

APOLLO

Complaints Handling Policy

November 2025

Apollo Investment Management Europe (Luxembourg) S.à r.l. (hereafter “**AIME**” or the “**Company**”) is committed to providing high quality services to its clients. While AIME makes every effort to conduct its business in a manner that minimizes complaints, we recognise that there may be instances where you are not fully satisfied with our products or services.

The Company has implemented this Complaints Handling Procedure to ensure that all complaints are addressed fairly, promptly, and in accordance with applicable regulatory requirements.

How to file a complaint

You may submit complaints free of charge either in writing by registered post or by e-mail making sure to include your full legal name and contact details.

To help us handle your complaint promptly and efficiently, please provide a detailed explanation of the issue, along with any relevant supporting documentation you have available.

Where to address your complaint

Please address your complaint to the Complaints Handling Officer¹ using one of the following methods:

Post: FAO: The Compliance Officer
Apollo Investment Management Europe (Luxembourg) S.à r.l.
2, Avenue Charles de Gaulle, L-1653 Luxembourg
Grand Duchy of Luxembourg

E-mail: ApolloLuxAIFM@ApolloLP.com
cc: ApolloLuxCompliance@apollo.com

Complaint details

- To ensure prompt handling of your complaint, please provide the following information: Name and surname as indicated on the ID card or passport along with the contact details of the complainant;

¹ AIME’s conducting officer responsible for processing, centralising and monitoring complaints is communicated and authorised by the Luxembourg *Commission de Surveillance du Secteur Financier* (the “**CSSF**”).

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- A clear description of the reason for the complaint, including any alleged damage or loss incurred; and
- Where applicable, copies of any supporting documentation relevant to the complaint.

Complaint resolution

Complaints are assessed by the Company on an ongoing basis to enable the identification of systemic or recurring problems, as well as any potential legal and operational risks.

If the Compliance Officer determines that a complaint may have a material impact (financial and/or reputational), AIME's board of managers (the "**Board**") shall be informed without delay. The Board will then decide whether it is necessary to notify the CSSF. Any response to a material impact of complaints will be subject to approval by the Board.

AIME commits to acknowledge the receipt of your complaint in writing without delay and in any case within 10 working days of receiving it. The acknowledgement will include the name and contact details of the person responsible for investigating and responding to your complaint.

A detailed response to your complaint, will be sent by a registered letter, no later than 20 business days from the date of receipt of the complaint. If a delay occurs, we will inform you in writing of the reason for the delay and provide an estimated date by which the investigation is expected to be completed.

If you have not received a reply to your complaint within the relevant timeframe, or if you are not satisfied with it, you may escalate the matter to the Board. In such cases, we will provide you with the professional contact details of the manager responsible for handling complaints within AIME.

Alternative dispute resolution

If you remain dissatisfied with the response, you may refer the matter to the CSSF for an out-of-court complaint resolution procedure. In accordance with Article 15 of CSSF Regulation 16-07, you have up to one year from the date you filed your complaint to AIME, to escalate the matter to the CSSF. This allows you to involve the regulator as a neutral mediator, free of charge.

The out-of-court request can be filed in writing, by post, e-mail or online on the CSSF website.

Post: Commission de Surveillance du Secteur Financier
Département Juridique
283, route d'Arlon
L-2991 Luxembourg
Grand Duchy of Luxembourg

E-mail: reclamation@cssf.lu

Website (online complaint form): <https://www.cssf.lu/en/customer-complaints/>

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You must submit your complaint to the CSSF within one year from the date you initially filed your complaint with us.

Recording of complaints

Complaints are recorded in a register maintained by the Compliance Officer and include, *inter alia*, the following information:

- Complainant's name and surname (as indicated on the ID card or passport);
- Date of receipt of the complaint;
- Date of acknowledgement of receipt;
- Description of the complaint;
- Conclusion from the Compliance Officer;
- Escalation to the Board (if applicable)
- Date of answer; and
- Deficiencies identified (if applicable).

Once a complaint has been fully handled, a report with all related documentation, including all written communications with the complainant (e.g. emails, letters), shall be recorded. All complaints that have been received, processed and closed shall be electronically stored in a secure, computerized format. The retention period for each complaint file will depend on the nature of the matter. However, complaints shall be retained for a minimum of five years. Both the complaints register and the associated documentation shall remain at the Company's premises.

The Compliance Officer will regularly share the complaints register with the Board, where applicable, highlighting any identified issues, the corrective actions taken and the follow-up on those measures.

In accordance with Article 16 (3) of CSSF Regulation 16-07, the Company submits an annual report to the CSSF, within five months following the end of its financial year. This report includes a table detailing the number and categories of complaints received, along with a summary of the measures taken to address and resolve them.