

GDI (EII) Pty Limited

FY25 Modern Slavery Statement



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1 Reporting criteria 1

1.1 About GDI

GDI (EII) Pty Limited (ACN 154 766 524) (GDI (EII)) is an unlisted investment vehicle that wholly owns the Allgas natural gas distribution network (Allgas Network). GDI (EII) has 100% ownership of the trading entity Allgas Energy Pty Limited (ACN 009 656 446) (Allgas). In this statement, when we refer to "GDI" it is a reference to GDI (EII) and Allgas, which are both reporting entities under the Modern Slavery Act 2018 (Cth) (Act).

Allgas has three wholly owned subsidiaries which do not trade. Allgas Toowoomba Pty Limited ACN 009 655 645 (which holds network infrastructure assets), Allgas Pipelines Operations 1 Pty Limited ACN 154 784 853 (which holds the investment in Allgas Pipelines Operations Pty Limited), and Allgas Pipelines Operations Pty Limited ACN 076 666 807 (which holds easements).

The Allgas Network extends from Brisbane, south of the river, to the northern tip of New South Wales, with separate networks in Toowoomba and Oakey. It is supplied with natural gas from a variety of upstream producers that connect into APA's East Coast Grid via the Roma – Brisbane Pipeline (RBP). The Allgas Network connects to the RBP at Oakey, Toowoomba and Brisbane.

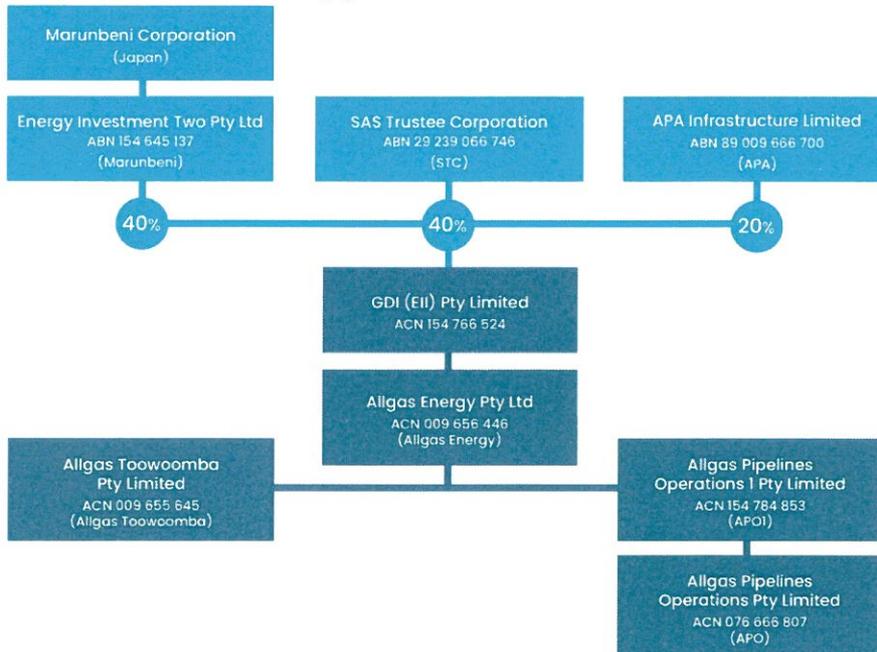
The Allgas Network consists of over 4,000km of pipelines and distribution mains, delivering gas to over 120,000

customers in QLD and NSW. Its major customers are energy retailers and commercial and industrial users.

The Allgas Network is a non-scheme pipeline and subject to light regulation pursuant to the National Gas Law and National Gas Rules by the Australian Energy Regulator.

APA Group (APA) provides operations and maintenance and corporate services to GDI via a services agreement. APA is responsible for the supply chain of GDI and their owned or controlled entities. The services agreement between APA and GDI expires on 31 December 2026. APA has confirmed it does not intend to extend the services agreement, however will continue to provide corporate services to GDI. Currently GDI is in the process of finalising a long-term operations and maintenance agreement with a reputable third party which is estimated to commence on 1 December 2025.

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



1.2 About this statement

This Modern Slavery Statement (statement) has been prepared for GDI (EII) and Allgas by APA, the operator of the Allgas Network, to meet the requirements of the Act for the financial year ending 30 June 2025 (FY25). The entities covered by the statement are identified in [Appendix 1](#).

This statement has been prepared by APA's Sustainability and Corporate Affairs team in conjunction with APA's Modern Slavery Working Group, with the assistance of external subject matter experts. Information about the approach to consultation with reporting entities and owned or controlled entities to develop this statement is set out under [Reporting Criteria 6](#).

This statement was approved by the GDI Board on 2 December 2025 on behalf of all reporting entities covered by this statement. The statement has been signed by the Chair of GDI.



Garrick Rollason

Chair GDI Pty Limited

2 Reporting criteria 2

2.1 Operating Model

The Allgas Network is operated by APA under the terms of a services agreement in which APA performs all the services necessary for the management of the gas distribution network. This includes managing the operations, procurement policies and procedures, and supply chains.

2.2 Operations and supply chain

Total procurement spend = ~\$74million

Direct suppliers engaged = 16

Indirect suppliers engaged = 262

During FY25, GDI's procurement spend was approximately \$74 million, with 16 tier 1 suppliers. APA, on behalf of GDI, procured products and services from 262 tier 2 suppliers. The term 'tier 1 suppliers' refers to GDI's direct suppliers of goods or services. References to 'tier 2 suppliers' are the suppliers or subcontractors of GDI's tier 1 suppliers, 'tier 3 suppliers' are the suppliers or subcontractors of GDI's tier 2 suppliers, and so forth.

