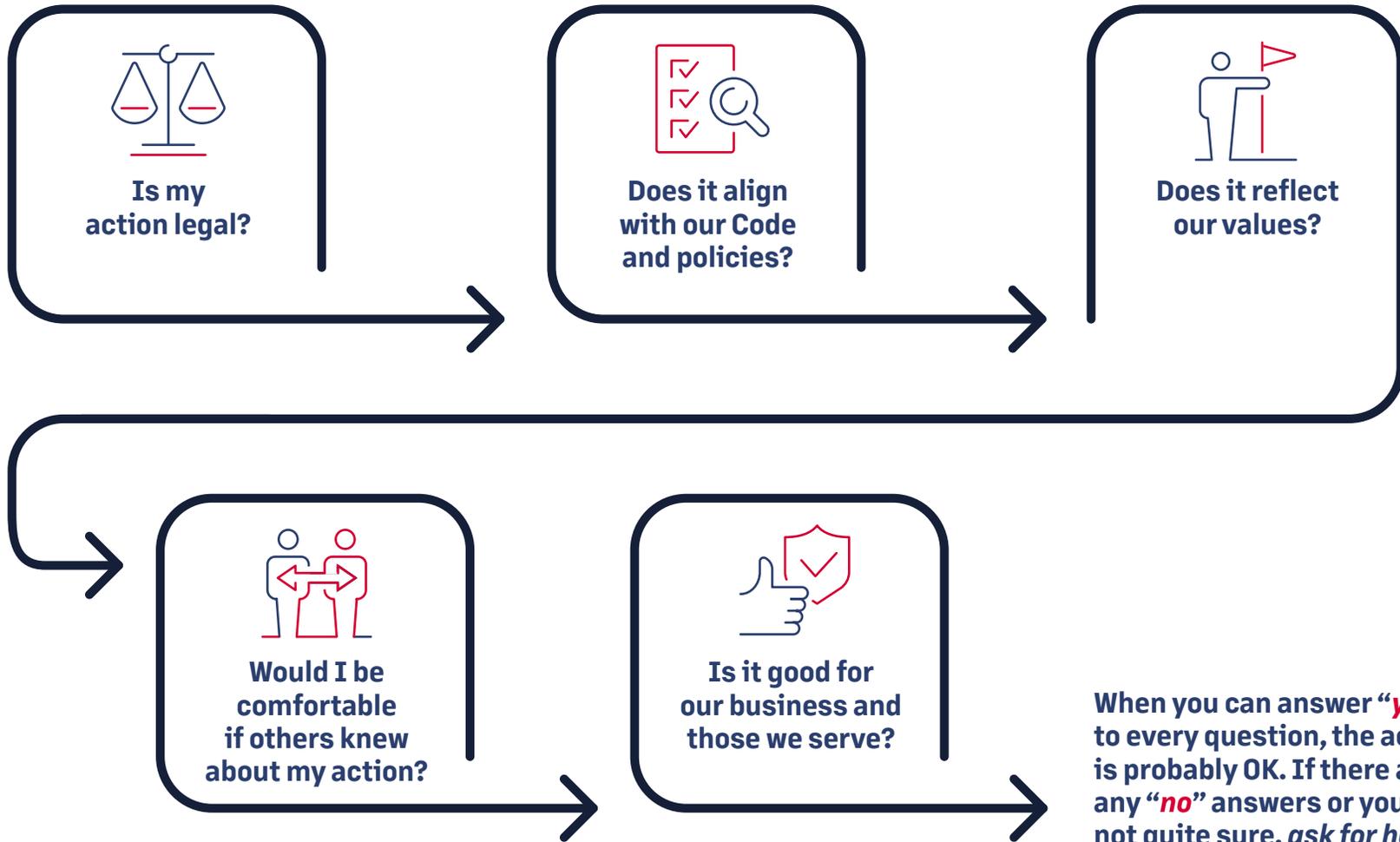
Keep an open door – Great leaders are also great listeners. Make time for your team when they have questions or concerns and help them feel comfortable and confident in speaking up.



Be responsive – Once you’re aware of a potential violation, don’t take a wait-and-see approach, and don’t investigate it yourself. Speak up right away.

GOOD DECISIONS, EVERY DAY

Our daily decisions have the power to impact our business and our reputation. But making the right choice in a tricky situation isn't easy. The Code can help you choose what's right, but if you're still unsure, ask yourself:



When you can answer “**yes**” to every question, the action is probably OK. If there are any “**no**” answers or you’re not quite sure, ask for help before proceeding.

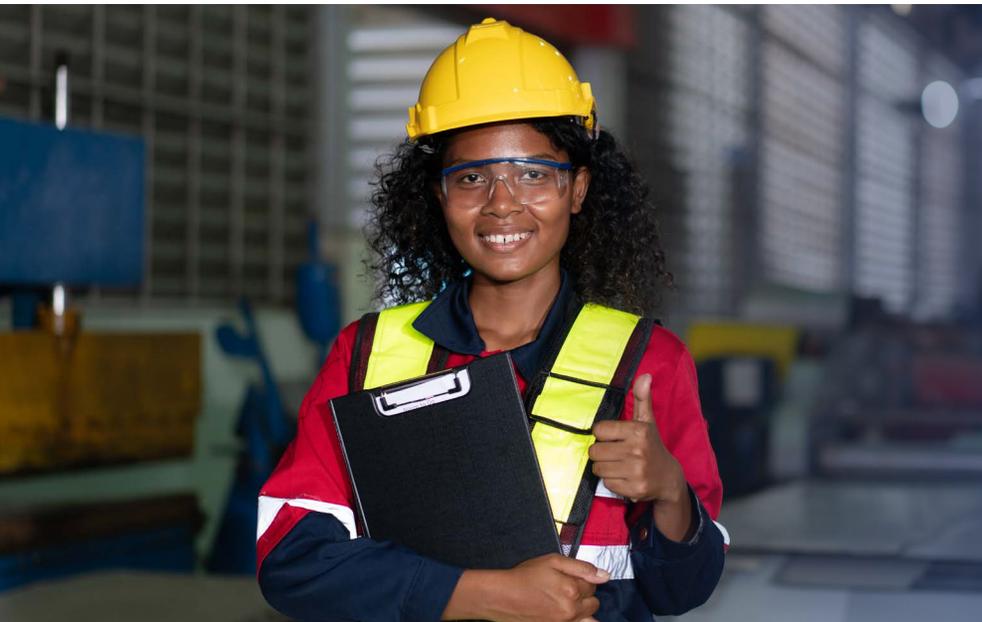
HAVE A CONCERN?

Each of us at APi Group has a right to be heard. When we see or suspect misconduct, that right becomes a responsibility. For that reason, we speak up whenever something doesn't seem right. It's the best way for our company to address harmful activity and find ways to do better.

YOU HAVE OPTIONS

We recognize speaking up may not be easy, especially if your concern involves a teammate, a people leader, or something sensitive, but it's extremely important that you do. APi wants you to feel confident and safe when asking questions or sharing concerns, so we offer a variety of options. Speak up to either:

- > Your direct leader or any other member of senior leadership
- > Your Human Resources representative
- > The Compliance Department
- > The Legal Department



If you're not comfortable with these resources, contact:

APi GROUP'S ETHICS HELPLINE

APi Group's Ethics Helpline is a way for you to share your concerns, either online or via phone. It's operated by an independent third-party provider and is available 24/7. While we encourage you to identify yourself when reporting, you do have the option to remain anonymous, where permitted by local law.



