



MODERN SLAVERY
FACT SHEET 2023

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ACKNOWLEDGEMENT OF COUNTRY

At APA, we acknowledge the Traditional Owners and Custodians of the lands on which we live and work throughout Australia. We acknowledge their connections to land, sea and community.

We pay our respects to their Elders past and present and commit to ensuring APA operates in a fair and ethical manner that respects First Nations peoples' rights and interests.

Cover image: Emu Downs wind farm

APA Group is a leading Australian energy infrastructure business, owning, operating and managing a diverse \$22 billion portfolio. We are proud of the role we play in delivering energy solutions to millions of customers in every State and Territory.

Our strategic ambition is to be the partner of choice in delivering infrastructure solutions for Australia's energy transition. Our approach is customer driven as we look to support the decarbonisation ambitions of our priority customer groups – including governments, resource companies, energy supply and wholesale customers, and large commercial and industrial customers. Through this approach to market we see immense opportunities across our four priority asset classes of contracted renewables and firming, electricity transmission, gas transportation and future energy.

Our work to manage modern slavery risks supports our purpose and strategy and we continued to enhance our actions in this area over FY23. While we have made important progress, we recognise the need to maintain our focus on continuous improvement, including to manage potential modern slavery risks associated with the energy transition.

This Fact Sheet details the processes and controls we have in place to manage the risk of modern slavery to APA's operations and supply chain. It has been designed to address the modern slavery questions you may have as an existing, or prospective, customer, supplier, or investor.

All information provided as at 30 June 2023. An update to this Fact Sheet will be published in December 2024.

For more details, please contact the [APA Modern Slavery Team](#)

APA Group Details

Organisation legal name	APA Group Limited
Organisation Registering ID (ABN)	99 091 344 704
Country of Registration	Australia
Head Office Address	Level 25, 580 George Street, Sydney, NSW 2000
Contact Details	APAModernSlaveryTeam@apa.com.au

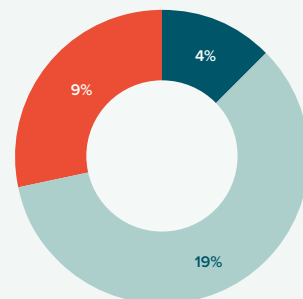
APA's national site numbers



*3 full-time employees were based in the Texas (USA) office during FY23, the office was closed in early FY24.

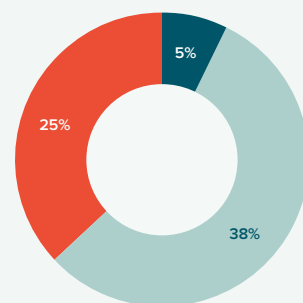
Employment Category	Male	Female	Grand Total
Full-time permanent	1490	601	2,091
Part-time permanent	9	74	83
Full-time fixed term	111	60	171
Part-time fixed term	5	11	16
Casual	25	21	46
Grand Total	1,640	767	2,407

FY23 AGE DIVERSITY — FEMALE



- Female Under 30 years
- Female 30-49 years
- Female 50+ years

FY23 AGE DIVERSITY — MALE



- Male Under 30 years
- Male 30-49 years
- Male 50+ years



Policies & Procedures

Our group wide policy framework sets the foundation for our approach to managing modern slavery risks in our operations and supply chain. Key policies governing ethics and integrity at APA include:

