

May 1, 2024

APOLLO

APOLLO GLOBAL MANAGEMENT, INC.

# Supplier Code of Conduct

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## Introduction

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*This Supplier Code of Conduct (this “Supplier Code”) sets forth basic principles, guidelines, and expectations for unaffiliated third parties who are engaged by Apollo Global Management, Inc. or its subsidiaries (together, “AGM”, “Apollo”, or the “Company”) to provide goods and/or services (each a “Supplier” and, collectively, the “Suppliers”). AGM expects its Suppliers to share the Company’s commitment to integrity. It is the responsibility of the Supplier to know the requirements of this Supplier Code and to operate in accordance with its principles in addition to any contractual commitments to AGM. Supplier personnel (e.g., employees, agents, affiliates and subcontractors) involved in providing goods and/or services to or on behalf of the Company should also adhere to the principles set forth in this Supplier Code. Additionally, AGM may request a Supplier to certify compliance with this Supplier Code. Should any business relationships violate this Supplier Code, AGM may evaluate the remedies available, including the termination of the business relationship.*

*This Supplier Code is intended to be in addition to any applicable requirements set forth in AGM’s [Code of Business Conduct and Ethics](#).*

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## Compliance with Laws, Rules, and Regulations

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Suppliers are expected to be in compliance with applicable laws and regulations in all jurisdictions in which they operate, and in which services are performed. Suppliers shall conduct business activities in compliance with any applicable Company policies published or provided, and any applicable policies of the Company’s subsidiaries. AGM also expects Suppliers to abide by all international trade laws and regulations, including antitrust and trade controls, and maintain an appropriate system of records to manage the same.

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## Workplace Behavior and Employment Practices

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AGM is committed to promoting a safe, secure, and healthy workplace and working environment, free from violence, threats, and harassment. Suppliers shall not discriminate against an employee, volunteer, or participant of the Supplier on the basis of any protected characteristic under applicable law.

### Equal Opportunity, Diversity, and Inclusion

AGM is committed to equal opportunity, diversity and inclusion in the workplace. We believe diversity of thought, background, experience and people drive innovation while supporting our growth objectives and producing superior results. We believe a diverse and inclusive Supplier base expands the breadth of our supplier talent, reinforces our commitment to the communities where we live and work, and enhances our brand. AGM encourages Suppliers to integrate equivalent principles on Supplier diversity in their operations, as applicable and appropriate.

## Health and Safety

Suppliers are expected to provide appropriate controls, safe work procedures, and protective measures to mitigate health and safety risks in the workplace that meet or exceed applicable laws and local regulations regarding occupational safety and health.

## Forced and Child Labor

Suppliers shall not use forced or involuntary labor, whether in the form of prison labor, indentured labor, bonded labor, or labor acquired through slavery or human trafficking.

The ability of workers to move freely shall not be restricted by Suppliers through abuse, threats, and practices such as retention of passports or valuable possessions in an unlawful manner and without consent.

All Suppliers are expected to comply with applicable local child labor laws and employ only workers who meet the applicable minimum legal age requirements.

Suppliers shall not work with other entities or engage Suppliers that employ child or forced labor.

The Company's [Human Rights Policy](#) includes a section applicable to the Company's suppliers, which sets forth the Company's expectations as they relate to human rights.[Wage and Benefits](#)

Suppliers are expected to pay workers at least the minimum compensation required by local law and provide all legally mandated benefits.

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## Financial Integrity

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### Fraud Prevention

Suppliers must not initiate, participate, or assist in fraudulent or dishonest activities. Such activities include but are not limited to: theft, embezzlement or misappropriation of Company funds or property, or the property or funds of others; falsification, misuse, or unauthorized removal of Company records, property or assets, or the records, property or assets of others; or false representation or concealment of information. Any known or suspected fraudulent activity directly or indirectly relating to a Supplier's relationship with the Company must be reported immediately.

### Anti-Bribery, Anti-Corruption, Anti-Money Laundering and International Sanctions

The Company expects Suppliers to comply with, and adopt policies with respect to, applicable anti-bribery, anti-corruption, and anti-money laundering laws and regulations. Suppliers must not do business with sanctioned persons, entities, or countries.

### Intellectual Property

Suppliers are expected to respect intellectual property rights and conduct technology and knowledge transfers in a manner protecting intellectual property rights and in accordance with applicable law governing such transfers.

