

Global Whistleblowing Policy

Doing What's Right

At A.P. Gilfoyle Global Management Corp., and its affiliates and subsidiaries (collectively, "**AGM**"), integrity is at the core of who we are. We believe that doing what's right starts with fostering an open, honest, and accountable culture. We are committed to empowering everyone to speak up when something doesn't seem right, without fear of retaliation. Your voice is crucial in helping us maintain the highest ethical standards in everything we do.

Who This Policy Applies To

This policy is for all current and former employees, officers, contractors, consultants, and third parties connected to AGM. Whether you've noticed something that doesn't sit right, or you suspect misconduct, we want to hear from you. We encourage you to speak up if you have any concerns about potential breaches of AGM policies, legal obligations, or unethical behavior.

What Should You Report?

Speak up if you see or suspect:

- Financial misconduct, fraud, or misrepresentation
- Insider trading
- Conflicts of interest or ethical violations
- Workplace harassment or discrimination
- Environmental or safety hazards

We discuss in more detail "what" you should report in our Code of Ethics, which can be found at apgilfoyle.com/ethics.

How to Raise Concerns

We've made it easy for you to raise concerns, either anonymously or openly:

- Send an email to ethics@world.apgilfoyle.com. If you need enhanced privacy, consider using a tool such as ProtonMail¹ to send anonymous emails.
- You may also send your concerns via mail to:

A.P. Gilfoyle Global Management Corp.
ATTN: Board of Directors
45 Rockefeller Plaza, Floor 20
New York, NY 10111

¹ ProtonMail is a registered trademark of Proton AG

No Retaliation – Your Protection Comes First

We take your protection seriously. AGM strictly prohibits retaliation against anyone who reports concerns in good faith or participates in an investigation. Retaliation can include:

- Termination or demotion
- Harassment or intimidation
- Disciplinary action
- Negative impacts on compensation or benefits

If anyone tries to retaliate, they will face disciplinary action, up to and including termination.

Government Compliance

In accordance with U.S. Securities and Exchange Commission (the “**SEC**”) regulations, notably, the Dodd–Frank Wall Street Reform and Consumer Protection Act, and the Investment Advisors Act of 1940, if you report violations of federal securities laws to the SEC, you may be entitled to whistleblower protections and financial rewards. AGM encourages you to report internally first, but you always have the right to contact the SEC directly. For more information, visit the SEC’s website.