



always
powering
ahead

Modern Slavery Statement 2022

apa

Acknowledgement of Country

APA acknowledges the Traditional Custodians of the lands on which it operates throughout Australia and their connections to land, sea and community. We pay our respects to their Elders past and present and we commit to continuing to find meaningful ways to ensure APA operates in a manner that genuinely and consistently reflects that respect.

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References in this statement to “we”, “us”, or “our” is a reference to the APA Group (APA), our subsidiaries and the entities owned and controlled by our Company as outlined on page 34 unless specified otherwise.

All information provided as at 30 June 2022.

About this statement

In line with the UN Guiding Principles on Business and Human Rights (UNGPs), at APA we respect all internationally recognised human rights as set out in the Universal Declaration of Human Rights and the International Labour Organization's Declaration on Fundamental Principles and Rights at Work.

This joint Modern Slavery Statement (statement) has been prepared by APA to meet the requirements of the Australian *Modern Slavery Act 2018* (Cth) for the financial year ending 30 June 2022 (FY22). The reporting entities covered by the statement are identified in Appendix One.

APA is involved in a number of operated and non-operated energy infrastructure investments in addition to managing operations for third parties. APA's operations and supply chain as operator for third parties and the services APA provides to non-controlled investments are included in the scope of this statement. This statement does not cover our non-controlled and non-operated energy infrastructure investments.

This statement has been prepared by our Modern Slavery Team, in conjunction with our Modern Slavery Working Group, with the assistance of external subject matter experts. Information about our approach to consultation with reporting entities and owned or controlled entities to develop this statement is set out on page 33.

This statement was approved in November 2022 by the Board of APA Infrastructure Limited (APAIL), as the principal governing body of the highest entity in the APA Group, for each of the reporting entities listed in Appendix 1. This statement has been signed by Michael Fraser, Chairman, and Adam Watson, Acting CEO.



Michael Fraser
Chairman



Adam Watson
Acting Chief Executive Officer

Feedback

We value and welcome all feedback. If you have any questions or comments relating to this statement, please email apamodernslaveryteam@apa.com.au



Message from Acting CEO

**We are APA:
Always Powering
Ahead.**



ADAM WATSON

The most recent UN estimates suggest there are 50 million victims of modern slavery around the world. This is an increase of 25% since 2016. These figures underscore the importance of businesses, governments and other stakeholders taking action to address modern slavery.

In this context, I am proud to present APA Group's third Modern Slavery Statement, which has been prepared pursuant to the Modern Slavery Act 2018 (Cth), for the financial year ended 30 June 2022.

The statement outlines our modern slavery risk management journey to date, and the actions taken to address potential risks in our operations and supply chain.

During the financial year, we focused on completing due diligence on the high-risk suppliers identified in our FY21 procurement spend. In addition, we engaged with a number of suppliers in known high risk categories to minimise any potential modern slavery risks that may occur. Case studies on our engagement with cleaning service providers and solar panel suppliers can be found on pages 26 and 27.

At APA we consider the impact we have on our supply chain and operations and where we have opportunities to drive positive change.

In doing so we have continued to build and improve on our modern slavery training. During the year we developed and rolled out new face to face training to employees who deal directly with customers and suppliers.

During the reporting period, APA has not been immune from the continuing impacts of COVID-19. We have been affected by labour shortages and supply chain impacts, particularly at our larger project sites. We remain vigilant to the ongoing impacts of the COVID-19 pandemic, and its potential to continue to impact supply chain workers' vulnerability to modern slavery.

Despite the challenges presented by COVID-19, we have continued to safely operate our existing infrastructure assets and reliably deliver services to customers.

Some of the key achievements from FY22 include:

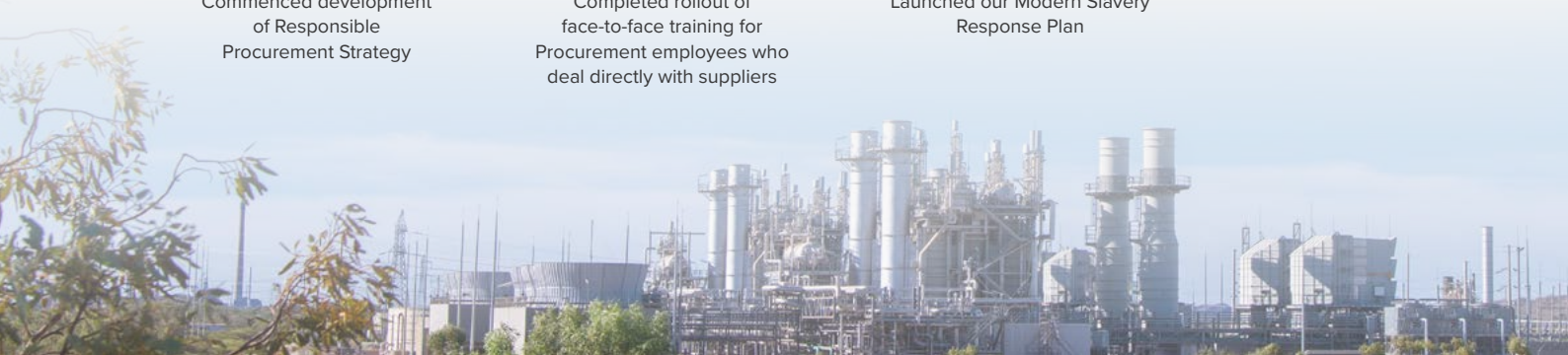
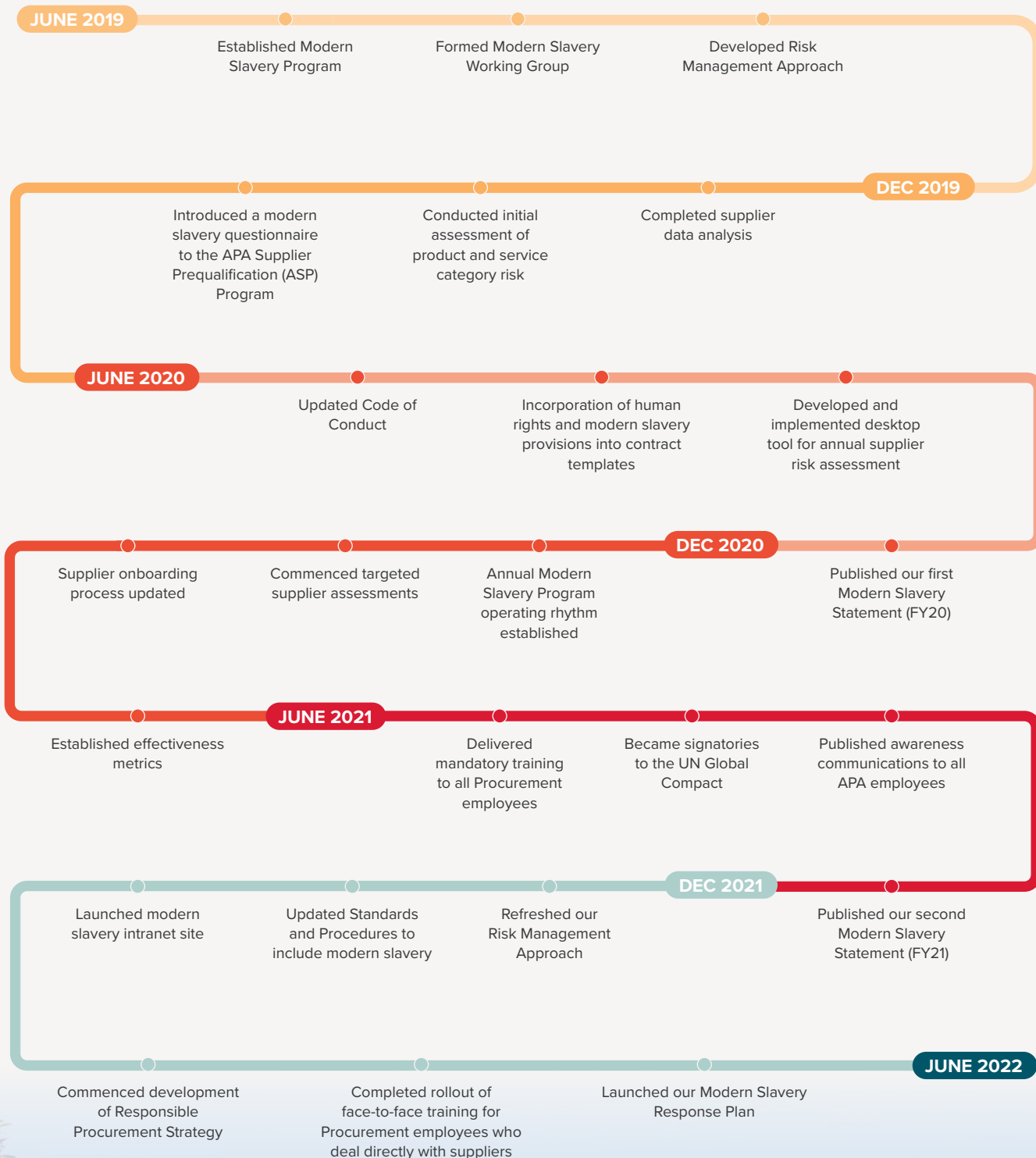
- Commencing our responsible procurement journey,
- Development and launching APA's Modern Slavery Supplier Response Management Plan,
- Maintaining our status as a UN Global Compact signatory, including participating in UN Global Compact Network Australia,
- Completing desktop risk assessments and commencing targeted reviews for high-risk suppliers,
- Delivering modern slavery face to face training to operations staff and employees who deal directly with suppliers,
- Publishing modern slavery awareness materials for all APA employees.

You will find further detail on these and other initiatives underway across the business in this statement.

Adam Watson
Acting Chief Executive Officer

Our modern slavery journey to date

APA's Modern Slavery roadmap continues to mature and evolve over time. We continue to learn from our industry peers, external human rights experts, and third-party benchmarks to build and strengthen our approach. The schematic below highlights key achievements thus far.



About APA

Company details

Company name

APA Group Limited ACN 091 344 704 (the Responsible Entity)

Ownership and legal form

APA Group (APA) comprises two registered managed investment schemes – APA Infrastructure Trust (APA Infra) and APA Investment Trust (APA Invest) – and their controlled entities

Head office

Level 25, 580 George Street, Sydney NSW 2000



\$21bn

ENERGY INFRASTRUCTURE
ASSET PORTFOLIO

APA is a leading Australian Securities Exchange (ASX) listed energy infrastructure business. We own and/or manage and operate a diverse, \$21 billion portfolio of gas, electricity, solar and wind assets.

Consistent with our purpose to strengthen communities through responsible energy, we deliver about half of the nation’s gas use and connect Victoria with South Australia and Tasmania, and New South Wales with Queensland, through investments in electricity transmission assets. We also own and operate renewable power generation assets in Australia, with wind and solar projects across the country.

With Australia and the world focused on decarbonising energy supply systems, APA is well positioned to play a key role in developing and deploying the energy solutions of tomorrow.

Our modern slavery risk will change as APA and the energy market transitions to renewable energy. We will continue to assess and address modern slavery risks during this transition process as part of our commitment to deliver responsible energy.

At APA we are Always Powering Ahead

Purpose

WHY WE EXIST

We strengthen communities through responsible energy.

Vision

WHAT WE ASPIRE TO

To be world class in energy solutions.





