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A.P.Gilfoyle

Modern Slavery Statement

This modern slavery statement (this "***Statement***") is made voluntarily in accordance with the guidelines set forth in the UK Modern Slavery Act 2015 (the "***Act***") for the financial year ending 31st December 2026 on behalf of the following entities (collectively, the "***Reporting Entities***"):

- A.P. Gilfoyle Investment Management LLC (registration number: 10392315) ("***AGIM***");
- A.P. Gilfoyle International, Inc. (registration number: 10229643) ("***AGIH***"); and
- A.P. Gilfoyle U.K., Ltd. (registration number: 16255668) ("***AGUK***").

1. *Voluntary Statement.*

The Reporting Entities have determined that they are not subject to the reporting requirement in section 54 of the Act, so this Statement is not mandatory for them. They publish it because they take the risk of modern slavery and human trafficking seriously and want to say plainly how they manage it. Nothing in this Statement creates a contractual or other legal obligation to any third party.

2. *Business and Organisational Structure.*

The Reporting Entities are members of The A.P. Gilfoyle Group (the "***Group***"), a global investment firm founded in 2025. The Group's parent company is parent company AGIM, a Delaware limited liability company. Addresses for the Group's headquarters, branches, subsidiaries, and operations are available at apgilfoyle.com/contact.

- AGIM, a limited liability company organised under the laws of the State of Delaware in the United States, is an investment management and technology development firm. A.P. Gilfoyle maintains its headquarters in the United States. AGIM is the parent company of AGIH and AGUK.
- AGIH, a corporation organised under the laws of the State of Delaware, serves as the international holding company for the Group. AGIH is a wholly-owned subsidiary of AGIM.
- AGUK, a private limited company incorporated in England and Wales, provides support and infrastructure services to the Group.

References in this Statement to the Group are to the Reporting Entities and their affiliates.

3. *Policy Regarding Modern Slavery and Human Trafficking.*

The Group is committed to maintaining high ethical and legal standards and to treating colleagues with respect and professionalism. As part of that commitment, it is the Group's policy not to tolerate modern slavery, servitude, forced labour, or human trafficking in its business activities or employment arrangements. The Group expects each of its suppliers to comply with applicable laws in conducting its business and to operate a fair and ethical workplace for its staff.

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4. *Members and Employees.*

Most of the Group's employees carry out highly skilled work, and all staff receive pay and benefits that exceed those required by applicable laws and regulations. The risk of the Group's staff being subject to modern slavery is therefore low.

The Group seeks to provide a safe, healthy, and desirable workplace. Its staff have the protections of the employment law that applies to them, and the Group's policies and procedures reflect the relevant parts of that law. The Group is satisfied that there is no evidence of any act of modern slavery or human trafficking involving its employees.

5. *Supply Chain.*

The Group's business activities are limited to investment management and related services. Its supply chain is correspondingly small. It includes providers of financial data, software, and investment research, along with suppliers of office supplies and equipment and of services for non-core activities such as cleaning, catering, and transportation. The risk of modern slavery in this supply chain is low compared with businesses that make or sell physical goods, or that operate in regions at higher risk of modern slavery.

The Group will not knowingly deal with, support, or purchase goods or services from any supplier engaged in modern slavery, human trafficking, or other practices criminalised by the Act. A supplier or service provider found to violate the Group's ethical business expectations may have its business relationship ended.

6. *Existing Policies.*

The Group operates policies and procedures designed to ensure compliance with applicable law and regulation. Some of them help the Group detect and prevent modern slavery and human trafficking in its business and supply chain, including policies on money laundering, bribery, whistleblowing and escalation, harassment and discrimination, equal opportunity, and remuneration.

7. *Training and Awareness.*

The Group has taken steps to inform all employees of its policy on modern slavery and human trafficking. All staff receive annual training, including on the Act, and are encouraged to report in good faith any concern about potential ethics, human rights, legal, or regulatory violations.

8. *Approval.*

Because this Statement is voluntary, the Group has not set formal targets under the Act. The Group will review periodically how effective its efforts are in ensuring that modern slavery and human trafficking do not take place in its business or supply chain. This Statement covers the financial year ending 31st December 2026.

This Statement has been approved by the governing bodies of each of the Reporting Entities and is signed by the principal executive officer of AGIM which is the parent company of the Reporting Entities.

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A.P. Gilfoyle

A.P. GILFOYLE INVESTMENT MANAGEMENT LLC

Signed by:
Asuna Gilfoyle
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Asuna P. Gilfoyle

Chief Executive Officer & Chief Futurist.

Date: 11/12/2026