

OCTOBER 2022

APOLLO

APOLLO IMPACT PLATFORM

# Operating Principles for Impact Management Disclosure Statement

---

## Introduction

---

Since our founding in 1990, Apollo's consistent, rigorous, value-oriented approach across private equity, credit, and real assets has helped make us one of the largest alternative investment managers serving many of the world's most prominent institutional investors.

As one of the world's largest alternative investment managers, Apollo manages capital for hundreds of fund investors in dozens of countries, including some of the most sophisticated institutional allocators of capital.

Apollo invests in opportunities, communities, and our people to achieve exceptional outcomes for our investors and a positive social impact. We embrace complexity and fuel innovation to find potential where others do not. We achieve our purpose by living our values every day:

- **Outperform Expectations:** We pursue excellence through the tenacity, passion, and integrity of our people.
- **Challenge Convention:** We create value and find uncommon investment opportunities through continual learning, contrarian thinking, and rigorous debate.
- **Champion Diversity and Inclusion:** We seek diverse perspectives, foster belonging for all of our employees, and commit to making progress every day.
- **Lead Responsibly:** We hold ourselves to the highest standards as financial and social stewards; we strive to make a positive impact at every opportunity.
- **Drive Collaboration:** We work together as a One Apollo team – without silos – across our integrated platform, and we endeavor to develop the leadership capabilities of all our people.

In 30 years, the Apollo team has grown to more than 3,700 employees, including 575 investment professionals, working from more than 25 global offices as of March 31, 2022. From the firm's beginning, Apollo has established a record of success in private equity and other forms of alternative investment.

### Apollo's ESG Philosophy

As one of the world's largest alternative investment managers, Apollo believes that consideration of Environmental, Social, and Governance ("ESG") issues is essential to companies' success — by enhancing their ability to manage risks and, more than ever, by identifying areas for growth. Apollo's ESG program rests on four pillars: ESG diligence, engagement with companies as appropriate to our private equity, real assets or credit businesses, a commitment to transparency, and ensuring regulatory and compliance standards are met. We see our investments and our business through an ESG lens, in the belief that Apollo can and should have a positive impact on society.

---

## 1. Diligence

Apollo's proactive approach to integrating ESG issues begins with identifying ESG risks and ensuring they are appropriately addressed and documented throughout our diligence and pre-investment decision-making. Our investment professionals, together with third-party advisors, apply their expertise and an industry-specific approach to potential ESG risks. They assess potentially material risks and identify ways to minimize or eliminate them, at the same time seeking out potential ESG-related opportunities to engage with management teams post-acquisition.

## 2. Engagement

Once a transaction has closed, our approach to engagement across ESG issues focuses on working with a company to improve long-term sustainability and increasing benefits for all stakeholders. Specific engagement topics are often tailored to a particular company's circumstances, based on the findings of our pre-investment diligence process. We also engage companies on topics that apply across industries and geographies, such as ensuring governance structures are implemented that provide appropriate levels of oversight, and internal processes for collecting and monitoring key ESG performance indicators. More generally, Apollo acts as a resource for company management teams on ESG matters and provides programming to share best practices alongside operational assistance on environmental, health, safety, workforce, and governance issues.

## 3. Transparency

We believe that being transparent about the ESG performance of reporting companies is an integral and essential element of a comprehensive ESG program, and we provide periodic reports to both limited partners and the public. We encourage companies to adopt this approach through compliance with applicable ESG regulatory regimes, and by voluntarily disclosing ESG data and information on their historical performance and future goals.

## 4. Compliance

Apollo receives regular updates from reporting companies on ESG performance to ensure that ESG risks are being mitigated and that regulatory and compliance standards remain in focus. We leverage our network of advisors and consultants and host virtual events for reporting companies that focus on ESG-related regulatory developments in various regions and jurisdictions. This helps companies identify and prepare for trends that may impact their operations, supply chains, and investors.

While often discussed together, Impact Investing and ESG are two different, yet related, concepts.

- **ESG** entails analyzing the Environmental, Social and Governance factors of an investee's operations and implementing best practices across these areas to enhance value and increase the sustainability and responsibility of operations.
- **Impact Investing** entails investing in companies with the explicit intention to generate positive social or environmental impact through their products and services alongside financial returns.