APA Values and Behaviours

Our people are the key to our success

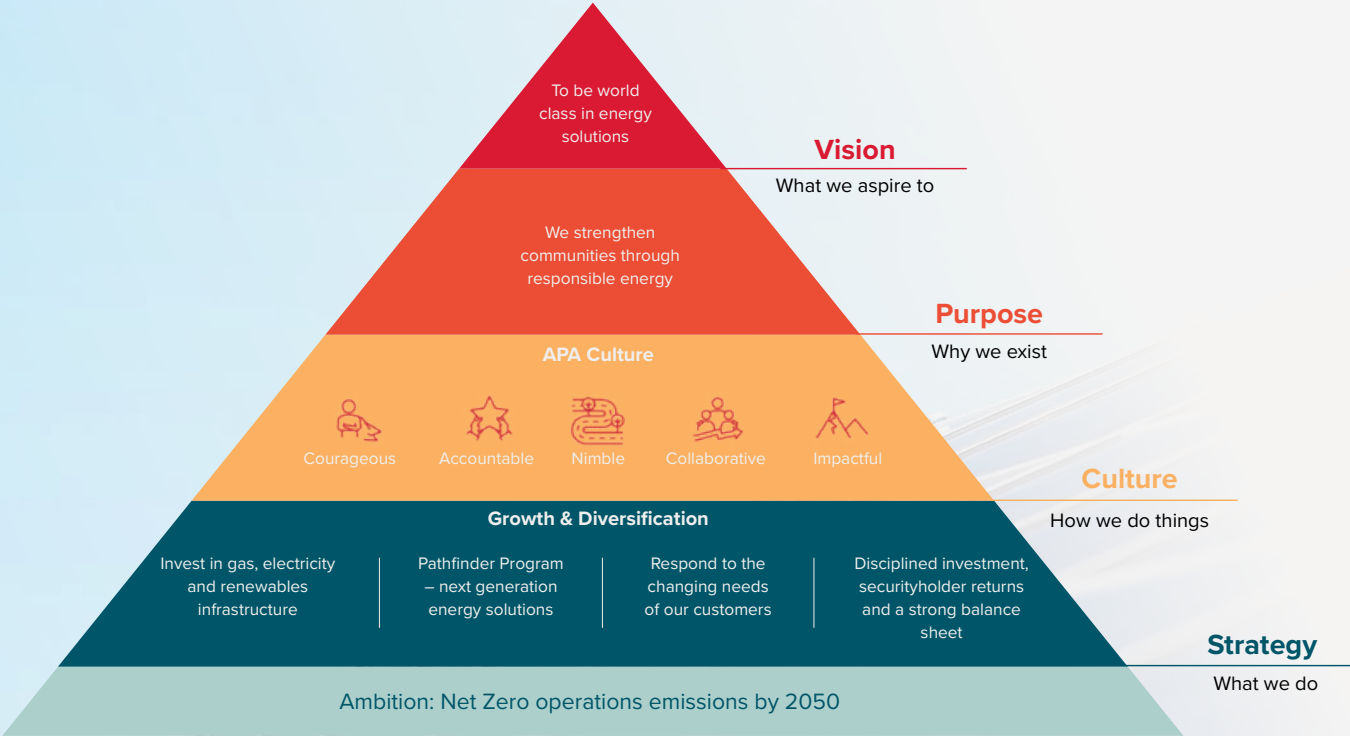


APA's core behaviours set the benchmark for how our people interact with customers, suppliers and each other. They support our strategy and the high-performance culture to which APA aspires. The behaviours guide how APA conducts its business and helps to shape our culture.

The behaviours were refreshed in FY21, and during FY22 we focused on embedding them into our systems, processes, programs and frameworks.



Our Strategy



Addressing modern slavery risks aligns with our values and behaviours.

 <p>Courageous We are honest and transparent; we learn from our mistakes and we challenge the status quo.</p>	 <p>Accountable We spend time on what matters, we do what we say and deliver world class solutions.</p>	 <p>Nimble We are curious, adaptive and future focused.</p>	 <p>Collaborative We are inclusive, work together and respect and listen to our stakeholders.</p>	 <p>Impactful We create positive legacies and work safely, for our customers, communities, our people and the environment.</p>
<p>During FY22 we awarded a material contract to a supplier to produce solar panels for one of our major projects as they were able to provide us with greater supply chain transparency, even though they were more expensive than other competitors (refer to case study on page 27)</p>	<p>By focusing our efforts on identifying high risk areas for APA and seeking to understand the ways other businesses have mapped their supply chains, we can ensure we take appropriate steps to mitigate modern slavery risks, and act to remediate where needed.</p>	<p>We have continued to develop our knowledge of emerging areas of risk, not only through collaborating with industry peers, but by seeking out webinars to attend, research reports, and courses on reporting.</p>	<p>Working with industry peers and third-party service providers to understand the challenges and experiences of supply chain mapping to inform our approach to undertake this important work.</p>	<p>Our Responsible Procurement Strategy drives our approach to socially responsible, sustainable, and ethical procurement.</p> <p>Also, our modern slavery training and awareness communications has embedded an understanding of modern slavery risk across the business.</p>

Our operations and supply chain

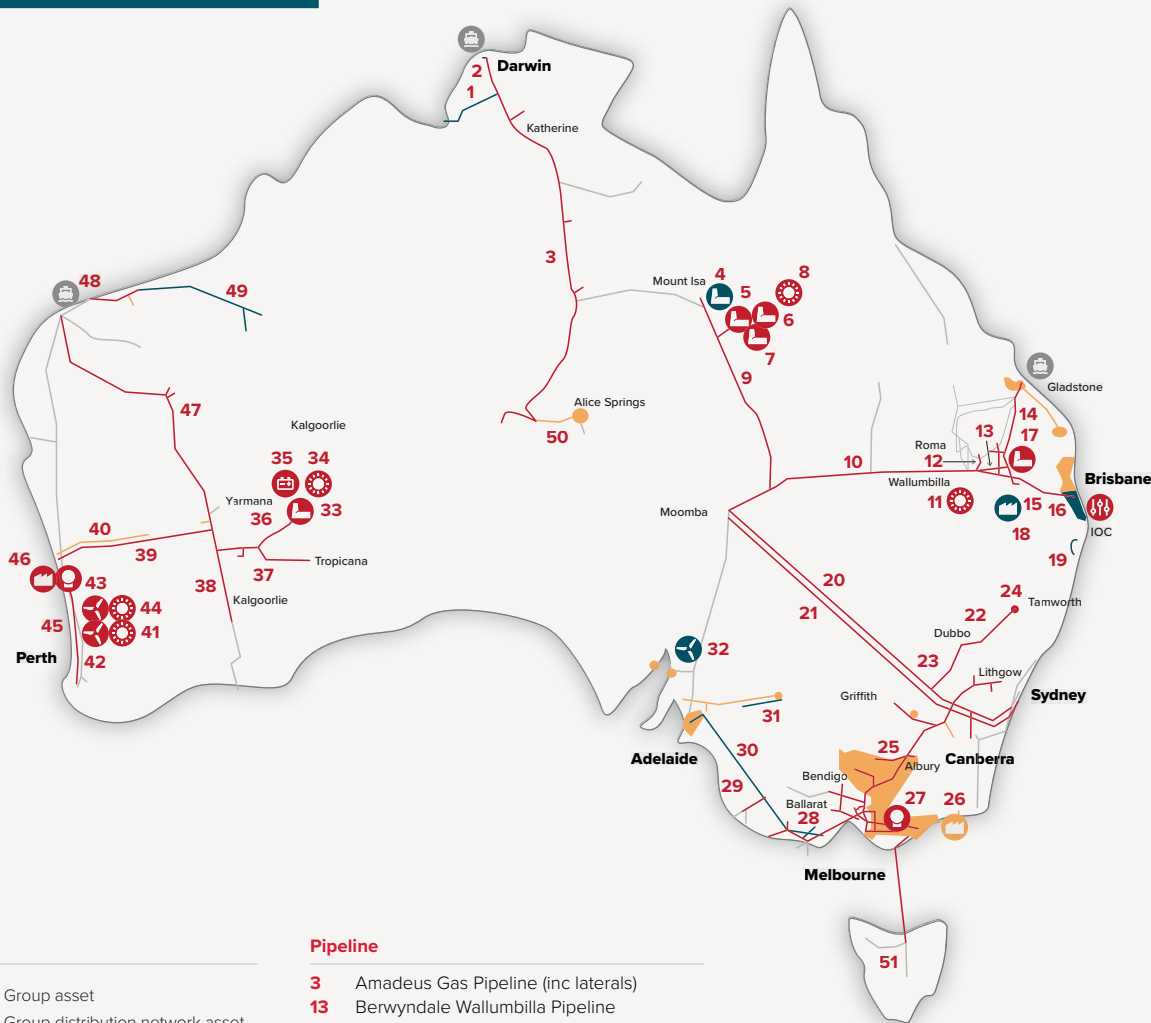
Our operations

In FY22, APA's principal activities continued without significant change from FY21 being:

- **Energy infrastructure** – gas transmission, gas storage and processing, and gas-fired and renewable energy power generation across Australia
- **Asset management** – services for most of APA's energy investments, and for third parties
- **Energy investments** – in unlisted entities.



APA's portfolio of assets and investments



Key

- APA Group asset
- APA Group distribution network asset
- APA Group investment
- Investment distribution network
- APA Group managed asset (not owned)
- Managed distribution network
- Other natural gas pipelines

- ⚙️ Wind farm
- ☀️ Solar farm
- 🏭 LNG plant
- 🔋 Battery storage
- 🏠 Gas storage facility
- 🏭 Gas processing plant
- ⚡ Gas power station
- 👥 Integrated Operations Centre

Pipeline

- 3 Amadeus Gas Pipeline (inc laterals)
- 13 Berwyndale Wallumbilla Pipeline
- 1 Bonaparte Gas Pipeline
- 9 Carpentaria Gas Pipeline
- 22 Central Ranges Pipelines
- 23 Central West Pipeline
- 37 Eastern Goldfields Pipeline
- 47 Goldfields Gas Pipeline
- 38 Kalgoorlie Kambalda Pipeline
- 40 Mid West Pipeline
- 20 Moomba Sydney Pipeline
- 21 Moomba to Sydney Ethane Pipeline
- 28 Mortlake Gas Pipeline
- 39 Northern Goldfields Interconnect¹
- 45 Parmelia Gas Pipeline
- 48 Pilbara Pipeline System
- 12 Reedy Creek Wallumbilla Pipeline
- 15 Roma Brisbane Pipeline (inc Peat lateral)
- 30 SEA Gas Pipeline
- 29 SESA Pipeline
- 10 South West Queensland Pipeline
- 49 Telfer/Nifty Gas Pipelines and lateral
- 25 Victorian Transmission System
- 14 Wallumbilla Gladstone Pipeline (inc laterals)
- 2 Wickham Point Pipeline
- 36 Yamarna Gas Pipeline

Gas processing and storage

- 27 🏭 Dandenong (680TJ / 12000t)
- 35 🏭 Gruyere Battery Station (4.4 MW/MWh)
- 18 🏭 Kogan North (12TJ/d)
- 46 🏭 Mondarra (18PJ)
- 26 🏭 Orbost (55.9TJ/d)²

Gas Distribution

- 16 Allgas Gas Network
- 50 Australian Gas Networks
- 24 Tamworth Gas Network

Electricity transmission

- 51 Basslink
- 19 Directlink
- 31 Murraylink

Generation

- 17 ⚡ Daandine (30 MW)
 - 6 ⚡ Diamantina (242 MW)
 - 33 ⚡ Gruyere (45 MW)
 - 7 ⚡ Leichhardt (60 MW)
 - 5 ⚡ Thomson (22 MW)
 - 4 ⚡ X41 (41 MW)
- Solar Farm**
- 43 ☀️ Badgingarra (19 MW)
 - 11 ☀️ Darling Downs (110 MW)
 - 41 ☀️ Emu Downs (20 MW)
 - 34 ☀️ Gruyere Solar Farm (13.2 MW)
 - 8 ☀️ Mica Creek (88 MW)¹

Wind Farm

- 44 🌪️ Badgingarra (130 MW)
- 42 🌪️ Emu Downs (80 MW)
- 32 🌪️ North Brown Hill (132 MW)

1. Under construction.

2. Average rate as reported by Cooper Energy Limited (ASX:COE) on 21 October 2022.

Our Workforce

APA has 2092 employees and 261 contingent workers located in offices and sites across Australia, with 79% of our workforce located at five major offices (Sydney, Brisbane, Melbourne, Adelaide and Perth).

