



# API GROUP

## SUPPLIER CODE OF CONDUCT

### 1. SUMMARY:

APi Group, Inc., including each of its divisions, business units and subsidiaries (collectively, “APi”), is committed to the highest standards of ethics and business conduct. In this Code, APi is sometimes also referred as “we” or “our”.

As stated in APi’s [Code of Business Conduct and Ethics](#), all APi team members must conduct themselves honestly and ethically, deal fairly, protect and properly use APi’s assets, comply with applicable laws, rules and regulations, and report any illegal or unethical behavior.

Our suppliers are critical to our success by enabling APi to provide superior products and services in a responsible manner. Accordingly, we require all our suppliers to meet our expectations for ethics and compliance.

This Supplier Code of Conduct (the “Code”) sets forth APi’s expectations for each of its product and service suppliers; APi intends this Code to apply to all suppliers of goods and services to APi across the globe.

Under this Code, a “Supplier” is any third party that contracts with APi to provide products or services of any kind, regardless of the term otherwise used to refer to such party in its agreement with APi (vendor, contractor, agent, consultant, sub-contractor, freight forwarder, etc.). Unless otherwise indicated by the context, the term “Supplier” also refers to employees, agents, sub-suppliers and subcontractors of the entities and individuals described in the preceding sentence (i.e., their representatives). In this Code, Suppliers are also sometimes referred to as “you” or “your”. APi expects that our product and service suppliers will have their own internal codes of ethics and conduct. Therefore, this Code is not intended to be an exhaustive list of all ethical and business conduct requirements.

By entering into a contractual relationship with APi, each Supplier must represent and warrant that it will comply with this Code. This Code establishes expectations that go beyond mere compliance with applicable domestic and foreign laws and regulations. APi Group anticipates that suppliers will not only meet but exceed the standards outlined in this Code. The expectations set forth in this Code are not intended to conflict with the terms and conditions of your contracts with APi. If a contract requirement is more restrictive than this Code, you must comply with the more restrictive contractual requirement.

### 2. COMPLIANCE WITH LAWS

- You must maintain full compliance with all laws and regulations applicable to the operation of your business and your relationship with APi.



### 3. QUALITY

- No alterations to product specifications, designs, materials, manufacturing processes, production sites, or registration details are to be made without our prior written consent. This is critical to maintain product consistency and adherence to our quality standards.
- You are required to have robust quality assurance processes in place to identify, notify, and communicate with API about any defects. These processes should also rectify such issues promptly to ensure that all products and services delivered meet or exceed the agreed-upon contractual quality and comply with all legal and regulatory standards.
- You are required to implement and maintain quality systems and product registrations that comply with all relevant legal standards in the countries where the products are made and sold. This system should guarantee continuous adherence to these regulatory requirements.
- All products must be clearly and correctly labeled to prevent misidentification and ensure full traceability. Labels must include essential information to meet these standards and comply with the relevant regulatory and legal requirements.
- All necessary inspection and testing must be conducted correctly by authorized and qualified personnel. You must ensure that all required certifications are completed accurately and maintained up to date.

### 4. ENVIRONMENT, HEALTH AND SAFETY

- You must comply with all applicable environmental, health and safety laws, regulations, and directives; and also be a good steward of natural resources.
- You must also assure safe and healthy work environments for your employees and business invitees.
- You must implement a robust health and safety management system to ensure workplace safety, prevent injuries or threats to anyone on API premises or jobsites, and investigate all reported incidents. This means you must:
  - a. Follow all safety guidelines, policies, and laws, including local rules and regulations regarding maximum hours worked per day and week, along with required time-off from work to rest - consistent with the principles of applicable [International Labor Organization \(ILO\) conventions](#);
  - b. Look out for each other and help others to work safely;
  - c. Prohibit drug and alcohol abuse, illegal weapons, and/or violence in the workplace;
  - d. Respect and adhere to all physical security procedures, including access to facilities and use of employee badges; and
  - e. Promptly report all injuries, hazards, threats, and close calls so they can be investigated, addressed, and prevented in the future.



