MODERN SLAVERY STATEMENT 2023

powering tomorrow

MODERN SLAVERY STATEMENT 2023

ACKNOWLEDGEMENT OF COUNTRY

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

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

Cover image: Badgingarra wind farm

About this statement

This Modern Slavery 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 2023 (**FY23**). This is a joint statement made on behalf of the reporting entities listed in Appendix 1.

In this Modern Slavery Statement (**statement**), unless otherwise stated, references to 'APA Group', 'we', 'us' and 'our' refer to APA comprising the ASX-listed entity and the APA Infrastructure Trust and the APA Investment Trust. Any reference in this statement to a 'year' relates to the financial year ended 30 June 2023.

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 was developed through consultation with each of the reporting entities it covers (listed in Appendix 1), as well as owned or controlled entities. The consultation process is outlined on page 31. This statement was subsequently approved in November 2023 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. This statement has been signed by Michael Fraser, Chairman, and Adam Watson, CEO and Managing Director.

Michael Fraser
Chairman

Adam Watson
Chief Executive Officer
and Managing Director

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For more information
See APA Group FY23 results

Message from CEO and Managing Director

APA: powering tomorrow

Adam Watson
Chief Executive Officer and Managing Director

Our purpose is to strengthen communities through responsible energy.

At APA we are committed to driving our strategy to be partner of choice in delivering infrastructure solutions for the energy transition. This includes our commitments to sustainability and enhancing our social licence to operate, which underpin our ability to create value for our investors and communities.

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

We are also working to integrate our modern slavery response with the broader work to manage other human rights and ESG risks, including through our new Responsible Procurement Strategy. This strategy supports our commitment to respect internationally recognised human rights, engaging with the communities we live and work in to foster impactful relationships, including with First Nations Peoples, while transitioning to a decarbonised energy future. This transition highlights the intersection of modern slavery and renewable energy. It is imperative that we maintain a robust modern slavery program informed by our understanding of the different types of modern slavery risks in renewables and our broader business, which enables us to proactively identify, assess and manage these risks through appropriate actions.

Key highlights in FY23 include:

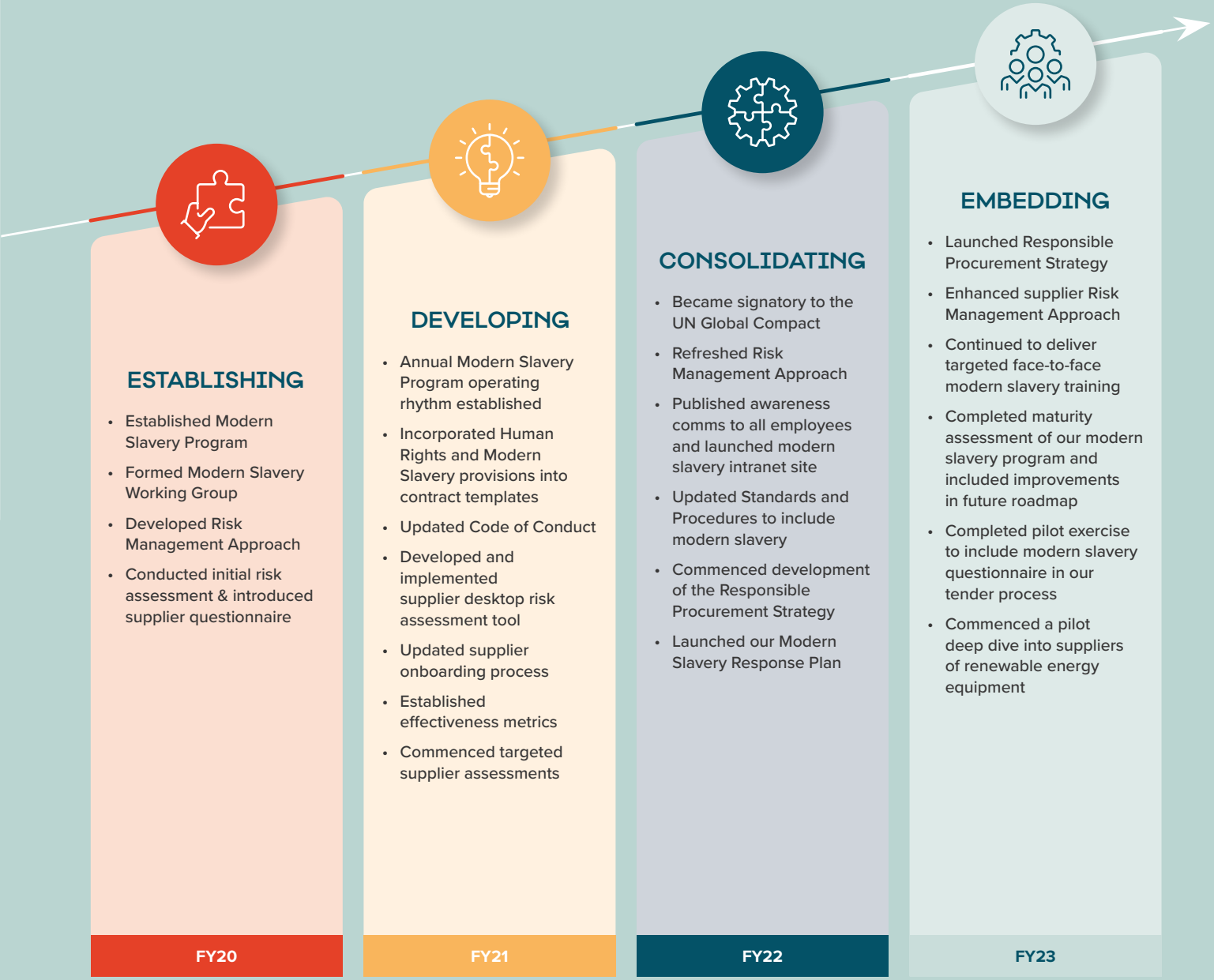
- Delivered modern slavery training to relevant business functions and continued to raise awareness of modern slavery to all employees.
- Completed a maturity assessment of our modern slavery program to further improve our capability to identify, assess and monitor risk and supplier performance.
- Strengthened our modern slavery due diligence by implementing a technology solution to assess modern slavery and ESG risk in our supply chain.
- Developed a comprehensive list of modern slavery questions for inclusion in APA tender process.
- Achieved the Chartered Institute of Procurement and Supply Corporate Ethics Mark[1] during the year.
- Became a signatory to the Clean Energy Council Pledge Against Modern Slavery.

I am pleased to sign and present this statement. As always, we welcome your feedback[2] and look forward to continuing to work with our stakeholders on this important issue.

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

How our modern slavery response is evolving

At APA, we are focused on refining our modern slavery response as we continue to strengthen our understanding of how to effectively identify and manage modern slavery risks. The visual below explains how our modern slavery response has developed and key achievements to date.



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 investment schemes, APA Infrastructure Trust (**APA Infra**) and APA Investment Trust (**APA Invest**)

Head office
Level 25, 580 George Street,
Sydney NSW 2000

PURPOSE · WHY WE EXIST

To strengthen communities through responsible energy.

STRATEGY · WHAT WE DO

To be the partner of choice in delivering infrastructure solutions for the energy transition.

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

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

Our behaviours

Our behaviours set the benchmark for how our people interact with customers, communities, suppliers and each other. They support our strategy and the high-performance culture that we strive for. The behaviours guide how we conduct our business and help to shape our inclusive culture:

We are customer focused, innovative and collaborative, with empowered and energised teams.

COURAGEOUS

We are honest and transparent; we learn from our mistakes and we challenge the status quo.

ACCOUNTABLE

We spend time on what matters, we do what we say and deliver world class solutions.

NIMBLE

We are curious, adaptive and future focused.

COLLABORATIVE

We are inclusive, work together and respect and listen to our stakeholders.