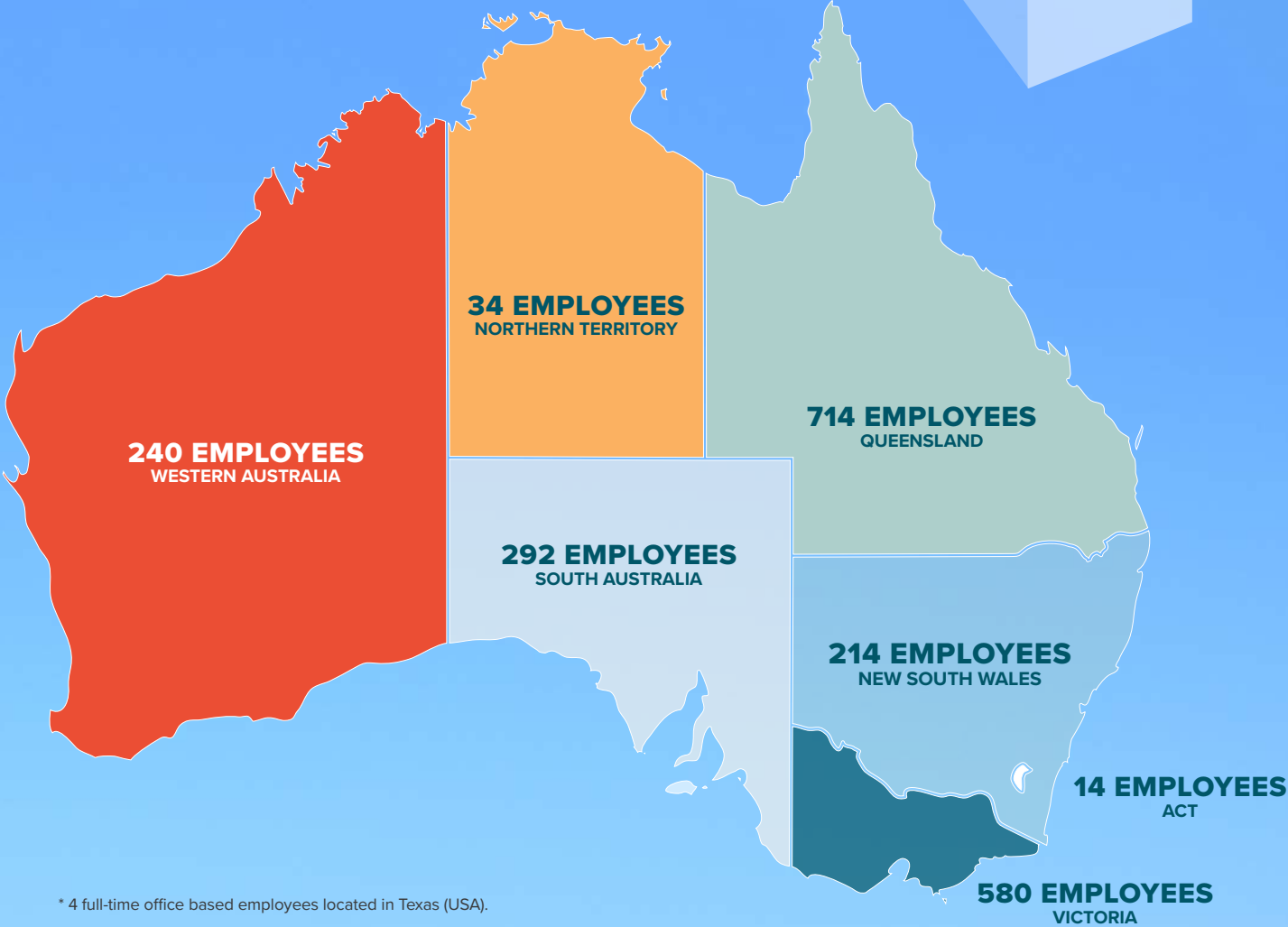
Details of our workforce are provided in the tables below.

Employment Category	Male	Female	Total
Full-time permanent	1,329	486	1,815
Part-time permanent	8	68	76
Full-time fixed term	113	44	157
Part-time fixed term	5	4	9
Casual	22	13	35
Total	1,477	615	2,092

Workplace Gender Equality Act Skill Group	Male	Female	Total
Apprentices	9	3	12
Clerical and Administrative Workers	35	183	218
Graduates	9	9	18
Interns	6	10	16
Professional	594	286	880
Technicians and Trades Workers	577	31	608
Managers - CEO	1	0	1
Managers - Key Management Personnel	4	0	4
Managers - Other Executives & General Managers	27	17	44
Managers - Senior Managers	63	21	84
Managers - Other Managers	152	55	207
Total	1,477	615	2,092



APA's National Site Numbers



* 4 full-time office based employees located in Texas (USA).



* 4 full-time office based employees based in Texas (USA).

Our Supply chain

During FY22, APA's combined capital and operating spend was approximately \$1.4 billion, with 3,374¹ direct (tier 1) suppliers. The procurement of a diverse range of goods and services to support our business operations is predominately managed through contractual arrangements, ranging from, but not limited to:

- Purchase orders governed by standard terms and conditions
- Bespoke agreements for complex procurement
- Multi-year standing arrangements governed by Precedent Agreements

A proportionately small amount of spend is also undertaken using credit cards, primarily for travel expenses.

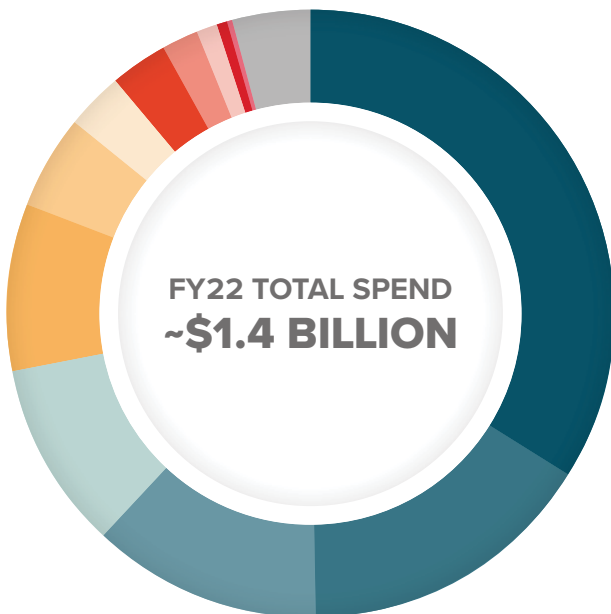
1. Suppliers APA has a direct contractual relationship with.



Total Spend

~\$1.4 BILLION

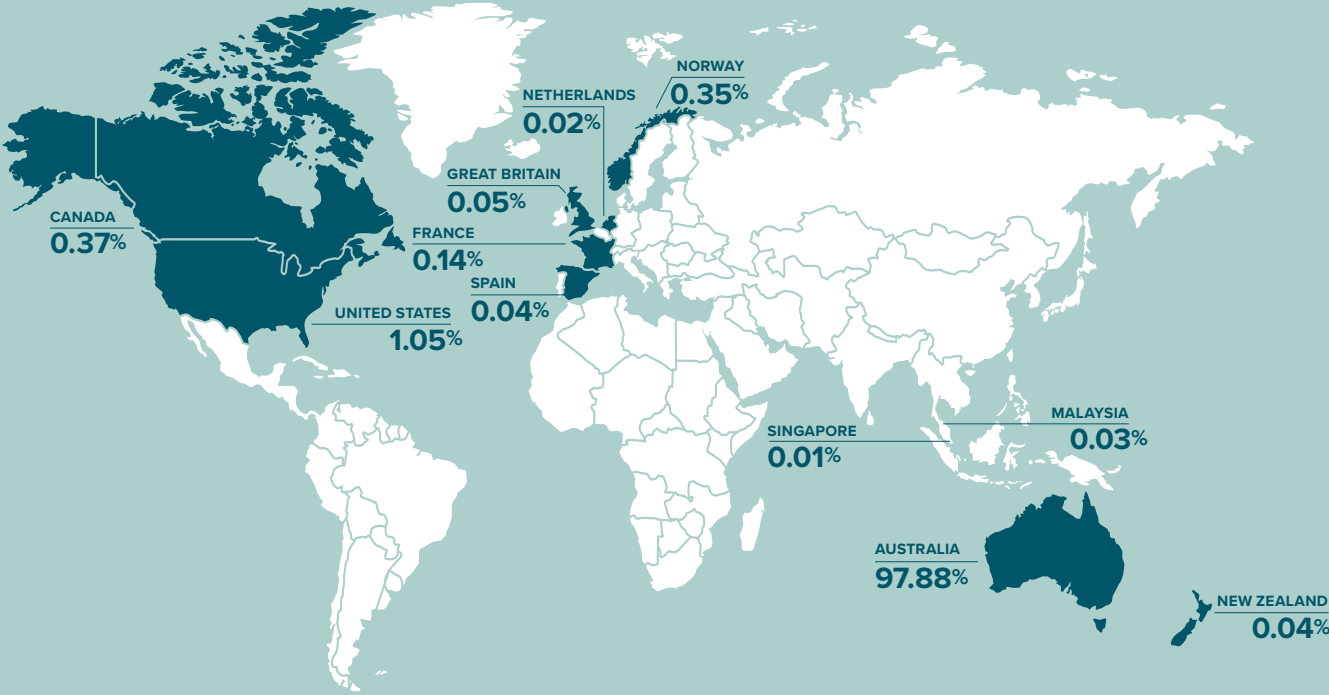
During the reporting period we procured goods and services across a wide range of purchasing groups:



- **34%** Works Contractors (Major and Minor), who also supply various construction materials
- **16%** Professional Services (including Engineering Design Services)
- **12%** Operations Consumables and Special Services
- **10%** Infrastructure Fixed Equipment, including construction equipment and materials
- **9%** Piping materials (inc valves)
- **5%** Information Technology and Telecommunications
- **3%** Facilities Management
- **3%** Insurance
- **2%** Land Charges
- **1.2%** Recruitment and Labour Hire
- **0.4%** Freight and Logistics
- **0.3%** Travel and Entertainment
- **0.2%** Safety Clothing
- **3.9%** Other

Similar to FY21, the majority of spend for FY22 was with direct suppliers based in Australia (98%). However, these suppliers are likely to rely on, to varying degrees, operations and supply chains in overseas locations.

