



February 16, 2024

APA Anti-Bribery & Corruption Policy



1. Purpose

This Anti-Bribery and Corruption 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**).

2. Scope

This Policy applies to all APA employees, directors, contractors, consultants, suppliers and other third parties acting on our behalf across the APA Group. For the purpose of this Policy, these are collectively referred to as **APA Personnel**.

This Policy must be read together with the *Anti Bribery and Corruption Standard* and associated process documents.

3. APA Position

APA prohibits bribery and corruption in any form, whether direct or indirect, or whether public or private. Key principles of this Policy are:

- **Maintaining standards:** APA will maintain anti-bribery and corruption and fraud prevention programs to drive awareness, transparency and a culture of ethical decision making.
- **Gifts and other benefits:** The receipt of gifts and other benefits of a material nature is generally discouraged. The giving and receipt of gifts or other benefits must be appropriate (including infrequent giving or receipt) and subject to relevant approvals and documentation.
- **Third party due diligence:** APA performs due diligence enquiries over third parties before entering supplier agreements. These enquiries and checks are recorded and include anti-bribery and corruption and sanctions and money laundering risks.

4. Objectives

APA is subject to national and international laws prohibiting bribery and corruption. As an ASX listed entity this also includes ASIC and ASX corporate governance principles and requirements.

The objectives of this Policy are to:

- Ensure APA at all times complies with bribery and corruption law and the requirements set out under this Policy are applicable to the jurisdictions in which APA operates.



- Set out the responsibilities of APA and APA Personnel in preventing, detecting, and eliminating bribery and corruption.
- Define unacceptable behaviour in relation to bribery and corruption.

5. Key roles and responsibilities

For the purposes of monitoring and managing risk across APA, the following specific responsibilities apply:

Position	Responsibility
Risk Management Committee (RMC)	<ul style="list-style-type: none">• Approve the Anti-Bribery and Corruption Policy• Oversee the Anti-Bribery and Corruption Programs
Managing Director	<ul style="list-style-type: none">• Encourage a culture of compliance• Action reports of perceived, potential or actual solicited bribes and facilitation payments• Approve cash gifts and benefits in accordance with the policy and standard
Executive Leadership Team (ELT)	<ul style="list-style-type: none">• Approvals to give or receive benefits or gifts in accordance with the policy and standard
Group Risk, Compliance & Insurance	<ul style="list-style-type: none">• Ensure effective programs are in place to manage bribery and corruption risk, ensuring material breaches are reported to the RMC• Ensure APA management (level 4 and above) receive training on bribery and corruption risk• Maintain the gifts and benefits register and the political donations register (via Vigilant)
APA Personnel	<ul style="list-style-type: none">• Comply with this policy and standard• Report any gifts or benefits given or received, and obtaining relevant approvals in accordance with the policy and standard

6. Related Documents

- Code of Conduct
- Conflicts of Interest Policy
- Delegation of Authority document
- Anti-bribery and Corruption Standard
- People & Culture Standard
- Contracts and Commitment Standard
- Compliance Management Policy
- Procurement Policy
- Whistleblower Policy
- Risk Management Policy



7. Version Control

Date	Version	Changes
24/10/2019	Version 1.0	First draft new policy
22/12/2020	Version 2.0	Updated to reflect new group policy template, gifts, sponsorships, and donations
26/07/2023	Version 3.0	Updated to remove references to ARMC and Governance & External Affairs
16/1/2024	Version 4.0	Scheduled periodic review - updated to reflect new reporting structure, approval committee and removal of reference to Sponsorship and Donations, and Political Donations for inclusion in separate policy