Both ESG and Impact Investing:

- Are forms of sustainable and responsible investing
- Can potentially be implemented across all investment verticals
- Drive value without a financial return trade-off
- Involve screening and integration components

Apollo is proud of its ESG program today and believes the establishment of the Apollo Impact Platform represents the next evolution in the responsible investing space and that there is significant room to grow and contribute to have a positive impact on our communities and the broader economy.

### Operating Principles for Impact Management Affirmation

Apollo Global Management, Inc. hereby affirms its status as a Signatory to the Operating Principles for Impact Management.

This Disclosure Statement applies to the following assets (the "Covered Assets"):

- The Apollo Impact Platform

The total Covered Assets in alignment with the Impact Principles as of 06/30/2022 is USD \$924 million.

By:  \_\_\_\_\_

Name: Marc Becker

Title: Co-Head, Apollo Impact Platform

By:  \_\_\_\_\_

Name: Joanna Reiss

Title: Co-Head, Apollo Impact Platform

---

## PRINCIPLE 1

### Define Strategic Impact Objective(s), Consistent with the Investment Strategy

---

*The Manager shall define strategic impact objectives for the portfolio or fund to achieve positive and measurable social or environmental effects, which are aligned with the Sustainable Development Goals (SDGs), or other widely accepted goals. The impact intent does not need to be shared by the investee. The Manager shall seek to ensure that the impact objectives and investment strategy are consistent; that there is a credible basis for achieving the impact objectives through the investment strategy; and that the scale and/or intensity of the intended portfolio impact is proportionate to the size of the investment portfolio.*

---

Apollo Global Management, Inc. (together with its subsidiaries, not including Athene for the purposes of the disclosure statement, the “Firm”, “Apollo”, “we”, or “our”) has established the Apollo Impact Platform (“AIP” or the “Platform”) which is designed to pursue private equity-like opportunities primarily through buyouts, carve-outs, and platform build-ups that are made with the intention to generate positive, measurable social and/or environmental impact while generating attractive risk-adjusted returns.

AIP is pursuing a rigorous impact investment philosophy targeting investments that leverage Apollo’s historical expertise across five core Impact-Aligned Investment Themes aligned with the UN Sustainable Development Goals (“SDGs”):

1. **Economic Opportunity** – Seeking to invest in companies that provide the tools to improve livelihoods through financial inclusion and literacy, as well as improving access to goods and services



2. **Education** – Seeking to invest in companies that provide the tools to improve livelihoods through education and job preparedness



3. **Health, Safety & Wellness** – Seeking to invest in companies that expand access to affordable healthcare, develop products and services that deliver wellness-based solutions, ensure safety and security for individuals and the community at large, and provide the building blocks of a healthy lifestyle.



4. **Industry 4.0** – Seeking to invest in companies that leverage innovation to benefit and support underrepresented stakeholders and bolster equity, sustainability, and efficiency.



5. **Climate & Sustainability** – Seeking to invest in companies focused on improving the sustainability of natural resources and ecosystems.



To be a potential fit for AIP, investment opportunities must also demonstrate **Additionality** and **Intentionality**.

- *Additionality* refers to whether targeted positive impacts would have occurred “but for” the investee company’s existence or Apollo’s investment
  - Company Additionality is achieved via a company’s products and services or operations
  - Investor Additionality is achieved via access to proprietary capital or other benefits, such as technical assistance, mentorship or connections
- *Intentionality* is the expressed desire by the investor and the target to actively and materially convey social or environmental benefit

## Apollo's Role

As Apollo pursues impact investing through the Platform, we believe the current impact opportunity set and competitive landscape present an opportune moment for Apollo's value-oriented, later-stage investment approach. The capital dedicated to impact investing has grown dramatically in recent years, and we expect those trends to continue. At its outset, the impact investing space was focused on debt, venture and growth equity in technology-oriented businesses as well as emerging and developing markets. While a large portion of impact capital remains focused on these strategies, we believe AIP's investment approach is highly differentiated.

Impact investing funds greater than \$500 million have historically been more targeted towards early-stage rather than later-stage, buyout opportunities. We believe mature businesses present the most critical need for impact-oriented capital. By virtue of their operational scale, number of employees and suppliers, wide customer and consumer bases, and therefore influence within the communities in which they operate, we believe mature companies' wider breadth of activity can create a larger scale of impact while enabling alpha generation. By expanding the pool of later-stage private capital dedicated to impact investments, we believe AIP is positioned to help companies achieve impact over the course of the business' life cycle.