Access APi Group's Ethics Helpline



Or call **1-844-950-1973** from the U.S. or Canada. From anywhere else in the world, please dial your local access number which can be found here.

AFTER YOU SPEAK UP ...



Your report is reviewed promptly by the Legal and/or Compliance Departments.



You may be asked to provide additional information or cooperate with an investigation.



If it's found that a violation has occurred, we will take appropriate measures, which may include taking disciplinary action against those involved.

HAVE A CONCERN?

COULD I FACE RETALIATION?

Speaking up is one of our most important responsibilities. That is why our company doesn't tolerate retaliation against anyone for sharing a concern in good faith.

Retaliation is a serious violation of our Code, so if you experience or suspect retaliation against anyone, speak up immediately.



While working on a project, a people leader who is helping us suggested that we do something I believe may violate our policies. No one has a problem with it but me. Should I just let this go?

No, you shouldn't. Nobody at API Group is above the Code or the law or exempt from our policies, and they don't have the authority to ask you to break them. You have a responsibility to speak up immediately.



Dig Deeper

Non-retaliation Policy

THINGS TO KNOW

Retaliation may look like:

- Termination
- Demotion
- Discipline

These are just a few examples. Watch for any kind of retaliation and speak up about it.



We put the safety, health, and well-being of all our leaders first —

Our people are by far our greatest priority and deserve a safe, healthy, and respectful work environment. Each of us must help maintain that environment by looking out for each other and creating a place where everyone can grow, thrive, and belong.

Respect in the workplace **12**

Health and safety at work **13**

RESPECT IN THE WORKPLACE

At APi Group, we promote a culture of respect, where everyone feels welcomed, valued, and safe from discrimination and harassment.

WE TREAT EVERYONE WITH RESPECT. We treat every individual, no matter who they are, as we would want to be treated – with dignity and respect. It also means having positive and cooperative interactions and never singling anyone out for unfair treatment.

WE PROMOTE PSYCHOLOGICAL SAFETY. That means we make sure everyone at APi feels included and is offered the space and time to learn and grow. Show others that they help make our team successful and support their efforts to challenge the status quo without fear of retaliation, reprisal, or alienation.

WE VALUE OTHERS' CONTRIBUTIONS. Our diverse leaders are a great source of strength for us, so we value the unique contributions and perspectives of each person. Invite input from diverse sources – never exclude or silence anyone.

WE SPEAK UP FOR EACH OTHER. If you experience or witness discrimination, harassment, or other offensive conduct, don't turn your back. Speak up about it immediately.



**Focus on ...
Putting the safety,
health, and well-being
of all our leaders first.**

Help us maintain a positive environment by preventing harassment and abuse.

THINGS TO KNOW

Discrimination means treating a person or group of people differently because of a protected characteristic.

Harassment is a form of discrimination. It includes unwelcome verbal, visual, or physical conduct that denigrates or shows hostility or aversion towards an individual, or which creates an intimidating, hostile, or offensive working environment that interferes with work performance.

Sexual harassment is one form of harassment, and it can include: unwanted physical closeness, sexual advances, requests for sexual favors, repeated requests for dates, physical gestures, display of sexualized images, and sexualized comments or jokes.

Harassment can also include display of offensive images, comments or jokes, and slurs.



A teammate expressed being offended by ethnic jokes made by another leader but doesn't want to report it. Since this person doesn't want to speak up, should I keep this to myself?

No, you shouldn't. If disrespectful conduct is happening at our business, and you're aware of it, you should let us know about it.



HEALTH AND SAFETY AT WORK

It's vitally important to us at APi Group that everyone goes home safely every day. As leaders, it's up to us to make health and safety a priority by looking out for each other, following safety rules and applicable health and safety laws, and never taking unnecessary risks.

WE MAKE ZERO OUR FAVORITE NUMBER. Safety is our number one priority, which is why APi is committed to zero incidents. We work to build a safer workplace every day, through strict safety standards, more than 100 dedicated safety leaders and Corporate Safety. We rely on you to commit to enhancing safety and well-being and working towards zero incidents.

WE FORGE A PROACTIVE PATH TO RISK MANAGEMENT.

We strive to exceed the industry's best practices in health and safety with STEPS: Striving Towards Excellence & Professionalism in Safety. This award-winning initiative supports workplace safety through:

- Auditing and reporting
- Corporate training
- Loss prevention
- Management participation
- Results-driven accountability



Focus on ...
Putting the safety, health, and well-being of all our leaders first.

Take personal responsibility for safety. Be alert to protect yourself and others.

Practice STEPS in your daily work and encourage others to do the same.



WE REPORT ANYTHING POTENTIALLY HARMFUL. And we don't wait to speak up. Immediately report things like:

- Violations of safety rules or laws
- Broken or malfunctioning equipment
- Unsafe conditions
- Substance abuse
- A weapon at work or on our property
- Verbal or physical threats



HEALTH AND SAFETY AT WORK

THINGS TO DO

Take our core beliefs to heart. The centerpiece of our commitment to safety is a set of core beliefs, which each of us must uphold:



Work safely so everybody wins. Never take shortcuts that compromise safety, quality, or productivity.



Show you care for others by focusing on zero incidents – that’s our goal and the expectation of everyone on our team.



Recognize you have the personal responsibility, authority, and support to stop work if it’s unsafe. Speak up to learn and share behaviors.



Remember, all incidents are preventable. When you help identify an incident’s root cause, you help us learn how to be safer.



Don’t give safety a day off. Your family, friends, and teammates need you to be safe all day, every day.



We build caring and enduring relationships with others

Achieving incomparable results requires incomparable relationships. At APi Group, we make lasting connections with each other, customers, and business partners, built on mutual trust and integrity.

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BUSINESS RELATIONSHIPS

Relationships are the building blocks of our business. We take the time and effort to establish relationships with high-quality and diverse business partners we can work with for the long term – those who share our commitment to excellence and to leading with integrity.

WE CHOOSE OUR WORK AND OUR BUSINESS PARTNERS FAIRLY AND WISELY. Because our business partners impact the quality of our services, we hold them to the same high standards we hold for ourselves. If you help choose our business partners, like customers, suppliers, vendors, or other partners, do your research. Practice contract selection while also focusing on fairness and diversity. Make sure business partners:

- Meet our standards of quality and value
- Are not listed as an excluded party by the government
- Share our commitment to Environmental protection and sustainability for a greener future
- Share our commitment to ethical behavior and upholding human rights

WE PAY CLOSE ATTENTION. Remember, good relationships require care and maintenance, so if you work with business partners, monitor their work, and make sure they understand their obligations to:

- Represent APi with integrity
- Follow applicable laws
- Fulfill contractual obligations
- Follow our policies and procedures
- Operate as good stewards of the environment
- Enable the achievement of our own sustainability ambitions



**Focus on ...
Building caring and
enduring relationships
with others.**

Let your ethical actions show business partners what great leadership looks like.

If you see business partners doing anything that may violate our Code, policies, or the law, Speak up immediately.

