

Whistleblowing Policy

Our Commitment

A.P. Gilfoyle conducts business ethically, lawfully, and transparently. We are committed to fostering a culture in which our people, partners, and stakeholders feel safe and empowered to raise concerns without fear of retaliation. This policy outlines our approach to whistleblowing and the protection of those who report suspected misconduct.

This policy applies to all current and former employees, directors, officers, contractors, and third-party vendors of A.P. Gilfoyle and its subsidiaries.

Oversight

Our Audit Committee oversees the implementation and governance of this policy. The Chief Legal Officer and the Legal & Compliance team are responsible for its operational execution.

Speak Up

If you know of—or reasonably suspect—misconduct related to A.P. Gilfoyle, you are encouraged to report it promptly. This includes, but is not limited to, concerns involving:

- Financial misconduct or fraud
- Misrepresentations in financial reporting
- Legal or regulatory violations
- Harassment, discrimination, or retaliation
- Environmental, health, or safety risks
- Human rights violations (e.g., forced labor, trafficking)
- Data protection or cybersecurity breaches
- Bribery, corruption, money laundering, or sanction breaches
- Anti-competitive behavior
- Attempts to conceal any of the above

Reporting Channels

Concerns can be reported through any of the following:

- Directly to your manager or department lead
- Legal & Compliance team
- The Human Capital team
- A.P. Gilfoyle's external reporting platform (which supports anonymous submissions where permitted by law)

We encourage you to provide sufficient detail to allow for a prompt and effective investigation. Anonymous reports are permitted, though we note that anonymity may limit our ability to investigate or follow up.

External Reporting

Where legally allowed, individuals may also report to regulators or designated public authorities. Nothing in this policy restricts your right to speak with regulators, law enforcement, or other statutory bodies, including regarding wages, workplace safety, harassment, discrimination, or other unlawful practices.

Confidentiality

All reports will be treated with discretion and shared only with those who have a legitimate need to know. Your identity will be kept confidential to the extent allowed by law and consistent with conducting a thorough investigation.

Non-Retaliation

A.P. Gilfoyle strictly prohibits retaliation against anyone who raises a concern in good faith or who participates in an investigation. Any form of retaliation—whether direct or indirect—may result in disciplinary action, up to and including termination.

Global Considerations

Some jurisdictions impose specific requirements on whistleblowing. We will comply with all applicable laws regarding internal and external reporting, data handling, and disclosure obligations.

Commitment to Improvement

We recognize that a strong reporting culture supports better risk management, ethics, and operational resilience. We periodically review and update this policy to reflect evolving best practices, regulatory changes, and the needs of our people and stakeholders.

If you have questions about this policy, contact Legal & Compliance (legal@world.apgilfoyle.com).