The remainder of our spend was with companies based overseas. FY22 country spend data, assessed against the Walk Free Global Slavery Index 2018 (GSI), showed we procured goods and services from countries which are ranked as medium-high risk of modern slavery. Suppliers of goods and services from Malaysia, Singapore and Slovakia will be assessed as part of our risk management approach in FY23.



Direct suppliers engaged

3,374



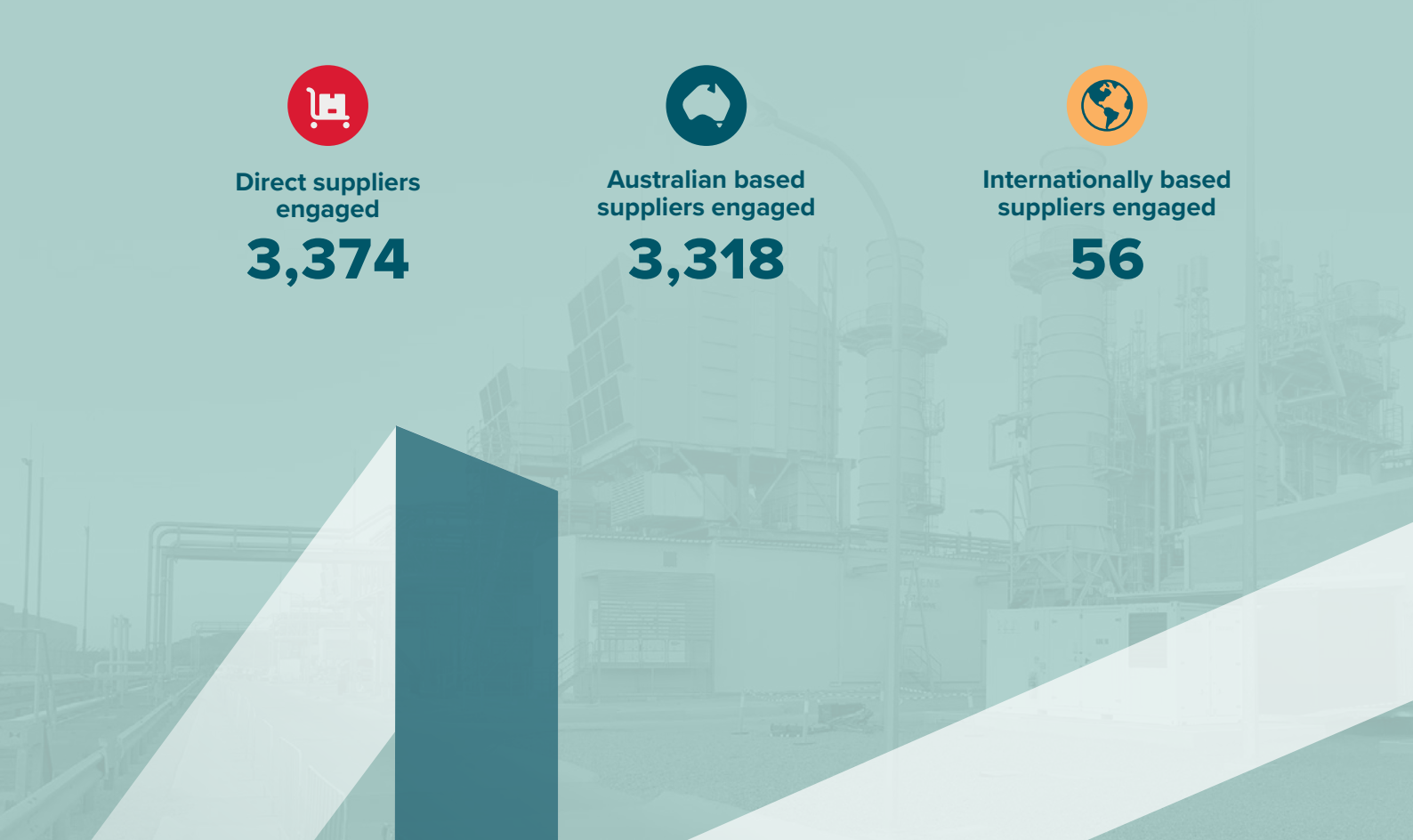
Australian based suppliers engaged

3,318



Internationally based suppliers engaged

56



The infrastructure sector can involve complex global supply chains. The visual below shows the types of activities that can occur throughout our supply chain, including below Tier 1.

Key supply chain elements are depicted below.

APA Operations

We own, manage and/or operate gas, electricity, solar and wind assets.

Our Tier 1 Supply Chain

We engage over 3,000 direct suppliers to provide us with goods and services to operate our business. The majority of these suppliers are located in Australia.

Goods

Provision of products for use in our operations such as electrical equipment, pipe fittings, personal protective equipment, fuels and IT equipment.

Services

Provision of services to support our operations such as cleaning, recruitment, insurance, construction, engineering and maintenance.

Our Supply Chain at Tier 2 and Below

Key supply chain activities in our extended supply chain can include:

Sourcing of Raw Materials

Component Manufacturing and Assembly

Warehousing and Logistics Services



The following table shows our areas of main operation and their corresponding supply chains.

Area	Main Operations	Key Supply Chain Elements
Infrastructure Development	Development and delivery of capital growth projects such as gas fired power stations, solar farms, pipelines and related infrastructure – new infrastructure asset construction management	<ul style="list-style-type: none"> – Engineering consultants – Industrial construction materials and equipment sourced directly from Australia and indirectly from Europe, North America and Asia such as steel pipe, high pressure valves, compressors, solar panels, wind turbines, and battery storage systems. – Construction contractors.
Network Operations	<p>Operation and maintenance of third party owned gas distribution networks.</p> <p>Development and delivery of capital growth projects and third part works, such as new mains and services, extensions and reticulation of new developments.</p>	<ul style="list-style-type: none"> – Industrial construction materials and equipment sourced directly from Australian tier 1 suppliers, who in turn source materials (such as steel pipe, fittings, valves and gas measurement devices) from offshore suppliers. – Australian based construction and maintenance contractors, mains and service layers, main renewal contractors, plumbers and gas fitters. – Pipe and fitting products, such as polyethylene pipe (PE) sourced and manufactured in Australia. PE raw materials are sourced in Australia and offshore via prequalified tier 2 suppliers.
Operations	<p>Operation of APA’s asset base in Australia including:</p> <ul style="list-style-type: none"> – Transmission pipelines – Gas processing facilities – Gas storage facilities – Gas fired power stations – Solar and wind farms – Electricity interconnectors 	<ul style="list-style-type: none"> – Operations consumables, such as odorant – Bulk chemicals – Spare parts and materials inventory – Australian based service and maintenance contractors, such as vegetation management – International service and maintenance contractors, such as OEM maintenance contractors for engines at our gas fired power stations.
Managed Joint Ventures and Investments	<p>APA has non-controlling interests in a number of energy related infrastructure assets such as gas transmission pipelines, gas processing facilities, gas distribution networks, gas compression facilities, electricity transmission, and renewable and gas fired power generation assets through its investments in other energy infrastructure entities. Some of these entities are also operated by APA, including ownership interests in, and operational management of, GDI (EII) Pty Limited which operates the Allgas gas distribution network in Queensland and Northern NSW, and ownership interest in and operational management of Energy Infrastructure Investments (EII).</p>	<p>The Joint Ventures and Investments which are managed by APA have a supply chain common with those detailed for Infrastructure Development, Network Operations and Operations in this table.</p>
North America	<p>During this reporting period APA explored opportunities in energy infrastructure in North America.</p> <p>As announced in August 2022, APA will not pursue an acquisition in the United States (US) in the foreseeable future.</p>	<p>APA had an established office in Houston, however, did not operate a business in North America or establish a supply chain beyond maintaining this office.</p>
Head Office	<p>Corporate functions, such as:</p> <ul style="list-style-type: none"> – Finance – Strategy & Commercial – Human Resources – Information and technology – Procurement – Risk, Compliance, Insurance, Legal and Sustainability (including Climate) – Health, Safety, Environment & Heritage 	<ul style="list-style-type: none"> – Fleet management – Professional services – Information Technology – Safety clothing and personal protective equipment for corporate and site-based staff – IT equipment and telecommunications – Recruitment and labour hire – Office products – Corporate real estate and facilities – Marketing and advertising – Travel and accommodation – Catering

Identifying our Modern Slavery Risks

We have assessed the risk of modern slavery in our operations and supply chains consistent with the UN Guiding Principles on Business and Human Rights (UNGPs).

The UNGPs set out a three-part continuum to explain how companies could be involved in human rights harms, such as modern slavery. The Australian Government recommends companies use this continuum to understand and communicate about their modern slavery risks.

Overall, within both our operations and supply chain, we do not consider that we are likely to cause or contribute to modern slavery, within the meaning of the UNGPs. This reflects our view that our actions or omissions are unlikely to either result in modern slavery occurring or facilitate or incentivise modern slavery, including due to the range of controls we have in place. These controls are outlined throughout this statement.

However, as an energy infrastructure business with complex supply chains, we recognise that we may be directly linked to modern slavery through the products and services we procure, which could involve a range of modern slavery risks.

During FY22 we continued our due diligence process and worked to address high risks highlighted through our risk management approach. During the year we did not identify any incidents of modern slavery in our operations or supply chain.

Modern slavery risks in our operations

In FY22, we assessed the risk of modern slavery in our operations as low based on the location of our operations in Australia,¹ our compliance with all applicable legislative requirements in Australia regulating workplace relations, and the internal policies and processes we have in place. These include:

- Recruitment and onboarding processes include employment, visa and health checks.
- Induction processes include mandatory training and confirmation employees have read and understood our key group policies.
- Our Health, Safety and Wellbeing policy and practices, which commit to providing workplaces that support good health, wellbeing, respect and inclusion for our employees, contractors and visitors.
- Continuing to build a diverse and inclusive culture where everyone feels safe, valued and is trusted to do their very best every day.
- Remunerating all staff in excess of minimum wage, and encouraging employees to enjoy the right to family, recreation, and work-life balance through flexibility initiatives.
- Code of Conduct, Policies and Procedures which address behaviour and conduct expectations of employees, contractors and visitors including in relation to bullying, harassment and discrimination; and grievance processes enabling employees, workers and contractors to raise a grievance or complaint.
- Providing regular and ongoing training, including modern slavery awareness training, to our employees about their obligations regarding lawful, appropriate behaviour, discrimination and complaints and investigation processes.
- Organisation wide modern slavery communications, including our awareness video.

Our employees are free to associate and enter into employment agreements that meet the requirements of the National Employment Standards (NES), including freedom to join unions and/or enter collective bargaining agreements, as well as requests for flexible working arrangements, parental leave and long service leave.

Findings from our payroll data review

At APA we are committed to doing the right thing by our people. An independent review of payroll data (FY21) identified payroll errors relating to our seven Enterprise Agreements (EAs), which resulted in payment errors to some current and former employees.

We have now engaged external consultants to conduct a review of all employee payments and entitlements under our seven enterprise agreements over the past 7 years, and will, as appropriate, remediate with interest current and former employees where underpayments are identified. We are communicating with and providing regular updates to our employees about the review. We have also made a voluntary disclosure to the Fair Work Ombudsman and will continue to communicate and work with the Ombudsman.

