

Third Party Code of Conduct

Introduction

The A.P. Gilfoyle group is committed to conducting business ethically, transparently, and in full compliance with all applicable laws and regulations. We expect the same commitment from all third parties who conduct business with or on behalf of A.P. Gilfoyle.

Applicability

This Third Party Code of Conduct (this “**Code**”) applies to all third parties engaged with A.P. Gilfoyle, including but not limited to distributors, resellers, service providers, consultants, and contractors. Third parties are responsible for ensuring that their employees, agents, and subcontractors understand and comply with the provisions of this Code.

Ethical Business Practices

Third parties must uphold high standards of ethical conduct in all business dealings. This includes:

- **Compliance with Laws:** Adhering to all applicable laws, regulations, and standards.
- **Integrity:** Avoiding any form of corruption, extortion, embezzlement, or bribery.
- **Transparency:** Maintaining accurate and complete records of all business activities.

Human Rights and Labor Standards

Third parties must respect and uphold internationally recognized human rights, including:

- **Non-Discrimination:** Ensuring equal opportunity and fair treatment for all workers.
- **No Harassment or Abuse:** Providing a workplace free from harassment, abuse, or inhumane treatment.
- **Voluntary Labor:** Prohibiting forced, bonded, or involuntary labor, and human trafficking.
- **Child Labor:** Not employing workers below the minimum legal age for employment.

Health and Safety

Third parties must provide a safe and healthy working environment, including:

- **Workplace Safety:** Identifying and mitigating potential health and safety risks.

- **Emergency Preparedness:** Establishing procedures for emergency situations.
- **Health and Safety Permits:** Obtaining and maintaining all required health and safety permits.

Environmental Responsibility

Third parties are expected to operate in an environmentally responsible manner, including:

- **Compliance:** Adhering to all applicable environmental laws and regulations.
- **Resource Conservation:** Implementing measures to reduce waste and conserve resources.
- **Pollution Prevention:** Taking steps to minimize pollution and environmental impact.

Monitoring and Compliance

A.P. Gilfoyle reserves the right to assess third-party compliance with this Code. Non-compliance may result in corrective action, up to and including termination of the business relationship.

Reporting Concerns

Third parties must provide a mechanism for employees and stakeholders to report concerns or violations of this Code confidentially and without fear of retaliation. Reports can also be directed to A.P. Gilfoyle's Legal & Compliance department (legal@world.apgilfoyle.com).