

API GROUP CORPORATION
(the “Company”)

Stockholder Communications Policy

Introduction

The Board of Directors of the Company (the “Board”) has adopted this Stockholder Communications Policy (the “Policy”) to facilitate stockholder access to the Board and to ensure that communications from the Company’s stockholders are accorded proper treatment and attention to address valid concerns.

Stockholder Communications

Stockholders of the Company and other parties interested in communicating directly about the Company with the Co-Chairmen of the Board, lead independent director or with non-management members of the Board may do so in writing to:

Co-Chairmen of the Board
APi Group Corporation
c/o Corporate Secretary
1100 Old Highway 8 NW
New Brighton, MN 55112

All communications should be accompanied by the following information:

- if the person submitting the communication is a stockholder, a statement of the type and amount of the securities of the Company that the person holds;
- if the person submitting the communication is not a stockholder and is submitting the communication to the non-management directors as an interested party, the nature of the person’s interest in the Company;
- any special interest, meaning an interest not in the capacity of a stockholder of the Company, of the person in the subject matter of the communication; and
- the name, address, telephone number and e-mail address, if any, of the person submitting the communication.

Review and Handling of Stockholder Communications

The Corporate Secretary will review any communication from stockholders and other interested parties that is intended for the Board and maintain a log of all such communications. Communications shall be distributed by the Corporate Secretary to the Board, or to any individual directors as appropriate, depending on the facts and circumstances outlined in the communication. Any communications regarding individual grievances or other interests that are personal to the party submitting the communication and could not reasonably be construed to be of concern to security holders or other constituencies of the Company (such as employees, members of the communities in which the Company operates its businesses, customers and suppliers) generally as well as resumes and other forms of job inquiries, solicitations, advertisements, surveys, "junk" mail and mass mailings will be handled in accordance with the Company's established procedures for these types of communications.

Other Communications

Communications relating to accounting, internal controls or auditing matters will be handled in accordance with the Company’s Employee Reporting Policy.

Proposals submitted by stockholders are not considered communications under this Policy and will be handled in accordance with applicable law.