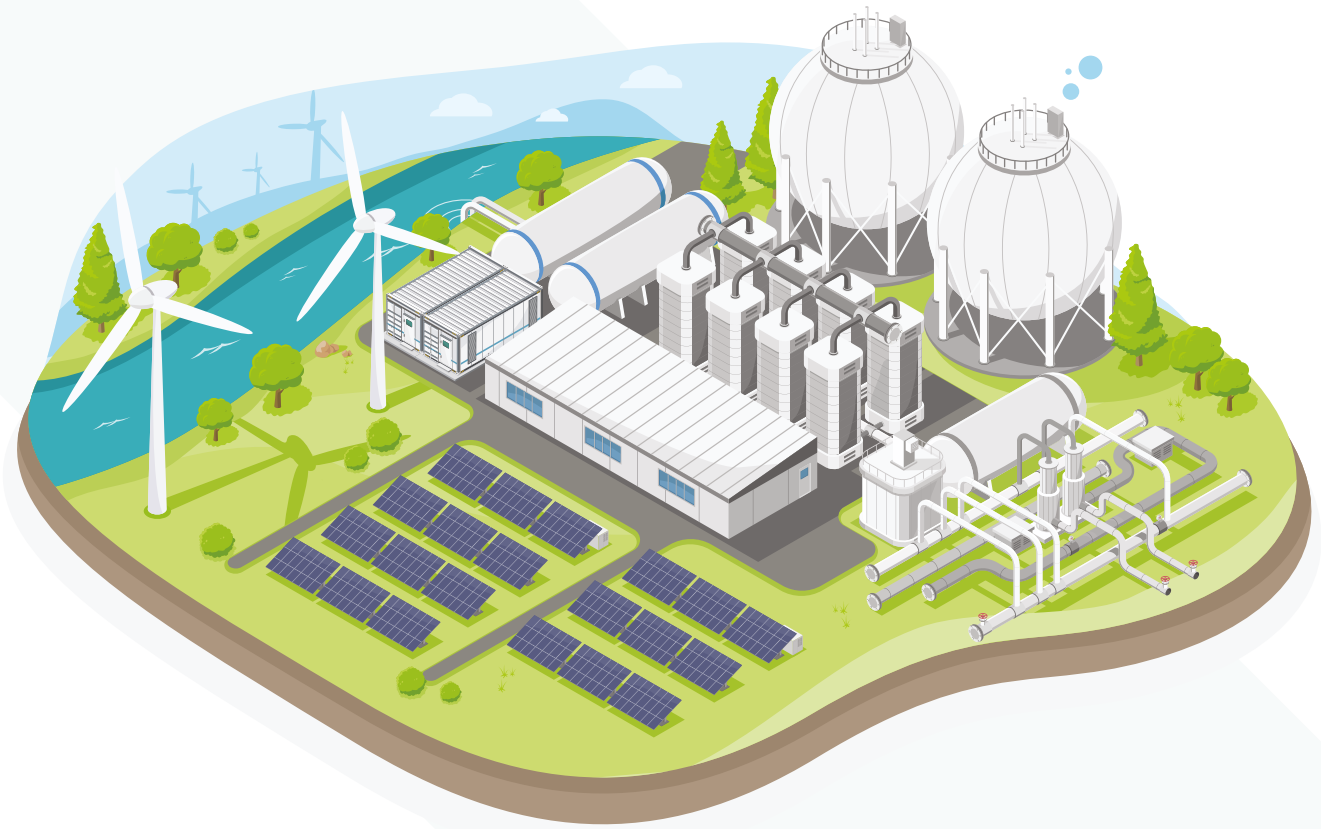
IMPACTFUL

We create positive legacies and work safely, for our customers, communities, our people and the environment.

Our operations and supply chain

Our operations

Focused on three principal activities.



Energy infrastructure

APA's wholly or majority owned energy infrastructure assets across gas transmission, compression, processing, storage and electricity generation (gas and renewables) and transmission). During the reporting period, we invested $845 million in critical infrastructure and completed a range of major projects, including delivery of the largest remote-grid solar farm in Australia and completion of the Northern Goldfields Interconnect (**NGI**) pipeline.

Asset management

The provision of asset management and operating services for third parties and the majority of APA's investments. For example, we own and operate Emu Downs Wind Farm in Western Australia and Diamantina and Leichhardt Power Stations in Queensiond.

Energy investments

APA's interests in energy infrastructure investments. This includes investments in assets such as the North Brown Hill Windfarm in South Australia and the SEA Gas Pipeline which transports natural gas to markets in Victoria and South Australia.

Understanding our operations: The pipeline construction process

We operate over 15,000 kilometers of natural gas pipelines across every state and territory in mainland Australia. Typically, the normal pipeline construction process will include a number of stages, including:

STAGE 01

Surveying and fencing off the pipeline route and clearing and grading the route to prepare for construction. This work is typically undertaken by construction works contractors.

STAGE 02

Delivering high strength steel pipe sourced by Australian suppliers from reputable international mills to the site, which is laid end to end next to where the trench will be dug. Where required, specialised machinery is used to bend the pipe to follow the pipeline route and land contours.

STAGE 03

Welding together of pipe sections, which includes testing of each weld. Construction of pipelines (including excavation and installation) is typically undertaken by works contractors.

STAGE 04

Excavating the pipeline trench using specialised machinery and installation of the pipe into the trench.

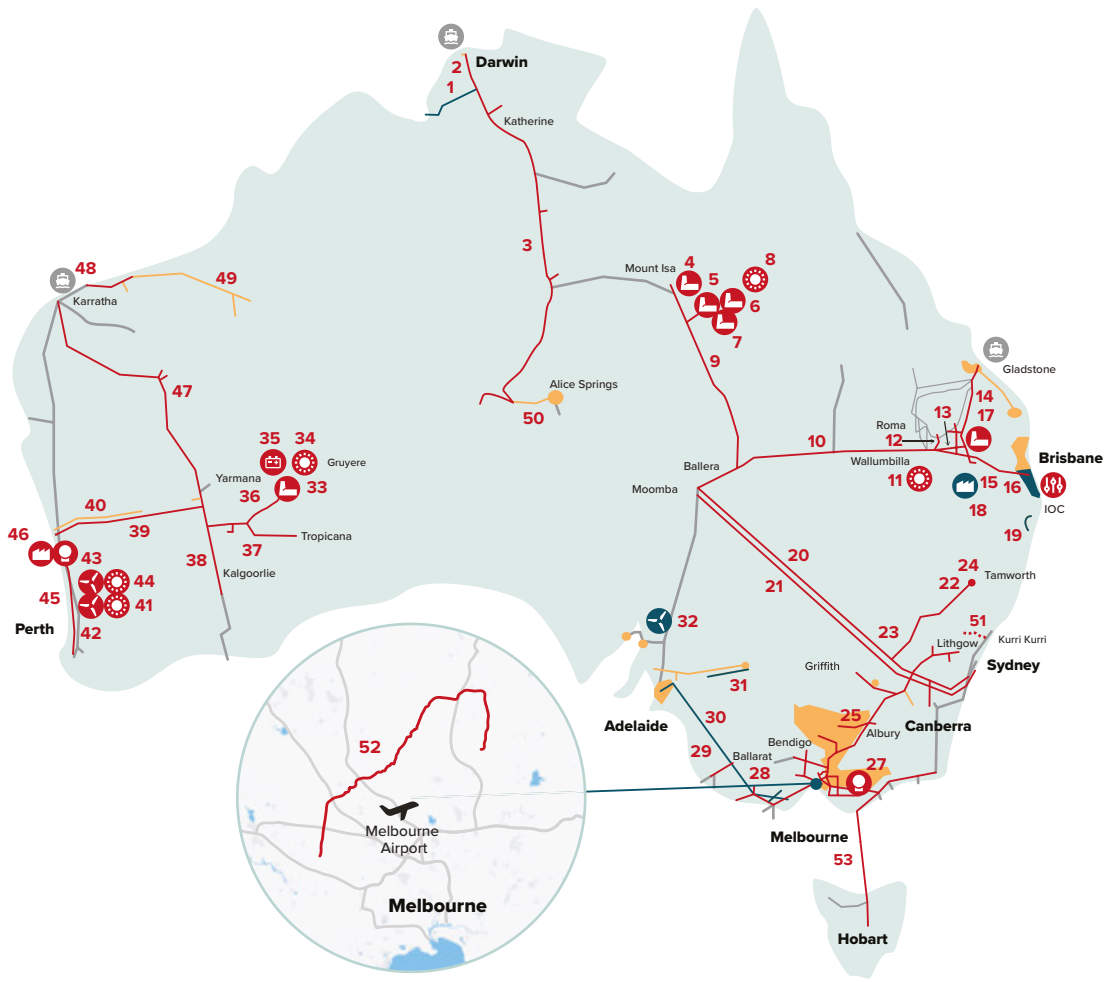
STAGE 05

Coverage of the pipe with fine grain padding materials (typically sourced from the easement area) before backfilling with excavated subsoil.

STAGE 06

Pressure testing of the pipeline to ensure it is fit for service and restoration of land disturbed during construction.

APA PORTFOLIO OF ASSETS AND INVESTMENTS



Pipeline

3	Amadeus Gas Pipeline (inc laterals)
13	Berwyndale Wallumbilla Pipeline
1	Bonaparte Gas Pipeline
9	Carpentaria Gas Pipeline (inc laterals)
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 (inc laterals)
21	Moomba to Sydney Ethane Pipeline
28	Mortlake Gas Pipeline
39	Northern Goldfields Interconnect
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
51	Kurri Kurri Lateral Pipeline (KKLP)
52	Western Outer Ring Main (WORM)

Gas Processing and Storage

27	Dandenong (680TJ/12000t)
18	Kogan North (12TJ/d)
46	Mondarra (18PJ)

Gas Distribution

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

Electricity Transmission

19	Directlink
31	Murraylink
53	Basslink*

Generation

17	Daandine (30 MW)
6	Diamantina (242 MW)
33	Gruyere (47 MW)
7	Leichhardt (60 MW)
5	Thomson (22 MW)
4	X41 (41 MW)
35	Gruyere Battery Station (4.4 MW/MWh)

Solar Farm

43	Badgingarra (19 MW)
11	Darling Downs (108 MW)
41	Emu Downs (20 MW)
34	Gruyere Solar Farm (13.2 MW)
8	Dugald River Solar Farm (88 MW)

Wind Farm

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

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
- Under construction

- Wind farm
- Solar farm
- LNG plan
- Battery storage
- Gas storage facility
- Gas processing plant
- Gas power station
- Integrated Operations Centre