In response to the issues that have been identified we are reviewing and investing in our payroll processes, systems, and technology. While we recognise that intentional underpayment could be deemed as a red flag for modern slavery, the payroll errors were predominantly due to incorrect interpretation of EAs, which are highly complex agreements, and other system, process and administration errors.

Modern slavery risk in our investments

All of our energy infrastructure assets and investments in the reporting entities covered by this statement are managed by APA using APA's supply chain and policies. Accordingly, the risk of those investments is reflective of the broader APA Group.

Modern slavery risk in our supply chain

APA's supply chain may be directly linked to modern slavery in the sourcing and processing stages of the raw materials that make their way into the products ultimately supplied to us, and in the manufacturing plants located in higher risk locations that supply goods to our suppliers or their wholesalers. Modern slavery risks in these scenarios may be increased by the use of based-skilled migrant workers, sourcing from countries with a comparatively higher prevalence of modern slavery, procurement from sectors which can involve high levels of subcontracting, and reliance on complex supply chains.

We also monitor information about emerging modern slavery risks. For example, recent research has identified potential modern slavery risks linked to the use of state sponsored forced labour in the production of polyvinyl chloride (PVC). We primarily source polyethylene (PE) rather than PVC products and are undertaking further work to assess our possible risk exposure.

Our risk management approach has continued to be used to inform and assess the main areas of exposure to modern slavery risks in our supply chain. The table below details the products and services we procured from high risk suppliers and the generally known modern slavery risks.

1. During the reporting period, a small number of employees were located in the United States of America.

Product / service procured by APA	Generally known modern slavery risks
<ul style="list-style-type: none"> – Photovoltaic modules – Batteries, cells and accessories – Lubricants, oils, greases and anti-corrosives 	<p>Key risks relating to this category are outlined below:</p> <p>Certain manufacturing and mining regions and materials carry higher risks of modern slavery, including where materials may be produced or sourced in higher risk countries or involve sectors known to have high modern slavery risks. For example, we procure building materials such as concrete, timber, steel, quarried stone products, solar panels, glass, and construction films, which may involve modern slavery risks due to the way these materials are produced or manufactured.</p> <p>We also procure a range of machinery and equipment used in construction, which can involve modern slavery risks if they are manufactured in countries with a higher prevalence of modern slavery risks or include components such as electronics manufactured in high-risk countries.</p> <p>Similarly, mining operations for copper, tin, lead, lithium, quartz, silicon, selenium, tellurium, arsenic, cadmium, aluminium, boron, gallium or indium, can involve modern slavery risks related to forced and child labour, including the worst forms of child labour. Therefore, any equipment containing components which include these minerals may involve modern slavery risks.</p> <p>We also recognise that there is increasing evidence about the risks of modern slavery in the manufacture of polysilicon, which is a key component of solar modules. This includes reported links to state sponsored forced labour.</p>
<ul style="list-style-type: none"> – ICT hardware – IT Service delivery – Software maintenance and support 	<p>Key risks relating to this category are outlined below:</p> <p>We procure a range of computer and telecommunications hardware and services, including to support our corporate operations.</p> <p>Modern slavery risks are present in the supply chains that provide IT companies with the necessary materials to produce electronic goods, and parts of those goods. For example, there may be modern slavery risks (including the worst forms of child labour and forced labour) associated with the mining of cobalt and mica.</p> <p>Modern slavery risks may also be associated with our suppliers and the use of offshore contact centres and other services by telecommunications and software companies and the construction and maintenance of telecommunications infrastructure.</p>
<ul style="list-style-type: none"> – Uniforms – Protective gloves 	<p>Key risks relating to this category are outlined below:</p> <p>We procure a variety of textiles and apparel products, including PPE. The textiles and apparel sector is recognised as a high-risk sector for modern slavery, including due to the use of raw materials such as cotton which may be produced using modern slavery, as well as exploitation in factories manufacturing textiles and apparel products. PPE such as masks and gloves can also involve particular modern slavery risks, which have been exacerbated by increased demand for these products during the COVID-19 pandemic.</p>
<ul style="list-style-type: none"> – Temporary personnel services – Personnel recruitment 	<p>Key risks relating to this category are outlined below:</p> <p>We engage contract workers and other temporary workers. We also engage key service providers such as construction services and cleaning and security services providers, who may rely on temporary and contract workers. In some circumstances, we may also engage catering workers for our sites and corporate offices.</p> <p>Temporary and contract workers in Australia and overseas performing base-skilled labour can be vulnerable to modern slavery due to a range of factors, including opaque subcontracting arrangements, which can make it difficult to monitor working conditions. The use of migrant workers in sectors such as cleaning and construction can also involve modern slavery risks, including where these workers may not understand their workplace rights and entitlements. From time to time, where our construction contractors have a need for temporary or contract workers, they are generally highly skilled trades or educated professionals such as engineers or designers rather than base-skilled labour.</p>
<ul style="list-style-type: none"> – Fuels 	<p>Key risks relating to this category are outlined below:</p> <p>There is a risk that raw material extraction, manufacture and disposal could be associated with vulnerable populations in higher-risk countries. There is also the risk that vessels used for the transport of fuel could expose crew to forced labour or unacceptable working conditions.</p>
<ul style="list-style-type: none"> – Travel 	<p>Key risks relating to this category are outlined below:</p> <p>The provision of travel and accommodation related services may involve modern slavery risks, including in relation to the use of base-skilled, subcontracted workers by accommodation providers. APA's travel is primarily domestic and would not generally involve travel to countries where modern slavery is comparatively more prevalent.</p>
<ul style="list-style-type: none"> – Freight & logistics 	<p>Key risks relating to this category are outlined below:</p> <p>There is a risk that freight and logistics services provided by third parties (including warehousing) could involve the exploitation of base-skilled workers. These risks are likely to be higher where these services are provided overseas. There are also particular risks associated with working conditions for seafarers and we recognise these risks have been exacerbated by the COVID-19 pandemic.</p>

Actions taken to assess and address risk

We are committed to taking meaningful action to address risks in our operations and supply chain. This section outlines the actions we have taken during the reporting period.

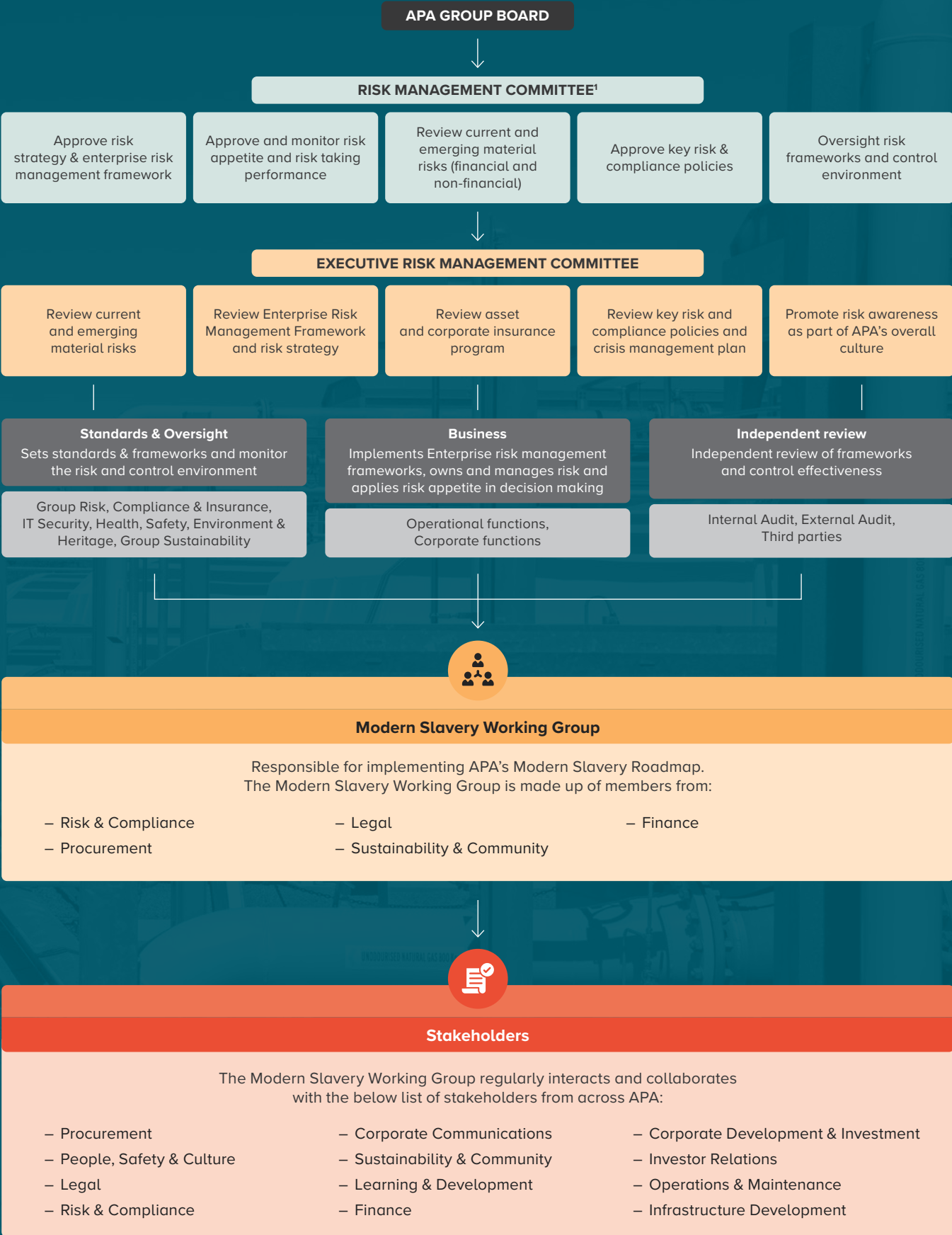
Governance Framework

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.

Our response to modern slavery is overseen by our cross-functional Modern Slavery Working Group, which is responsible for implementing our modern slavery roadmap. The Working Group was established in late 2019 and is made up of representatives from Procurement, Risk and Compliance, Sustainability & Community, Finance and Legal. During the reporting period, the Working Group continued to meet monthly and reported to the Executive Risk Management Committee and the Risk Management Committee annually on the progress of the planned activities from the roadmap, the progress of risk assessments, and the modern slavery risks identified through those assessments.



The following diagram depicts the key aspects of APA's governance arrangements.



1. In October 2022 the Audit & Risk Management Committee was split into two committees - the Audit & Finance Committee and the Risk Management Committee.