Policy	Relevance to Modern Slavery	How this policy continued to be implemented at APA during the reporting period
Code of Conduct (Our Code)	<p>Our Code of Conduct serves as a roadmap to help ensure that we all work together and operate ethically, with integrity and in a compliant way.</p> <p>The purpose of our Code of Conduct is to embed a common understanding of our commitments, what APA stands for and what type of behaviour is expected at APA.</p> <p>Our Code focuses on our 19 commitments, our behaviours and our people. These commitments outline APA's principles and standards which we expect employees, officers, suppliers and contractors to demonstrate at all times.</p> <p>Our commitments include, but is not limited to, respecting human rights, preventing bullying and harassment and procuring our goods and service ethically and responsibly.</p>	<p>Our Code is available to all our suppliers on the APA website and is referred to in our precedent works and contractor agreements, in our purchase order terms and conditions, and our new supplier request form.</p> <p>Our Code makes it clear that we expect our suppliers, contractors, and business partners to uphold the principles and standards of our Code. Our Code applies whenever we represent APA, including when we are outside of our normal workplace or working hours.</p> <p>Suppliers have an obligation under this Code to advise APA of any illegal or unethical practices of which they become aware, which would include modern slavery.</p> <p>Consequences of non-compliance with the Code can include termination of contract and new contracts not awarded.</p>
Inclusion & Diversity Policy	<p>The current policy sets out our principles for an inclusive and diverse workplace, including guidelines on acceptable behaviour and anti-discrimination practices.</p> <p>Member of the Diversity Council Australia (DCA).</p>	<p>Fair treatment awareness training is mandatory for all APA employees, and an inclusive leadership course is available for people leaders.</p> <p>The Inclusion and Diversity Policy applies to all APA workplaces, employees, contractors, consultants, visitors and other workplace participants.</p> <p>The Policy extends to conduct in any work-related context, including outside of normal working hours.</p> <p>In FY23 the Inclusion & Diversity Policy was refreshed and is available on the APA website.</p>
Respect@Work Procedure	<p>APA is committed to providing and fostering an inclusive and respectful workplace with safe, fair and positive working conditions.</p> <p>We do not tolerate any form of harmful behaviour including unlawful discrimination, bullying, harassment, sexual harassment, sex-based harassment, vilification, victimisation and other inappropriate behaviour.</p>	<p>In FY23 APA launched our Respect@Work procedure. This aligns with the Inclusion & Diversity Policy and the Code of Conduct.</p> <p>This procedure encourages all APA workers (including but not limited to employees, contractors and sub-contractors) to speak up if they witness harmful behaviours including unlawful discrimination, bullying, harassment, sexual harassment, sex based harassment, vilification and victimisation.</p>
Anti-Bribery and Corruption Policy	<p>Our commitment to fostering business integrity including detecting and preventing bribery, corruption and fraud, which we recognise can facilitate modern slavery.</p> <p>Our Anti-Bribery and Corruption Policy prohibits bribery and corruption in any form.</p>	<p>Training is provided annually to senior leadership and managers of employees.</p> <p>APA recorded zero confirmed incidents of fraud, bribery, or corruption in FY23.</p>

Policy	Relevance to Modern Slavery	How this policy continued to be implemented at APA during the reporting period
Health, Safety, Environment and Heritage Policy	The Policy sets out our commitment to provide workplaces free of injury and support the good health, wellbeing, respect and inclusion of our employees, contractors and visitors. APA is committed to managing and minimising our impact on the environment and heritage. We foster a culture of responsibility, leadership and awareness of our environment and heritage obligations and practices.	The Policy is implemented through our Health, Safety, Environment and Heritage Management (HSEH) system Safeguard which identifies and establishes controls to meet the objectives of the policy.
Risk Management policy	Our Risk Management Policy sets out APA's overall risk management principles and approach to risk management and approach aligns with the principles in the international risk standard ISO 31000:2018.	The Policy informs our Risk Management Approach to modern slavery. Consideration of the risk across countries, suppliers and product /service categories, recognising social performance and specific international social impact risk data, to drive supplier reviews and interventions. These reviews consider the control environment supporting key risk areas for suppliers including legal requirements, confidence in assurance provided, independent third-party reviews together with brand and reputation impacts of transacting with the supplier.
Compliance Policy	The Compliance Policy supports the effective management of compliance obligations and incorporation of compliance into the broader Enterprise Risk Management Framework. The Compliance Policy aligns with the principles and requirements in the international good practice standard for compliance (ISO 19600:2016 – Compliance Management Systems), sets out compliance management objectives and clarifies responsibilities for compliance within APA.	The Compliance Management System (CMS) ensures APA complies with the applicable legal, regulatory, standards, codes and licence requirements, including the <i>Modern Slavery Act 2018</i> (Cth). The CMS also ensures processes are established for identification of regulatory change to provide for timely change implementation activities. APA has adopted a risk-based approach to managing the risks of modern slavery in our operations and supply chains and is supported by a model of continuous improvement.
Whistleblower Policy	The Whistleblower Policy (Policy) is one of a number of policies and codes implemented to foster a culture of compliance and responsible, ethical decision making within APA Group (APA). The Whistleblower Policy provides for disclosures regarding modern slavery practices occurring in APA's supply chain.	Our Whistleblower Policy is available on the APA website. Whistleblower reports or disclosures made are investigated by the Disclosure Officer, and where substantiated, process or control improvements implemented.
Procurement Policy	The Procurement Policy and associated performance requirements and procedures reflect our approach to identifying and mitigating modern slavery risk and to align with our Code of Conduct.	The Procurement Policy and associated Procurement Standard and Modern Slavery Response Plan Procedure are available for all employees via our intranet. The approach to identifying and managing modern slavery risk is embedded within the Policy and associated documents, with role specific training tailored towards educating employees to identify red flags, and all of business communications designed to raise awareness of modern slavery.