## **5. COMPETITION ON THE MERITS AND FAIR PLAY**

- You must compete strictly on the basis of the merits of your products and services.
- You must not pay a bribe in any amount, to anyone, anywhere, for any reason whatsoever, whether on APi's behalf, your behalf, or on behalf of others.
- Accordingly, you must never offer, promise, authorize, or provide, directly or indirectly, anything of value (including business gifts or courtesies) with the intent or effect of inducing anyone (including an APi customer, APi team member, or higher tier or sub-tier supplier) to forego their duties and provide unfair business advantage to APi, you, or others. This includes facilitating payments (e.g., payments to expedite or secure performance of a routine governmental action like obtaining a visa or customs clearance).
- You must not engage in any anti-competitive conduct for any reason whatsoever, whether on APi's behalf, your behalf, or on behalf of others. Accordingly, you must never rig bids, fix prices, improperly allocate customers or markets, or exchange APi's or your competitively sensitive information (e.g., price, cost, output, etc.) with APi's competitors or your competitors.
- You must also refrain from abusing your market power, whether for your benefit or for the benefit of others, by refusing to deal, engaging in predatory or discriminatory pricing practices, improperly conditioning the sale or provision of a particular product or service with that of another product or service, or undertaking similar abusive tactics.
- You must not engage in other deceptive or unfair market practices, whether on APi's behalf, your behalf, or on behalf of others. Accordingly, you must never make misrepresentations regarding APi's products or services, your products or services, or the products or services of others. Similarly, you must never denigrate APi's competitors or your competitors, or their products or services.

## **6. CONFLICT OF INTEREST**

- You must avoid all conflicts of interest or situations giving the appearance of a conflict of interest in your dealings with APi.
- You must report to APi any instances involving actual or apparent conflicts of interest between your interests and those of APi, such as if one of your employees (or someone close to one of your employees) has a personal relationship with a APi employee who can make decisions impacting your business, or if an APi employee has an ownership or financial interest in your business.

## **7. INTERNATIONAL TRADE COMPLIANCE**

- You must conduct business in compliance with all applicable laws and regulations governing:



- a. the export, re-export and retransfer of goods, technical data, software and services;
- b. import of goods;
- c. economic sanctions and embargoes; and
- d. governmental antiboycott requirements.

## **8. GOVERNMENT PROCUREMENT**

- You must take special care to comply with the unique and special rules that apply to contracting with governmental agencies and dealing with government officials. If you support an APi contract with a governmental agency, you must at all times follow the applicable government's rules for competing fairly, honor restrictions applying to government employees (e.g., receipt of gifts and employment), deliver products and services that conform to specifications, laws and regulations, adhere to government accounting and pricing requirements, claim only allowable costs, ensure the accuracy of data submitted and comply with all other applicable governmental requirements.

## **9. INFORMATION PROTECTION & DATA PRIVACY**

- You must respect the proprietary rights and intellectual property rights of APi and others.
- You must take proper care to protect sensitive information, including confidential, proprietary, and personal information ("Information") and to comply with all applicable laws and regulations governing the processing and/or control of personal data.
- You should not use Information for any purpose other than the business purpose for which it was provided unless the owner of the Information provided its prior written authorization.

## **10. BUSINESS CONTINUITY PLANNING AND RESILIENCE**

- You must be prepared for any disruptions of your business (e.g. natural disasters, terrorism, software viruses, illness, pandemic, infectious diseases). This preparedness especially includes disaster plans to protect both employees and the environment, to the extent possible, from the effects of possible disasters that arise within the domain of operations.
- You must have crisis management plans in place. At a minimum, these should consider people, premises, process (information and technology), and providers.
- You must review, test and exercise these plans on a regular basis to ensure that you can continue to provide your services to APi in the event of any disruption to your operations.



## **11. ACCURACY OF RECORDS AND SUBMISSIONS**

- You must maintain books and records that accurately and completely reflect all transactions related to APi’s business, and each of your submissions to APi, its customers, and regulatory authorities must be accurate and complete.
- You must never make any false entry in your books and records or alter, conceal, or destroy any document to misrepresent any fact, circumstance, or transaction related to APi business.

## **12. NON-DISCRIMINATION**

- You must treat your existing and prospective employees and business partners fairly, based only on merit and other factors related to your legitimate business interests, and without regard to race, religion, color, age, gender, gender identity or expression, sexual orientation, national origin, marital status, veteran status or disability, or any other characteristic protected under applicable law, consistent with APi’s policy and the principles of applicable ILO conventions.

## **13. FREEDOM OF ASSOCIATION**

- You must recognize the principle of freedom of association and the right to concerted action and collective bargaining as permitted under all applicable laws and regulations in the countries where you operate.

## **14. COMPENSATION**

- You must comply with all applicable laws and regulations pertaining to wages, hours, and legally mandated benefits.
- You must provide employees with documentation regarding the terms and conditions of employment (such as compensation and benefits), and payment of overtime must be at a premium/higher rate as required by applicable law.

## **15. CHILD LABOR**

- You must ensure that child labor is not used in the performance of your work, whether or not related to APi business, consistent with APi policy and in line with the principles of applicable ILO conventions. The term “child” refers to any person under the minimum legal age for employment where the work is performed.