Policy Framework

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
<p><u>Code of Conduct (Our Code)</u></p>	<p>The principles and business standards that support safety, anti-harassment, anti-bullying, anti-discrimination, human rights (such as modern slavery), community engagement, environmental protection, anti-corruption and data privacy and security, and prevent anti-competitive behaviour. The Code of Conduct was updated during FY22.</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. 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. Consequences of non-compliance with the Code can include termination of contract.</p>
<p><u>Diversity and Inclusion Policy (Including Equal Employment Opportunity)</u></p>	<p>The current policy sets out our principles for a diverse and inclusive workplace, including guidelines on acceptable behaviour and anti-discrimination practices. This also helps us to model the same behaviour we expect from our suppliers in relation to the rights of workers.</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 Diversity and Inclusion Policy applies to all APA workplaces, employees, contractors, consultants, visitors and other workplace participants. The Policy extends to conduct in any work-related context, including outside of normal working hours.</p> <p>In FY23 the current Diversity and Inclusion policy is being renewed.</p>
<p><u>Anti-Bribery and Corruption Policy</u></p>	<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 FY22.</p>
<p><u>Health, Safety and Wellbeing Policy</u></p>	<p>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.</p>	<p>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.</p>
<p><u>Risk Management policy</u></p>	<p>Our Risk Management Policy sets out APA's overall risk management principles and approach to risk management and is aligned to the international risk management standard ISO 31000.</p>	<p>The Policy informs our Risk Management Approach to modern slavery.</p> <p>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.</p>

Policy	Relevance to Modern Slavery	How this policy continued to be implemented at APA during the reporting period
<p>Compliance Policy</p>	<p>The Policy supports a culture of regulatory compliance and ethical decision-making and ensuring appropriate updates and reporting to our regulators.</p>	<p>The Compliance Management System (CMS) ensures APA complies with the applicable legal, regulatory, standards, codes and licence requirements, including the Modern Slavery Act 2018 (Cth). The CMS also ensures processes are established for identification of regulatory change to provide for timely change implementation activities.</p> <p>APA has adopted a risk-based approach to managing the risks of modern slavery in our operations and supply chain and is supported by a model of continuous improvement.</p>
<p>Whistleblower Policy</p>	<p>The process for our people to report matters of concern and suspected wrongdoing that constitutes reportable conduct. The Whistleblower Policy provides for disclosures regarding modern slavery practices occurring in APA's supply chain.</p>	<p>Our Whistleblower Policy is available on the APA website.</p> <p>Whistleblower reports or disclosures made are investigated by the Disclosure Officer, and where substantiated, process or control improvements implemented.</p>
<p>Procurement Policy</p>	<p>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.</p>	<p>The Procurement Policy and associated requirements and procedures is available for all employees via our intranet. The approach to identifying and managing modern slavery risk is embedded within the procedures with training and communications in place focussed on the role of our employees in identifying modern slavery issues, looking out for supplier red flags and raising awareness on modern slavery across our business.</p>



Modern Slavery Risk Management Approach

We continued to use our operating rhythm set in FY21 whilst delivering to our planned roadmap for this reporting period. Opportunities for improvement were identified and changes made to our process to analyse the spend data for FY22, our desktop risk assessment tool to improve usability, and monthly reporting to our Modern Slavery Working Group.

APA's modern slavery supplier due diligence encompasses:

- APA's new supplier onboarding process and human rights declaration,
- Contractual clauses for new supplier agreements to comply with modern slavery provisions,
- Supplier information from APA's Supplier Prequalification System for new and existing critical suppliers (refreshed annually).

Our modern slavery risk management approach comprises three stages:

Stage 1 – data driven risk assessment:

Our spend data from FY21 was mapped against the United Nations Standard Products and Services Codes (UNSPSC), country risk assessed against the [Walk Free Global Slavery Index 2018 \(GSI\)](#), and supplier risk screening against lists of known sanctions and enforcements relating to a range of issues. The results were categorised into high, medium and low risk suppliers. Further analysis was conducted, and 33 suppliers were shortlisted for further review.

Stage 2 – desktop risk assessments:

The 33 suppliers shortlisted in Stage 1 underwent desktop risk assessments to determine if they had the necessary controls in place to manage modern slavery risks in their supply chain.

Results of the desktop risk assessments were analysed by the Modern Slavery Team and Procurement Managers. Findings were presented to the Modern Slavery Working Group and ten suppliers were identified as requiring further targeted assessment.

Stage 3 - targeted supplier assessments

We engaged a reputable external consultancy to provide additional due diligence information in the form of modern slavery red flag reports. The reports provided additional information across modern slavery risk indicators and additional research data for each of the ten suppliers.

The reports were reviewed by our Procurement Managers and findings presented to the Modern Slavery Working Group. A small number of high risk suppliers have been flagged for additional engagement in early FY23 to understand their approach to modern slavery risk management. The risk will be reassessed, and any suppliers that remain high risk will be managed via our Modern Slavery Response Plan, medium risk suppliers continue to be monitored.

Case study – Beyond the first tier Product and supplier analysis for safety and protective clothing

We recognise that PPE can involve higher modern slavery risks. In FY22, we continued to monitor and consolidate items of safety clothing and PPE, further reducing the number of brand manufacturers we have on our approved range by 25%. We also moved PPE items to our approved supplier's own manufactured brand to simplify modern slavery compliance management and secure stock supplies.

COVID-19 restrictions in FY22 led to challenges with monitoring compliance to ethical sourcing and accreditation due to factory shutdowns. As factory audits have slowly resumed, we have received 16 of 17 certificates of currency relating to factories our supplier sources from. These include:

- Worldwide Responsible Accredited Production (WRAP), one of the world's largest independent facility certification programs,
- Sedex Members Ethical Trade Audit (SMETA), which provides a globally recognised way to assess responsible supply chain activities and good practice in ethical audit technique, and
- Ethical Clothing Australia (ECA), an accreditation body working collaboratively with local textile, clothing and footwear businesses.

These audit certifications provide a globally recognised audit technique to independently assess responsible supply chain activities at a factory level.

Further consolidation is planned for PPE gloves and eye protection in FY23.



Modern Slavery Roadmap

Employee Training

Delivering training to raise awareness of modern slavery and help ensure our people are equipped to identify and respond to potential modern slavery concerns is a key element of our modern slavery risk management approach.

During FY22 we developed and commenced the rollout of new 1.5 hour face-to-face training about modern slavery. The training was designed to highlight key potential risk areas for APA, detail how we are taking action to manage modern slavery risks and provide guidance on how employees can identify and report concerns or suspicions about modern slavery.

We partnered with an expert third party provider to develop this training and ensured it was tailored to APA. The first face-to-face session was piloted with the Modern Slavery Working Group and Procurement Managers and feedback was used to enhance the training content. At the end of June 2022, training delivery to the highest priority groups was complete, with four sessions held for 80 staff. The training program will continue to be rolled out to other impacted functions in FY23 and will be refreshed annually.

In addition, we have also prepared an e-learning module about modern slavery, which will be rolled out in FY23. The training has been designed to complement the more detailed face-to-face training outlined above and aims to raise general awareness of modern slavery, provide examples of red flags, and how employees can safely report modern slavery concerns.

Raising awareness through communications

Throughout the year we published modern slavery awareness communications to all employees in the form of a CEO email, updates via our internal social networking site, and publications on our internal news site.

A general awareness video was produced and distributed to all employees. The video referenced everyday areas of life where modern slavery may be hidden, including in food and clothing production, and detailed our selection process on a recent major project for solar panel suppliers, highlighting the potential modern slavery risk this type of purchase poses for APA (refer to the case study on page 27). The video and accompanying article resulted in the highest number of employee comments generated on a communications piece.

In addition, a dedicated intranet site was established for all APA employees to readily access information about our Modern Slavery Program. The site provides links to frequently asked questions, our modern slavery statement, modern slavery e-learning, awareness video, internal communications articles published throughout the year, and details on how to safely report concerns about modern slavery.

The communications aimed to raise awareness of modern slavery and help promote positive purchasing decisions in work and at home. Close to the Easter 2022 period, we published an article on the 2022 Chocolate Scorecard¹, which assesses chocolate companies on key sustainability issues including traceability of cocoa beans and transparency of supply chain; payment of a living income; and the eradication of child labour in its cocoa production processes and the prevalence of policies, plans and remediation schemes to address this issue.

While not directly relevant to APA, discussing modern slavery risks in the chocolate sector provided an opportunity for our employees to engage with the complexities of addressing modern slavery more generally.

This exercise resulted in a range of positive feedback from employees previously unaware of the inequity in the chocolate sector.

Our Responsible Procurement Journey to date

We continue supporting APA's ongoing commitment to responsible procurement practices in FY23. We have commenced an initiative to attain a CIPS² Corporate Ethics Mark by end of CY22 and development of our Responsible Procurement Strategy.

Achieving the CIPS Corporate Ethics Mark

The CIPS Corporate Code of Ethics was developed as part of its commitment to reinforcing ethical values across all procurement and supply practices. The voluntary code can be adopted by organisations across the world, of any size and from any sector, and sets out the values, business culture and practices the organisation must demonstrate.

By adopting the voluntary code, APA commits to:

- 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.

To achieve the Corporate Ethics Mark, all employees responsible for sourcing and management of suppliers will be trained by taking the CIPS 2-hour e-learning package with an online test. Once completion is confirmed, the CIPS Statement of Commitment is signed as a public commitment reinforcing our organisation's focus on sourcing ethically. To maintain the Corporate Ethics Mark, requires annual renewal.

Developing our Responsible Procurement Strategy

In FY22, APA engaged a professional third-party service provider to assist in the development of our inaugural Responsible Procurement Strategy. The objective being to undertake a broader Environment, Social and Governance (ESG) and modern slavery risk and opportunity assessment within APA's supply chain utilising the third-party risk tool. A gap analysis to ISO20400³, to understand the current state and approach to sustainable procurement was also undertaken to build a maturity roadmap to 2025. Along with focused initiatives, the objective is to increase APA's maturity in its sustainable procurement capability.

The Responsible Procurement Strategy is targeted for approval and key initiatives identified for strategy execution to commence in FY23.

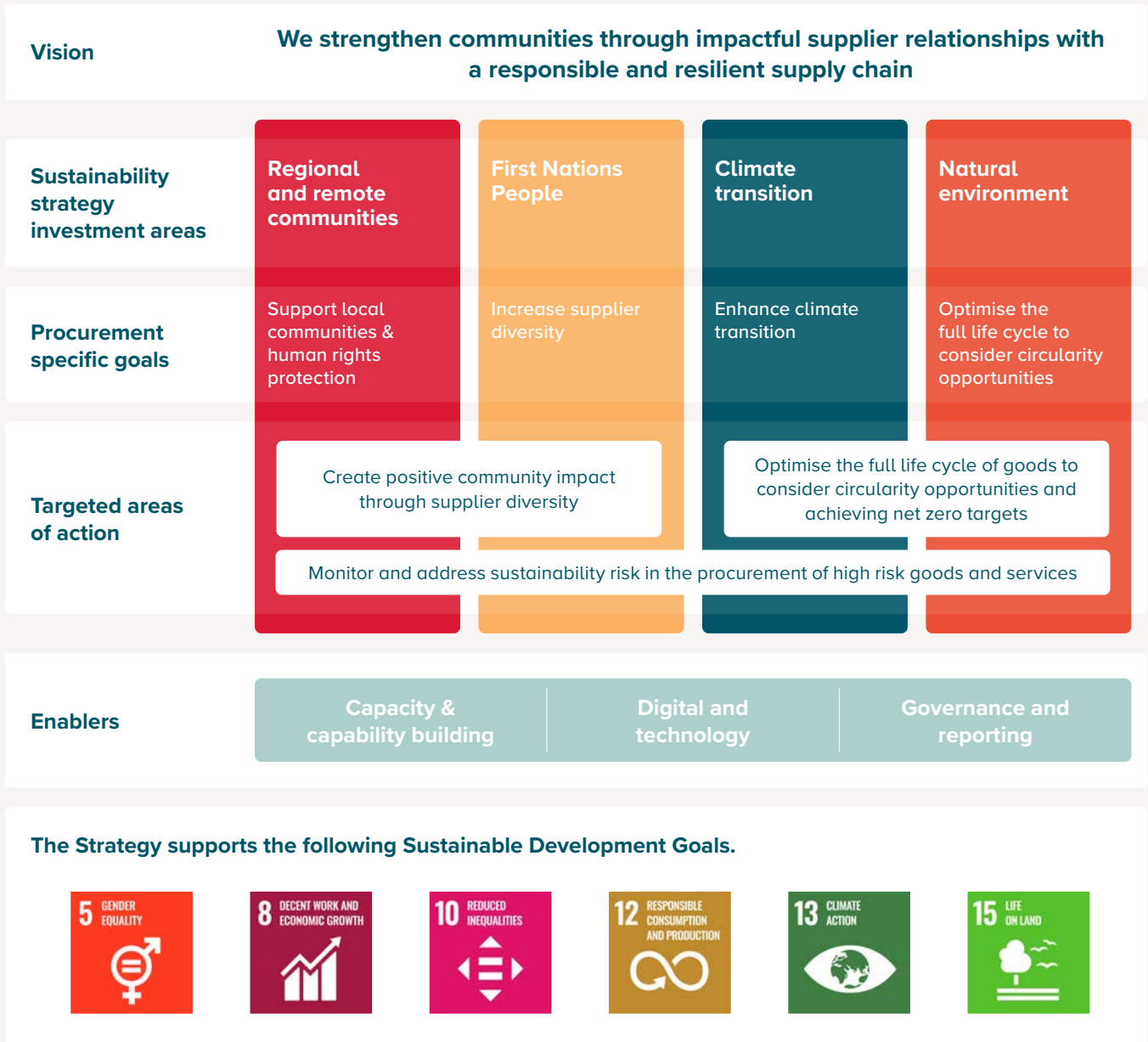
1. [Chocolate Scorecard 2022](#)