---

## PRINCIPLE 2

### Manage Strategic Impact on a Portfolio Basis

---

*The Manager shall have a process to manage impact achievement on a portfolio basis. The objective of the process is to establish and monitor impact performance for the whole portfolio, while recognizing that impact may vary across individual investments in the portfolio. As part of the process, the Manager shall consider aligning staff incentive systems with the achievement of impact, as well as with financial performance.*

---

AIP's impact management processes are incorporated into due diligence and investment committee processes, and throughout the life of all investments, as detailed further in *Principles 4-7*.

#### Impact-Aligned Incentive Structure

The nature of AIP's Impact Carry Coefficient ("ICC"), with a portion of carried interest attributed to the impact component, requires the comparison of actual impact following exit against the expected impact.

#### Impact-Oversight Governance

Impact Advisory Committee. In order to position the strategy for success and enable the potential for alpha generation, we believe it is important to leverage the collective expertise of leaders in the impact investing space who can assist in driving the impact potential of different investment opportunities. We have established an Impact Advisory Committee comprised of highly regarded experts in their respective fields who work with the investment team on various initiatives aimed at enhancing alpha generation and positioning the portfolio companies to achieve impact at scale. Committee members have a breadth of experience that spans philanthropy, foundations/NGOs, corporations, venture capital, public markets, and academia, along with industry experts with sector expertise such as education, healthcare, environmental sustainability, and technology. The Impact Advisory Committee is tasked with providing strategic counsel to amplify the impact performance of portfolio companies by leveraging their experience and professional networks, as well as to help inform impact objectives and methodology.

External Impact Advisor. The AIP Team leverages the impact consulting and measurement expertise of an external impact advisory firm. The external impact advisor works in concert with the AIP investment team to diligence, measure, and track the impact of AIP investment opportunities, which is critical to Apollo's objective and robust approach to impact investing.



---

## PRINCIPLE 3

### Establish the Manager's Contribution to the Achievement of Impact

---

*The Manager shall seek to establish and document a credible narrative on its contribution to the achievement of impact for each investment. Contributions can be made through one or more financial and/or non-financial channels. The narrative should be stated in clear terms and supported, as much as possible, by evidence.*

---

#### The Apollo Difference

AIP leverages Apollo's private equity expertise and the Firm's integrated platform as well as our ESG program to source, underwrite, measure, and monitor impact investments. Over the past 30 years, Apollo has established itself as a leader in the private equity industry. Apollo seeks to bring its successful strategy and capabilities as a leading private equity investor to establish itself as a leader in the impact investing space.

Consistent with Apollo's private equity approach, we believe AIP's ownership and involvement in portfolio companies is critical to enabling companies to increase the reach and depth of their impact while simultaneously seeking to generate attractive private equity financial returns.

Power of the Apollo Platform. Apollo believes that a key advantage of its approach to investing its private equity funds is its ability to proactively create value across its managed funds' portfolios and in their underlying investments. Apollo seeks to add value to its managed funds' portfolio investments by focusing on both the left and right sides of the balance sheet. That is, on the left side, or the asset side, Apollo is adept at working with management to enhance the operations of its managed funds' portfolio companies, working closely with Apollo's deep network of operating executives. In this capacity, the Firm helps to rationalize non-core and underperforming assets, generate cost and working capital savings, and maximize liquidity. Additionally, Apollo works closely with its portfolio companies to implement best practices relating to group purchasing and other cost-saving and value-accretive initiatives to capitalize on the scale of its portfolio. Through these broader Firm capabilities, Apollo-managed funds can help drive efficiencies and cost savings at smaller businesses that wouldn't ordinarily have access to such resources. On the right side, or the liability side, Apollo relies on its deep credit orientation and works with management to help optimize the capital structure of its managed funds' portfolio companies through proactive restructuring of the balance sheet to address shorter-term maturing debt or capturing discounts on publicly-traded debt securities through exchange offers and potential debt buybacks. By acting as a catalyst to improve the operations of its managed funds' portfolio companies, as well as optimize their capital structures, Apollo believes it is able to create more valuable enterprises with increased flexibility to withstand market cycles.