The procurement spend is predominately managed through contractual arrangements including:

- purchase orders governed by master agreement terms and conditions, such as agreements for professional services or supply of goods,
- bespoke agreements for the procurement of complex and high value goods, including for products such as valves and regulators to support the development of new assets,
- multi-year standing arrangements governed by Precedent Agreements such as long-term services agreements.

The following table shows GDI's main areas of operation and its corresponding supply chains.

Area	Main Operations	Supply Chain
Network Operations	Operation and maintenance of third party owned gas distribution networks. Development and delivery of asset replacement, growth projects and third-party works, such as new mains and services, extensions and reticulation of new developments.	<p>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</p> <p>Australian-based construction and maintenance contractors, mains and service layers, main renewal contractors, plumbers and gas fitters</p> <p>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</p>
Head Office ¹	<p>Corporate services, such as:</p> <ul style="list-style-type: none"> Finance and Technology Strategy and Corporate Development People, Safety and Culture Procurement Risk, Compliance and Insurance Legal and Governance Sustainability (including Climate) and Corporate Affairs Health, Safety, Environment and Heritage 	<ul style="list-style-type: none"> Fleet management Professional services Information Technology, including telecommunications Safety clothing/personal protective equipment (PPE) Recruitment and labour hire Office products Corporate real estate and facilities Marketing and advertising Travel Catering Training and development Insurance

¹The GDI head office is APA's head office. All corporate functions are provided by APA staff. In the same way APA provides all operational support. GDI does not have its own employees.

3 Reporting criteria 3: Identifying modern slavery risks

GDI relies on APA's analysis of its own operational and supply chain risks, as APA provides GDI with operations and maintenance and corporate services, and GDI's suppliers are a subset of APA's suppliers.

APA draw on the UN Guiding Principles on Business and Human Rights (UNGPs) to inform our approach to assessing our potential links to modern slavery risks.

As the globally recognised standard for addressing business-related adverse human rights impacts, the UNGPs outline a three-part continuum that explains how companies may be connected to human rights violations, including modern slavery. The Australian Government also encourages businesses to use this continuum to assess and report on their modern slavery risks.

 Cause	 Contribute	 Directly Linked
<p>Entities can cause modern slavery if their operations 'directly result in modern slavery practices'.</p> <p>Hypothetical example:</p> <p>A construction contractor working in the infrastructure sector intentionally exploits foreign workers it recruits, including confiscating their passports to force them to work.</p>	<p>Entities can contribute to modern slavery where their 'acts or omissions...facilitate or incentivise' modern slavery practices.</p> <p>Hypothetical example:</p> <p>An infrastructure company revises the parameters for a major project at short notice, including requiring a subcontractor to meet tightened cost and timing deadlines that could only reasonably be achieved by the subcontractor requiring excessive working hours and unpaid overtime.</p>	<p>An entity can be directly linked to modern slavery where its 'operations, products or services. (are) connected to modern slavery through the activities of another entity...(it has) a business relationship with'</p> <p>Hypothetical example:</p> <p>An infrastructure company sources personal protective equipment (PPE) produced by a supplier using cotton harvested by a sub-supplier using forced labour.</p>

3.1 Modern slavery risks in our operations

As noted in previous modern slavery statements, and in this statement, GDI and its subsidiaries do not have any employees. APA employees and contractors work on the network on behalf of GDI. As such, there remains a low risk that GDI or its subsidiaries have caused, contributed or were directly linked to, adverse human rights via their operations.

In FY25, APA consider the risk of modern slavery in our operations to be low as:

- our workforce is based in Australia and primarily employed on a permanent or fixed-term basis
- we are committed to complying with all applicable legislative requirements regulating workplace relations in Australia and have systems in place to monitor and support ongoing compliance
- we have well-defined internal policies and processes in place to maintain a safe and fair working environment, such as: recruitment and onboarding processes including employment, visa and health checks, induction processes and training, and comprehensive policies and procedures.

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

APA's Apprentice Program is open to school leavers aged 16 and above. We aim to provide a safe and fair working environment for our apprentices in line with Australian workplace law. All Apprenticeship Program participants undergo a multiweek induction program which includes training courses on issues including safety, wellbeing, and internal systems and procedures. They then complete their apprenticeships in areas such as civil construction and fabrication

3.2 Modern slavery risk in our supply chain

GDI's primary supplier is APA. APA provides operations and maintenance and corporate services to GDI via a service agreement.

APA recognises modern slavery risks are likely to be present in parts of our supply chain. GDI recognises that it may be directly linked to modern slavery through 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.

We understand that we could also potentially contribute to modern slavery if the controls we have in place fail or are not fit for purpose.

The visual below highlights our key areas of modern slavery risk and shows the different risk factors we take into account when assessing our risks.

Modern slavery risk areas in APA's supply chain

Our key modern slavery risk areas

 Construction materials	 Freight and logistics	 Fleet vehicles	 IT hardware / software
 Temporary and contract workers	 Apparel	 Travel	

Influencing risk factors

Raw materials extracted or processed using child or forced labour	Dangerous / substandard working conditions	High-level of subcontracting	Sourcing from geographies with heightened vulnerability to, and prevalence of, modern slavery
Reliance on migrant workers	Reliance on complex supply chains	Use of base skilled workers	Sourcing from sectors with heightened risks of modern slavery

4 Reporting criteria 4: Actions taken to assess and address the risk

GDI remains committed to taking meaningful action to address risks in its operations and supply chain. All of the actions outlined in this section were undertaken by APA on behalf of GDI, given APA operates GDI's assets and is responsible for its supply chain. APA's modern slavery statement provides additional details in relation to its actions, for APA and on behalf of GDI.

