

May 1, 2024

APOLLO

APOLLO GLOBAL MANAGEMENT, INC.

Human Rights Policy

Introduction

This Human Rights Policy (this “[Policy](#)”) set forth basic principles regarding Apollo Global Management, Inc.’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 Sustainability and Corporate Responsibility Committee (the “[Sustainability 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 Sustainability Committee is responsible for reporting regularly to the Board.

Employees

AGM is committed to providing a workplace that respects each employee’s human rights and ensuring that the interactions that employees have with clients, suppliers, and other stakeholders comply with human rights-related laws, rules, and regulations in the jurisdictions in which we operate. The Company’s commitment, policies, and controls related to human rights, including those related to equal employment opportunity, privacy, and unlawful discrimination and harassment, are set forth in AGM’s [Code of Business Conduct and Ethics](#). The steps taken by the Company to ensure that slavery and human trafficking, including child labor and forced labor, are not taking place in the Company’s business and supply chains are set forth in the Apollo [UK Modern Slavery Act Statement](#).

Clients

AGM strives to identify potential human rights issues in the due diligence processes in connection with investment activities. The Company has due diligence processes in place, including but not limited to Know-Your-Client processes, that are designed to, where relevant, assess and mitigate human-rights related risks. These processes help to inform business decisions.

Additional details are set forth in AGM’s [Code of Business Conduct and Ethics](#).

Suppliers

AGM seeks to conduct business with suppliers that are not engaged in committing human rights violations, including modern forms of slavery and human trafficking. While suppliers bear responsibility to define their own standards with regard to human rights, we strive to make them aware of our standards, including by making this policy available on our website. AGM expects suppliers and their supply chain to, at minimum, comply with applicable laws, rules, and regulations. In addition, AGM expects suppliers to adhere to the principles and expectations in AGM's [Supplier Code of Conduct](#), including those related to forced and child labor and employment practices.

AGM is aware that the international nature of the Company's business can pose certain risks. Should AGM have actual knowledge that anyone with whom the Company has a business relationship is not adequately managing their adverse human rights impact, AGM will evaluate the remedies available, up to and including the termination of the business relationship.

Policy Governance

The Sustainability and Corporate Responsibility Committee shall review this policy on a periodic basis. The AGM Chief Sustainability Officer shall review and approve all updates to this policy.

Effective Date: May 1, 2024