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# Apollo Modern Slavery Statement

## 1. INTRODUCTION

This statement (the "**Statement**") has been prepared pursuant to the UK Modern Slavery Act (the "**UK MSA**") and relates to the financial year ended December 31, 2025. Although no Apollo entities meet the reporting threshold under the Australian Commonwealth Modern Slavery Act (the "**Australian MSA**"), Apollo Management Singapore Pte. Ltd. ("**AMSP**") chooses to make this statement voluntarily. In this Statement, we use the term "**modern slavery**", which includes slavery, servitude and forced or compulsory labour and human trafficking.

We have prepared this Statement on a consolidated basis for Apollo Global Management, Inc. ("**Apollo**", "**we**", or "**our**") because we have a single compliance program relating to modern slavery—although not all of the entities in our consolidated group are subject to each or any of the aforementioned laws. This Statement is made in accordance with Section 54 of the UK MSA on behalf of Apollo Management International LLP ("**AMI**"), Apollo Credit Management International Ltd ("**ACMI**"), and Apollo Asset Management Europe LLP ("**AAME**" and, collectively with AMI and ACMI, "**Apollo UK**").

Apollo is committed to ensuring that, as far as we can be aware, modern slavery does not take place in any part of our business or our supply chains.

## 2. OUR STRUCTURE AND BUSINESS

Apollo is a global alternative asset manager and a retirement services provider. Apollo conducts its business primarily in the United States but carries out business around the world. As of December 31, 2025, Apollo had a global team of approximately 6,140 employees.

Apollo carries out business in the United Kingdom through the Apollo UK entities, along with certain other group entities that are not required to prepare a statement under the UK MSA. Apollo UK employs over 300 professionals in the UK who do business across Europe. Each of the Apollo UK entities are subsidiaries of Apollo.

AMSP, a Singaporean subsidiary of Apollo, conducts business in Australia on behalf of Apollo. AMSP employs over 60 professionals in Australia and Singapore who do business principally across the APAC region.

We believe that the risk of modern slavery in our workforce is remote. Our workforce consists almost entirely of skilled professional employees. We maintain rigorous hiring practices and we have a high level of transparency with respect to employment practices due to the size of our workforce.

As discussed further below, we also believe that the risk of modern slavery in our vendors is low. Given the nature of our business, we do not sell physical goods for which components or raw materials are sourced.

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## 3. OUR POLICIES

Apollo has adopted a Human Rights Policy which sets forth basic principles regarding Apollo's approach to human rights. Apollo strives to be a company that treats all people with integrity, respect, and fairness, and accordingly, recognises and supports fundamental human rights. While Apollo 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. Apollo is committed to upholding this approach with stakeholders, including business partners, employees, clients, and suppliers.

As set forth in its charter, the Sustainability and Corporate Responsibility Committee (the "**S&CR Committee**") of Apollo's Board of Directors (the "**Board**") is responsible for, amongst other things, monitoring and reviewing significant strategies, initiatives, policies, and programmes related to human rights. The S&CR Committee is responsible for reporting regularly to the Board.

Apollo seeks to conduct business with suppliers that are not engaged in committing human rights violations, including modern slavery and child labour. 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 statement and our Human Rights Policy available on our website. Apollo expects suppliers and their supply chain to, at minimum, comply with applicable laws, rules, and regulations. In addition, Apollo expects suppliers to adhere to the principles and expectations in Apollo's Supplier Code of Conduct, including those related to forced and child labour and employment practices.

Should Apollo have actual knowledge that any of the vendors with whom it has a business relationship is not adequately managing their adverse human rights impact, Apollo will evaluate the remedies available, up to and including the termination of the business relationship.

We have a grievance mechanism, including an anonymous reporting mechanism and a non-retaliation policy, for personnel to report violations of law or our policies. Third parties also may contact us using the contact information on our website. It is important that individuals working for us and our suppliers feel comfortable and supported when reporting suspected legal violations or breaches of our policies. The Apollo Code of Business Conduct and Ethics (and non-retaliation policy contained therein) offers protection to personnel who report suspected wrongdoing. As noted above, we may terminate relationships with individuals and organisations working on our behalf if they breach policies with respect to modern slavery.

In addition, our approach to investing underscores our commitment to good corporate citizenship. As part of our investment process, we may seek to engage in accordance with our Sustainable Investing Policy with applicable investments of Apollo-managed funds on potentially financially material matters, including but not limited to modern slavery. In addition, companies in which Apollo-managed funds invest are expected to comply with applicable laws and regulations, including those relating to modern slavery. This Statement does not discuss the compliance activities of those companies.