4.1 Governance Framework

APA's governance framework helps to manage material risks and opportunities, including risks relating to modern slavery, and material risks are escalated through the executive leadership team to the GDI Board.

APA's cross-functional Modern Slavery Working Group supports the Executive in providing reporting to the Board, that our approach to managing modern slavery risks is effective and aligns with internal policies and standards.

4.2 Policies and processes

GDI's risk management framework leverages APA's group wide policy framework, which sets the foundation for the approach to managing modern slavery risks.

APA's Compliance Management Framework governs policy and processes and underpins our approach to managing modern slavery risks across our operations and supply chain. Details of relevant policies can be found in [Appendix 3](#).

4.3 Training and awareness raising

Staff training

Providing tailored modern slavery training to key staff across our business is one of the foundations of our modern slavery response. We see training as critical to building and maintaining awareness of modern slavery across key areas of our business and to help ensure relevant staff are equipped to identify and safely report any concerns.

During the reporting period, we integrated modern slavery content into our mandatory Procurement e-Learning module for all employees.

Micro-training was delivered to APA employees to provide them with the knowledge and tools to identify potential modern slavery red flags across accommodation, cleaning and Warehousing and Logistics in hotels and other accommodation settings. For more information, see our case study on page [10](#)

CIPS Mark

During FY26, we renewed our Chartered Institute of Procurement and Supply (CIPS) Corporate Ethics Mark.

The CIPS Corporate Code of Ethics was developed as part of CIPS' commitment to reinforcing global 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.

APA employees responsible for sourcing, supplier selection and supplier management activities completed the CIPS Ethics Test during the year.

The annual training, along with signing the CIPS Statement of Commitment, reinforces APA's focus on ethical sourcing and engagement with suppliers, including in relation to modern slavery.

Board engagement

Engagement in November 2024 with a presentation of the FY24 Modern Slavery Statement and supporting update on progress against the Modern Slavery Roadmap and the the government's review of the Modern Slavery Act 2018 (Cth).

Internal communications

We reinforced awareness with internal communications throughout the year, covering topics such as:

- Human Rights Day
- Publication of our inaugural [Modern Slavery Policy](#)
- Release of the 6th edition of the Chocolate Scorecard
- The intersectionality of modern slavery and First Nations Peoples
- Release of our new ethically sourced merchandise range
- Release of our FY24 Modern Slavery Statement

4.4 Modern Slavery Risk Management Approach

As our most likely connection to modern slavery risks is through our supply chain, the modern slavery due diligence approach is focused on suppliers. APA supports the assessment of modern slavery risks through due diligence activities in supplier management processes. This includes a series of levers outlined below.

Supplier screening and supply chain mapping

In FY25, APA mapped the theoretical supply chain risk for suppliers, including those of GDI. Supply chain mapping is completed for all suppliers, tracing economic inputs typically required to produce products and services sourced from tier 1 up to tier 10 suppliers. This supply chain mapping then links supply chain data from 190 countries and over 15,000 industry sectors. Data is typically sourced from:

- the United Nations' (UN) System of National Accounts
- UN COMTRADE databases
- Eurostat databases
- the Institute of Developing Economies, Japan External Trade Organization (IDE/JETRO)
- numerous national agencies including the Australian Bureau of Statistics.

This process also examines supply chains against international standards:

- the UN Guiding Principles on Business and Human Rights
- Walk Free Global Slavery Index
- International Labour Organisation's (ILO) Global Estimates of Modern Slavery
- the United States' Reports on International Child Labour and Forced Labour.

Results from the screening and supply chain mapping are reviewed and may result in further supplier assessments.

Category and sourcing strategies are developed to further identify, mitigate and manage industry, supplier and region-specific risk considerations. Insights are utilised from supply chain screening and supply chain mapping activities, as well as inputs from monitoring and supplier assessment activities, throughout the procurement, supplier and contract management lifecycle.

Supplier onboarding

All new suppliers that were onboarded into the APA supplier eco-system during the reporting period by APA completed human rights declarations. This process included suppliers declaring their commitment to respect workers' fundamental human rights before they are added to our internal systems.

This includes committing to:

- providing a safe working environment (and appropriate worker accommodation facilities where relevant)
- paying a fair wage in accordance with all relevant laws and regulations
- treating workers equally without distinction based on gender, race, age or religion
- ensuring workers are free from forced labour, including that workers are able to access employee documentation and passports (if internationally sourced labour)
- ensuring workers are free to join a union or other similar collective bargaining arrangements.

Supply chain risk monitoring

Supplier monitoring is undertaken to assess alignment to [APA Supplier Code of Conduct](#). This process includes monitoring for inherent modern slavery risk where there is an increased likelihood of modern slavery occurring, such as in specific industries and location. Where suppliers are found to have caused or contributed to modern slavery, APA's response would be guided by the United Nations Guiding Principles, including the implementation of relevant remediation and corrective actions.

Supplier assessment

Supplier assessments may include desktop assessments with systematic verification of evidence; supplier self-assessment questionnaires, on-site assessments carried out by APA employees, consultants, third-parties, and/or independent accredited auditing bodies. These assessments are utilised to assess considerations such as the level of modern slavery risk in the supply chain, and the maturity of suppliers' modern slavery risk management response. Assessments consider:

- company information and related policies
- modern slavery supplier risk screening and assessment

- training and education
- due diligence
- grievance and remediation mechanisms
- measuring effectiveness
- industry collaboration.

Assessments are utilised to determine if further due diligence, such as deep-dives or detailed risk assessments, and/or remediation actions such as Supplier Improvement Plans are required.