## **16. HUMAN TRAFFICKING & FORCED LABOR**

- You must comply with all laws and regulations prohibiting human trafficking.



- Consistent with APi policy and the principles of ILO conventions, you must not engage in the use of forced or compulsory labor (defined as all work or service which is exacted from any person under the menace of any penalty and for which the said person has not offered himself voluntarily). Also prohibited are other forms of forced or compulsory labor including, but are not limited to, bonded labor, indentured labor, involuntary prison labor, slavery or trafficking in persons.

## **17. DIVERSITY, EQUITY, AND INCLUSION**

- You must ensure a workplace free from violence, coercion, intimidation, harassment, sexual harassment, discrimination, or any demeaning behavior.
- You must treat all employees with dignity, respect, and fairness.
- You must promote diversity, equity, and inclusion in your employment, promotion processes, and management representation.
- You must aim to develop procurement practices that support a diverse array of suppliers, wherever possible.

## **18. HARASSMENT AND ABUSIVE BEHAVIOR**

- You must share our commitment to providing a workplace free from harassment, bullying, threats, and violence.

## **19. ENVIRONMENTAL STEWARDSHIP**

- Your organization must operate in full compliance with all local, state, federal, or other jurisdictional laws and regulations, and always abide by any environmental permits.
- You should endeavor to understand and minimize the negative impacts your operations have on the environment, to utilize natural and energy resources responsibly and efficiently.

## **20. REPORTING MISCONDUCT**

- You must provide your employees and your business partners with access to adequate reporting channels to raise legal or ethical issues or concerns, including, without limitation, reports of a violation of this Code by you or your business partners, without fear of retaliation, including opportunities for anonymous reporting.
- In the event that you become aware of misconduct related to APi business undertaken by any APi team member, any of your employees, or any employees of your business partners, we expect you to promptly notify APi in writing.



- You may contact API's Compliance Office at [compliance@apigroupinc.us](mailto:compliance@apigroupinc.us), in addition, you may contact [API's Ethics Helpline](#) with the option to report anonymously.

## **21. ETHICS & COMPLIANCE PROGRAM**

- Commensurate with the size and nature of your business, you must have management systems, tools, and processes in place that:
  - a. ensure compliance with all applicable laws, regulations and requirements set forth in this Code;
  - b. promote an awareness of and commitment to ethical business practices, including, without limitation, the expectations set forth in this Code;
  - c. facilitate the timely discovery, investigation, disclosure (to API and others, as appropriate) and implementation of corrective actions for violations of law, regulations or the expectations set forth in this Code; and
  - d. provide training to your employees on compliance requirements, including the expectations set forth in this Code.

## **22. YOUR BUSINESS PARTNERS**

- If your contract with API prohibits you from assigning, delegating, or subcontracting your obligations, we expect you to strictly comply with this prohibition.
- If your contract with API permits you to assign, delegate, or subcontract your obligations or procure products or services from others that will be incorporated in products or services acquired by API from you, we expect you to carefully select your business partners, and perform due diligence, audit, and oversight to prevent and detect misconduct.
- You are responsible to ensure that your business partners and supply chain comply with this Code.

## **23. CODE COMPLIANCE**

Compliance with this Code is mandatory. Failure to comply with this Code may result in termination as a Supplier, possible legal action and potential referral of the matter to local authorities.

- You will promptly report to API any known breach of this Code in writing.
- You will permit API and/or its representatives to assess your compliance with the requirements set forth in this Code in performing work for API, including through on-site inspection of facilities and review of associated books, records, and other documentation. API reserves the right to hold You responsible for reasonable costs of investigating non-compliance.



- You must also provide APi, upon request, with additional information and certifications evidencing compliance, if applicable.
- You must ensure that APi has the right to assess your business partners' compliance with the requirements set forth in this Code in performing work for APi, including through on-site inspection of facilities and review of associated books, records, and other documentation.
- You must ensure that your business partners will provide APi, upon request, with additional information and certifications evidencing compliance. In the event of any wrongdoing, you will fully cooperate with any related investigation conducted by APi.
- You will ensure that your business partners also fully cooperate if such investigation involves their performance.
- You (and your business partners) must promptly correct any non-conformities identified during assessments.
- APi does not assume any duty to monitor or ensure compliance with this Code, and you acknowledge and agree that you are solely responsible for ensuring full compliance with this Code by you, your directors, officers, employees, representatives, and business partners.

For questions or concerns about this Code, including its application to specific circumstances in connection with your organization's performance of work for APi, or suspected failures by your organization to satisfy these expectations in performing work for APi, please contact APi's Compliance Office at [compliance@apigroupinc.us](mailto:compliance@apigroupinc.us).