2. Chartered Institute of Procurement & Supply. <https://www.cips.org/>

3. ISO20400 is the international guidance standard for sustainable procurement. <https://www.iso.org/obp/ui/#iso:std:iso:20400:ed-1:v1:en>

Responsible Procurement Strategy

Outlined below is APA's responsible procurement strategy. It is aligned to the APA Sustainability Strategy and the four priority investment areas. Across the strategy pillars are key actions required to operationalise the goals, as well as enablers required for effective implementation.





ASP Program

APA's Supplier Prequalification Program plays a vital role in APA's supply chain sustainability performance by tracking supplier commitments and performance in health, safety and environment, modern slavery, social and community performance.

Key suppliers are invited to join the Program based on the contract size, supply category, lack of readily available alternative sources and the risk to APA operations from an asset and employee perspective. It acts as a central repository for key supplier information, including financial data, safety performance, environment, and social issues, as well as the supplier's position and level of maturity with respect to awareness and mitigation of modern slavery in their supply chains and operations.

In FY22, 238 suppliers participated in APA's Supplier Prequalification Program and modern slavery questionnaires were completed by each one. The modern slavery questionnaire includes 40 questions covering:

- Modern Slavery Statement submission requirement
- Modern slavery policies, systems and processes
- Country sourcing

APA continues to review the modern slavery questionnaire as part of our annual review and will make improvements as part of our processes.

Supplier selection and onboarding

During FY22 495 new suppliers were onboarded using the APA supplier onboarding process. The process ensures suppliers declare their commitment to respect workers' fundamental human rights before they are added to our systems. These commitments include:

- 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.

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.



238 SUPPLIERS

PARTICIPATED IN APA'S SUPPLIER
PREQUALIFICATION PROGRAM
DURING FY22

Engagement and collaboration

Working with industry peers to discuss their experience with mapping supply chains, allowed APA to gain insights to the differing approaches to understanding supply chains, as well as the challenges faced in embarking on this work. The greatest challenge common to those who have done this work is the reliance on Tier 1 suppliers to provide the necessary information.

We have also engaged with various third-party providers who undertake supply chain mapping and developed tools to provide greater transparency and improve the risk-assessment capability and ongoing monitoring and performance improvements from the ESG & modern slavery risk perspective. This is to understand marketplace solutions that are best placed to meet APA's requirements to undertake supplier due diligence.

Further work is being undertaken in FY23 to determine broader risk assessment requirements beyond the ESG and modern slavery scope, to assess the possibility of a common platform for risk assessment, monitoring and performance improvement.

Our Modern Slavery Team has engaged with external human rights experts to develop and deliver training packages. The team has also attended a number of modern slavery webinars hosted by legal firms and consultancy agencies.

United Nations Global Compact (UNGC) Membership

The UNGC is the world's largest corporate sustainability initiative. APA joined the UNGC in 2021, which involves committing to ten key principles, including relating to addressing forced and child labour, as well as other human rights abuses.

We submitted APA's 2022 Communication on Progress to the UNGC to demonstrate our commitment to making the UNGC and its principles part of APA's strategy, culture and day-to-day operations, and we participated in UNGC's Early Adopter Program for communicating on our progress in their new digital platform.

Our communication on progress highlighted key steps we have taken to enhance our modern slavery risk management over FY21. These steps are explained in our FY21 [Modern Slavery Statement](#).

Impact of COVID-19

APA responded to the COVID-19 pandemic in FY21 by reducing payment timeframes for regional and smaller suppliers (<50 employees). To continue support of small businesses in our supply chain the preferential payment terms were made permanent in FY21 and were implemented for any new small suppliers in FY22.

Case study Deep dive into cleaners

A high-risk area for modern slavery in Australia is the provision of cleaning services. APA procures a range of cleaning related services for our corporate offices and sites around Australia.

During the year, we reviewed our cleaning services providers across Australia to assess and understand our risk exposure across all sites. We also wanted to better understand the range of suppliers in our network.

No immediate modern slavery risks were identified by this process. Many of our suppliers have:

- Modern Slavery Policies,
- Codes of Conduct that addresses modern slavery,
- issued mandatory or voluntary modern slavery statements,
- become members of the Cleaning Accountability Framework (CAF), which aims to improve labour practices in the sector (this includes the majority of our main corporate offices), or pre-qualified CAF suppliers.

As part of our continuous engagement approach to modern slavery, and in line with how we onboard new suppliers, we have asked our existing cleaning services suppliers to formally accept APA's Code of Conduct and commit to upholding fundamental human rights, including human rights relating to freedom from modern slavery. We have received positive feedback from many of our cleaning services suppliers. As of 1 October 2022, we have received acceptance from 65% of those suppliers.

Case Study: Selecting Suppliers for Solar Panels

In our FY21 Modern Slavery Statement, we noted we had reviewed our sourcing strategy for solar panels associated with solar farm construction projects. Given the inherent risk in solar panel manufacturing and the sourcing of raw materials in certain countries, we developed an alternative approach where APA would procure solar panels directly from international suppliers. This differs from the traditional approach where an Engineering, Procurement and Construction (EPC) contractor would supply solar panels as part of their scope of supply. Importantly, our revised approach provides us with greater control of where the solar panels are sourced and enables us to engage directly with suppliers.

In FY22, APA developed and commenced construction on the Mica Creek Solar Farm (MCSF). We recognised that EPC contracts are generally lump sum contracts, which could incentivise EPC contractors to select the lowest cost solar panels rather than the lowest risk option from a modern slavery risk perspective. In response to modern slavery risks in the solar sector, APA decided to procure the solar panels directly and free issue them to our solar farm construction contractor.

For the MCSF project, APA undertook a competitive tender for the supply of 100MW DC of solar panels (approximately 184,000 panels). The tender list included large and well known international suppliers of solar panels. We ensured that modern slavery risk, and in particular the origin and sources of polysilicon, was a key part of the tender evaluation

criteria. All the tenderers supplied high quality policy and procedural documentation in relation to their modern slavery risk management.

Through the evaluation, we selected a preferred supplier (Supplier A) and undertook more detailed scrutiny of their modern slavery documentation and their supply chain. As this phase progressed, however, it became evident that Supplier A could not provide the supply chain certainty and the contractual mechanisms to warrant that the sources of polysilicon in solar panels was not sourced from regions linked to internationally reported forced labour. As a result, we elected not to proceed with contract negotiations with Supplier A and approached an alternate supplier (Supplier B).

Whilst a more expensive option, Supplier B was able to provide us greater supply chain transparency, supported by contractual provisions that the polysilicon in our panels originated from areas that are not synonymous with widely reported modern slavery abuses.

We appreciate that modern slavery risks in the solar sector can relate to structural factors that are difficult for individual businesses to address, often resulting in supply chains that are unable to be audited. However, our engagement with suppliers on this issue has highlighted how we can use our leverage to promote increased transparency and action by individual suppliers.



Grievance mechanisms and remediation

As outlined in this statement, we take a range of steps to prevent and mitigate our modern slavery risks. However, we recognise that it is also important we are prepared to respond to modern slavery related allegations or incidents.

Our externally managed whistleblower line (available by phone and email) provides 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 our employees, contractors and other stakeholders, including suppliers and their workers.

During the year, we continued to raise awareness of the whistleblower process through regular employee communications, including when our updated Code of Conduct was rolled out. Importantly, we also included information about modern slavery red flags and our whistleblower mechanism in our modern slavery training for employees.

During the reporting period, no complaints relating to modern slavery were received through our whistleblower mechanism. However, we understand that modern slavery is complex to identify and that not identifying any incidents does not mean modern slavery could not occur in our supply chains.



Development of Modern Slavery Response Plan

During the reporting period, we developed and launched a four-step Modern Slavery Response Plan in close consultation with our Modern Slavery Working Group.



1. IDENTIFY

2. REVIEW

3. INVESTIGATE

4. REMEDIATE

The aim of the Response Plan is to provide a framework for APA to appropriately manage a potential modern slavery allegation or incident involving a supplier. We worked with an external business and human rights advisory firm to assist us to align the Response Plan with the UNGPs. For example, the Response Plan provides guidance about how we could assess whether we may have caused, contributed to, or be directly linked to modern slavery, in line with the UNGPs.

No incidents or reports of modern slavery were received in FY22. We understand that each allegation or incident of modern slavery raised will be unique. As per the Response Plan, any future reports of modern slavery would undergo the following:

- Establish a cross-functional team to manage our response;
- Work to prioritise the best interests of any victims;
- Consider the most appropriate approach to engage with law enforcement and other external stakeholders;
- Take other relevant steps to investigate the allegation or report, and;
- Work to always ensure the safety of our employees and any victims.

In FY23 the Response Plan will be formally incorporated into our Procurement Standard.

Effectiveness Assessment

Assessing the effectiveness of our modern slavery risk management helps us to understand the impact of our actions and identify opportunities for continuous improvement.

We see an effective response to modern slavery risks as one that is: fit for purpose; tailored to our context and risk profile; and meaningfully implemented across our business.

We aim to take an evidence-based approach to assessing the effectiveness of our actions. Our Modern Slavery Working Group is primarily responsible for assessing the effectiveness of our actions as part of our annual operating rhythm. The table below sets out how we monitor the effectiveness of our actions against key areas of our response.