The deep-dive process may incorporate a desktop review of publicly available, and other disclosed supplier information, considering production sites, ownership structure, directors, and any other relevant information that may determine the risk of modern slavery in its operations, and supply chain. This information is then assessed to determine if direct engagement with a supplier is required.

Where required, detailed risk assessments, supplier risk treatment plans and/or supplier performance plans are defined and implemented throughout contracting and contract management phases. Suppliers that fail to meet our minimum requirements may result in exclusion from procurement and purchasing activities.

Supplier performance management

Supplier performance management may be required for existing suppliers where APA identifies the need for further modern slavery due diligence, and/or opportunities for improvement.

The approach will typically commence with direct supplier engagement, with consideration given to Supplier Assessment insights. The supplier will be provided with relevant information detailing insights captured, to validate and/or respond, such as modern slavery risks identified or potential improvements or gaps in due diligence. APA would then seek to address any residual areas of concern by seeking agreement of remediation actions and timing with the supplier.

Supplier development plans

Supplier Improvement Plans form part of the supplier management program, where APA may provide a range of insights and technical support to build capacity and capability within the industry, our suppliers, our supply chain and potential suppliers.

Contracting and contract management practices

The Procurement Governance Framework provides details and requirements related to contracting, contract management and supplier management to increase awareness of individual's role and responsibilities throughout the purchasing process, the key risks inherent in procuring goods and services on behalf of APA.

Role specific training is provided to all employees and contingent labour to ensure individuals responsible for undertaking supplier evaluations, contracting, contract management and supplier management activities on behalf of APA are aware of their roles and responsibilities, when identifying, assessing, managing and monitoring supplier and supply chain risks, including Modern Slavery.

Procurement practitioners are provided ethical procurement and supply training encompassing environmentally responsible procurement, human rights, fraud, bribery and corruption to enhance the proficiency of our practitioners, ensuring they maintain the highest standard of integrity in all business relationships, promote the eradication of unethical business practice, and ensure full compliance with laws and regulations.

APA's precedent agreements include modern slavery clauses and obligations to mitigate risk to personnel, by requiring workers:

- are paid a living wage
- receive a contract in writing in a language understood by them
- are of legal working age
- are not subjected to discrimination on any ground
- who are provided accommodation arranged by the supplier, have access to hot water for bathing, adequate heating and ventilation, reasonable personal space, hygienic facilities for cooking and eating and unrestricted ability to enter and exit the accommodation facilities
- are not subject to corporal punishment or mentally, physically, sexually or verbally abusive or inhumane treatment or cruel or abusive disciplinary practices in the workplace.

4.5 CASE STUDY: Targeting high risk areas and regional labour practices

During the reporting period, APA's assessment of regional suppliers in the cleaning and accommodation high-risk category provided valuable insights in an area where oversight had previously been limited.

Managing elevated risk in regional locations

APA conducted further assessments for suppliers in the cleaning and accommodation categories due to the elevated risk of modern slavery, linked to high levels of subcontracting, and reliance on migrant workers and transient labour, coupled with regional and/or remote nature of location operations.

Both cleaning and accommodation categories attract seasonal workers, specifically migrant and transient workers, who may be particularly vulnerable to modern slavery in Australia because of language barriers, lack of awareness of local workplace laws, expectations based on their experience in other countries and the short term nature of their visa. In addition, these industries are dominated by casual, short-term, low-skilled labour with high-levels of subcontracting increasing the risk of exploitation, potential abusive practices or poor employment conditions which can lead to modern slavery.

All suppliers in the cleaning and accommodation categories were required to complete a self-assessment. Responses were reviewed, and where required, further clarification, due diligence and/or assessment steps were undertaken.

Building capability in our people

Micro-training was developed and provided to key APA employees to build awareness, advocacy, and capability for identifying red flags and capturing observations to support our due diligence practices. This included:

- information on modern slavery, risk factors, context and red flags
- information on modern slavery risk in the accommodation, cleaning and warehouse and logistics industries
- what steps has APA taken so far to identify modern slavery risk for these suppliers
- an Accommodation Checklist was also developed, which included things to look for and space to record observations.

Focusing our efforts

Where supplier assessments determined that suppliers required further due diligence, micro-trained APA employees completed on-site audits during their planned travel and site visits.

Following completion, the APA employee observations recorded were reviewed for red flags. To date no red flags have been identified for suppliers, however observations have been utilised to enhance micro-training.

Leveraging employee diversity and enhancing accessibility

This initiative demonstrated the value of empowering APA's diverse workforce to actively participate in modern slavery risk identification and mitigation efforts. By engaging our team members who possess varied linguistic capabilities and cultural insights, we were able to access previously untapped perspectives that enhanced our understanding of supplier practices across different regional contexts. This approach revealed opportunities for improvement in our grievance mechanisms, particularly through the strategic utilisation of employees' preferred working languages when conducting direct supplier engagements, creating more inclusive communication channels to enable supplier employees to express concerns more comfortably and comprehensively, ultimately strengthening the effectiveness of our oversight processes.

Overall outcomes and strategic impact

The outcome of this initiative elevated awareness of modern slavery risks among our workforce while providing APA with invaluable insights into supplier practices, especially in regional locations and supplier labour practices where oversight had previously been limited. The integration of multilingual direct engagement capabilities and systematic observation protocols by APA's employees has also identified opportunities to develop more robust, culturally sensitive, and accessible mechanisms for ongoing supplier monitoring and modern slavery risk management across our extended supply chain network.

4.6 Stakeholder engagement and collaboration

In addition to engagement with suppliers (outlined above), APA engages with other external stakeholders on modern slavery. Throughout FY25, the Modern Slavery Team engaged with a range of external stakeholders, including customers, investors, industry peers and external human rights experts.