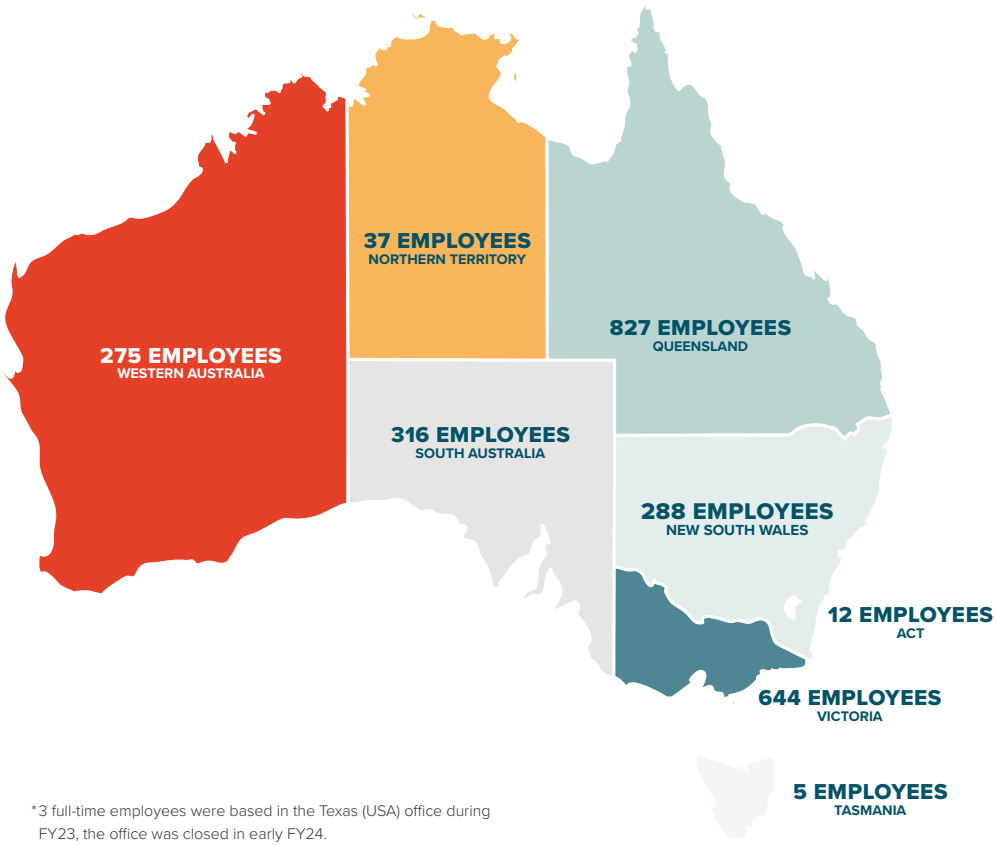
* Acquired October 2022.

Our Workforce

APA has 2407 employees and 333 contingent workers located in offices and sites across Australia, with 73% of our workforce located at five major offices (Sydney, Brisbane, Melbourne, Adelaide and Perth). Our workers perform a wide variety of tasks ranging from trades such as welding and gas fitting through to office-based roles in corporate functions such as finance and people and culture.

A more detailed breakdown of our workforce information can be found in the 2023 Sustainability Report Data Book. A summary is provided below.

APA'S NATIONAL SITE NUMBERS



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

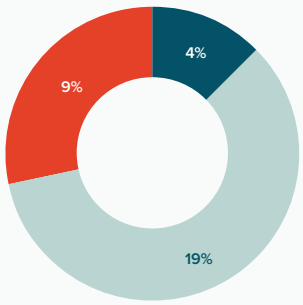
Workplace Gender Equality ACT Skill Group	Male	Female	Grand Total
Apprentices	12	8	20
Clerical and Administrative Workers	37	200	237
Graduates	20	16	36
Interns	12	14	26
Professional	724	390	1114
Technicians and Trades Workers	574	33	607
Managers - Key Management Personnel	4	4	8
Managers - Other Executives & General Managers	31	18	49
Managers - Other Managers	153	58	211
Managers - Senior Managers	73	26	99
Grand Total	**1,640**	**767**	**2,407**

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

INCREASED TOTAL FEMALE REPRESENTATION TO 31.8%

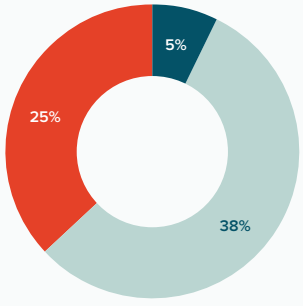
among total employees, up from 29.5% in FY22

FY23 AGE DIVERSITY — FEMALE



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

FY23 AGE DIVERSITY — MALE



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

Our supply chain

How we procure goods and services

During FY23, APA's combined capital and operating spend was approximately $1.8 billion, with 3,526 tier 1 suppliers. The term 'tier 1 suppliers' refers to our direct suppliers of goods or services. References to 'tier 2 suppliers' are the suppliers or subcontractors of our tier 1 suppliers, 'tier 3 suppliers' are the suppliers or subcontractors of our tier 2 suppliers, and so forth.

The spend is predominately managed through contractual arrangements, ranging from, but not limited to:

- 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 solar panels and compressors to support the development of new assets,
- multi-year standing arrangements governed by Precedent Agreements such as long-term services agreement.

Total Spend

~$1.8bn

Direct suppliers

3,526

Australian based suppliers

3,415

International based suppliers

111

Credit Cards contribute to a small portion of our supplier spend. This is primarily comprised of spend on domestic travel expenses, hospitality, professional memberships and booking training.

Our procurement function seeks to provide strategic, scalable and streamlined procurement, purchasing, supply chain and real estate services across APA, delivering value, insights, innovation and sustainable outcomes, whilst appropriately managing third party risk. This includes taking appropriate steps to manage modern slavery risks.

The following groups are focussed on specific procurement activities:

- **Procurement Operations and Governance –** responsible for managing procurement process governance across APA, supplier relationship management, system governance, reporting and also provides requisitioning and purchasing support via the Central Purchasing team.
- **Responsible Procurement –** builds capability and capacity to execute the Responsible Procurement Strategy, aligned to enterprise sustainability objectives.
- **Corporate Procurement –** responsible for the strategic category management, strategic sourcing, contract lifecycle management, fleet management and supplier management activities for Corporate spend.
- **Operations Procurement –** responsible for the strategic category management, strategic sourcing, contract lifecycle management and supplier management activities for Power, Transmission and Midstream assets.
- **Infrastructure Delivery Procurement –** responsible for project procurement from sourcing to contracting and contract lifecycle management covering capital growth and stay-in-business projects, such as gas-fired power stations, solar farms, pipelines and related infrastructure.
- **Networks Procurement –** is responsible for strategic sourcing, contract lifecycle management, and supplier management activities for the Networks business units, comprising of capital replacement program, growth projects and third party works, along with operations and maintenance of third party owned gas distribution networks.
- **Real Estate Services –** responsibilities include capital works and project management to meet APA's real estate requirements.

1. Suppliers APA has a direct contractual relationship with.

The goods and services we procure

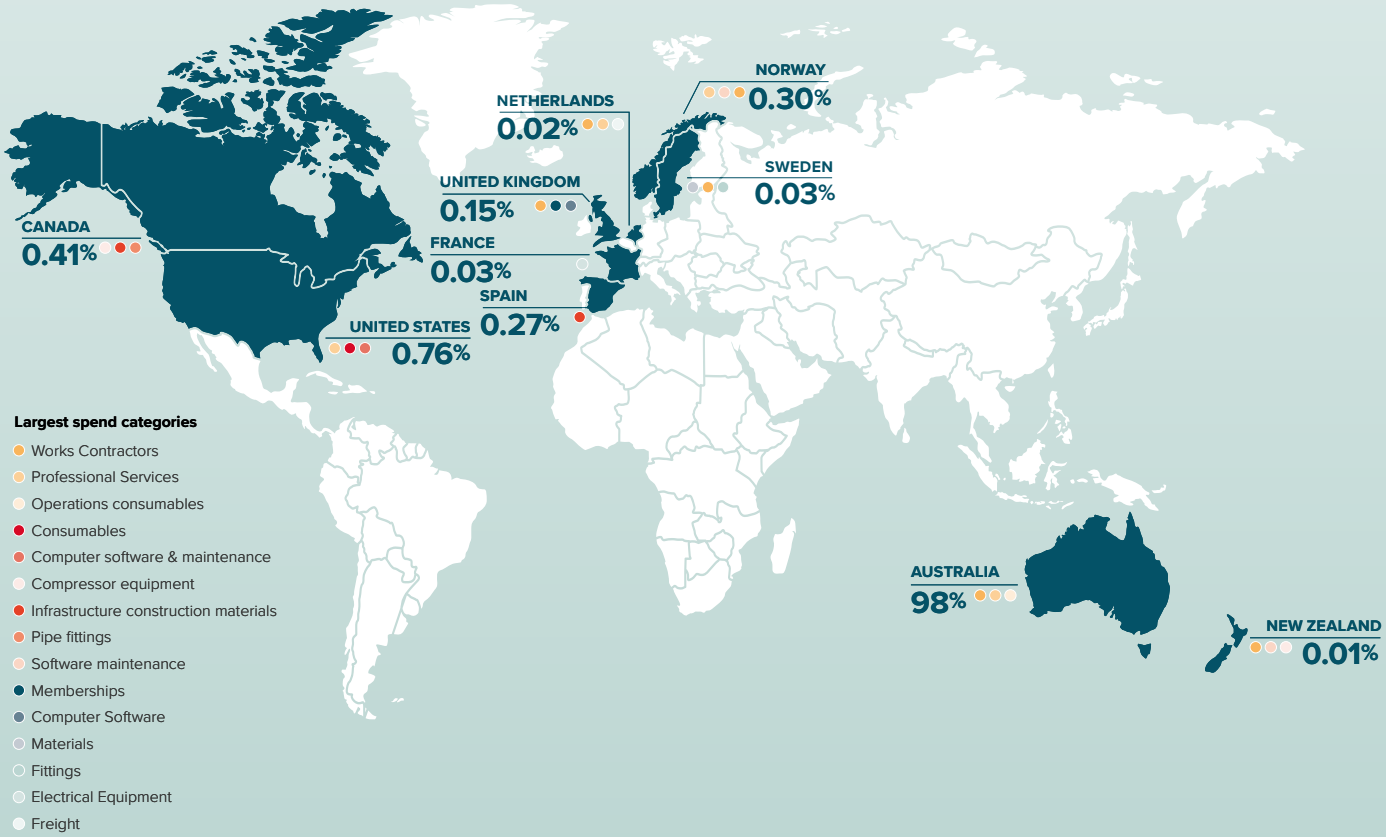
Throughout FY23 our procurement groups procured goods and services across a wide range of supplier categories. Our spend over FY23 was broadly consistent with FY22 and there were no significant changes to our reporting footprint over FY23.

