

Apollo UK Modern Slavery Act Statement

1. INTRODUCTION

The UK Modern Slavery Act 2015 (the “**MSA**”) requires large organisations doing business in the United Kingdom that provide goods or services to publish a disclosure statement detailing the steps taken to ensure that “slavery and human trafficking” is not taking place in its business and supply chains. In this document (the “**Statement**”), we use the term “**modern slavery**”, which includes slavery, servitude and forced or compulsory labour and human trafficking, all of which are abuses of a person’s freedoms and rights.

Apollo Global Management, Inc. (“**Apollo**”) carries out business in the United Kingdom through Apollo Management International LLP (“**AMI**”), Apollo Credit Management International Ltd (“**ACMI**”), and Apollo Asset Management Europe LLP (“**AAME**”), along with certain other group entities that are not required to prepare a statement under the MSA (collectively with AMI, ACMI, and AAME, “**Apollo UK**”, “**we**”, or “**our**”).

This Statement is made in accordance with Section 54 of the MSA on behalf of AMI, ACMI and AAME, but all of Apollo UK 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 in line with the principles and goals advocated in the MSA and related guidance. The same policies and procedures, due diligence, risk assessment, monitoring and training pertaining to modern slavery are employed across Apollo UK.

The Statement has been prepared for financial year ended 31 December 2023.

2. OUR STRUCTURE AND BUSINESS

We are an alternative investment management and advisory business. We employ over 300 professionals in the UK who do business across Europe. Apollo UK entities are subsidiaries of Apollo.

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.

3. OUR POLICIES

Global Apollo 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

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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 “**Sustainability Committee**”) of Apollo’s Board of Directors (the “**Board**”) is responsible for monitoring and reviewing significant strategies, initiatives, policies, and programmes related to human rights. The Sustainability 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 forms of 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 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.

Apollo UK policies

We also have a handbook for members of AMI (“**AMI Members**”) and a handbook for employees and workers (“**Apollo UK Personnel**”) of Apollo UK (collectively, the “**Handbooks**”) that summarise policies and procedures established for the benefit of the AMI Members and Apollo UK Personnel, respectively. The Handbooks affirm that Apollo has a zero-tolerance policy towards the use of modern slavery in its business. The Handbooks encourage AMI Members and Apollo UK Personnel with any suspicion that any improper conduct related to any Apollo UK entity or its supply chain has occurred or is occurring to notify a manager or report it in accordance with the Apollo Whistleblowing Policy. AMI Members and Apollo UK Personnel are required to attest that they have read the latest version of the relevant Handbook.

We have a grievance mechanism, including a whistleblowing 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 Whistleblowing Policy offers protection to personnel who report suspected wrongdoing.

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 and Environmental, Social, and Governance Policy with applicable investments of Apollo-managed

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funds on potentially financially material environmental, social, and governance matters, including 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.

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

To assess the risk of modern slavery in our business and our 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.

To help ensure that vendors are aware of our policies and expectations relating to modern slavery, Apollo's Human Rights Policy is available to suppliers on Apollo's website. 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.

We are not aware of any incidents of modern slavery or child labour in our vendors in 2024. If cases of non-compliance are uncovered, we will 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

We will monitor progress of Apollo UK efforts in complying with applicable laws and regulations relating to modern slavery, any issues, should they arise, and, if determined to be appropriate, key performance indicators. In accordance with applicable policies, modern slavery issues will be reported to the designated senior personnel.

6. TRAINING

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

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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. Apollo UK Personnel are encouraged to bring any questions or concerns pertaining to policies or compliance with them to designated internal personnel.

In addition, through internal meetings and formal approval of this Statement and the relevant policies and procedures, we have educated Apollo UK 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, heads of business units, risk, legal, European strategy and office services.

7. STATEMENT APPROVALS

For purposes of the MSA, this Statement has been approved by the AMI Members on 8 January 2025, directors of ACMI on 3 March 2025, and members of AAME on 27 March 2025, and signed by the undersigned as an authorised representative of designated members for AMI and AAME and directors of ACMI.

APOLLO MANAGEMENT INTERNATIONAL LLP



By:

Name: Christopher Dearie

Title: Authorised Signatory

Date: 17 April 2025

APOLLO ASSET MANAGEMENT EUROPE LLP



By:

Name: Christopher Dearie

Title: Authorised Signatory

Date: 17 April 2025

APOLLO CREDIT MANAGEMENT INTERNATIONAL LIMITED



By:

Name: Christopher Dearie

Title: Authorised Signatory

Date: 17 April 2025