These engagement opportunities support us to monitor and learn from peers and contribute to industry wide approaches and standard setting.

Clean Energy Council (CEC)

APA is a member of the CEC Risk of Modern Slavery Working Group. The CEC Working Group provides an opportunity for APA to meet with peers to discuss modern slavery risks facing the energy industry.

The Working Group has met regularly throughout the year and we participated in each of these meetings.

A key area of focus for the Working Group was to support the development of a Code of Practice (CoP) on Managing Modern Slavery Risks in Renewable Energy Value-Chains in collaboration with the NSW Anti-slavery Commissioner.

APA is a member of the sub-group that was established by the CEC to draft the CoP and determine the associated mechanisms and frameworks in order to operationalise the CoP, and setting out the commitments participants would be expected to adhere to.

APA was an active participant at the workshops during the reporting period.

United Nations Global Compact (UNGC) Membership

Our ongoing membership of the UNGC continues to reinforce our commitment to uphold the 10 Principles of the United Nations in the areas of Human Rights, Labour, Environment and Anti-Corruption, including the Sustainable Development Goals.

Our GRI Index and SASB Index are available in the [FY25 Sustainability Data Book](#).

United Nations Global Compact Network Australia Modern Slavery Community of Practice

Through our UNGC membership, we were able to attend meetings and events during the reporting period, including participation in two Modern Slavery Community of Practice meetings.

The Modern Slavery Community of Practice brings together participants to explore topics including the Anti-Slavery Commissioner's Strategic Plan, rights-holder engagement, and global and local developments relating to business and human rights, including modern slavery.

Fair Supply

A number of APA employees closely involved in APA's modern slavery response participated in Fair Supply's Summer Program focused on business responsibilities in addressing Modern Slavery. The sessions included interaction with participants from various Australian companies.

4.7 Grievance mechanisms and remediation process

As outlined in this statement, APA takes a range of steps to prevent and mitigate modern slavery risks. We recognise that it is also important to be prepared to respond to actual or suspected incidents of modern slavery. The diagram below outlines APA's grievance mechanisms and remediation process; the remediation process is documented in APA's Modern Slavery Response Procedure.

APA's Grievance Mechanisms and Modern Slavery Response Procedure

Whistleblower Line			
<p>Our 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 Line 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. 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 APA's supply chains.</p>			
Other available mechanisms to raise concerns:			
<ul style="list-style-type: none"> Complaints made directly to APA employees/management Self-reporting by a supplier (in relation to its own activities or those of a sub-supplier) Reports made to Modern Slavery Team APA's modern slavery risk management activities APA employees identifying modern slavery red flags on sites Media or civil society reporting 			
1. IDENTIFY	2. REVIEW	3. INVESTIGATE	4. REMEDIATE
<p>Modern slavery report received</p> <p>Reports are received through the mechanisms mentioned above</p>	<p>Assessment of report</p> <p>All reports will be assessed and considered by APA and a decision will be made as to what type of investigation is required</p> <p>Addressing the report</p> <p>APA will establish a cross-functional Incident Response Team. Reports may be addressed informally or through a formal investigation, depending on the nature of the report</p>	<p>Incident identified</p> <p>Where an investigation identifies an instance of modern slavery, appropriate action will be taken. We will consider the most appropriate approach to engage with law enforcement and other external stakeholders</p> <p>Formal investigation</p> <p>Formal investigations may be confidential, will be conducted in a timely manner and will be fair and independent from any persons to whom the report relates</p>	<p>Determining our involvement under the UNGPs</p> <p>The Incident Response Team will determine if APA has caused, contributed, or is directly linked to the incident in line with the UNGPs. External expert business and human rights advice will be sought to inform the assessment</p> <p>Responding to the incident</p> <p>We have a clear commitment to taking a victim-first approach to remediation</p>

5 Reporting criteria 5: Assessing effectiveness

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

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 the business. We apply a quantitative and qualitative lens to assessing the effectiveness of our actions, which is the primary responsibility of the Modern Slavery Working Group.

The table below details the measures we monitor and our outcomes for FY25.

