

Human Rights Policy

Introduction

This Human Rights Policy (this “**Policy**”) set forth basic principles regarding A.P. Gilfoyle Global Management Corp.’s (together with its subsidiaries, “**AGM**” or the “**Company**”) approach to human rights. AGM strives to be a company that treats all people with integrity, respect, and fairness, and accordingly, recognizes and supports fundamental human rights. While AGM believes that national governments bear the primary responsibility for ensuring human rights, we believe that the private sector has a role to play in championing these rights, examples of which are set forth in the Universal Declaration of Human Rights. AGM is committed to upholding this approach with stakeholders, including business partners, employees, clients, and suppliers.

Oversight

As set forth in its charter, the Audit Committee of AGM’s Board of Directors (the “**Board**”) is responsible for monitoring and reviewing significant strategies, initiatives, policies, and programs related to human rights. The Audit Committee is responsible for reporting regularly to the Board.

Our Commitment

We’re deeply committed to respecting internationally recognized human rights in our business operations, as set out in the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights, and the International Covenant on Economic, Social and Cultural Rights (together, the “**International Bill of Human Rights**”) and the International Labour Organization’s Declaration on Fundamental Principles and Rights at Work. Our approach is based on the UN Guiding Principles on Business and Human Rights.

Everywhere we operate, we seek to conduct business in compliance with applicable laws and in accordance with our commitment to respect internationally recognized human rights. When faced with conflicting requirements, in keeping with the UN Guiding Principles, we seek to comply with applicable law and also seek ways to honor our commitment to respect principles of internationally recognized human rights.

We conduct robust due diligence to identify salient human rights risks through risk assessments and through channels we maintain with stakeholders, including workers in our supply chain, civil rights groups, human rights and labor experts, investors, governments, and United Nations bodies. We work to mitigate these risks, and we seek to remedy adverse impacts, track and measure our progress, and report our findings.

Ethical Investing

Our asset management business has adopted the United Nations Principles for Responsible Investing and the Extractive Industries Transparency Initiative. We consider the Equator

Principles for certain transactions which, through the International Finance Corporation's environmental and social Performance Standards, addresses issues such as labor and working conditions, community health and safety, land acquisitions and resettlement, and the treatment of indigenous peoples.

Transparency and Communication

We want everyone—from our customers to our industry peers—to know about our values and the progress we're making for people and the planet.

We track and measure our performance across a range of areas, and we apply the lessons we learn to continually improve. To make sure our progress is as meaningful and impactful as possible, we work with a broad range of groups—including workers' rights advocates and local leaders—and consult with rights holders and other stakeholders that include United Nations bodies, governments, nongovernmental organizations, civil rights groups, and the world's leading human rights experts.

We always strive to be an example for others to follow, and to share our progress to accelerate industrywide change. But we also know our work will never be finished—because we believe that if we aren't finding ways to improve, we aren't looking hard enough.