Focus on Operational Improvements and Fundamental Enhancements. Apollo is a "hands-on" investor and remains actively involved in its managed funds' controlled portfolio companies through board participation and a regular dialogue with management for the duration of each investment. Following an investment, Apollo works closely with management of its portfolio companies to enhance operations by attracting leading management teams, implementing business optimization and cost-saving

initiatives, identifying and executing follow-on acquisitions, focusing on technology and innovation opportunities, and optimizing capital structures. Furthermore, the Platform will leverage Apollo's portfolio company optimization team, Apollo Portfolio Performance Solutions ("APPS"). APPS is a dedicated team focused on driving value to portfolio companies through enhanced portfolio operations, cost savings, technology transformation, innovation, and talent management. APPS consists of the Operational Performance Improvement team that helps drive top-line growth and sustainable EBITDA improvement through sharing of best practices across the portfolio; the Technology Transformation team that focuses on improving profitability through the adoption of emerging technologies and supporting better connectivity and knowledge share among tech companies, VCs, the startup community and Apollo; and the Talent Management team that builds and cultivates Apollo's executive network and curates an ecosystem of best-in-class service providers.

The Platform will also leverage Apollo's established relationships with operating executives that assist in the diligence of new opportunities, develop operating plans, and provide strategic and operational oversight for portfolio investments post-acquisition. Following an investment, Apollo often seeks to have that same operating executive take a position within the company's board or management team to further work on implementing the underwritten operating plan.

Apollo often pursues transactions in which synergies can be realized with existing fund portfolio companies, through a combination, shared services agreement or other strategic alternatives that seek to generate incremental value creation during the investment horizon. Additionally, the AIP investment team and external impact advisors evaluate impact specific value creation approaches during diligence.

Optimize Capital Structures and Create Financial Flexibility. Apollo believes that it has leading capabilities with respect to structuring investments. Apollo's experience as a credit and distressed investor drives the Firm's ability to be creative in its capital structure creation, constantly seeking the optimal balance of risk mitigation with upside potential. Generally speaking, the Firm seeks to employ portfolio company-level leverage in its managed funds' investments to enhance return potential, although such decisions are made on a case-by-case basis depending on the specific characteristics of the investment and other relevant factors. In order to incorporate leverage, the Firm first undertakes due diligence to ensure that the business is capable of supporting debt financing, even through industry downturns.

Apollo's focus on a fund portfolio company's capital structure does not end after closing on the investment. Apollo regularly monitors the financial positioning of its funds' portfolio companies in the context of broader market conditions. If the Firm senses that a company may experience a liquidity squeeze due to a variety of potential factors, Apollo works with management to seek to act early and decisively to address concerns by executing complex refinancings, distressed debt exchanges and other restructuring initiatives.

Industry-Leading ESG Program and Citizenship Focus. Apollo has spent more than a decade developing its rigorous and detailed ESG monitoring, management and reporting for private equity. We believe the Firm's ESG program provides strong baseline infrastructure for AIP in terms of portfolio company engagement, monitoring and reporting. At Apollo, we believe in the importance of incorporating ESG factors into our underwriting and ongoing investment management strategies and we have worked

closely with the portfolio companies of the private equity funds we manage to help introduce or implement best practices. Since 2012, over 190 portfolio companies have participated in Apollo's ESG reporting program. Over the same timeframe, portfolio companies have collectively recycled more than 12 million metric tons of waste, donated in excess of \$746 million to charitable organizations, and volunteered more than 1.1 million hours. Apollo is proud of its ESG program today, and we believe AIP represents the next evolution in the space and that there is significant room to grow and contribute to positive impacts on our communities and the broader economy.

Relevant Sector Expertise. Apollo believes that its deep industry expertise provides the Firm with significant advantages in sourcing and evaluating investment ideas for the Platform, as well as in adding value to its managed funds' portfolio companies post-investment. Over the past 30 years, Apollo has developed deep sector expertise across industries that have historically been aligned with SDGs, including healthcare, education, renewable energy, industrials, business services, financial services, consumer, and technology. In the process of screening, executing and monitoring investments in these industries over several decades, Apollo has developed valuable relationships with leading management teams, consultants and other intermediaries. Due to this industry specialization, the Firm believes it is well-positioned to identify key trends, areas of opportunities and potential risks within its targeted sectors.