WE ACT FAIRLY WITH BUSINESS PARTNERS. In all your dealings and interactions with business partners, highlight fairness and respect. Never try to manipulate or influence them (or be influenced by them) with improper offers. To learn more, see Anti-bribery and anti-corruption and Gifts and entertainment.



BUSINESS RELATIONSHIPS

THINGS TO DO

When choosing a business partner, make your choice based on:



APi's needs



Products and services offered



Price and value



Quality of their work



Reputation and record

Never base your choice on:



Personal bias



Personal gain



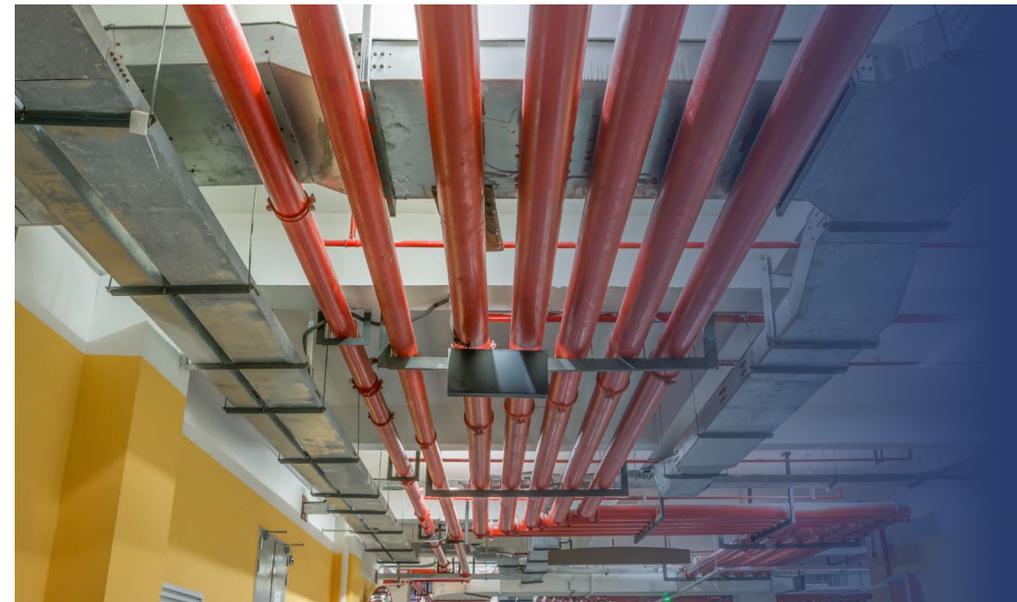
I read something on social media suggesting one of our suppliers could be involved in a bribery scandal. Since it only seems to be a rumor, is it OK to ignore this for now?

No, it isn't. If a supplier may be violating the law, we need to hear about it. After all, the things they do reflect on our business and could impact us. You don't need to confirm the rumor – just get this information to those who can research the supplier appropriately.



Dig Deeper

*APi Group Policy Prohibiting Bribery and Other Corrupt Practices
APi Travel and Expense Policy*



GOVERNMENT INTERACTIONS

APi Group is honored to work with all kinds of customers and business partners, including national, regional, and local governments. While we act with integrity in every business relationship, we also recognize that interactions with governments call for greater responsibility and greater care.

WE FOLLOW THE RULES. Be aware that a variety of legal, regulatory, and contractual requirements apply to our government engagements. Know these requirements and how they apply to you. They can impact the way APi and our business partners handle:

- Contract selection
- Accounting, invoices, and billing
- Contracts and subcontracting
- Employment practices
- [Gifts and entertainment](#)
- Purchasing
- [Accurate recordkeeping](#)

Follow all requirements to the letter. Contact the [Legal Department](#) with questions.

WE PRACTICE HONESTY AND TRANSPARENCY. Whether we're working with a government customer or interacting with a government official, directly or through intermediaries, we are open and honest in everything we do. In your dealings with governments, never mislead them. Provide requested information promptly and accurately.

WE PROTECT GOVERNMENT PROPERTY. If our government customers or partners provide us with any materials, equipment, or other property, it's up to us to use them responsibly and protect them. That includes protecting their confidential or classified information or intellectual property from disclosure.



GOVERNMENT INTERACTIONS

THINGS TO DO

In all transactions, including government transactions, APi Group has a responsibility to ...

Always:



Use current and accurate pricing data.



Be accurate and honest in all proposals, quotes, invoices, reports, and communications.



Protect classified information and government property.



Comply with applicable APi policies.

Never:



Alter or falsify documentation.



Share confidential government information.



Bend the rules related to government interactions or hiring.



Dig Deeper

Federal Contractor Code of Business Ethics and Conduct

DATA PRIVACY

We believe privacy should be respected. It's also a requirement for building lasting and trusting relationships. Our customers, business partners, and leaders all may share personal information with APi Group, and we take every reasonable precaution to secure it.

WE RECOGNIZE WHAT'S PRIVATE. As a company, we regularly collect, store, access, and dispose of personal information, which is any kind of information that could be used to identify someone. This information includes:

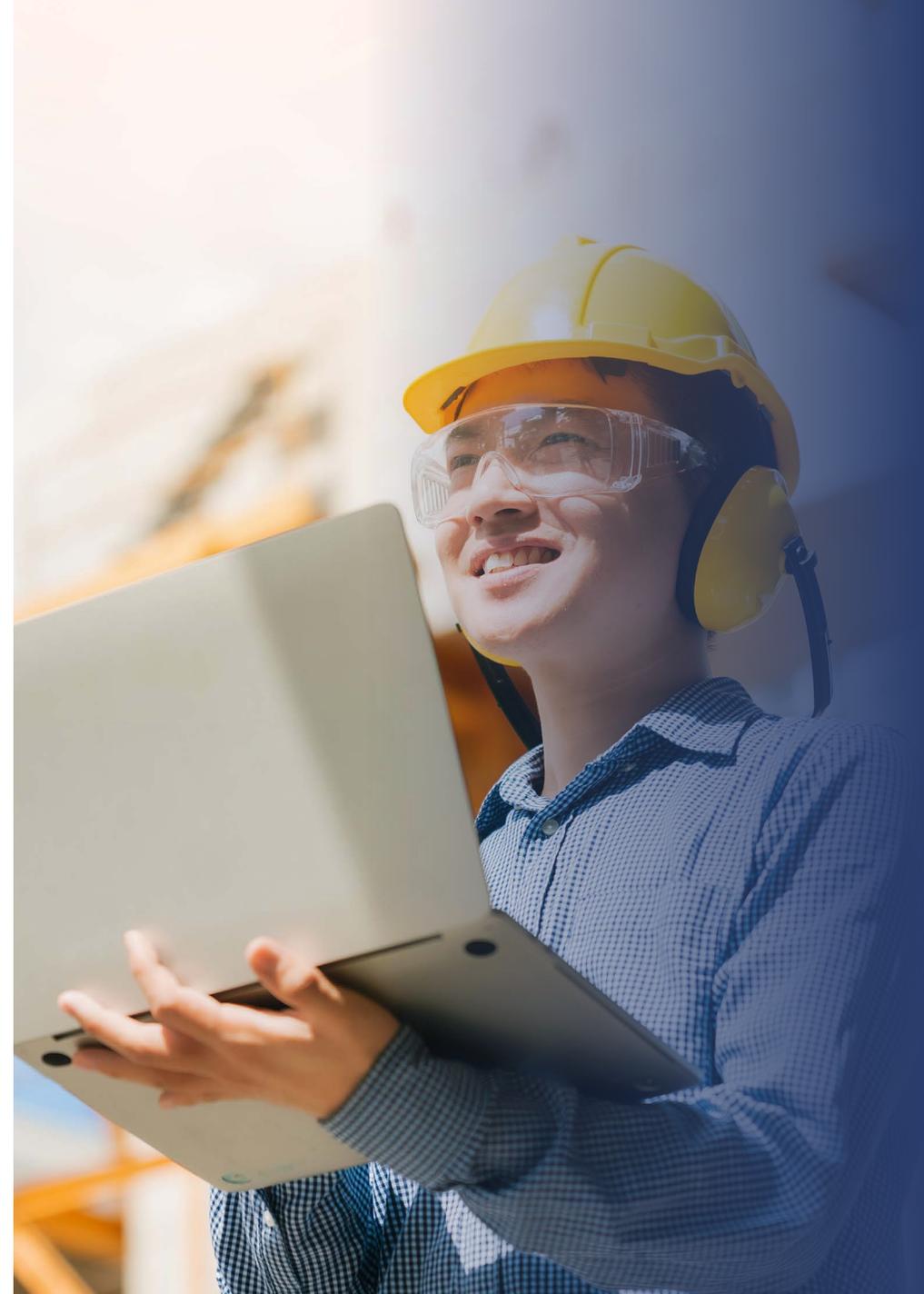
- Name, address, or identification number
- Email or other online identifier
- Birth date
- Phone number
- Health records
- Banking or other financial information
- Location data