Key actions taken	How we seek to measure the effectiveness of our actions	Outcomes
Governance of Modern Slavery Program		
Regular Modern Slavery Working Group meetings	Meetings held monthly to progress the roadmap and track actions.	Active participation by all Working Group members. Key actions implemented to schedule.
Development of Responsible Procurement Strategy	Annual review of strategy will incorporate progress of key initiatives and will be refreshed to further enhance maturity in responsible procurement capability.	Responsible Procurement Strategy approved and published internally.
Grievance mechanisms and remediation		
Monitoring of whistleblower mechanism	Number of complaints raised per financial year, which helps us to understand how the whistleblower mechanism is operating.	Zero whistleblower complaints raised in respect to modern slavery in FY22.
Development of our Modern Slavery Response Plan	When the Modern Slavery Response Plan is activated, we would seek to assess its effectiveness by reviewing any lessons learned.	Modern Slavery Response Plan approved and integrated into procurement standard.
Training development and modern slavery awareness		
Development and rollout of targeted face to face training for operational staff and employees who deal directly with suppliers.	Number of team members from priority groupings trained, which helps us to track awareness levels across our business. Monitoring feedback from training sessions to help us identify opportunities to further tailor the training to participants' needs.	Training needs analysis completed. Training module established in learning management system. Priority 1 group training completed. Priority 2 and 3 group training dates planned.
Taking steps to raise awareness of modern slavery to all APA employees	Number of articles published (4 in FY22) and feedback received.	Internal comms articles published to all APA employees.
	Monitor site traffic to track engagement.	Creation of modern slavery information site on intranet.
	Feedback from employees, which helps us to further tailor the intranet site and FAQs to employees' needs.	Modern slavery FAQs developed and published internally.
Procurement documentation		
Update Standards and Procedures to include specific modern slavery protocols	Feedback from employees and suppliers which helps in identifying areas where further governance or guidance is required.	Procurement Policy and Procurement Standard published for use by all APA embedded into business-as-usual practices.
Review Risk Management Approach	Annual review of Risk Management Approach.	Improvements from FY22 incorporated into Risk Management Approach.
Risk Management		
Supplier Prequalification (ASP) Program	ASP participation monitored and compliance tracked.	Modern slavery due diligence questionnaires completed for 238 contracted suppliers.
Implementation of our Risk Management Approach	Number of desktop risk assessments completed for high-risk suppliers.	33 desktop risk assessments completed for high-risk suppliers.
	Number of targeted supplier assessments commenced for shortlisted suppliers.	10 suppliers identified as requiring targeted review. 4 suppliers identified as requiring further investigation.
Selection and onboarding of new suppliers	New supplier procedure declarations tracked for completeness, which helps us to determine if suppliers understand the process.	495 compliant new suppliers in FY22.

Looking back

What we said we would do in our FY21 Modern Slavery Statement	Progress in FY22	Page/s
<p>Develop and deliver training: Further targeted mandatory training to be developed and rolled out to operational staff and employees who deal directly with suppliers.</p>	<p>Delivered for high priority trainees. Ongoing annual training.</p>	23
<p>Risk management approach: Continue with our data driven risk assessment and identify any high-risk suppliers which would require a targeted review through a desktop risk assessment and supplier follow-up.</p>	<p>Data driven risk assessment completed. Desktop risk assessments completed. Follow-up with high risk suppliers in progress.</p>	22
<p>Update Standards and Procedures: Update the standards and procedures identified during the review in FY21.</p>	Completed	20-21
<p>Develop modern slavery response plan: Include a response strategy / plan for use if an incident of modern slavery is identified in our supply chain.</p>	Completed	29
<p>Collaboration with industry: Collaborate with industry networks and peer groups to better understand approaches being taken to assess suppliers beyond the first tier.</p>	Commenced	26
<p>Responsible procurement: Begin development of our Responsible Procurement Strategy.</p>	Commenced	23-24
<p>We have delivered the following additional initiatives during the reporting period:</p>		
Increased internal communications to all employees		23
Released an awareness video focusing on purchasing of solar panels to all employees		23
Dedicated modern slavery intranet site launched		23
Commenced the initiative for APA to achieve a Corporate Ethics Mark by having Procurement complete the CIPS Ethics Testing		23
Mandatory human rights declaration and acceptance of APA's Code of Conduct requested for all cleaning service providers		26



Looking forward

We are continuing to learn and mature our approach to modern slavery year on year. Our roadmap has been agreed with our Modern Slavery Working Group and builds on our progress to date, and the improvement opportunities identified in FY22.

In the coming year, our priorities are:

Training & awareness – embed modern slavery training as part of business as usual, extend information sharing and awareness communications.

Risk management – deep dives / audits for suppliers operating in high risk categories and/or countries.

Continuous improvement – review of supplier modern slavery questionnaire. Review and uplift of our risk management approach and desktop risk assessment tool.

Documentation – review and update relevant policies and procedures to integrate our risk management approach.

Responsible procurement – finalisation and approval of inaugural strategy. Commence execution of the responsible procurement strategy through targeted initiatives.

Industry collaboration – continue to engage with industry networks and peer groups to provide opportunities for shared learnings in our assessment of suppliers beyond the first tier.



Process of consultation

The following is a list of the reporting entities covered by this Modern Slavery Statement.

The reporting entities, and their owned and controlled entities, operate under the direction and governance of the APA Group and share the same executive management. This statement therefore reflects the risks in the reporting entities and their owned and controlled entities as well as the actions taken to assess and address those risks.

During the reporting period, the Modern Slavery Working Group actively engaged and consulted with APA's executive management covering all companies we own or have an interest in, and manage, or operate. This includes all the reporting entities covered by this statement. Topics of consultation included the reporting requirements under the *Modern Slavery Act 2018* (Cth), information regarding the actions undertaken and planned actions to address the reporting requirements.

During the reporting period, updates were provided to the Executive Risk Management Committee, as well as the Risk Management Committee. Prior to being put to the Board for review and approval, the statement was reviewed by each member of the Modern Slavery Working Group, Acting CEO, Group Executive Infrastructure Development, General Manager External Affairs and Reputation, General Manager Risk Compliance and Insurance, General Manager Sustainability and General Manager Business Services & Finance Transformation.

This statement has been endorsed by APA's Executive Leadership Team and was approved by the Board of APA Infrastructure Limited (**APAIL**) as the principal governing body of the highest entity in the APA Group, for each of the reporting entities listed in Appendix 1.



Appendix 1 – Our reporting entities

On 6 May 2022, APA Group changed its group entity names to better reflect its renewed focus on energy infrastructure, with a portfolio of gas, electricity, solar and wind assets across Australia. The naming conventions, now harmonised across the APA Group, are:

- Australian Pipeline Limited (APL) changed to **APA Group Limited** (APA)
- Australian Pipeline Trust (APT) changed to **APA Infrastructure Trust** (APA Infra)
- APT Investment Trust (APTIT) **APA Investment Trust** (APA Invest)
- APT Pipelines Limited (APTPL), which is the borrowing entity of the APA Group, changed its name to **APA Infrastructure Limited** (APAIL)

Name	Description
APA Infrastructure Trust	One of two registered investment schemes that comprise APA Group (APA), and parent of APA Infrastructure Limited.
APA Infrastructure Limited	Investment in controlled entities and acting as the borrowing entity for APA Group, that comprises APA Infrastructure Trust (APA Infra) and APA Investment Trust (APA Invest) and their controlled entities.
APT Pipelines Investments (NSW) Pty Ltd	Parent of East Australian Pipeline Limited (EAPL). The entity is non-operating.
East Australian Pipeline Limited	Owner and operator of the Moomba to Sydney Pipeline.
APT Pipelines Investments (WA) Pty Ltd	Holding entity for APA's interests in the Goldfields Gas Pipeline, Parmelia Gas Pipeline, and Northern Goldfields Interconnect (under construction).
SCP Investments (No 1) Pty Ltd	Holding entity for APA's 88.175% interest in the Goldfields Gas Pipeline. The entity is non-operating.
SCP Investments (No 2) Pty Ltd	Wholly owned subsidiary of SCP Investments (No 1) Pty Ltd. The entity is non-operating.
Southern Cross Pipelines Aust Pty Ltd	Wholly owned subsidiary of SCP Investments (No 2) Pty Ltd. One of the JV owners of Goldfields Gas Pipeline, holding 62.664% interest.
APA VTS Australia Pty Limited	Parent of APA VTS Australia (Holdings) Pty Limited, which holds APA's interest in the Victoria Transmission System (VTS). The entity is non-operating.
APA VTS Australia (Holdings) Pty Limited	Parent entity of APA VTS Australia (Operations), which owns and operates the VTS. The entity is non-operating.
APA VTS Australia (Operations) Pty Limited	Wholly owned subsidiary of APA VTS Australia (Holdings) Pty Limited. Owner and operator of the VTS.
APT AM Holdings P/L	Wholly owned subsidiary of APA Infrastructure Limited. Parent of APT O&M Holdings Pty Ltd, whose controlled entities are responsible for the asset management and operations of Australian Gas Networks Limited (AGN).
APA Power Holdings Pty Ltd	Owner and operator of Gruyere Power Station and parent of Darling Downs Solar Farm (DDSF), owner and operator of DDSF. Parent of APA Power PF Pty Ltd, which holds APA's interest in Diamantina Power Station via its controlled entities.
APA Power PF Pty Limited	Holds APA's interest in Diamantina Power Station via Diamantina Holding Company Pty Limited. The entity is non operating.
Diamantina Holding Company Pty Limited	Holds APA's interest in Diamantina Power Station. The entity is non-operating.
Diamantina Power Station Pty Limited	Owner and operator of Diamantina Power Station.
APA Sub Trust No 2	Parent of APA EE Holdings Pty Limited which holds APA's interest in the Epic gas pipelines (Pilbara Pipeline and South West Queensland Pipeline) via its controlled entities. Trustee is APA Group Limited (APA).
APA EE Holdings Pty Limited	Holds APA's interest in SWQP and Pilbara Pipeline via its controlled entities. The entity is non operating.
Epic Energy East Pipelines Trust	Holds APA's interest in SWQP and Pilbara Pipeline via its controlled entities. The entity is non operating.
APA EE Pty Limited	Holds APA's interest in SWQP and Pilbara Pipeline via its controlled entities. The entity is non operating.
APA EE Australia Pty Limited	Holds APA's interest in SWQP and Pilbara Pipeline via its controlled entities. The entity is non operating.
APA (SWQP) Pty Limited	Owner and operator of the South West Queensland Pipeline (SWQP).
APA Transmission Pty Limited	Wholly owned subsidiary of APA Infrastructure Limited. Holds APA's interest in the Wallumbilla Gas Pipeline (WGP), Reedy Creek Wallumbilla Pipeline and the APA Western Slopes Pipeline project via its controlled entities.
APA BidCo Pty Limited	Holding entity for APA's interest in the WGP. It is a non operating entity.
APA WGP Pty Ltd	Owner and operator of the WGP.

Appendix 2 - How our statement addresses the mandatory criteria

Mandatory criteria	Sections	Page/s
a) Identify the reporting entity	About this statement	01
	Appendix 1	34
b) Describe the reporting entity's structure, operations and supply chains	About APA	04, 06-07
	Our operations and supply chain	08-15
c) Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls	Modern slavery risks in our operations	16
	Modern slavery risks in our investments	16
	Modern slavery risks in our supply chain	16-17
d) Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes	Actions taken to assess and address the risks	18-19
	Policy framework	20-21
	Risk management approach	22
	Modern slavery roadmap	23, 25-27
	Responsible Procurement Strategy	24
	Grievance mechanisms and remediation	28
e) Describe how the reporting entity assesses the effectiveness of these actions	Effectiveness assessment	30
	Looking back	31
	Looking forward	32
f) Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls	Process of consultation	33
g) Any other information that the reporting entity, or the entity giving the statement, considers relevant	Impact of Covid-19	26
	Findings from our payroll data review	16
	Message from Acting CEO	02
	Our modern slavery journey to date	03





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