### Tracking & Accelerating Impact

The AIP investment team, with support from outside impact advisors, will collect the data needed on a periodic basis to monitor the impact KPIs and negative externality KPIs that were identified during diligence. Shortly after close, each company will take the B Impact Assessment ("BIA"), a detailed assessment developed by B Lab, that measures the company's impact on its stakeholders (i.e., workers, community, environment, and customers). The BIA is one of the most comprehensive assessments of a company's impact and has been used by over 50,000 businesses to date. Portfolio companies will retake the BIA over the life of the investment, generally on an annual basis, and we believe the data will allow us to assess the trends of the company's impact on key stakeholders during the holding period. Furthermore, we summarize portfolio company impact and financial performance on a periodic basis through investor reports.

AIP focuses on driving strategic initiatives identified during diligence that could improve the company's financial performance and ability to drive impact at scale, which requires significant time and value-add capabilities and is integral to producing attractive returns. The AIP investment team working on a particular investment are responsible for maintaining a regular dialogue with the company as well as external impact advisors and keeping the broader team apprised of progress through update meetings and, more thoroughly, during formal periodic portfolio reviews.

---

## PRINCIPLE 4

### Assess the Expected Impact of Each Investment, Based on a Systematic Approach

---

*For each investment the Manager shall assess, in advance and, where possible, quantify the concrete, positive impact potential deriving from the investment. The assessment should use a suitable results measurement framework that aims to answer these fundamental questions: (1) What is the intended impact? (2) Who experiences the intended impact? (3) How significant is the intended impact? The Manager shall also seek to assess the likelihood of achieving the investment's expected impact. In assessing the likelihood, the Manager shall identify the significant risk factors that could result in the impact varying from ex-ante expectations. In assessing the impact potential, the Manager shall seek evidence to assess the relative size of the challenge addressed within the targeted geographical context. The Manager shall also consider opportunities to increase the impact of the investment. Where possible and relevant for the Manager's strategic intent, the Manager may also consider indirect and systemic impacts. Indicators shall, to the extent possible, be aligned with industry standards and follow best practice.*

---

AIP determines a deal-specific Impact Mission ("Impact Mission") for each portfolio investment. An Impact Mission is a stated company-specific impact thesis, determined pre-acquisition, that creates impact goals for the company's management, employees, and other key stakeholders. Progress in achieving the Impact Mission is measured by several KPIs that are tracked throughout the life of the investment and reflect the specific impacts the AIP Team is focused on achieving or improving upon, tailored to each portfolio company.

Apollo employs a rigorous underwriting process<sup>1</sup> when it comes to both the financial and impact aspects of a given deal. Consistent with Apollo's broader approach to private equity investing, AIP pursues a disciplined, value-oriented, and opportunistic approach to impact investing. Apollo believes its flexible investment approach, integrated business model, willingness to tackle complexity and deep industry specialization provide the Firm with advantages in sourcing and evaluating new opportunities. AIP leverages Apollo's private equity underwriting expertise and overlays the impact lens.

In addition to applying Apollo's rigorous, bottoms-up financial underwriting, we believe AIP has established a proprietary, best-in-class impact underwriting approach. Further to pursuing investments that fall within the five Impact-Aligned Investment Themes outlined in *Principle 1*, AIP applies its disciplined impact approach and framework to each investment opportunity during the due diligence phase and throughout the life of each investment. Our multipronged, thematic approach pursues alignment with the UN SDGs, identifies an Impact Mission with supporting KPIs, and leverages the IMP Five Dimensions during diligence, and provides an external perspective of the company's social and environmental performance through the BIA assessment process. We believe our rigorous approach to measurement enables successful investing into collinear opportunities.

---

<sup>1</sup> The investment processes described herein are subject to change. There can be no assurance that the investment processes identified above will continue to be employed by AIP or Apollo. Notwithstanding the foregoing, to the extent investment processes are materially changed in the future, Apollo will strive to replace them with processes consistent with managing for impact.

## Screening and Due Diligence

AIP has established strict criteria to evaluate an investment’s suitability for the Platform as well as a generally recurring review to screen potential opportunities in order to quickly ascertain which prospective investments are worthy of additional resources and due diligence. This review process allows the investment team to have an open dialogue and ensure appropriate prioritization and selection of opportunities to pursue. After an opportunity is identified that meets the requirements of AIP’s initial screening process that is conducted leveraging threshold questions, representing a bespoke interpretation of the IMP Five Dimensions, the investment team employs the more rigorous AIP Impact Underwriting Framework and applies Apollo’s private equity due diligence process to conduct financial underwriting in parallel to evaluate each investment opportunity. This process involves an extensive review of both impact and financial considerations of the company and seeks to identify material risks, relevant mitigants, potential areas for value creation, and ability to achieve meaningful impact at scale. The AIP Impact Underwriting Framework includes preliminary impact KPI modeling incorporated into the projection model and a multi-page write-up outlining in detail the investment opportunity’s impact thesis/mission, societal need, and the business’ alignment to our impact criteria and underwritten KPIs.