At the country-level, in the UK and Australia, we have employee and worker handbooks that summarise Apollo and local jurisdiction policies and procedures (the "**Handbooks**"). The Handbooks affirm that Apollo has a zero-tolerance policy towards the use of modern slavery in its business. The Handbooks encourage personnel with any suspicion that any improper conduct related to an Apollo entity or its supply chain has occurred or is occurring to notify a manager or report it in accordance with the Apollo Code of Business Conduct and Ethics. Personnel are required to attest that they have read the latest version of the relevant Handbook.

## 4. DUE DILIGENCE, OUR RISK ASSESSMENT AND RISK MITIGATION PROCESSES

To assess the risk of modern slavery in our business and supply chains, we have considered the type of business we undertake and our supply chains, including our employment practices and our procedures for the selection and approval of third-party vendors.

Our key vendors include professional services firms, such as legal, investment banking, accounting and other consulting firms, and providers of research and data analytics, software and information technology services. Given the nature of the services provided, we believe that the risk of modern slavery at these vendors is minimal.

To a lesser extent, we utilise other services such as food, cleaning and car services, and purchase off-the-shelf goods such as technology equipment, stationery, office furniture and certain merchandise branded with the Apollo name or logo. With respect to the services that they provide to us, we believe that the risk of modern slavery at these vendors is low in part due to the geographic location of performance. Given the limited nature of our business relationships with many of these vendors, we do not have the practical ability to assess each of their employment practices or supply chains.

As noted above, Apollo seeks to conduct business with suppliers that are not engaged in committing human rights violations and, while suppliers bear responsibility to define their own standards with regard to human rights, we strive to make them aware of our standards.

We are not aware of any incidents of modern slavery or child labour at our vendors in 2024 or 2025. If cases of non-compliance are uncovered, it is our process to determine the appropriate course of action on a case-by-case basis. In cases where non-compliance cannot be resolved to our satisfaction, we may terminate the arrangement with the vendor.

## 5. MONITORING AND KEY PERFORMANCE INDICATORS

To assess the effectiveness of our actions, we monitor compliance with applicable laws and regulations relating to modern slavery, any issues (should they arise), including through our grievance mechanisms, and, if determined to be appropriate, other key performance indicators. We also periodically review our policies and procedures related to modern slavery.

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## 6. TRAINING

All Apollo personnel are encouraged to bring any questions or concerns pertaining to policies or compliance to designated internal personnel.

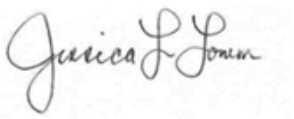
All Apollo UK Personnel are trained on our policies and procedures, including those relating to modern slavery. This training is led by the Compliance department and is provided via an interactive electronic medium, with mandatory reading times and questions to answer. As part of the training, Apollo UK Personnel are reminded that they should not facilitate modern slavery of any kind, they should be vigilant when making agreements or negotiating with suppliers and should report any suspicious or improper conduct in relation to modern slavery. We are working to make modern slavery specific training available to applicable AMSP personnel in the future.

In addition, through internal meetings and formal approval of this Statement and the relevant policies and procedures, we have educated Apollo UK and AMSP personnel about modern slavery risk and our related policies and procedures. We provide copies of this Statement and the policies described herein to, among others, employees, heads of business units, risk, legal, and office services.

## 7. STATEMENT APPROVALS

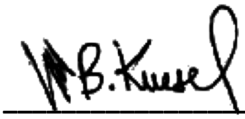
***UK MSA***

Solely for purposes of compliance with the UK MSA, this Statement has been approved by the members of AMI on 23 April 2026, directors of ACMI on 23 June 2026, and members of AAME on 4 June 2026, and signed by the undersigned as an authorised representative of designated members for AMI and AAME and directors of ACMI.



**By:**_____
**Name:** Jessica L. Lomm
**Title:** Vice President
**Date:** 5 May 2026

**APOLLO ASSET MANAGEMENT EUROPE LLP**
By: Apollo International Management Holdings, LLC, its designated member



**By:** _____
**Name:** William B. Kuesel
**Title:** Vice President
**Date:** 5 June 2026

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**APOLLO CREDIT MANAGEMENT INTERNATIONAL LIMITED**

**By:** 
**Name:** Skardon Baker
**Title:** Director
**Date:** 30 June 2026

***Australian MSA***

AMSP chooses to make this statement voluntarily having regard to the requirements of the Australian MSA. Nothing in this statement is intended to, or should be construed to create or give rise to any right, duty, obligation, liability or legitimate expectation under the Australian MSA.

AMSP does not own or control any other entities. The principal risks of modern slavery in AMSP's business and supply chain, and the actions taken by AMSP to assess and address the risks of modern slavery, are the same as those discussed earlier in this Statement.

This Statement was prepared after consultation with AMSP. This Statement was approved by the Board of AMSP on 5 June 2026 and signed by a director thereof.

**APOLLO MANAGEMENT SINGAPORE PTE. LTD.**

**By:** 
**Name:** Agnes Freer
**Title:** Director
**Date:** 30 June 2026