Controls

Category	Details
Responsible Procurement Strategy	<p>In FY23, APA launched its first Responsible Procurement Strategy. The Strategy supports the execution of APA's Sustainable Development Investment Program by aligning to the four enterprise-level priority investment areas.</p> <p>Management of modern slavery risk is a key consideration in all initiatives to ensure a responsible approach to procurement, and as such the targeted area of action to monitor and assess sustainability risks, including modern slavery, underpins all four pillars of the Responsible Procurement Strategy.</p>
Governance Framework	<p>APA's governance framework helps to ensure material risks and opportunities, including risks relating to modern slavery, are escalated through our executive leadership team to the Board with the support of the Executive Risk Management Committee, and the Risk Management Committee.</p> <p>Our cross functional Modern Slavery Working Group is made up of representatives from Responsible Procurement, Risk and Compliance, Procurement, Sustainability and Community, and Legal.</p> <p>The Working Group meets regularly to drive the continuous improvement in our approach to managing modern slavery risk. The Working Group reports annually to the Executive Risk Management Committee and the Risk Management Committee on the progress of the planned activities from the roadmap, the progress of risk assessments, and the modern slavery risks identified through those assessments.</p>
Training & Communication	<p>Modern slavery training is prioritised for employees to help ensure they are equipped to identify and respond appropriately to any concerns and manage key risks. This approach will be further refined in FY24 by delivering a modern slavery training session to the APA Executive Leadership Team and Board.</p> <p>Face to face training is rolled out to those employees who deal directly with suppliers and/or contractors.</p> <p>The targeted training program is complemented by a broader initiative to raise awareness of modern slavery across APA. Throughout the year we published modern slavery awareness communications to all employees via our internal news and social networking sites.</p>
Supplier Selection and Onboarding	<p>Modern slavery checks are part of our supplier onboarding and risk assessment. During FY23 650 new suppliers were onboarded using the APA supplier onboarding process, which requires suppliers to declare their commitment to respect workers' fundamental human rights before they are added to our systems. This commitment includes:</p> <ul style="list-style-type: none"> • providing a safe working environment (and appropriate accommodation facilities if being provided), • paying a fair wage in accordance with all relevant State and Commonwealth laws and regulations, • equal treatment without distinction based on gender, race, age, religion, • freedom from forced labour, including access to employee documentation and passports (if internationally sourced labour), and • freedom to join a union or other similar collective bargaining arrangement. <p>For all procurement-managed spend >\$200k a precedent agreement is considered, in accordance with APA's Procurement Policy. The precedent agreement includes modern slavery clauses and obligations that were added in FY21. These template clauses support our Risk Management Approach, ongoing due diligence, and our Modern Slavery Response Plan. This includes any necessary investigation process in circumstances where risk is identified, and/or incidents are reported.</p>
Supplier Risk Management	<p>Suppliers are screened for indications of modern slavery against risk factors such as geographic location, industry sector and product or service category. Lessons learned from due diligence completed in previous periods identified the opportunity to uplift our approach from being reactive, in only assessing suppliers' post-engagement, to a proactive process whereby suppliers are screened prior to being onboarded. This further supports uplifting capability to inform the forward-looking due diligence process and supplier management actions required. The refreshed risk management approach will be in operation from FY24.</p>
Grievance Mechanisms	<p>A Whistleblower Line is maintained through an externally managed disclosure service as an independent, impartial and confidential means of reporting potential incidents, including any concerns related to modern slavery or broader labour rights issues. The Whistleblower mechanism is available to employees, contractors and other stakeholders, including suppliers and their workers. Information about the Whistleblower mechanism is included in our modern slavery training. Communication of grievance mechanisms should be tailored and accessible for potentially impacted stakeholder groups. For example, for office-based employees our Whistleblower Policy features prominently in onboarding training and on notice boards. We consider there is an opportunity to promote our grievance mechanisms externally to our suppliers. An initiative on the FY24 roadmap includes reviewing accessibility of the grievance mechanisms for potential improvement.</p>