IMP Five Dimensions	Question
WHAT	<p>Is there a <b>reasonable hypothesis</b> that one or more of the company’s core products and services has a clear Impact Mission aligned with the UN’s Sustainable Development Goals?</p> <p>Does the <b>majority of the company’s value</b> (as measured by total enterprise value, EBITDA or an industry-equivalent metric), expected to come from business units that pursue the Impact Mission(s) described in Question 1?</p> <p>Does the company create significant <b>negative externalities</b> that cannot be mitigated?</p> <p>Is there <b>rigorous evidence</b> that validates the intermediate outcomes created by the companies with this Impact Mission result in social or environmental impact?</p> <p>Do we have conviction, based on relevant evidence, that the <b>company’s products or services create the intermediate outcomes that lead to impact?</b> If not, is there a reasonable plan for the company to begin producing these outputs?</p>
WHO	<p>Are the company’s products or services primarily directed toward, readily accessible by, or ultimately benefiting <b>underserved populations or the environment?</b></p>
HOW MUCH	<p>What is the reach and depth of the company’s impact?</p>
CONTRIBUTION	<p>Does the company provide a differentiated offering, serve as a market leader, or demonstrate a tangible effort towards advancement of its sector?</p>
RISK	<p>Is there a prohibitive risk to the Collinearity of the company’s business operations and Impact Mission?</p>

## Decision Making

The decision to proceed through each stage of the evaluation process is made by consensus among the AIP investment team after considering input from other AIP and Apollo investment professionals, the

Impact Advisory Committee Chair, Apollo's ESG team, external impact advisors, operating executives and various other industry experts.

After an investment opportunity and associated AIP impact underwriting has been vetted by the investment team, diligence, and previewed with other members of the Investment Committee, it is formally presented to the full Investment Committee. Consistent with other Apollo investment committees, AIP requires a consensus from its Investment Committee for an opportunity to proceed.

### Post-Signing/Closing

Post-closing, AIP defines 3-5 company-specific impact KPIs aligned with the company's impact mission. The KPIs will likely align with the Impact Management Project's "How Much" dimension via reach (quantity) and depth (quality), and likely drive financial performance (top or bottom line) due to the collinearity thesis. AIP works closely with the company's management team, external impact advisors, and may reference existing impact indicator catalogues, including IRIS+, to generate relevant KPIs.

Shortly after acquisition, each controlled portfolio company takes the BIA, a detailed assessment developed by B Lab, that measures the company's impact on its stakeholders (i.e., workers, community, environment, and customers). The BIA is one of the most comprehensive assessments of a company's impact and has been used by over 50,000 businesses to date. AIP seeks to improve the BIA score across each investment from acquisition to exit and have companies retake the assessment on an annual basis.

---

## PRINCIPLE 5

### Assess, Address, Monitor, and Manage the Potential Negative Impacts of Each Investment

---

*For each investment the Manager shall seek, as part of a systematic and documented process, to identify and avoid, and if avoidance is not possible, mitigate and manage Environmental, Social and Governance (ESG) risks. Where appropriate, the Manager shall engage with the investee to seek its commitment to take action to address potential gaps in current investee systems, processes, and standards, using an approach aligned with good international industry practice. As part of portfolio management, the Manager shall monitor investees' ESG risk and performance, and where appropriate, engage with the investee to address gaps and unexpected events.*

---

#### Negative Impact Assessment & Monitoring

As detailed above in *Principle 4*, each Impact Mission is substantiated by approximately 3 to 5 KPIs directly connected to the Impact Mission, reflecting the specific impact the AIP Team is focused on achieving or improving at each portfolio company. In addition to tracking positive impact KPI performance, we believe it is crucial to address any material negative externalities associated with a given investment. As such, negative externalities are a core focus during due diligence and underwriting, as certain material negative impacts may be grounds to cease pursuit of a particular opportunity. In cases where the AIP Team believes there are negative externalities that we can successfully manage, we identify negative externality KPIs which are tracked throughout the investment's life. Both positive impact KPI performance as well as negative externality KPIs are taken into account for purposes of determining the ICC. The AIP investment team, with support from external impact advisors, collects data needed on a periodic basis to monitor negative externality KPIs that were identified during diligence. Additionally, as detailed in *Principle 4*, each controlled portfolio company completes the B Impact Assessment shortly after acquisition. The BIA provides an external perspective of governance, social and environmental performance and can serve to highlight potential areas of improvement. Portfolio companies will retake the BIA on an annual basis, with the goal of improving the score over the life of the investment. The BIA score is taken into account along with the impact KPIs for purposes of determining the ICC.