Key actions taken	How we measure its effectiveness	Outcomes
Governance framework		
Maintain Modern Slavery Working Group	<ul style="list-style-type: none"> Tracking frequency of meetings and progression of key action items. 	<ul style="list-style-type: none"> Modern Slavery Working Group met 6 times throughout the year. Key actions implemented or progressed as planned.
Policies and processes		
Refresh Modern Slavery Risk Management Approach Procedure	<ul style="list-style-type: none"> Annual review and refresh of Modern Slavery Risk Management Approach Procedure to help ensure it remains fit for purpose 	<ul style="list-style-type: none"> Modern Slavery Risk Management Approach Procedure embedded during FY25. Further uplift will be considered at the next review stage.
Supplier due diligence		
Map supply chains for high-risk suppliers	<ul style="list-style-type: none"> Number of high-risk suppliers identified as a result of the supply chain mapping and modern slavery risk assessment. 	<ul style="list-style-type: none"> FY24 spend data was used in FY25 to map theoretical supply chain risk as deep as tier 10 for all GDI suppliers, with supplier assessments completed for high risk suppliers.
Identify high-risk suppliers and issue supplier assessments for completion	<ul style="list-style-type: none"> Number of supplier assessments completed by suppliers, the quality of these responses, and the proportion of suppliers requiring a deep dive assessment. 	
New suppliers complete human rights declaration during onboarding	<ul style="list-style-type: none"> Number of new suppliers onboarded and compliant with the new supplier process. 	<ul style="list-style-type: none"> Human rights declaration completed for all new suppliers.
Training and awareness raising		
Continue to rollout face-to-face training to priority groups across the business	<ul style="list-style-type: none"> Mandatory training rolled out to all APA employees. Feedback from training sessions monitored and lessons learned incorporated into future sessions. 	<ul style="list-style-type: none"> All APA employees were enrolled in mandatory Procurement Fundamentals eLearning during FY25. Tailored training pack created for employees staying in accommodation in remote areas.
Raise awareness of modern slavery and red flags for APA through internal communications	<ul style="list-style-type: none"> Number of modern slavery related articles published, and feedback received throughout the financial year. 	<ul style="list-style-type: none"> 5 articles published on APA's intranet homepage and internal networking site. Modern slavery fact sheet for FY24 published on APA website.
Completion of the CIPS Ethics Test	<ul style="list-style-type: none"> All employees responsible for sourcing, supplier selection and supplier management activities complete CIPS training. 	<ul style="list-style-type: none"> All employees (61) responsible for sourcing, supplier selection and supplier management activities completed the CIPS Ethics Test during FY25.
Stakeholder engagement and industry collaboration		
Participation in Clean Energy Council	<ul style="list-style-type: none"> Number of meeting attended in the Clean Energy Council Working Group 	<ul style="list-style-type: none"> APA participated in three Clean Energy Council meetings in FY25 APA participated as a member CEC subgroup to draft the Code of Practice
Grievance mechanisms and remediation		
Monitor whistleblower mechanism	<ul style="list-style-type: none"> Number of modern slavery related complaints raised each financial year and the outcome of any complaints raised. 	<ul style="list-style-type: none"> A concern was raised at a Modern Slavery training session. The early stages of the Modern Slavery Response Procedure was initiated and upon assessment of the concern, it was referred for review via the Whistleblower team. The review found the allegation was unsubstantiated.
Maintain Modern Slavery Response Procedure	<ul style="list-style-type: none"> Number of times the Modern Slavery Response Procedure was activated for each financial year and the outcomes of any investigation. 	

5.1 APA's progress on past commitments

APA is committed to improving our approach to addressing modern slavery by applying lessons learned, strengthening our due diligence practices, and deepening our engagement with suppliers

The following highlights reflect our progress over the reporting period.

Goals for FY25 as set out in our FY24 statement	FY25 Progress
Training and awareness	
Reassess modern slavery training as part of business as usual.	▶ Modern slavery training built into mandatory Procurement Fundamentals eLearning for all employees.
Hold information sharing and awareness sessions for those employees managing high-risk categories.	▶ Modern slavery awareness communications released on APA's internal networking site.
Publish modern slavery fact sheet for FY24 reporting period.	▶ Published the FY24 Modern Slavery Fact Sheet on our external website to answer common questions from our existing, or prospective, customers, suppliers, and investors.
Risk management	
Continue to monitor emerging risks and proactively assess modern slavery risk prior to engaging suppliers.	▶ Supplier monitoring is undertaken to assess alignment to APA Supplier Code of Conduct. This process includes monitoring for inherent modern slavery risk where there is an increased likelihood of modern slavery occurring, such as in specific industries and location. Where suppliers are found to have caused or contributed to modern slavery, APA's response would be guided by the United Nations Guiding Principles, including the implementation of relevant remediation and corrective actions.
Progress the development of our Modern Slavery Risk Mitigation Engagement Guide for engaging with suppliers presenting an elevated-risk of modern slavery.	▶ The requirements of the Modern Slavery Risk Mitigation Engagement Guide have been incorporated as guidance in the procurement process. The updated guidance provides step by step instructions on how to assess and evaluate modern slavery risks and actions that can be taken to manage those risks
Annual renewal of Chartered Institute of Procurement and Supply (CIPS) Corporate Ethics Mark.	▶ Successfully renewed our CIPS Corporate Ethics Mark, as a demonstration of our ongoing commitment to ethical procurement practices.
Procurement and supplier engagement	
Progress our new Supplier Code of Conduct.	▶ Published our Supplier Code of Conduct which sets out APA's principles and standards on human rights and labour, business ethics, diversity and inclusion and engagement with communities.
Work collaboratively with suppliers to build awareness of modern slavery risks and capability to support related due diligence, including supplier training.	▶ APA sponsored the World Commerce & Contracting 'Sustainable Procurement and Commercial Practices' event to build awareness and capability with suppliers and customer organisations. As a co-host, APA led a discussion on driving sustainable practices within our supply chains, including incorporation of social and environmental criteria to promote transparency and ethical practices and how to develop and share supplier scorecards to enable supplier development.
Preparation and readiness for future <i>Australian Modern Slavery Act 2018 (Cth)</i> changes	▶ We have continued to closely monitor developments relating to the <i>Australian Modern Slavery Act 2018 (Cth)</i> and the Government's response to the proposed recommendations, ensuring we remain aligned with evolving regulatory expectations.
Develop an action plan template to support the Modern Slavery Response Procedure, for use during investigations where it is determined that APA has caused or contributed to an incident.	▶ A review of our grievance mechanisms is underway to determine how best to strengthen the Modern Slavery Response Procedure and assess gaps in related protocols, including the feasibility of action plan templates. Improvement plans for suppliers have now been embedded into procurement processes.
Responsible procurement	
Continue support for Reconciliation Action Plan delivery.	▶ Procurement teams supported and contributed to the delivery of APA's Reflect RAP obligations for First Nations peoples and provided input on procurement focused actions in the Innovate RAP. We recognise First Nations communities have historically been subject to conditions that may be recognised as modern slavery today. Our Innovate RAP includes actions to improve employment outcomes by increasing First Nations recruitment, retention, and professional development as well as increase First Nations supplier diversity to support improved economic and social outcomes.
Industry collaboration	
Collaborative supplier engagement.	▶ Enhance our due diligence on current and potential suppliers in two categories; cleaning and accommodation. Refer to the case study on page for more details.
Participate in Clean Energy Council (CEC) Modern Slavery Working Group.	▶ CEC Modern Slavery Working Group attendance and participation.
Grievance and remediation	
Refresh our Modern Slavery Response Procedure.	▶ Modern Slavery Response Procedure was reviewed and updated to incorporate lessons from the previous reporting period, including to provide further clarity on APA's internal process and ensure it remains fit for purpose.
Continue the review of APA's grievance mechanisms in terms of awareness and accessibility.	▶ Grievance mechanism included in APA's new Supplier Code of Conduct to increase awareness and accessibility of the mechanism.