Be aware, some personal information is considered sensitive and may require additional safeguards.

WE RESPECT DATA PRIVACY LAWS. A variety of laws exist around the world to protect personal information, and we comply with them carefully. Know how these laws apply to your work and [ask questions](#) if anything is unclear.

WE RESPECT PERSONAL INFORMATION. If you handle or come into contact with personal information through your work, use extreme care to protect it from misuse or disclosure. (To learn more, see [Use of APi Group assets](#) and [Confidential information and intellectual property](#).)

If you are aware of a possible data breach or disclosure of personal information, [speak up](#) immediately. This will help us notify the proper authorities quickly and avoid further harm.



DATA PRIVACY

THINGS TO DO

You have the power to protect personal information from disclosure. Remember:



Collect only the minimum amount of personal information you need for your job.



Only use personal information for legitimate business purposes.



Never share it with anyone who isn't authorized.



Never use unsecured networks to access it.



Never send it to unattended devices, like printers.



Follow our policies to dispose of it securely.



Speak up about any potential data breach.



A leader from another department has requested a customer contact list from me for a marketing campaign. Since this person is within APi, may I share the list?

Not necessarily. It could violate our policies or data privacy laws. You may only share information with someone who's authorized – whether they are outside or inside of APi. Before you share the list, check with your leader or APi's Privacy Team to make sure it's OK.



Dig Deeper

Records and Information Management Policy



We work with honesty and integrity

Great leaders have their own unique strengths and perspectives, but at APi Group, there's something our leaders all share: a commitment to honesty and integrity. These are the building blocks of our success.

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FAIR COMPETITION

We believe healthy competition creates a healthy marketplace – an environment where everyone has the same chance to participate. That means no matter where in the world we’re conducting our business, we play fairly and follow the rules.

WE DON’T CHEAT. At APi Group, we don’t use deceptive practices to succeed or to harm someone’s ability to compete. We know we can rely on our hard work and the quality of our services to get ahead.

WE DON’T MAKE IMPROPER AGREEMENTS. Use care in your interactions with competitors, customers, and business partners. Never agree (or even appear to agree) to do something that benefits us but illegally limits competition, such as:

- **FIXING** prices or terms of sale for our services
- **SETTING** the terms or fixing the outcome of a bid
- **DIVIDING** territories, markets, or customers
- **REFUSING** to deal with another customer or competitor

WE MARKET OURSELVES HONESTLY. Our customers need to know we mean what we say and can keep our promises. If your work involves marketing or advertising for our business, be truthful and able to back up the claims you make; don’t make false claims about the competition.

WE LEARN ABOUT THE COMPETITION ETHICALLY. Learning as much as we can about the competition is critical, but when you do, only use publicly available information. Never use information that was illegally obtained (like confidential information obtained by a customer or teammate).

WE RESPECT COMPETITION LAWS. A variety of laws exist around the world to ensure fair competitive practices, and we’re committed to following them. These laws can vary, so know how laws apply in the countries where you do business. If you have questions or if laws seem to conflict, contact the [Legal Department](#).



FAIR COMPETITION

THINGS TO DO

In your interactions with competitors, be able to say “no” to each of the following:

Does it sound like you might be ...



Fixing prices?



Interfering or colluding with others in the bidding process?



Dividing up territories or customers?



Boycotting suppliers or competitors?

Any “yes” or “maybe” answers are a sign to stop the conversation and ask for help.



While talking to a competitor at a trade show, the topic of customers and territories came up. I made an excuse and left the conversation. Was that the right thing to do?

Almost. Your intuition was correct to stop the conversation, but before leaving you should have let them know it's an inappropriate topic to discuss. Then after leaving, you should contact the Legal Department right away to alert them to what happened.



Dig Deeper

Antitrust Compliance Policy



ANTI-BRIBERY AND ANTI-CORRUPTION

Acts of bribery and corruption can cost us our relationships and our reputation, so we don't use them to get ahead. We succeed through hard work and confidence in the quality of our talents and services.

WE DON'T BRIBE. A bribe can be anything of value that's offered to influence someone or gain an unfair advantage. Stay alert for improper offers, including:

- > Cash or gift cards
- > Special discounts
- > Inappropriate gifts
- > Charitable or political contributions
- > Excessive entertainment
- > Sponsored travel
- > Securities

To learn more about which offers are appropriate (and which aren't), see [Gifts and entertainment](#).

WE FOLLOW THE LAW. At APi Group, we're committed to keeping bribery and corruption out of our operations. Do your part by following our policies and the anti-bribery laws wherever in the world you do business. These laws may vary, so contact the [Legal Department](#) if anything is unclear or if laws or local customs seem to conflict with our policies.



Focus on ...
Honesty and integrity.

Help us prevent and expose bribery and corruption.

WE INTERACT ETHICALLY. In your interactions with business partners or other third parties, don't make or accept offers that might appear improper. If it looks like someone might benefit unfairly from an offer, avoid it – whether or not it's customary where you're working. Remember, stricter rules apply in dealings with government officials; any offer to them – no matter how small – may violate the law, so seek approval from the Legal Department.

THINGS TO KNOW

We're responsible for the actions of those working on our behalf, including suppliers or consultants. That means we can face serious legal consequences if they break the law.

WE DOCUMENT TRANSACTIONS. Every transaction of every size requires proper documentation. Accurately and completely document every transaction and payment – never make misleading entries in our [records](#).

WE SPEAK UP. If you're aware of anyone breaking the law or our policies, [speak up](#) immediately.