Goods and Services	% of spend
Works Contractors (Major and Minor), who also supply various construction materials	41%
Professional Services (inc Engineering Design Services)	20%
Operations Consumables (inc filters, lubricants, fuels)	17%
Infrastructure construction equipment and materials	6%
Information Technology & Telecommunications	3%
Legal & Insurance	3%
Land Charges	1%
Recruitment & Labour Hire	1%
Freight & Logistics	1%
Travel & Expenses	1%
Facilities Management (inc cleaning)	0.5%
Training & Development	0.5%
Safety Clothing & Equipment	0.2%
Other	4.8%

Where we procure goods and services

In FY23 98% of our spend was with 3,415 direct suppliers based in Australia. However, these suppliers are likely to rely on, to varying degrees, operations and supply chains in overseas locations, such as US, Europe and China (beyond Tier 1). We have increased our visibility of our indirect supply chain for our high-risk suppliers. For example, see case study on page 22.

Country spend data for the reporting period shows the remainder of our spend was with 81 suppliers based overseas.



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

Main Operations	Key Supply Chain Elements
Infrastructure Delivery	
Development and delivery of capital growth projects such as gas fired power stations, solar farms, pipelines and related infrastructure – new infrastructure asset construction management.	• 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	
Operation and maintenance of third party owned gas distribution networks. Development and delivery of capital replacement, growth projects and third party works, such as new mains and services, extensions and reticulation of new developments.	• 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	
Operation of APA's asset base in Australia including: • Transmission pipelines • Gas processing facilities • Gas storage facilities • Gas fired power stations • Solar and wind farms • Electricity interconnectors	• 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	
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**).	The Joint Ventures and Investments which are managed by APA have a supply chain common with those detailed for Infrastructure Delivery, Network Operations and Operations in this table.
North America	
As announced in August 2022, APA ceased pursuit of the North American strategy and instead has focused on the opportunities that exist in the Australian market.	In early FY24, activities focused on the closure of the Huston office were finalised.
Head Office	
Corporate services, such as: • Finance & Technology • Strategy & Corporate Development • People, Safety & Culture • Procurement • Risk, Compliance & Insurance • Legal and Governance • Sustainability (including Climate) & Corporate Affairs • Health, Safety, Environment & Heritage	• 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

APA draws upon the UN Guiding Principles on Business and Human Rights (UNGPs) to understand how we could be exposed to modern slavery risks.

The UNGPs are the authoritative global standard for addressing business-related adverse human rights impacts and 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.

CAUSE	CONTRIBUTE	DIRECTLY LINKED
Entities can cause modern slavery if their operations 'directly result in modern slavery practices'.	Entities can contribute to modern slavery where their 'acts or omissions...facilitate or incentivise' modern slavery practices.	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'
Hypothetical example A construction contractor working in the infrastructure sector intentionally exploits foreign workers it recruits, including confiscating their passports to force them to work.	**Hypothetical example** An infrastructure company revises the parameters for a major project at short notice, including requiring a subcontractor to meet cost and timing deadlines that could only reasonably be achieved by exploiting workers.	**Hypothetical example** An infrastructure company sources PPE produced by a supplier using cotton harvested by a sub-supplier using forced labour.

Modern slavery risks in our operations

APA does not consider it is likely to cause or contribute to modern slavery within the meaning of the UNGPs due to the protections in place for our workforce (including young workers). The majority of APA's workforce is employed on a permanent or fixed term basis via enterprise agreements and individual employment contracts. We consider the risk of modern slavery in our operations to be low as our workforce is based in Australia [1], we are compliant with all applicable legislative requirements in Australia regulating workplace relations, and have well defined internal policies and processes in place, such as:

- 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 commit to providing workplaces that support good health, wellbeing, respect and inclusion for our employees, contractors and visitors.
- Continuing to build an inclusive and diverse 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.
- APA is committed to providing a workplace that promotes a safe, respectful and inclusive environment. Core to achieving this is not just what we do, but how we do it – making our APA behaviours part of how we work and show up for each other. At APA harmful behaviours are not tolerated.

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.

APA's Apprentice Program is open to school leavers aged 16 and above. All Apprenticeship Program participants undergo a multiweek induction program which includes training courses on issues including safety, wellbeing, and internal systems and procedures.

Update on our payroll data review

In FY22, APA identified certain employees across the Group were not paid in full compliance with the Group's obligations under APA's enterprise agreements ("**EA's**") and self-disclosed relevant information to the Fair Work Ombudsman. We continue to work to remediate with interest current and former employees where underpayments are identified.

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 Enterprise Agreements, which are highly complex agreements, and other system, process and administration errors.

Modern slavery risk in the communities where we operate

APA operates in metropolitan as well as rural and remote areas of Australia. We recognise that in some cases, the locations of our operations may impact our modern slavery risks. For example, some suppliers in rural and remote locations may be smaller than suppliers in other areas, which may mean they have less sophisticated risk management processes. In some cases, there may also be limited numbers of suppliers available in certain areas, which can impact our leverage to work with suppliers on modern slavery and other responsible procurement issues.

1. During the reporting period three employees were located in the United States of America.

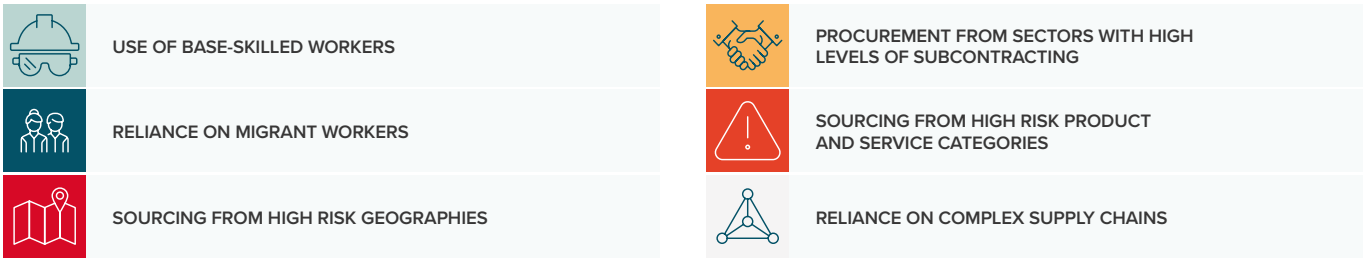
Modern slavery risks in our supply chain

APA's greatest exposure to modern slavery risks is through its supply chain.

We recognise we could be directly linked to a range of modern slavery risks through our suppliers, including for both goods and services. For example, APA may be directly linked to modern slavery though 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 outlined in this statement failed or were not fit for purpose.

Modern slavery risks across our supply chains may reflect a range of risk factors, including those outlined in the diagram below.



We also recognise that elements of our supply chain could include risks of state sponsored forced labour, including in relation to sourcing of materials such as solar panels. We monitor evolving industry approaches and recommendations from governments, civil society and other stakeholders in relation to assessing and managing these risks.

The table below outlines potential areas of modern slavery risk we assess may be relevant to APA.

High risk category	**Product / Service procured by APA**	**Modern slavery risk factors**	**Generally known modern slavery risks** (key risks relating to each category are outlined below)	**Controls**
Construction materials	• Lubricants, oils, greases and anti-corrosives • Valves, hardware and fittings • Pipe and pipe fittings		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, 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, 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.	**Key controls:** New suppliers required to declare their commitment to respect workers' fundamental human rights, page 21. All existing suppliers are assessed as per APA's Modern Slavery Risk Management Approach, page 21 & 22. Modern slavery clauses and obligations included in relevant precedent agreements. APA's policy framework.

High risk category	Product / Service procured by APA	Modern slavery risk factors	Generally known modern slavery risks (key risks relating to each category are outlined below)	Controls
Renewable Energy	• Photovoltaic modules		Reporting by third parties indicates there are 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. There may also be modern slavery risks associated with other segments of the solar value chain, including installation and recycling.	**Key controls:** As per above **Additional controls:** APA undertook a deep dive due diligence exercise with existing high-risk and potential future suppliers of renewable energy equipment (see case study on page 26). Additional actions will be taken in FY24 to address the risk, this will include direct engagement with suppliers.
	• Batteries, cells and accessories		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.	
	• Wind turbines		While we did not undertake any significant procurements in this area for FY23, we have previously undertaken procurement related to windfarm assets. Minerals and metals as well as lightweight materials such as balsa wood may carry higher risks for modern slavery including where they are sourced from higher risk countries.	
Freight & logistics	• Logistics services for infrastructure delivery projects		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.	**Key controls:** As per above.
Fuels	• Motor gasoline for use in our fleet vehicles and asset sites		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.	**Key controls:** As per above.
IT hardware / software	• ICT hardware • Telecommunications hardware • Software maintenance and support		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. 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.	**Key controls:** As per above.