#### Negative Impact Management

AIP focuses on driving strategic initiatives identified during diligence that could improve the company's financial performance and ability to drive impact at scale, which requires significant time and value-add capabilities and is integral to producing attractive returns. The AIP investment team working on a particular investment are responsible for maintaining a regular dialogue with the company as well as external impact advisors and keeping the broader team apprised of progress through update meetings and, more thoroughly, during formal periodic portfolio reviews. If at any time it is determined that progress against the negative KPIs and BIA score are not proceeding as planned and changes to the strategy need to be undertaken, the investment team will act accordingly.

## Industry-Leading ESG Program and Citizenship Focus

Apollo has spent more than a decade developing its rigorous and detailed ESG monitoring, management and reporting for private equity. We believe the Firm's ESG program provides strong baseline infrastructure for AIP in terms of portfolio company engagement, monitoring and reporting. At Apollo, we believe in the importance of incorporating ESG factors into our underwriting and ongoing investment management strategies and we have worked closely with the portfolio companies of the private equity funds we manage to help introduce or implement best practices. Since 2012, over 190 portfolio companies have participated in Apollo's ESG reporting program. Over the same timeframe, portfolio companies have collectively recycled more than 12 million metric tons of waste, donated in excess of \$746 million to charitable organizations, and volunteered more than 1.1 million hours. Apollo is proud of its ESG program today, and we believe AIP represents the next evolution in the space and that there is significant room to grow and contribute to positive impacts on our communities and the broader economy.

Additional detail on Apollo's ESG framework can be found in our *Responsible Investing and ESG Policy* [here](#).



---

## PRINCIPLE 6

### Monitor the Progress of Each Investment in Achieving Impact Expectations and Respond Appropriately

---

*The Manager shall use the results framework (referenced in Principle 4) to monitor progress toward the achievement of positive impacts in comparison to the expected impact for each investment. Progress shall be monitored using a predefined process for sharing performance data with the investee. To the best extent possible, this shall outline how often data will be collected; the method for data collection; data sources; responsibilities for data collection; and how, and to whom, data will be reported. When monitoring indicates that the investment is no longer expected to achieve its intended impacts, the Manager shall seek to pursue appropriate action. The Manager shall also seek to use the results framework to capture investment outcomes.*

---

#### Post-Signing/Closing

Post-closing, AIP defines 3-5 company-specific impact KPIs aligned with the company's Impact Mission. The KPIs will likely align with the Impact Management Project's "How Much" dimension via reach (quantity) and depth (quality), and likely drive financial performance (top or bottom line) due to the collinearity thesis. AIP works closely with the company's management team, external impact advisors, and may reference existing impact indicator catalogues, including IRIS+, to generate relevant KPIs.

Shortly after acquisition, each controlled portfolio company takes the BIA, a detailed assessment developed by B Lab, that measures the company's impact on its stakeholders (i.e., workers, community, environment, and customers).

#### Monitoring

The AIP team, with support from external impact advisors, collects the data needed on a periodic basis to monitor the impact KPIs and negative externality KPIs that were identified during diligence. Shortly after close, each portfolio company takes the BIA, and will retake the assessment over the life of the investment, generally on an annual basis. We believe these data will allow us to assess the trends of the company's impact on key stakeholders over the hold period.

AIP focuses on driving strategic initiatives identified during diligence that could improve the company's financial performance and ability to drive impact at scale, which requires significant time and value-add capabilities and is integral to producing attractive returns. The AIP investment team working on a particular investment is responsible for maintaining a regular dialogue with the company as well as external impact advisors and keeping the broader team apprised of progress through update meetings and, more thoroughly, during formal periodic portfolio reviews.