A government official in another country said we could speed up our transaction if we pay a "customary expediting fee." Since this is how business is done in that country, is it OK to pay?

No, it isn't. A fee like this is also known as a "facilitation payment" – a form of bribery – and we don't pay them. Ask your leader or the Legal Department for help.



Dig Deeper

*APi Group Policy Prohibiting Bribery and Other Corrupt Practices
Travel and Entertainment*

GIFTS AND ENTERTAINMENT

Reasonable courtesies are given in business all the time. But there’s a fine line between a token of appreciation and an attempted bribe. We don’t cross that line, and we don’t let inappropriate gifts or entertainment get in the way of our decision-making or use them to influence someone else.

WE KNOW OUR RULES. APi Group’s philosophy on business courtesies is this: We don’t offer or accept anything that might appear to compromise our integrity or look like a bribe. Make sure you know our policies about what’s acceptable and what isn’t.

WE REFUSE ANYTHING IMPROPER. When you know our policies and those of our business partners, including our Business Gifts and Entertainment Policy, you’ll be better prepared to recognize and refuse inappropriate offers. We know it isn’t always easy to do, so ask for help when you have an offer that you’re unsure about.

WE DON’T ASK OTHERS TO MAKE OFFERS FOR US. Be aware, APi doesn’t allow anyone to offer inappropriate business courtesies on our behalf. That includes sales representatives, distributors, and contractors.

THINGS TO KNOW

Offers are ...

Permitted when they are ...

- Nominal in value – see our Business Gifts and Entertainment Policy for details
- Offered openly and transparently
- Properly documented in our records

Prohibited when they are ...

- In violation of local law or either the giver’s or the recipient’s policies
- Cash or a cash equivalent
- Excessive in value or offered frequently
- Unprofessional or inappropriate
- Creating the appearance of a corrupt payment

THINGS TO DO

If you’re ever facing a business courtesies that you’re not sure is OK, ask yourself:



Is this offer legal?



Am I sure it couldn’t be perceived as a corrupt payment?



Does it align with both parties’ policies?



Is it reasonable and customary?



Is it being offered without expectation of a certain outcome?

Make sure you can answer “**yes**” to all of these. If you can, it may be OK. If you’re still not sure, ask for guidance.



Dig Deeper

Business Gifts and Entertainment

INSIDER TRADING

To ensure fair and legal investing and protect you from the criminal penalties of illegal insider trading, we trust you to play by the rules and never invest based on material, nonpublic information.

WE PROTECT INSIDE INFORMATION. If you come across material information about API Group or any other company that hasn't been made public, you have a responsibility to keep it private. That information might include:

- Project proposal plans, deals, or strategies
- New or developing products or services
- Financial earnings or losses
- Possible mergers or acquisitions
- Information about customers or business partners
- Major changes in leadership
- Potential legal actions or investigations

WE UNDERSTAND TRADING LAWS. Understand insider trading laws and follow them carefully any time you buy or sell a company's securities. Never base your trading activities on inside information – you could face serious legal penalties.

WE DON'T "TIP" ANYONE ELSE. To keep inside information secure, never share it with anyone, including "tipping" family, friends, or others. You could break the law if you engage in tipping – even if you don't trade on it yourself or instruct anyone else to buy or sell securities. If they do, you could be liable.

WE MAINTAIN TRADING WINDOWS. API may restrict when you may trade company stock, especially if you are in a leadership position. Know and carefully follow our trading windows and blackout periods. Ask the [Legal Department](#) if you have any questions.

THINGS TO KNOW

Who is an insider?

Anyone in a position to gain material, nonpublic information about a company, like a director, officer, or employee.

What is material, nonpublic information?

It's **material** if it's something that could affect stock prices or influence people's decisions to buy, sell, or hold securities.

It's **nonpublic** when it hasn't been released to the public, like through a press release or other official announcement.



Dig Deeper

Insider Trading Policy

INTERNATIONAL TRADE COMPLIANCE

Doing business in multiple countries can introduce gray ethical areas that can be hard to navigate. We're committed to following trade laws to make sure every deal and every interaction is appropriate and aligned with our values.

WE USE CAUTION IN INTERNATIONAL TRANSACTIONS. We take our Code and values with us wherever in the world we work, but internationally special rules and requirements apply. If we get it wrong, severe penalties may also apply – we can even lose our privilege to do business globally. Trade with ethical business partners and follow all rules and screening requirements for international transactions. [Ask for help](#) if anything is unclear.

WE DOUBLE-CHECK TRANSACTIONS. If you're working with a supplier or vendor that provides us with items requiring an export license, check everything carefully. Make sure we can see:

- Packing lists
- The names of everyone involved
- How items are described and classified
- The price paid
- What the intended "end use" of the product is
- The bills of lading

WE KNOW THE LAWS. It can be challenging to keep up with all the laws governing international trade, but we always need to comply. Get to know these laws and stay current when they change.

THINGS TO KNOW

Global trade compliance laws cover things like:

- **Import and customs activities** – to ensure accurate classification and other details
- **Exports and export controls** – to restrict exports for national security, anti-terrorism, and similar security reasons
- **Trade embargoes and sanctions screening** – to restrict business dealings with certain countries, entities or individuals
- **Anti-boycott** – to prohibit participation in unsanctioned boycotts of certain countries

Reach out to the [Legal Department](#) for help.



INTERNATIONAL TRADE COMPLIANCE

THINGS TO DO

Make sure, in every transaction, you can say:

 We have complied with all regulatory requirements, no exceptions or shortcuts.

 Our paperwork is complete and accurate.

 Our imports and exports have cleared customs at the proper declared value.