High risk category	Product / Service procured by APA	Modern slavery risk factors	Generally known modern slavery risks (key risks relating to each category are outlined below)	Controls
Professional Services	• Labour hire and other temporary workers • IT Service delivery • Management consultants • Construction design services • Cleaning and security service providers • Catering providers		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.	**Key controls:** As per above. **Additional controls:** Labour hire companies to have relevant certification, where required.
Apparel	• Uniforms • 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.	**Key controls:** As per above. **Additional controls:** In FY23 we continued to monitor and consolidate items of safety clothing and PPE to our approved supplier. We monitored compliance to ethical sourcing and accreditation, with 92% of certificates of currency received from factory audits. These include: • Worldwide Responsible Accredited Production (**WRAP**), • Sedex Members Ethical Trade Audit (**SMETA**), • Ethical Clothing Australia (**ECA**), Our approved supplier has recently aligned their practices to ISO 20400 Sustainable Procurement.
Travel	• Domestic accommodation • Domestic transport		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.	**Key controls:** As per above. **Additional controls:** 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.

Actions taken to assess and address modern slavery risks

As part of the continuous improvement approach to APA's Modern Slavery Program, a number of key initiatives were progressed through the year.

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

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.

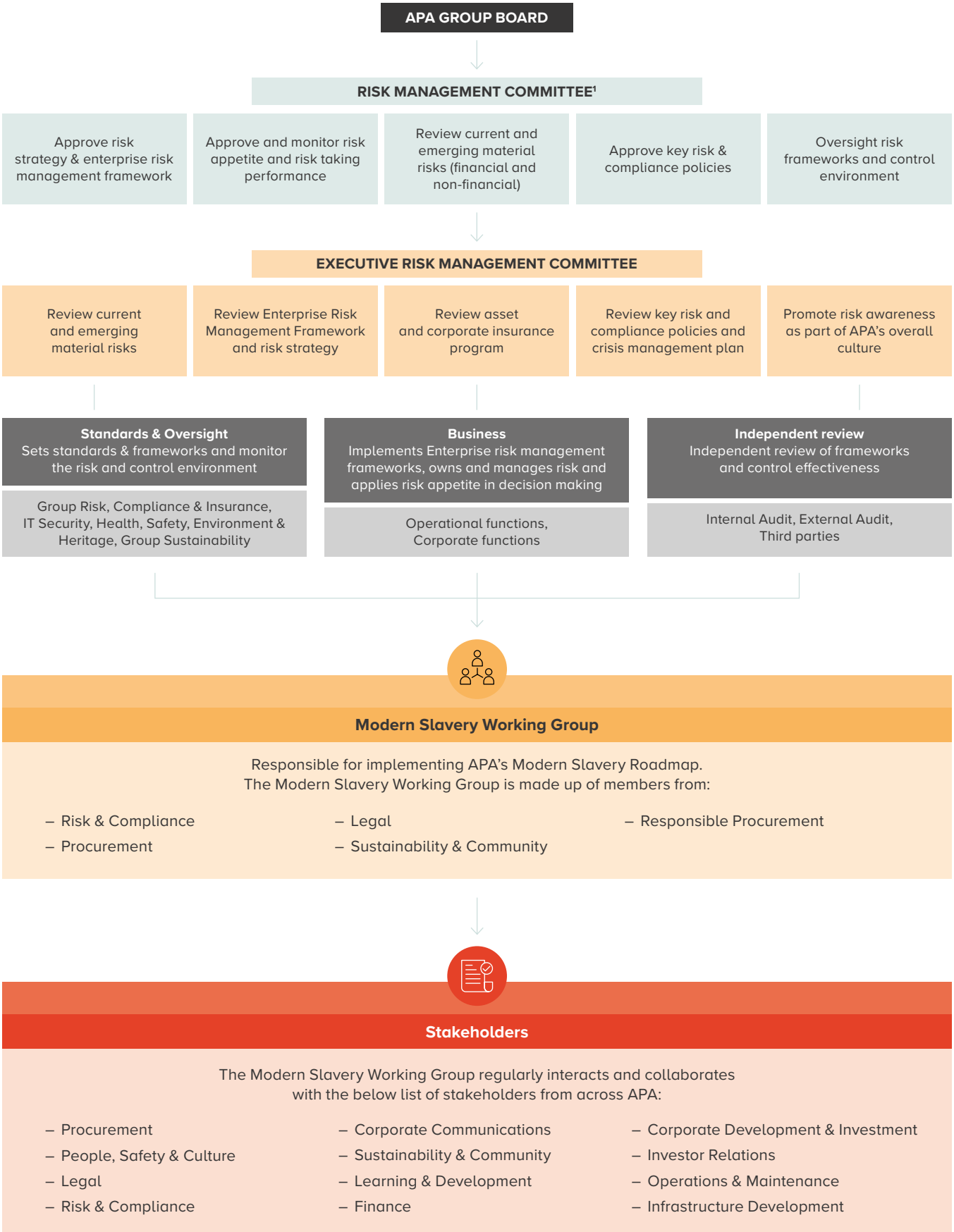
Our cross functional Modern Slavery Working Group is made up of representatives from Responsible Procurement, Risk and Compliance, Procurement, Sustainability and Community, and Legal.

The Working Group meets regularly to drive the continuous improvement in our approach to managing modern slavery risk. The Working Group reports annually to the Executive Risk Management Committee and the Risk Management Committee on the progress of the planned activities from the roadmap, the progress of risk assessments, and the modern slavery risks identified through those assessments.

Key topics discussed by the working group during FY23 included:

- renewable energy risks,
- progress on our FY23 supplier due diligence process,
- implementation of the new supplier risk management tool,
- effectiveness of our actions,
- ELT and Board training preparation and timing for delivery.

The following diagram depicts the key aspects of APA's governance arrangements. Our key policies are outlined in Appendix 3.



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.

During FY23 we launched a new Respect@Work Procedure, detailed below. A new Supplier Code of Conduct was drafted, for which further internal stakeholder engagement and development will continue in FY24.

Policy	Relevance to Modern Slavery	How this policy continued to be implemented at APA during the reporting period
Respect@Work Procedure	APA is committed to providing and fostering an inclusive and respectful workplace with safe, fair and positive working conditions. We do not tolerate any form of harmful behaviour including unlawful discrimination, bullying, harassment, sexual harassment, sex-based harassment, vilification, victimisation and other inappropriate behaviour.	In FY23 APA launched our Respect@Work procedure. This aligns with the Inclusion & 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.
Supplier Code of Conduct	The Supplier Code of Conduct sets the minimum standards for supplier engagement with APA and will cover our expectations on labour, safety and worker treatment, human rights and modern slavery.	Initial draft of the Supplier Code of Conduct was completed in FY23. Further internal stakeholder engagement and development will continue in FY24.

There were no significant changes to the existing Policy Framework during the reporting period. Details of these policies can be found in Appendix 3.

Our modern slavery risk management approach

New supplier selection and onboarding

Modern slavery checks are part of our supplier onboarding and risk assessment. During FY23 650 new suppliers were onboarded using the APA supplier onboarding process, which requires suppliers to declare their commitment to respect workers' fundamental human rights before they are added to our systems. This commitment includes:

- providing a safe working environment (and appropriate accommodation facilities if being provided),
- paying a fair wage in accordance with all relevant 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 also considered, in accordance with APA's Procurement Policy. The precedent agreement includes modern slavery clauses and obligations that were added in FY21. These template clauses support our Risk Management Approach, ongoing due diligence, and our Modern Slavery Response Plan. This includes any necessary investigation process in circumstances where risk is identified, and/or incidents are reported.

Existing supplier risk management

Suppliers are screened for indications of modern slavery against risk factors such as geographic location, industry sector and product or service category. Lessons learned from due diligence completed in previous periods identified the opportunity to uplift our approach from being reactive, in only assessing suppliers' post-engagement, to a proactive process whereby suppliers are screened prior to being onboarded. This further supports uplifting capability to inform the forward-looking due diligence process and supplier management actions required. The refreshed risk management approach will be in operation from FY24.

CASE STUDY

Enhancing our supplier risk management approach

After carefully evaluating several providers in late 2022, APA partnered with an ESG data provider to support us to enhance our supplier risk management. Following a successful pilot due diligence exercise for 120 high risk suppliers identified by sector, the technology solution was implemented for use from FY24. This will provide us with improved capability to assess modern slavery and broader ESG risk in our supply chain for all centrally managed suppliers. A baseline of indicative modern slavery risk profiles for suppliers that extend to Tier 10 level will be created.

The stages below explain how we undertook the pilot due diligence exercise. From FY24, we anticipate that all existing and potential future suppliers will be screened through this process.

Stage 1 – initial screening / supply chain mapping:

The tool was used to trace the economic inputs required to produce products and services sourced from Tier 1 up to Tier 10 suppliers. This supply chain mapping was performed by linking supply chain data from 190 countries and over 15,000 industry sectors. The tool sources data from:

- The United Nations' (**UN**) System of National Accounts,
- UN COMTRADE databases,
- Eurostat databases,
- The Institute of Developing Economies, Japan External Trade Organisation (**IDE/JETRO**), and
- Numerous National Agencies including the Australian Bureau of Statistics,

It examines supply chains against international standards:

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

Our Modern Slavery Team assessed the results from the initial screening and supply chain mapping and shortlisted 49 higher risk suppliers to complete a self-assessment questionnaire.