Category	Details
CIPS Corporate Ethics Mark	<p>The Chartered Institute of Procurement and Supply (CIPS) Corporate Code of Ethics was developed as part of its commitment to reinforcing global ethical values across all procurement and supply practices.</p> <p>By adopting the voluntary code, APA commits to:</p> <ul style="list-style-type: none"> ensuring consistent understanding of business ethics across the organisation at all levels, continually enhance knowledge of all relevant laws and regulations in the countries in which the organisation operates, either directly or indirectly, eradicating unethical business practices including bribery, fraud, corruption and human rights abuses, such as modern slavery and child labour. <p>During FY23 APA employees with responsibility for sourcing, supplier selection and supplier management successfully completed the CIPS Ethical Procurement and Supply Test, enabling APA Group to achieve the Corporate Ethics Mark.</p> <p>Completion of the CIPS Ethics Test will be an annual requirement for all employees responsible for sourcing, supplier selection and supplier management activities. By undertaking annual training, along with signing the CIPS Statement of Commitment, the public commitment reinforces APA's focus on ethical sourcing and engagement with suppliers.</p>
Risk Management Framework	<p>APA's risk management framework complies with ISO31000:2018 and informs our risk management approach to modern slavery.</p> <p>We are committed to meeting our obligations of the <i>Australian Modern Slavery Act (Cth) 2018</i>, doing what is right, and continuing to mature our approach over time. Refer to our most recent Modern Slavery Statement FY23.</p>
Risk Management Approach	<p>APA's modern slavery risk management approach was uplifted in FY23 with the introduction of a technology solution which provides APA with the capability to assess modern slavery and broader ESG risk in our supply chain for all centrally managed suppliers.</p> <p>APA's risk management approach comprises four stages:</p> <p>Stage 1: initial screening / supply chain mapping - the technology solution is used to trace the economic inputs required to produce products and services sourced from Tier 1 up to Tier 10 suppliers. This supply chain mapping is performed by linking supply chain data from 190 countries and over 15,000 industry sectors.</p> <p>Results from the initial screening are assessed by our Modern Slavery Team and high risk suppliers are requested to complete a self-assessment questionnaire.</p> <p>Stage 2: self-assessment questionnaires (SAQ) – the SAQs assess the level of modern slavery risk in the supply chain and the maturity of supplier's modern slavery risk management responses.</p> <p>Stage 3: deep dives – conducted for suppliers who remain as high risk of modern slavery following the SAQ process. The purpose of the deep dive is to provide further insight into the modern slavery risk exposure of selected suppliers.</p> <p>Suppliers that remain high risk will be managed via our Modern Slavery Supplier Response Procedure.</p> <p>Stage 4: supplier performance management – supplier performance management is required for existing and future suppliers where the need for further due diligence has been identified. This stage will commence with direct supplier engagement. The supplier will be provided with relevant information detailing the risk and given the opportunity to respond.</p> <p>Any remaining concerns will be addressed through agreed remediation actions and timing for review and discussion. This process may also be supported by third-party social audits, particularly where deeper supply chain visibility is required.</p>
Modern Slavery Supplier Response Procedure	<p>The Modern Slavery Response Procedure outlines the process for investigating and remediating a potential or actual modern slavery incident. The procedure consists of four key steps; identify, review, investigate, and remediate. It includes a clear commitment to taking a victim-first approach to remediation.</p> <p>APA's Incident Response Team, comprised of key members of the Modern Slavery Working Group, is responsible for the development of an appropriate remediation action plan. The Incident Response Team will determine if APA has caused, contributed to, or is directly linked to the incident in line with the UN Guiding Principles (UNGPs) on Business and Human Rights. External expert business and human rights advice will be sought to inform the assessment. The Modern Slavery Response Procedure has been made available for all employees to access via our intranet. Plans to further embed and operationalise the procedure is on the roadmap for FY24.</p>