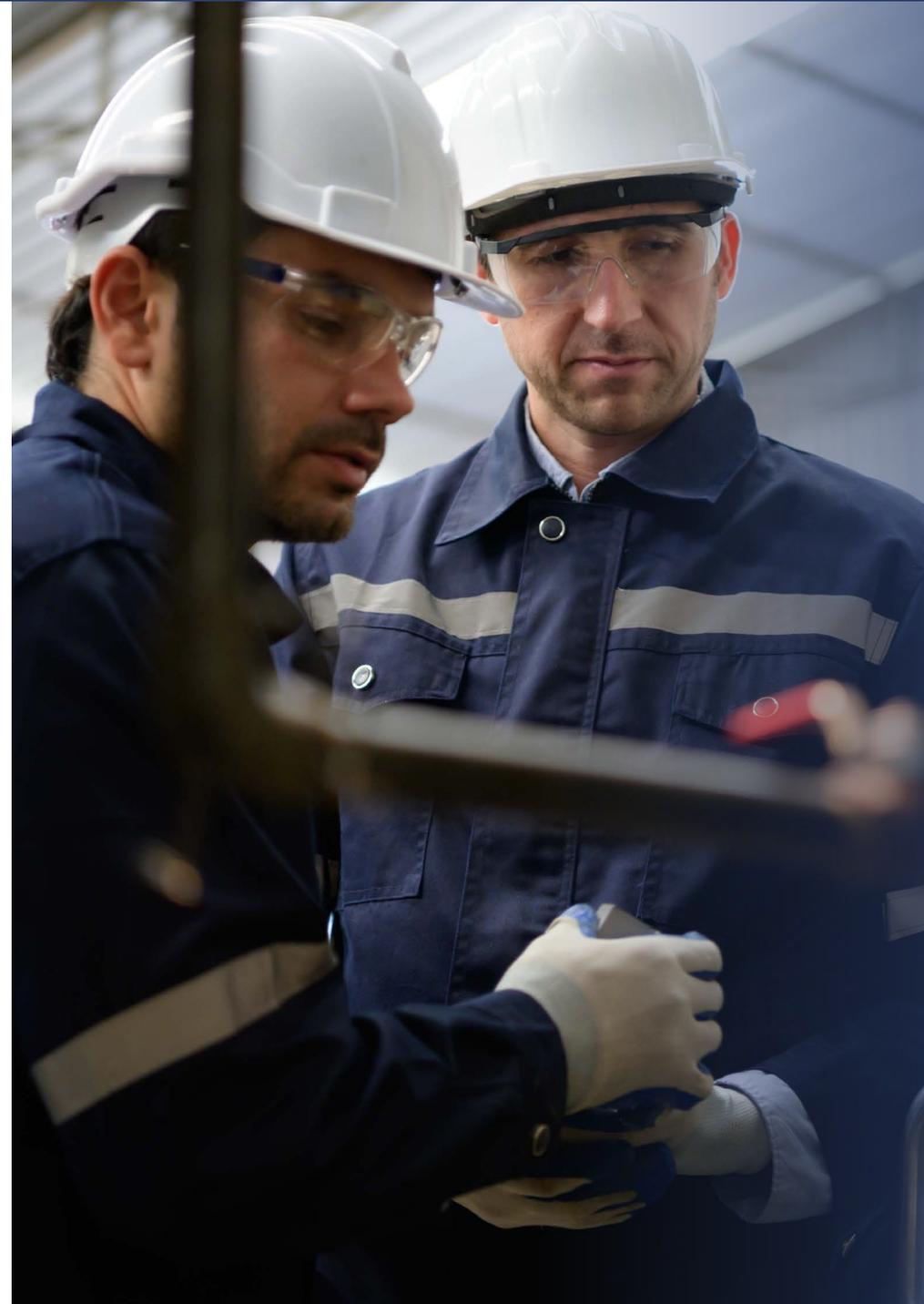
 We're not trading with any restricted or embargoed country or party.

 There is no participation in a boycott of any country.

 There are no facilitation fees being paid.

 The final destination is confirmed.

If you can't verify every item, go back and ask for help.



ACCURATE RECORDKEEPING

Like every organization, we need to know how our business is performing at any given time. Our books and records, when we manage them with care, give us those insights. The more accurate our records, the more useful they are in guiding our decisions and enhancing our reputation.

WE KEEP HONEST AND ACCURATE RECORDS. Being a public company comes with the responsibility of transparency – making sure our records present an accurate picture of our business and finances. Whenever you contribute to a business record or make financial disclosures on our behalf, be clear, accurate, and timely. Never alter a record or knowingly record something false or misleading.

WE WATCH FOR SUSPICIOUS ACTIVITY. If you handle our records, stay alert for signs of misconduct, including potential fraud, bribery, or money laundering (when someone tries to move illegally earned funds through a legitimate business like ours). Watch for false entries, misleading statements, or omissions in our records, and if you see them, don't ignore them. Speak up immediately.

WE PRACTICE ACCURATE RECORDS MANAGEMENT. Always follow applicable laws and accounting practices to properly manage our records. Also follow our policies for creating, maintaining, retaining, and destroying records. That includes following retention schedules and keeping necessary supporting documentation to back up our records. If a record is needed for a lawsuit or investigation, don't destroy it.



THINGS TO KNOW

Some of our records include:

- Payroll records
- Timecard records
- Invoices
- Safety and quality reports
- Purchase orders
- Expense reports
- Benefit claims



My leader suggested that I alter a financial record to “make the numbers work” this quarter. I can't refuse, can I?

Yes, you can. No one, no matter what position they hold, has the authority to ask you to falsify a record. It's a serious violation of our policies, so speak up about it immediately. We won't permit retaliation against you for sharing a concern.



Dig Deeper

Records and Information Management Policy

Code of Ethics for Senior Financial Officers

**Focus on ...
Working with
honesty and integrity.**

API's records are our responsibility – make sure they're always reliable.



CONFLICTS OF INTEREST

We're committed to doing what's best for our business. That includes making sure our personal activities don't impact our judgment, harm our business, or jeopardize our reputation. Situations like these are conflicts of interest, which we have a responsibility to avoid or manage appropriately.

WE RECOGNIZE POTENTIAL CONFLICTS. These situations could arise at any time and involve something that benefits you personally but has the opposite effect on our business. Conflicts come in many different forms but often include:

Outside employment – Taking on a second job or other activity that could interfere with your obligations to API Group or influence the decisions you make for us.

Personal relationships – Supervising or making employment decisions regarding a family member, friend, or spouse, or directing our business to a company they own or control.

Gifts, gratuities, and other benefits – Either making or accepting an offer that violates API's Business Gifts and Entertainment Policy; (See [Gifts and entertainment](#) to learn more.).

Financial interests – Owning or investing directly in a company that competes with our business or does business with us (or hopes to do business with us).

Business opportunities – Taking advantage of an opportunity that you discovered through your employment at API that could have been an opportunity for our company.

WE DISCLOSE POSSIBLE CONFLICTS. We couldn't list every possible conflict of interest situation here, but we do expect you to watch for and [disclose](#) any situation that could improperly influence you or even appear to be a conflict. We can work with you to avoid it or manage it.



Focus on ...
Working with honesty and integrity.

If it's good for you but bad for API, it should be avoided.

THINGS TO DO

Are you wondering if a particular situation is a conflict of interest? Ask yourself:

Will this situation ...



Make me feel an obligation to a company or person outside of our business?



Give me or someone I'm close to some kind of personal benefit?



Benefit me but do harm to API?



Cause someone to question my judgment?



Get in the way of my work for API?

Saying “**yes**” or “**maybe**” to any of these questions could signal a conflict of interest. Reach out to your leader or [Compliance Department](#) to find out if you should disclose the situation.



Dig Deeper

Conflict of Interest Policy

We strive for excellence, nothing less

Our leaders' dedication to excellence is the driving force behind APi Group's success – each of us making a conscious decision to outdo ourselves each day. That is the key to continuous improvement and preserving our legacy.

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ENSURING QUALITY

Our passion for providing better and safer services makes us the partner of choice for customers around the world. We'll never stop pushing ourselves to give our best each day.

WE HOLD OURSELVES TO THE HIGHEST STANDARDS. Make sure our name always represents excellence, carefully follow our internal quality policies and procedures along with government requirements and industry standards – no exceptions. Expect the same from your teammates.

WE HOLD BUSINESS PARTNERS TO EQUALLY HIGH STANDARDS. Insist on the best from our business partners. Watch for and report any quality issues involving suppliers, customers, and other partners to your leader or local Quality representative.

WE ARE PROPERLY TRAINED. Before using tools or performing services for our customers, make sure you have the proper authorization for the work you're doing, have received all required training, use the right tools the right way, and wear proper personal protective equipment for the job.



Focus on ...
Striving for excellence,
nothing less.

Never call a job complete unless it meets our high standards.



Help us ensure quality throughout our operations:



In our innovations – Put quality first in developing and testing our services – no shortcuts.