Stage 2 – self-assessment questionnaires:

Self-assessment questionnaires were issued to the 49 high risk suppliers, which included suppliers in sectors such as construction materials, renewable energy, and apparel. These questionnaires assess the level of modern slavery risk in the supply chain and the maturity of supplier's modern slavery risk management responses.

We received responses from 43% of suppliers. This response rate may reflect a range of factors, including effort required to clarify supplier contact details and the introduction of a new process for smaller suppliers. Survey responses were reviewed and assessed with Procurement Managers and next steps determined for residual high-risk suppliers. Next steps will continue into FY24 and include;

- Contacting suppliers to request further information.
- Offering supplier training for a select group of suppliers, to commence in FY24.
- Conducting further deep dive assessments for a select group of suppliers (see Stage 3).

Stage 3 – deep dives:

A secondary pilot exercise undertook a deep dive into nine of our suppliers of renewable energy equipment. This has provided APA with a modern slavery risk profile for existing and potential future renewable suppliers and supported us to identify potential risk mitigation actions. The deep dive will continue into the first half of FY24.

The deep dive exercise is detailed in the case study on page 26. This stage will be applied to individual suppliers identified as high risk following the first 2 stages of our risk management approach.

Stage 4 – supplier performance management:

Supplier performance management is required for existing and future suppliers where the need for further due diligence has been identified. This stage will commence with direct supplier engagement. The supplier will be provided with relevant information detailing the risk and given the opportunity to respond.

Any remaining concerns will be addressed through agreed remediation actions and timing for review and discussion. This process may also be supported by third-party social audits, particularly where deeper supply chain visibility is required.

At the time of writing this statement, we are continuing to engage with a potential future high-risk supplier using the above process.

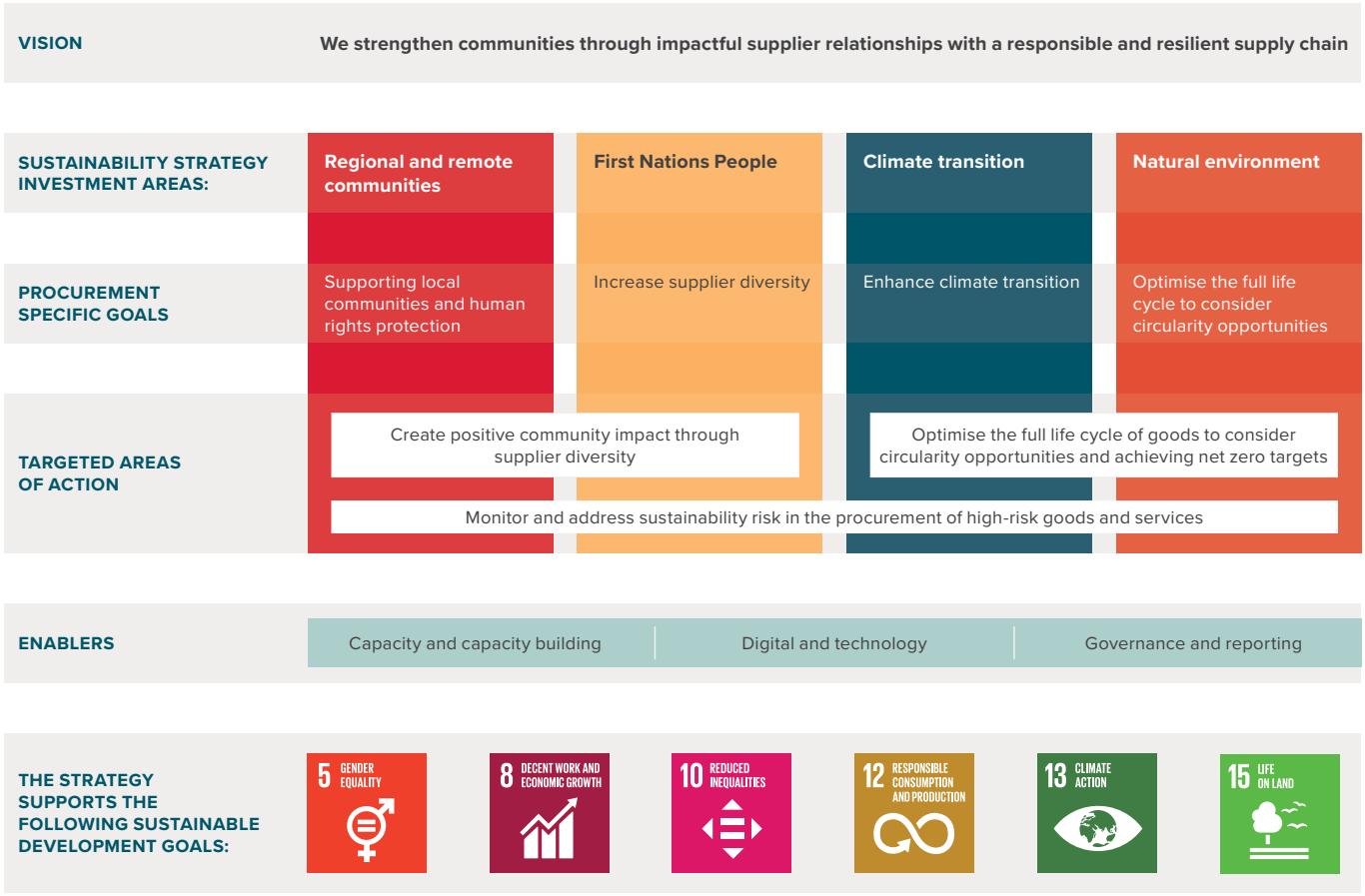
Key findings from the pilot exercise:

The pilot exercise has assisted us to identify and prioritise higher risk suppliers as part of our modern slavery risk management and provided insights into possible areas of risk across our indirect suppliers. Importantly, we are able to integrate these modern slavery risk assessments with assessments of broader ESG risks, which will enable us to take an integrated approach to supplier risk management. This exercise has also enabled us to identify opportunities to refine our procurement data to better support our risk assessments, including by cleansing our procurement taxonomy and spend categories.

Launch of our Responsible Procurement Strategy

We proactively seek to integrate our work to manage modern slavery risks with our broader approach to responsible procurement. In FY23, APA launched its first Responsible Procurement Strategy. The Strategy supports the execution of APA's Sustainable Development Investment Program by aligning to the four enterprise-level priority investment areas.

Management of modern slavery risk is a key consideration in all initiatives to ensure a responsible approach to procurement, and as such the targeted area of action to monitor and assess sustainability risks, including modern slavery, underpins all four pillars of the Responsible Procurement Strategy.



Early initiatives included building awareness of the strategy across business groups and improving supplier diversity capability by engaging with First Nations businesses as part of our Supply Nation membership. In collaboration with the Net Zero and Climate Team and to support our net zero ambitions, we also delivered an initiative to better understand emissions in our supply chain and identify a roadmap of future opportunities to reduce emissions, that will be developed into actions from FY24.

Launched our

RESPONSIBLE PROCUREMENT STRATEGY

AWARDED THE CIPS CORPORATE ETHICS MARK[1]

demonstrating our global committment to ethical procurement practices

Achieving the CIPS Corporate Ethics Mark

The Chartered Institute of Procurement and Supply (**CIPS**) Corporate Code of Ethics was developed as part of its commitment to reinforcing global ethical values across all procurement and supply practices. 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.

During FY23 APA employees with responsibility for sourcing, supplier selection and supplier management successfully completed the CIPS Ethical Procurement and Supply Test, enabling APA Group to achieve the Corporate Ethics Mark.

Completion of the CIPS Ethics Test will be an annual requirement for all employees responsible for sourcing, supplier selection and supplier management activities. By undertaking annual training, along with signing the CIPS Statement of Commitment, the public commitment reinforces APA's focus on ethical sourcing and engagement with suppliers.

Modern slavery maturity assessment

During the reporting period, we engaged a third-party advisory firm to complete a maturity assessment of APA's modern slavery response. The assessment was commissioned to help understand progress to date and how we can continue to build on our existing response.

The assessment considered APA's modern slavery-related policies and frameworks, management systems and controls, grievance mechanisms and approach to remediation. It encompassed a review of key documents, interviews with 12 stakeholders across the business, and a cross-functional workshop.

Overall, the assessment found that APA has taken 'significant action and made substantial progress'. It also identified a range of recommendations to further refine our response. These recommendations covered areas such as supplier risk assessments, training, and engagement with stakeholders.

Going forward, we are drawing on the findings of this assessment to help inform the future workplan. The assessment and key recommendations have been discussed with the Modern Slavery Working Group. Importantly, the findings of the maturity assessment are relevant to our effectiveness measures, including support to help understand the existing strengths and areas for uplift.

Employee Training

Modern slavery training is prioritised for employees to help ensure they are equipped to identify and respond appropriately to any concerns and manage key risks. This approach will be further refined in FY24 by delivering a modern slavery training session to the APA Executive Leadership Team and Board.

During FY23 we continued the rollout of our tailored 1.5 hour face-to-face modern slavery training for those employees who deal directly with suppliers and/or contractors. The training is designed in collaboration with an expert business and human rights advisory firm with content tailored for APA.

