



## The Apollo Group Supplier Code of Conduct

### Introduction

The Apollo Group and its subsidiaries (collectively, “Apollo”) are committed to maintaining high ethical standards, responsible environmental practices, and social responsibility. As our valued suppliers, contractors, and business partners (“Suppliers”), we expect you to uphold the same values in your business practices. This Supplier Code of Conduct (the “Code”) sets forth Apollo’s expectations and requirements for its Suppliers regarding ethics, environmental sustainability, labor practices, and governance. Compliance with this Code is mandatory, and failure to adhere may result in termination of the supplier relationship.

### 1. Legal, Regulatory Compliance, and Governance

- **Anti-Corruption and Bribery:** Suppliers must comply with all anti-bribery laws, including the U.S. Foreign Corrupt Practices Act, the UK Bribery Act, and any applicable local laws. Any form of bribery, extortion, or corruption is strictly prohibited, including offering or receiving any improper payments or gifts to influence business decisions.
- **Conflicts of Interest:** Suppliers must avoid any situations where personal interests conflict with Apollo’s business interests. Suppliers are required to disclose any actual or potential conflicts of interest to Apollo.
- **Accurate Business Records:** Suppliers shall maintain accurate and transparent records of all business activities. Misrepresentation or falsification of records is strictly prohibited.
- **Confidentiality:** Suppliers must protect Apollo’s confidential information, including trade secrets, and shall not disclose such information without prior authorization.

### 2. Social Responsibility

- **Human Rights and Fair Labor:** Suppliers must adhere to local and international labor laws, including prohibiting child labor, forced labor, and human trafficking. Suppliers shall ensure that their workers are treated with dignity and respect.
  - **No Child Labor:** Suppliers must comply with the minimum legal working age requirements and refrain from employing minors.

- **No Forced Labor:** The use of involuntary, bonded, or indentured labor is prohibited.
- **Equal Opportunity:** Suppliers shall not discriminate based on race, gender, religion, age, disability, or any other protected status.
- **Freedom of Association:** Suppliers must respect workers' rights to form and join unions or engage in collective bargaining as permitted by local laws.
- **Health and Safety:** Suppliers must provide a safe and healthy working environment for their employees. This includes adhering to occupational health and safety regulations, reducing workplace hazards, and ensuring access to necessary protective equipment.

### 3. Environmental Sustainability

Apollo is committed to sustainable business practices, and we expect our suppliers to share this commitment. Suppliers are required to:

- **Environmental Compliance:** Comply with all applicable environmental laws and regulations, including obtaining necessary permits and adhering to environmental standards.
- **Environmental Management Systems:** Implement systems to monitor and minimize environmental impacts, including pollution prevention, waste reduction, and efficient use of natural resources.
- **Climate and Emissions:** Suppliers must work to reduce greenhouse gas emissions, energy consumption, and overall environmental footprint. Apollo encourages suppliers to set measurable goals for emissions reductions.
- **Waste and Water Management:** Suppliers must implement sustainable practices for waste management, water conservation, and responsible disposal of hazardous materials.
- **Sustainable Sourcing:** Apollo expects suppliers to prioritize environmentally responsible sourcing of materials, including promoting biodiversity, preventing deforestation, and using renewable resources.
- **Plastics and Packaging:** Suppliers should strive to reduce single-use plastics and excessive packaging, opting for recyclable or compostable materials where feasible.

### 4. Governance and Compliance

- **Training and Awareness:** Suppliers must ensure that their employees are trained on the principles of this Code, including ethical behavior, human rights, and environmental responsibility.
- **Monitoring and Audits:** Apollo reserves the right to conduct audits of its Suppliers' operations to ensure compliance with this Code. Suppliers must provide reasonable access to their facilities, records, and staff during audits.

- **Reporting:** Suppliers shall report any known or suspected violations of this Code to Apollo. Apollo will maintain a reporting mechanism where such reports can be submitted anonymously and confidentially.

## **5. Reporting Violations**

Suppliers and their employees are encouraged to report any violations of this Code or unethical conduct to their Apollo point of contact. Apollo guarantees confidentiality and protection against retaliation for those who report in good faith.

## **Acknowledgment and Agreement**

By signing this document, Suppliers acknowledge and agree to comply with this Supplier Code of Conduct.

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**Supplier Signature & Title**