In our services – Follow all requirements, including legal, quality, and safety.



From our business partners – Monitor their work, procedures, and safety record. Report any safety or quality issues.



On a job site, I noticed a more senior teammate skipping a step in our process. Since I'm relatively new, I didn't feel comfortable saying anything. Should I?

Yes, you should. It doesn't matter that you're new or that your teammate is more experienced. Nothing comes ahead of quality – especially not speed or convenience. Your concerns are important – speak up about them immediately.



USE OF API GROUP ASSETS

A great deal goes into running a business like ours – vehicles, tools, facilities, ideas, information, and so much more. API Group entrusts each of us with these assets, which we must use responsibly and protect from theft, harm, or misuse – just as we’d protect our own property.

WE ARE GOOD STEWARDS OF OUR RESOURCES. Whether you’re working remotely, in one of our facilities, or on a job site, you need our resources to get your work done. Use care and good judgment with our assets and do your part to protect them.

THINGS TO DO

To protect our assets, remember:



Only use them for legitimate business purposes.



Limit your personal use – keep your use of our assets occasional and in line with our policies.



Never borrow, lend, or remove them without proper approval.



Keep them secure and maintained and immediately **report** loss, damage, misuse, or security breach.



USE OF API GROUP ASSETS

THINGS TO KNOW

Our assets can be ...



Physical

Things you can see and touch, such as:

- Company vehicles
- Facilities and furniture
- Tools and equipment
- Office supplies



Electronic

Assets that support our systems and networks, such as:

- Computer hardware and software
- Computer networks
- Email
- Internet access



Information

Information we create or gather through our work, such as:

- Intellectual property
- Research documents
- Project information
- Customer lists

WE FOCUS ON SECURITY. To prevent our facilities and information from unauthorized access, carefully follow our cybersecurity and physical security policies and procedures and our data breach response policy, including:

- Never sharing your ID or passwords
- Never clicking on suspicious links
- Never allowing unauthorized individuals into our facilities
- Watching for potential phishing scams
- Never installing unauthorized software onto our devices or using unsecured networks, like a public WiFi



CONFIDENTIAL INFORMATION AND INTELLECTUAL PROPERTY

As a part of our business, we generate and collect a great deal of sensitive and confidential information and recognize our duty to protect it from disclosure.

WE HANDLE INFORMATION WITH CARE. Your work could expose you to information about our company, our customers, business partners, or other organizations that isn't publicly available and could benefit our competition or be harmful if it's exposed. If you gather or access these assets, use care to protect both the information and our reputation. See [Use of API Group assets](#) to learn more.

WE PROTECT WHAT WE CREATE. Any information our business creates is our intellectual property – it's the ideas we develop that set us apart and make us competitive as a company. Keep this information secure, whether it belongs to API Group or any other entity.



THINGS TO DO



Classify information properly. Ask questions if you're unsure if information is confidential.



Only share confidential information with those who are authorized to see it and have a business need to know it – never with anyone who isn't authorized.



Only share what's necessary to fulfill a business purpose.



No matter who owns the confidential or sensitive information (whether it's our business or another organization), never discuss it in public (like in an elevator or on social media).

If you're aware of a possible breach of confidential information, **Speak up** immediately.

CONFIDENTIAL INFORMATION AND INTELLECTUAL PROPERTY

THINGS TO KNOW

We have a responsibility to protect:

Confidential information, such as:

- Personal information
- Projected sales or earnings
- Investment plans or possible acquisitions
- Business or marketing plans
- New product or service ideas or specifications
- Customer, vendor, and/or business partner information

Intellectual property, such as:

- Trademarks and service marks
- Copyrights, patents, and trade secrets
- Engineering ideas
- Proprietary technology and designs
- Marketing and creative materials
- Branding and logos
- Content or other assets belonging to third parties



I just interviewed a candidate who used to work for one of our competitors. This individual volunteered some information to me about their former employer that is probably confidential. Is this OK since they don't work there anymore?

If any of the information shared is proprietary or confidential it would be inappropriate to share it with us. We respect all confidential information, so don't share it with anyone else or use it to benefit our business.



RESPONSIBLE COMMUNICATIONS

Our words carry tremendous power. They can inform and inspire or cause harm, especially if they are spoken irresponsibly or spread beyond our control. That’s why we communicate with great care, making sure everything we say is truthful, helpful, and reliable.

WE LET API GROUP SPEAK FOR ITSELF. The way we communicate is critical to our business and our relationships. It’s easy for messages to be misunderstood, so we need every communication to be clear and consistent. We count on you to allow only authorized individuals to speak on our company’s behalf. Even if you see something posted that you believe is false, don’t respond yourself. Let your leader know so API senior leadership can provide an authorized response.

WE PROPERLY REFER REQUESTS. If someone outside of our business contacts you with a question intended for the company, immediately refer the request to the [Marketing Department](#). The same applies when someone asks you to speak or publish on API’s behalf.

WE USE SOCIAL MEDIA RESPONSIBLY. API encourages us to use social media to connect and communicate but to do so respectfully and thoughtfully. Our guidance on social media may change over time, so watch for new API policies. In the meantime, make sure your use of social media aligns with our values and use care to protect [confidential](#), [personal](#), and [nonpublic](#) information.



Focus on ...
Striving for
excellence,
nothing less.

Make sure your words
are always helpful –
not harmful.

THINGS TO KNOW

Even if your intentions are good, communicating on API’s behalf could do serious harm such as:

- **Misinforming** our customers, investors, or the public
- **Damaging** our reputation
- **Making a promise** we can’t keep
- **Disclosing** confidential information or intellectual property
- **Offending** or harassing others
- **Violating** our policies, values, or the law



I just replied to a post that I saw on social media that said something false about our company. I realize I probably shouldn’t have said anything. Is it too late to fix this?

No, it isn’t too late. It’s true that you shouldn’t have responded unless authorized, but you can still help. Delete your reply if possible and let your leader know about it immediately so we can take steps to respond with appropriate company messaging.



We take joy in our work and in each other ---

Our work brings us joy, as do the connections we make with our teammates, communities, and the world around us. Those connections give our work purpose, so we support and nurture them in all we do.

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DIVERSITY, EQUITY, AND INCLUSION

We know the value of diversity. We draw strength from each other’s diverse perspectives and talents – it’s what empowers us to innovate, improve our decision-making, and boost our performance as a team and as a company.

WE DON’T DISCRIMINATE. We celebrate the unique contributions of every leader and are committed to fair employment practices. If you make decisions like screening, hiring, promoting, or dismissals, follow equal employment laws and never base your choices on characteristics like race, color, national origin, gender identity or expression, sexual orientation, age, religion, disability, marital status, or veteran or military status. Do the same if your work involves choosing business partners. We are committed to reaching the full range of diversity that is available in our labor markets as we recruit new talent to the company. Only focus on factors such as:



Focus on ...
Taking joy in our work
and in each other.

Keep discrimination
and bias out of every
decision and interaction.

- > Qualifications
- > Talent
- > Merit
- > Job requirements

We are committed to reaching the full range of diversity that is available in our labor markets as we recruit new talent to the company.