The training highlights key potential risk areas and details how we are taking action to manage modern slavery risks. It provides guidance on how employees can identify red flags and report concerns or suspicions about modern slavery. It also includes a range of interactive components such as quizzes, polls and a series of dilemma scenarios. Each session is delivered by senior staff from the external business and human rights advisory firm and APA's Modern Slavery Team. 166 employees completed this training over FY23.

In addition to the core training, we have developed a condensed refresher version, which will be rolled out over FY24 for employees who completed the core training in FY23.

APA has opted to continue the investment in this face-to-face training rather than focusing on an e-learning approach. The participant feedback to date has highlighted the positive engagement from this model and resulted in strong learning outcomes.

1. Ethics Register | CIPS.

Raising awareness

The targeted training program is complemented by a broader initiative to raise awareness of modern slavery across APA. Throughout the year we published modern slavery awareness communications to all employees via our internal news and social networking sites. For example, we shared a guide to ethical Christmas shopping produced by a civil society organisation. While not directly related to APA, this helps demystify modern slavery in everyday purchasing and promotes a general understanding by personalising it to the individual. Key messages from APA's attendance at the Australian Government's 2023 Modern Slavery Conference were also shared.

The internal Modern Slavery Program intranet site was maintained throughout the year and includes links to relevant content, such as:

- Team Leader information sheet,
- Modern slavery statement,
- Modern slavery response plan procedure,
- Modern slavery e-learning, frequently asked questions and awareness video,
- Internal communications articles published throughout the year, and
- Details on how to safely report concerns.

A Modern Slavery fact sheet was designed and published on our external website. The fact sheet provides existing or prospective customers, suppliers and investors with a snapshot of the processes and controls we have in place to manage modern slavery risks across APA's operations and supply chain. The content is tailored to address common modern slavery questions received from stakeholders.

Engagement and collaboration

Throughout FY23 the Modern Slavery Team engaged with external human rights experts to deliver tailored training packages. The team attended a number of webinars and conference events hosted by Government, legal firms, and expert consultancy agencies.

The Modern Slavery Team worked closely with an ESG data provider and human rights consultancy to map high-risk suppliers beyond Tier 1. Providing us with guidance on appropriate due diligence requirements for further engagement with suppliers at different risk classification.

Clean Energy Council (CEC)

APA is a member of the CEC Risk of Modern Slavery Working Group. The 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.

In June 2023 we submitted our Clean Energy Council Pledge Against Modern Slavery. The pledge was developed by the Clean Energy Council in collaboration with its Risks of Modern Slavery Working Group. The Pledge demonstrates APA's commitment to addressing the modern slavery and forced labour issues facing the renewable energy industry.

United Nations Global Compact (UNGC) Membership

APA is a signatory to the UN Global Compact and is committed to the 10 key principles, including relating to addressing forced and child labour, as well as other human rights impacts. As members of the UN Global Compact Network Australia's Modern Slavery Community of Practice, we have completed an update on progress for FY23, this demonstrates our commitment to making the UNGC and its principles part of APA's strategy, culture and day-to-day operations.

Managing modern slavery risks in our investments

APA provides operations, maintenance, and/or corporate services to a number of operated and non-operated energy infrastructure investments, and also manages operations for third parties. The procurement of goods and services provided under these service agreements is managed by APA using APA's supply chain and policies and risk management controls. Accordingly, the risk of those investments is reflective of the broader APA Group.

CASE STUDY

Deep dive into suppliers of renewable energy equipment

Renewable energy, including solar, is recognised globally as a high-risk area for modern slavery. The latest Global Slavery Index (2023) identifies risks throughout the solar energy value chain.[1]

APA is facing the challenge of respecting human rights whilst delivering infrastructure solutions for the energy transition.

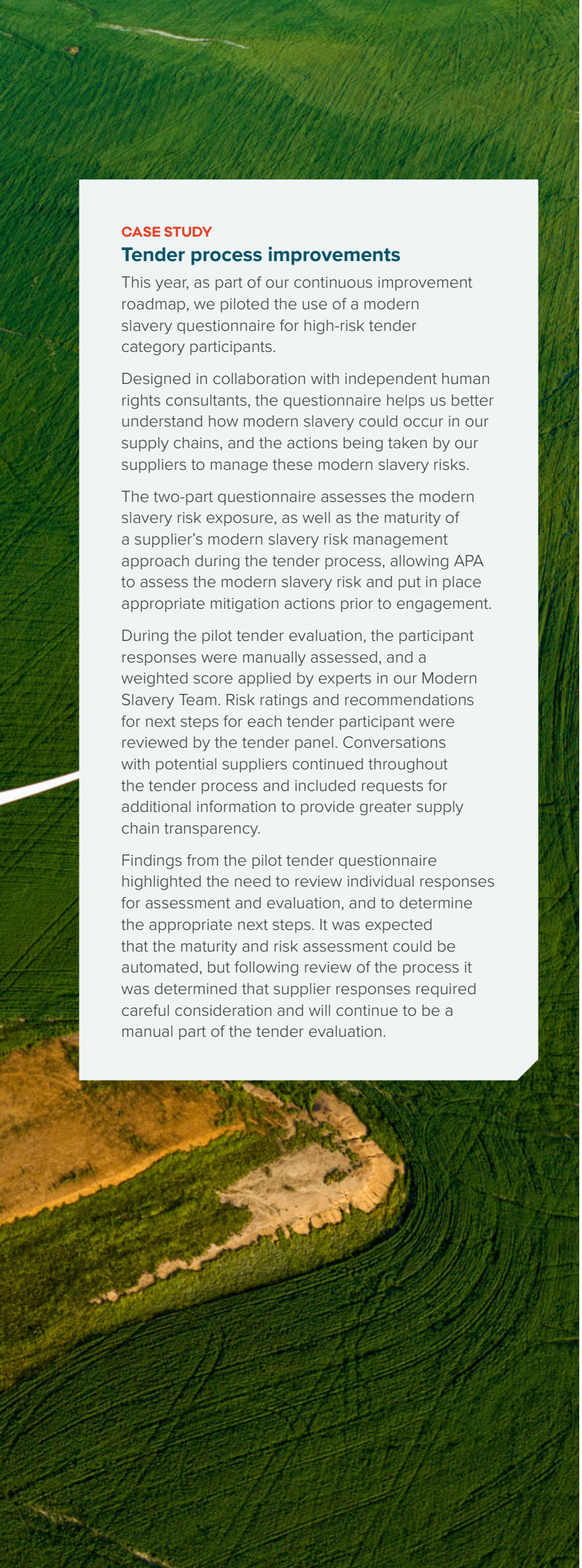
In FY21 and FY22 our modern slavery risk assessment identified solar panels as a high-risk product for APA. To mitigate the risk, we developed an alternative sourcing approach by procuring the solar panels directly from international suppliers. The approach provided us with greater control over the location of sourcing and an increased level of engagement directly with suppliers.

In FY23, to deepen our understanding of the modern slavery risk facing APA in our transition to renewable energy, we prioritised potential future suppliers of renewable energy and conducted a deep dive exercise.

External human rights consultants were engaged to complete a desktop audit of publicly available information and to produce a detailed report for each potential future renewable supplier. The deep dive reports have helped us form a baseline modern slavery risk profile for each. The reports were reviewed and discussed in detail with the Modern Slavery Team, Procurement Managers, and expert human rights consultants. While this work will continue into FY24, we have commenced direct engagement with a potential future high-risk supplier and further supplier due diligence has commenced.

As a learning from the deep dive exercise, in FY24 we will develop and launch a supplier engagement playbook. The playbook will set out due diligence required by the Procurement Team as they engage with high-risk suppliers. In parallel, we will also update our Risk Management Approach to capture the process for managing emerging modern slavery risks.

1. The costs of the climate crisis | Walk Free



CASE STUDY

Tender process improvements

This year, as part of our continuous improvement roadmap, we piloted the use of a modern slavery questionnaire for high-risk tender category participants.

Designed in collaboration with independent human rights consultants, the questionnaire helps us better understand how modern slavery could occur in our supply chains, and the actions being taken by our suppliers to manage these modern slavery risks.

The two-part questionnaire assesses the modern slavery risk exposure, as well as the maturity of a supplier's modern slavery risk management approach during the tender process, allowing APA to assess the modern slavery risk and put in place appropriate mitigation actions prior to engagement.

During the pilot tender evaluation, the participant responses were manually assessed, and a weighted score applied by experts in our Modern Slavery Team. Risk ratings and recommendations for next steps for each tender participant were reviewed by the tender panel. Conversations with potential suppliers continued throughout the tender process and included requests for additional information to provide greater supply chain transparency.

Findings from the pilot tender questionnaire highlighted the need to review individual responses for assessment and evaluation, and to determine the appropriate next steps. It was expected that the maturity and risk assessment could be automated, but following review of the process it was determined that supplier responses required careful consideration and will continue to be a manual part of the tender evaluation.

Grievance mechanisms and remediation

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

A Whistleblower Line is maintained through an externally managed disclosure service as an independent, impartial and confidential means of reporting potential incidents, including any concerns related to modern slavery or broader labour rights issues. The Whistleblower mechanism is available to employees, contractors and other stakeholders, including suppliers and their workers. Information about the Whistleblower mechanism is included in our modern slavery training.

Communication of grievance mechanisms should be tailored and accessible for potentially impacted stakeholder groups. For example, for office-based employees our Whistleblower Policy features prominently in onboarding training and on notice boards. We consider there is an opportunity to promote our grievance mechanisms externally to our suppliers. An initiative on the FY24 roadmap includes reviewing accessibility of the grievance mechanisms for potential improvement.