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## Confidentiality and Data Privacy

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AGM expects Suppliers to be committed to maintaining the privacy and confidentiality of proprietary and confidential information with which they are entrusted by exercising appropriate care at all times, including developing and enforcing policies and procedures to protect such information while maintaining physical, technical, and/or procedural safeguards in compliance with all applicable data security and cyber security laws. Confidential, proprietary or personal information obtained through a Supplier relationship with the Company must not be misappropriated or used for personal advantage or for the benefit of third parties.

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## Stewardship

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### Sustainability

AGM strives to incorporate sustainable practices in its operations that help protect the environment for future generations. In addition to complying with all relevant environmental laws and regulations, Suppliers are encouraged to conduct their operations in a manner that protects the environment. AGM also encourages Suppliers to undertake efforts to reduce or mitigate environmental harm with focus on waste management, recycling, and reduction of energy use, greenhouse gas emissions, waste, water use, in addition to proper disposal of hazardous materials. AGM also encourages Suppliers to implement certified environmental management systems (*e.g.*, ISO 14001, EMAS).

### Philanthropy

AGM actively engages in the communities in which we operate. We encourage Suppliers to support philanthropic and charitable endeavors in their own communities.

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## Use of Our Name

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Our brand includes the Apollo and Athene Holding Ltd. names. The names, along with their associated logos, are our valuable intellectual property and cannot be used for promotions, endorsements, or any other purpose without express prior written permission. All publicity and disclosures to third parties regarding Apollo or Athene requires prior written consent unless otherwise agreed.

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## Questions or Concerns

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We ask that you direct any questions regarding this policy to: [vendormanagement@apollo.com](mailto:vendormanagement@apollo.com).

AGM is committed to promoting ethical conduct, a commitment to compliance with the law, and due diligence to prevent and detect criminal conduct. AGM encourages its Suppliers to promptly report any circumstance that they believe in good faith may constitute a violation of policies, laws, rules, or regulations applicable to the Company. Suppliers may also report or discuss any other concerns they may have with respect to business operations.

### How to Report Concerns

Concerns can be reported by contacting someone with whom a Supplier is working, Apollo Vendor Management ([vendormanagement@apollo.com](mailto:vendormanagement@apollo.com)), or Apollo Compliance ([compliance@apollo.com](mailto:compliance@apollo.com)). If Suppliers have a concern about financial reporting, accounting, internal account controls, or audit matters, they may also submit a concern to the chair of the Audit Committee of the Board of Directors of AGM by sending a letter addressed to:

Apollo Global Management, Inc.  
Attn: Chair, Audit Committee of the Board of Directors  
9 West 57th Street  
New York, NY 10019

You can also make a report directly to the Chairperson of the Athene Audit Committee at [AuditCommittee@athene.bm](mailto:AuditCommittee@athene.bm).

### Reporting Generally

Reports may be made anonymously. If a Supplier wishes to report anonymously, we ask that the reporting person not provide their name or other identifying information when submitting their concern. However, please understand that if a Supplier chooses to remain anonymous and does not provide a means of contact, we may be unable to obtain the additional information needed to investigate or address the concern(s).

Reports will be investigated with discretion and reporters will be protected from retaliation.

Nothing in this Supplier Code prohibits any Supplier from reporting possible violations of federal law or regulation to any governmental agency or entity, including but not limited to the U.S. Department of Justice, the U.S. Securities and Exchange Commission, the U.S. Congress, and any agency, Inspector General, or making other disclosures that are protected under the whistleblower provisions of federal law or regulation. Suppliers do not need the prior authorization of Legal and Compliance to make any such reports or disclosures and are not required to notify the Company that such reports or disclosures have been made.

## Additional Athene Methods for Reporting and Raising Concerns

In addition to the reporting methods described above, reports can be made through any of the following Athene channels:

- Athene Compliance at [compliance@athene.bm](mailto:compliance@athene.bm); or
- Athene Human Resources at [HR@athene.bm](mailto:HR@athene.bm).
- Athene Legal at:
  - Bermuda based entities: [legalbda@athene.bm](mailto:legalbda@athene.bm); or
  - Non-Bermuda based entities: [legalreporting@athene.com](mailto:legalreporting@athene.com).

### **Any concern may be reported anonymously through Athene’s SafeCall:**

- Phone: Athene SafeCall at 855.339.2821;
- Email: Athene SafeCall at [AtheneSafeCall@GetInTouch.com](mailto:AtheneSafeCall@GetInTouch.com); or
- Web: Athene SafeCall at [www.intouchwebsite.com/AtheneSafeCall](http://www.intouchwebsite.com/AtheneSafeCall).

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## Policy Governance

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The Sustainability and Corporate Responsibility Committee of the Board of Directors of AGM 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**