WE PROMOTE AN INCLUSIVE ENVIRONMENT. We believe everyone deserves the same chance to participate and succeed at our company. When you interact with others, collaborate openly. Seek out new perspectives while respecting others’ unique viewpoints, personal beliefs, cultures, and values. Also strive to make unbiased decisions, without preconceived notions or personal assumptions.

WE SHARE OUR CONCERNS. If you see or suspect discrimination or any activity that violates our commitment to diversity, equity, and inclusion, speak up immediately to your leader or another API resource.



DIVERSITY, EQUITY, AND INCLUSION

THINGS TO DO

To keep personal bias out of your decision-making, check to make sure you are:



Aware of personal biases you might have



Looking for input from new sources



Never dismissing anyone's input



Thinking carefully before making decisions



Seeking feedback from others

If you can't check off each of these items, ask for guidance.

THINGS TO KNOW

Part of being an inclusive company is honoring and working in partnership with Black, Indigenous, and all people of color, including the Native Dakota people whose homeland is Minnesota (the location of our headquarters).

Let's Talk

While interviewing candidates, I had a definite rapport with a candidate who has a similar background to mine. I'd like to choose this person, but I'm worried it's because they are most like me. What should I do?

You're doing the right thing by taking a long look at why you want to choose this candidate. Carefully consider the other candidates again, ask for input from your teammates, or have them conduct their own interviews. That way you can rest assured that you're making an unbiased decision.



HUMAN RIGHTS

Our business is all about people – making their lives better, safer, and more secure. Our commitment to people carries over into every aspect of our business, making sure we have a positive impact on every person and every community our business touches.

WE RESPECT BASIC HUMAN RIGHTS. We expect every leader to work ethically and follow the human rights laws that apply to us. That means being careful that nobody who contributes to our business faces human rights abuses, such as:

- Human trafficking
- Child labor
- Forced or compulsory labor
- Physical punishment

Keep in mind, laws may vary from country to country, so ask the [Legal Department](#) if it's not clear how a law applies.

WE EXPECT THE SAME COMMITMENT FROM OUR BUSINESS PARTNERS. It's important that everyone working on our behalf shares our belief in protecting human rights. If you work with our business partners, watch their work to make sure they provide high-quality products and fair and safe work environments. They must also follow applicable laws, including those related to providing conflict-free minerals.

WE SPEAK UP FOR HUMAN RIGHTS. If you suspect a potential human rights violation anywhere in our operations (or those of our business partners), we need to know. [Speak up](#) immediately.

THINGS TO KNOW

We believe all people should have:

- The right to choose whether or not to work
- Equitable and legal pay
- Safe working conditions
- Humane and respectful treatment
- Legal and reasonable hours
- Freedom to associate or join trade unions



COMMUNITY SUPPORT

We take an active role in our communities, doing our part both as a company and as individuals to care for others and make the places where we live and work stronger, healthier, and more sustainable.

WE INVEST IN WHAT MATTERS. Since 1926, APi Group has recognized the value of community. We know when we help communities thrive, we thrive as a company.

WE MAKE OUR OWN IMPACT. We encourage every leader to make a difference when and where you can, whether through volunteering or charitable giving. Either find causes that are meaningful to you or help support our efforts.



**Focus on ...
Building caring and
enduring relationships
with others.**

Watch for APi-sponsored events and programs near you.

When you support a cause on your own, remember to:

- Keep your volunteer activities separate from your work. Participate on your own time.
- Use only your money and resources to support your activities.
- Never solicit your teammates or pressure them to participate or donate to your cause.
- Donate in your name – not in APi’s name without permission. We can’t reimburse you.

THINGS TO KNOW

APi shows our support for communities through a variety of initiatives, including:

- APi Gives
- APi Group Foundation
- US Veteran’s Rotational Program – career support training and employment for military veterans



ENVIRONMENTAL PROTECTION AND SUSTAINABILITY

As an environmentally conscious business, APi Group focuses on more than profits – we focus on the impact we have on the communities and world around us. Because each of us contributes to APi’s impact, we strive to be good stewards of our resources and our planet.

WE HELP BUILD A CLEANER, GREENER BUSINESS. Remember, each of us plays a vital role in building a more sustainable future. With your help and awareness, we can balance the needs of our business and customers with the need to manage resources responsibly and uphold our commitment to environmental stewardship and promoting sustainability.



**Focus on ...
Taking joy in our work
and in each other.**

If it’s harmful to the environment, it can harm the communities we serve. Be alert and protective.

WE FOLLOW ALL REQUIREMENTS. Whether it’s in our facilities or our work sites around the world, we expect you to know and carefully follow APi’s policies, procedures, and the laws and regulations that apply to us. Make sure our business partners do the same.

WE SPEAK UP FOR OUR WORLD. Part of our responsibility includes speaking up about possible environmental harm or a violation of laws or requirements, no matter who is involved or where it occurs. If you see something that concerns you, don’t wait – let us know right away. That includes leaks or spills of hazardous materials, improper waste disposal, or release of pollutants.



ENVIRONMENTAL PROTECTION AND SUSTAINABILITY

THINGS TO DO

Adopt good environmental habits, like:



Be a good steward of resources, reducing your use.



Safely store, handle, and dispose of waste.



Participate in APi's initiatives to recycle and reduce waste.



Encourage others to make environmentally friendly choices.



Share your ideas for supporting environmental initiatives in our communities and our company.



I noticed some practices at a work site that could be harming the environment, but I'm no expert. I'm also not sure if we are responsible or one of our contractors. Should I keep this to myself?

No – that's the worst thing you could do. Speak up about your concern immediately. Even though you're not an expert, and you're not sure who is involved, you still have a responsibility to take action and let us know if environmental harm might be happening.



CLOSING THOUGHTS

We thank you for reading through this critically important document and hope you find it helpful in handling the ethical challenges you could face as a leader.

Think for a moment about that word “leader.” If you’re a part of APi Group, we think of you as a leader. It’s because we believe in you. We believe you have the qualities and capabilities to represent our company and carry on our legacy of excellence. And when the things you say and do each day reflect our Code and our values and build trust in APi’s name, that’s what makes you a **great leader** – of that we’re certain.

But every leader sometimes needs help, so remember the Code is always here when you need guidance. Refer to it often and speak up if anything in the Code isn’t clear or you have questions.

Thank you for all you do to keep APi doing what we do best – doing great things with great integrity.



NEED HELP?

If you need additional guidance, we have a variety of resources to contact for help.

To ask questions, report potential misconduct, or other ethical concerns contact:



Your direct leader or any other member of management



You may also call **1-844-950-1973** from the U.S. or Canada. From anywhere else in the world, please dial your local access number which can be found [here](#).



Your local HR representative



For safety concerns: Corporate Safety



The Compliance Department



For data privacy concerns: Privacy Team



For legal questions: The Legal Department



For external inquiries: Marketing Department



For additional policies: International Policy Center

APi Group is an equal employment opportunity employer. We are committed to a workplace free of unlawful discrimination, harassment, and retaliation. APi supports our leaders' right to speak out publicly about matters of public concern and to participate in certain activities and communications related to the terms and conditions of their employment. Nothing in this Code or in any of our policies is intended to limit or interfere with that right. That includes activities protected under Section 7 of the U.S. National Labor Relations Act, such as discussions related to wages, hours, working conditions, health hazards, and safety issues.