6 Reporting criteria 6: Consultation process

6.1 Process of consultation with reporting entities and owned or controlled entities

GDI (EII), Allgas and their owned or controlled entities (which do not trade) have a common directorship and management team. They also share a supply chain, which is managed by APA. This statement was prepared in tandem with APA's statement. Accordingly, APA and GDI have a common modern slavery risk in their operations and supply chains, which is described in this statement.

The members of all of the GDI boards are common and have been notified of the key requirements of the Act and the actions undertaken to address and assess the risk of modern slavery as detailed in this statement.

7 Appendix 1 – Reporting entities

Name	Description
GDI (EII) Pty Limited ACN 154 766 524	Reporting Entity An unlisted investment vehicle that wholly owns the Allgas natural gas distribution network.
Allgas Energy Pty Limited ACN 009 656 446	The trading entity for the Allgas Network which extends from Brisbane, south of the river, to the northern tip of New South Wales, with separate networks in Toowoomba and Oakey.
Allgas Toowoomba Pty Limited ACN 009 655 645	Holds network infrastructure assets
Allgas Pipelines Operations 1 Pty Limited ACN 154 784 853	Holds the investment in Allgas Pipelines Operations Pty Limited.
Allgas Pipelines Operations Pty Limited ACN 076 666 807	Holds easements.

8 Appendix 2 – Key supply chain modern slavery controls

The table below provides details of the key controls in place for high-risk goods and services we procure and outlines further information about the relevant risks.

High risk area	Goods / service procured by APA	Generally known modern slavery risks (key risks relating to each high-risk area are outlined below)	Controls to mitigate and manage risk
Construction materials	<ul style="list-style-type: none"> Lubricants, oils, greases and anti-corrosives Valves, hardware and fittings Pipe and pipe fittings 	<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, glass, polyvinyl chloride and construction films, which may involve modern slavery risks due to the way these materials are produced or manufactured. 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. Similarly, mining operations for copper, tin, lead, lithium, quartz, silicon, tellurium, arsenic, nickel, manganese, 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>Key controls:</p> <p>New suppliers are required to declare their commitment to respect workers' fundamental human rights. For more information, see page 8.</p> <p>All existing suppliers are assessed as per APA's Modern Slavery Risk Management Approach Procedure, see page 8.</p> <p>Modern slavery clauses and obligations are included in relevant precedent agreements.</p> <p>Modern slavery questions are included in tenders.</p> <p>APA's policy framework</p>
Renewable energy	<ul style="list-style-type: none"> Batteries, cells and accessories 	<p>Key minerals used in batteries such as cobalt and lithium may carry higher risks for modern slavery, including where they are sourced from higher risk countries.</p>	<p>Key controls:</p> <p>As per above</p>
Freight and logistics	<ul style="list-style-type: none"> Logistics services for infrastructure delivery projects 	<p>There is a risk that freight and logistics services provided by third parties 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.</p>	<p>Key controls:</p> <p>As per above</p>
Fleet Vehicles	<ul style="list-style-type: none"> Purchase of fleet vehicles 	<p>There is a risk that raw material extraction, manufacture and disposal could be associated with vulnerable populations in higher-risk countries. This includes the worst forms of child labour and forced labour in the extraction of cobalt used in the production of batteries found in a variety of technology products and electric vehicles.</p>	<p>Key controls:</p> <p>As per above</p>
IT hardware/software	<ul style="list-style-type: none"> ICT hardware Telecommunications hardware Software maintenance and support 	<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. The NSW Anti-slavery Commissioner's IRIT identifies ICT hardware as an area with well-established evidence of modern slavery risks in its supply chains, including around child labour and forced labour. The IRIT also cites complex subcontracting arrangements in supply chains and the use of labour hire agencies as factors that can increase risks of exploitation. 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. The NSW Anti-slavery Commissioner's IRIT identifies offshore call centre services as having higher risks for modern slavery, where there are known to be high staff turnover rates due to high workloads and abusive practices.</p>	<p>Key controls:</p> <p>As per above</p>

Temporary and contract workers <ul style="list-style-type: none"> • Labour hire and other temporary workers • IT service delivery • Management consultants • Construction design services • Cleaning and security service providers • Catering providers 	<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>	<p>Key controls:</p> <p>As per above</p> <p>Additional controls:</p> <p>Labour hire companies must hold regulatory registration, where required.</p>
Apparel	<p>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. The NSW Anti-slavery Commissioner's IRIT identifies uniform and workwear procurement as having a high level of inherent modern slavery risk due to the difficulty in tracing raw materials and known risks of forced labour and child labour at the raw material stage and in manufacturing. The IRIT also identifies the casualisation of workforces and limited unionisation as risk factors.</p>	<p>Key controls:</p> <p>As per above</p> <p>Additional controls:</p> <p>Approved preferred supplier is engaged for the procurement of safety clothing and PPE. The supplier monitors and confirms their tier 1 (our tier 2) suppliers for compliance to ethical sourcing and accreditation, with 100% of certificates of currency received from factory audits. These include:</p> <ul style="list-style-type: none"> • Sedex Members Ethical Trade Audit
Travel	<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>	<p>Key controls:</p> <p>As per above</p> <p>Additional controls:</p> <p>Suppliers for domestic accommodation are vetted annually through a tender process in consultation with our travel management partner. Preferred suppliers are selected based on their responses to questions, such as, compliance with local employment laws, and organisation policies and grievance mechanisms.</p>