If at any time it is determined that progress against the Impact KPIs or financial metrics is not proceeding as planned and changes to the strategy need to be undertaken, the investment team acts accordingly.

## Reporting

The Impact Advisory Committee formally convenes on a periodic basis and discusses relevant investments, portfolio operations, and other initiatives that pertain to the impact strategy.

AIP summarizes portfolio company impact and financial performance on a periodic basis through investor reports and presentations. Limited Partners will receive Impact Reports on an annual basis with respect to each portfolio investment containing information about such investment, including the Platform's impact thesis and the impact performance of such investment.

Apollo's broader ESG program also supplements AIP's bespoke impact process by engaging, monitoring and reporting on ESG data and performance to investors and publicly on at least an annual basis. Since the inception of our ESG engagement and reporting program in 2008, the cumulative numbers are impressive: 540+ ESG reports and 80,000+ ESG data points have been submitted to Apollo by more than 190 reporting companies.

---

## PRINCIPLE 7

### Conduct Exits Considering the Effect of Sustained Impact

---

*When conducting an exit, the Manager shall, in good faith and consistent with its fiduciary concerns, consider the effect which the timing, structure, and process of its exit will have on the sustainability of the impact.*

---

The Platform has yet to conduct an exit.

Where possible, AIP will seek to safeguard the continuity of impact beyond exit and position companies to continue achieving impact at scale after the duration of Apollo's investment in an effort to minimize mission drift. By investing in companies whose business models are collinear, AIP believes it is well-positioned to cause exits as the continued growth and success of the business is linked to its ability to drive impact-aligned outcomes. The long-term alignment of impact and financial outcomes is a key consideration of the diligence process and is documented in both investment committee presentations and periodic impact reports. We believe that enhancing the positive impact of our investments will ultimately be accretive to companies' exits and a driver of value.

Additionally, AIP is exploring the possibility of making impact data and reports collected during the investment period available to potential bidders in the context of the sales process. AIP is also exploring the possibility of including impact data in securities filings in connection with a public offering.

---

## PRINCIPLE 8

### Review, Document, and Improve Decisions and Processes Based on the Achievement of Impact and Lessons Learned

---

*The Manager shall review and document the impact performance of each investment, compare the expected and actual impact, and other positive and negative impacts, and use these findings to improve operational and strategic investment decisions, as well as management processes.*

---

As described above under *Principles 5 & 6*, the impact performance of each investment (i.e., KPI performance, annual BIA scores, and insights gained from regular engagement with company management, portfolio review results, etc.) is monitored, reviewed, and documented on a periodic basis. Portfolio company impact and financial performance is reported to investors and the Impact Advisory Committee on a periodic basis.

If at any time it is determined that progress against the Impact KPIs or financial metrics is not proceeding as planned and changes to the strategy need to be undertaken, the investment team will act accordingly. Should the situation require, AIP may modify the KPIs and the BIA score (or replace the BIA with another third-party impact assessment framework) during the life of an investment.

The nature of AIP's Impact Carry Coefficient, with a portion of carried interest attributed to the impact component, requires the comparison of actual impact (i.e., Impact Mission KPI performance & BIA score improvement) following exit against the expected impact.

It is our intention in the future to periodically review findings to improve operational and strategic investment decisions, as well as management processes.

---

## PRINCIPLE 9

### Publicly Disclose Alignment with the Principles and Provide Regular Independent Verification of the Alignment

---

*The Manager shall publicly disclose, on an annual basis, the alignment of its impact management systems with the Principles and, at regular intervals, arrange for independent verification of this alignment. The conclusions of this verification report shall also be publicly disclosed. These disclosures are subject to fiduciary and regulatory concerns.*

---

This Disclosure Statement affirms the alignment of the Platform's impact management systems with the Principles and will be updated annually.

Consistent with the 2021 disclosure, AIP engaged BlueMark, a Tideline company, to independently verify the alignment of AIP's impact management practices with the Operating Principles for Impact Management, an industry standard for integrating impact throughout the investment lifecycle. BlueMark's assessment findings cover both areas of strength and areas for improvement, as reflected in the Verifier Statement. BlueMark is a leading independent provider of impact verification services in the impact investing market. BlueMark is a subsidiary of Tideline Advisors, LLC, a specialized consulting firm that works with asset managers and allocators to design and implement best-in-class impact management and measurement systems.

We expect to complete and publish a third-party verification on our alignment with the Operating Principles every three years.