9 Appendix 3 – APA’s policy framework*

These policies are supported by standards that set out performance requirements and detailed procedures. They are periodically reviewed to ensure they remain relevant and are made available on APA’s website or intranet. Key policies governing ethics and integrity at APA include (in alphabetical order):

*References to “we”, “us” or “our” in this section refers to APA.

Policy	Overview and relevance to modern slavery	How this policy continued to be implemented at APA during the reporting period
Code of Conduct (Our Code)	The APA Code of Conduct brings our purpose and culture to life so we can make the right choices every day. It is underpinned by our behaviours of being courageous, accountable, nimble, collaborative and impactful. It includes principles and business standards that support safety, inclusion and diversity, human rights, community engagement, environmental protection, data privacy and security, and prevent discrimination, bullying, harassment, corruption and anti-competitive behaviour.	Our Code is available to all our employees on the APA website. It sets out the behaviour required of APA employees in adhering to various policies, procedures and standards as well as relevant laws and regulations underpinning the principles of Our Code. All employees are required to maintain up to date training of Our Code.
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 37301:2021 – Compliance Management Systems), sets out compliance management objectives and clarifies responsibilities for compliance within APA.	The Compliance Management Framework (CMF) ensures APA complies with the applicable legal, regulatory, standards, codes and licence requirements, including the Modern Slavery Act 2018 (Cth). The CMF 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.
Health, Safety, Environment and Heritage Policy	Our foremost priority is the safety and care of our people, environment and the communities in which we operate. We are committed to establishing a workplace culture that values and prioritises safety and care of our people which includes physical and psychological safety, respect and inclusion	The Health, Safety, Environment and Heritage Policy is publicly available on our website. The policy is implemented through our Health, Safety, Environment and Heritage Management system Safeguard which identifies and establishes controls to meet the objectives of the policy.
Modern Slavery Policy	Our Modern Slavery Policy defines APA’s commitments and responsibilities, guiding how we identify, manage, and report modern slavery risks in our operations and supply chain.	Our Modern Slavery Policy is publicly available on our website. The Policy applies to all APA Group Directors, management, employees, consultants, contractors and third parties who act on behalf of APA, its wholly owned subsidiaries. The Policy was launched on 9 December 2024 and will be reviewed and updated in line with future regulatory changes. It is also subject to review every two years.
Modern Slavery Risk Management Approach Procedure	Our Modern Slavery Risk Management Approach Procedure sets out APA approach to managing our obligations under the Modern Slavery Act 2018 (Cth). It applies to all activities relating to APA’s supply chains. The Procedure is focused on management of APA’s supply chain and procurement activities through identification and management of potential modern slavery risks.	The Modern Slavery Risk Management Approach procedure was further embedded across APA during the reporting period, with a continued focus on Modern slavery due diligence activities. These activities included supplier screening and mapping, new supplier onboarding and ongoing risk monitoring. See page
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 Supplier Code of Conduct	The Procurement Policy and associated Procurement Standards, and Modern Slavery Response 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.
Respect@Work Procedure	Our commitment to providing and fostering an inclusive and respectful workplace with safe, fair and positive working conditions. APA has zero tolerance for any form of harmful behaviour, including unlawful discrimination, bullying, harassment, sexual harassment, sex-based harassment, vilification, victimisation and other inappropriate behaviour.	Respect@Work training is mandatory for all APA employees. Our Respect@Work Procedure aligns with the Inclusion and Diversity Policy and the Code of Conduct. 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.

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.	<p>The Risk Management Policy is publicly available on our website.</p> <p>The policy informs our Modern Slavery Risk Management Approach Procedure.</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.</p> <p>These reviews consider the control environment supporting key risk areas for suppliers including legal requirements, confidence in assurance provided, together with brand and reputation impacts of transacting with the supplier.</p>
Sanctions Policy	Our Sanctions Policy sets out the principles and processes all APA personnel are expected to adhere to in order to comply with our sanctions obligations.	The policy is available on our intranet and informs APA personnel of their responsibilities with respect to sanctions and demonstrates APA's commitment to compliance with its sanctions obligations.
Supplier Code of Conduct	Suppliers have an obligation under the Supplier Code of Conduct 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 and new contracts not awarded.	<p>Our Supplier Code of Conduct is publicly available on our website.</p> <p>The Supplier Code of Conduct applies to our suppliers, its officers and employees, including when they represent APA, both during and outside of our normal workplace or working hours. It is available to all our suppliers on the APA website and is referred to in our precedent 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>The Supplier Code of Conduct outlines the shared expectations between APA and its suppliers and sets out supplier's responsibility to uphold the Supplier Code of Conduct and the conduct expected for both organisations.</p>
Whistleblower Policy	This policy creates a safe and protected environment to escalate potential matters of concern and suspected wrongdoing for those working with and for APA, including our current and former employees, contractors, suppliers and consultants. The Whistleblower Policy also outlines the process and structures in place for assessing, addressing and reporting on whistleblower disclosures.	<p>Our Whistleblower Policy is publicly 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>