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.

Modern Slavery Supplier Response Procedure

The Modern Slavery Response Procedure outlines the process for investigating and remediating a potential or actual modern slavery incident. The procedure consists of four key steps; identify, review, investigate, and remediate. It includes a clear commitment to taking a victim-first approach to remediation.

APA's Incident Response Team, comprised of key members of the Modern Slavery Working Group, is responsible for the development of an appropriate remediation action plan. The Incident Response Team will determine if APA has caused, contributed to, or is directly linked to the incident in line with the UN Guiding Principles (**UNGPs**) on Business and Human Rights. External expert business and human rights advice will be sought to inform the assessment.

The Modern Slavery Response Procedure has been made available for all employees to access via our intranet. Plans to further embed and operationalise the procedure is on the roadmap for FY24.

Effectiveness Assessment

Assessing the effectiveness of APA's modern slavery risk management helps us 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 the business.

An evidence-based approach is taken to assess the effectiveness of our actions, which is the primary responsibility of the Modern Slavery Working Group. The table below details the measures and outcomes for FY23.

Key actions taken	How we seek to measure the effectiveness of our actions	Outcomes
Governance of Modern Slavery Program		
Modern Slavery Working Group	• Tracking frequency of meetings and progression of key action items.	• Active participation by all Working Group members at meetings held throughout the year. • Key actions implemented as planned.
Responsible Procurement Strategy	• Annual review and refresh of the Responsible Procurement Strategy to reflect progress of key initiatives and help ensure it remains fit for purpose, including as our capability matures.	• Roadmap of initiatives developed to implement and execute on the Responsible Procurement Strategy.
Refresh Risk Management Approach	• Annual review and refresh of Risk Management Approach to help ensure it remains fit for purpose.	• The Risk Management Approach was updated to reflect key learnings from FY23. • Following the FY23 pilot, deep dive initiatives will be incorporated for categories, rather than only individual suppliers, enhancing our risk assessments. • A supplier risk assessment playbook is under development for FY24.
Grievance mechanisms and remediation		
Monitoring of whistleblower mechanism	• Number of modern slavery related complaints raised each financial year and the outcome of any complaints raised.	• Zero whistleblower complaints raised in respect to modern slavery during FY23 (although we recognise this does not mean no modern slavery occurred).
Initiate Modern Slavery Response Plan	• Number of times the Modern Slavery Response Plan has been activated for each financial year and the outcomes of any investigation.	• Zero instances for FY23 required investigation using the plan. • References to the Response Plan and guidance on reporting concerns continued to be included in training for our people.
Create and publish Team Leader Information Sheet	• Number of Team Leaders provided with the Information Sheet. • Monitor engagement with Team Leaders, including any feedback.	• Information Sheet provided to Team Leaders and published on APA intranet site to provide guidance on their role as leaders and how to respond and report modern slavery concerns raised by employees.

Key actions taken	How we seek to measure the effectiveness of our actions	Outcomes
Training and communications		
Continue to rollout face to face training to priority groups across the business	• Number of employees trained. • Feedback from training sessions monitored and lessons learned incorporated into future sessions.	• 166 employees trained, with informal feedback suggesting increased awareness of modern slavery risks for those employees who deal directly with suppliers and/or contractors.
Raise awareness of modern slavery and red flags for APA through internal communications	• Number of articles published, and feedback received throughout the financial year.	• Articles published on group intranet homepage. • Dedicated modern slavery intranet site refreshed. • Frequently asked questions refreshed for FY23. • Modern Slavery Factsheet published on APA website.
Risk Management		
Map supply chains for high-risk suppliers Identify high risk suppliers, issue self-assessment questionnaires (**SAQ**) for completion Conduct supplier deep dives for high-risk suppliers	• Number of high-risk suppliers identified as a result of the supply chain mapping and modern slavery risk assessment. • Number of SAQs completed by suppliers, the quality of these responses, and the proportion of suppliers requiring a deep dive assessment. • Number of deep dives completed, and the level of engagement achieved with each supplier.	• Supply chain risk mapped as deep as Tier 10 for 120 high risk suppliers, with SAQs completed for 21 suppliers, and deep dives completed for 9 suppliers of renewable energy equipment. • Direct engagement with 1 supplier from deep dive pilot exercise.
New suppliers tracked for compliance against our New Supplier Procedure	• Number of new suppliers onboarded and compliant with the New Supplier Procedure (including completion of the Human rights declaration).	• Human rights declaration completed for 650 new suppliers.

Looking back

What we said we would do in our FY22 Modern Slavery Statement	Progress in FY23	Page number
Training & awareness Embed modern slavery training as part of business as usual, extend information sharing and awareness communications.	Delivered modern slavery training for high priority trainees. Ongoing annual training and awareness. Modern Slavery fact sheet published on our external website.	24 & 25
Risk management approach Deep dives / audits for operating in high-risk categories and/or countries.	Deep dives commenced for high-risk suppliers.	21 & 22
Continuous improvement Review of supplier modern slavery questionnaire.	Developed a comprehensive list of modern slavery questions for inclusion in APA tender processes.	27
Documentation Review and update relevant policies and procedures to integrate our risk management approach.	Risk Management Approach updated to include our maturity uplift in FY23. Modern Slavery Supplier Response Procedure released for all employees.	21, 22, 27
Responsible procurement Finalisation and approval of inaugural strategy. Commence execution of the responsible procurement strategy through targeted initiatives.	Launch and awareness of the responsible procurement strategy across the business.	23
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.	Ongoing throughout FY23.	25

Looking forward

In the coming year, our priorities are:

TRAINING & AWARENESS

- Continue to rollout and embed modern slavery training as part of business as usual, rollout refresher training, extend information sharing and awareness communications for those employees managing high risk categories.
- Complete development and rollout of modern slavery training to our Executive Leadership Team and APA Board.

RISK MANAGEMENT

- Monitor emerging risks and conduct deep dives for suppliers operating in high-risk categories and/or countries.
- Develop and launch step-by-step playbook for addressing and mitigating identified risk for high-risk suppliers.
- Annual renewal of CIPS Corporate Ethics Mark.

CONTINUOUS IMPROVEMENT

- Update tender process and rollout use of modern slavery questionnaire for all future tenders.
- Develop and rollout Modern Slavery Response Plan Guide for managing high risk supplier improvement plans.

DOCUMENTATION

- Continue development of new Supplier Code of Conduct.
- Update and publish Modern Slavery fact sheet for FY23 reporting period.
- Refresh modern slavery clauses and obligations in precedent agreements.

RESPONSIBLE PROCUREMENT STRATEGY

- Ongoing development of pipeline and initiative execution.
- Support for RAP delivery.

INDUSTRY COLLABORATION

- Partner with suppliers to strengthen their modern slavery awareness and their approach modern slavery risk management.
- Participate in CEC Modern Slavery Working Group.

GRIEVANCE AND REMEDIATION

- Further embed and operationalise the Modern Slavery Response Procedure.
- Review awareness and accessibility of grievance mechanisms.

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 as well as relevant owned and controlled entities. 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.

This statement has been endorsed by APA's Executive Risk Management Committee and APA's Risk Management Committee. It has been 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

Name	Description
APA (**SWQP**) Pty Limited	Owner and operator of the South West Queensland Pipeline (**SWQP**).
APA BidCo Pty Limited	Holding entity for APA's interest in the WGP. It is a non-operating entity.
APA EE Australia Pty Limited	Holds APA's interest in SWQP and Pilbara Pipeline via its controlled entities. The entity is non-operating.
APA EE Holdings Pty Limited	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 Infrastructure Limited	Investment in controlled entities and acting as the borrowing entity for APA Group, that comprises APA Infrastructure Trust and APA Investment Trust and their controlled entities.
APA Infrastructure Trust	One of two registered investment schemes that comprise APA Group ("**APA**"), and parent of APA Infrastructure Limited. APA owns and operates energy infrastructure assets and businesses, including: • energy infrastructure, comprising gas transmission, gas storage and processing, and gas-fired and renewable energy, power generation businesses located across Australia; • asset management services for the majority of APA's energy investments and for third parties; and • energy investments in unlisted entities.
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.
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 Transmission Pty Limited	Wholly owned subsidiary of APA Infrastructure Limited. Holds APA's interest in the Wallumbilla Gas Pipeline (**WGP**) and Reedy Creek Wallumbilla Pipeline via its controlled entities.
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.
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 WGP Pty Ltd	Owner and operator of the WGP.
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**).
APT Pipelines Investments (WA) Pty Ltd	Holding entity for APA's interests in the Goldfields Gas Pipeline, Parmelia Gas Pipeline, and Northern Goldfields Interconnect.
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.
East Australian Pipeline Limited	Owner and operator of the Moomba to Sydney Pipeline.
Epic Energy East Pipelines Trust	Holds APA's interest in SWQP and Pilbara Pipeline via its controlled entities. The entity is non-operating.
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.

Appendix 2: How our statement addresses the mandatory criteria

Mandatory criteria	Section	Page number/s
a. Identify the reporting entity	About this statement	1
	Appendix 1	32
b. Describe the reporting entity's structure, operations and supply chains	About APA	4, 5
	Our operations	6, 7, 8
	Our Workforce	9, 10
	Our supply chain	11, 12, 13
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	14, 15
	Modern slavery risks in the communities where we operate	15
	Modern slavery risks in our supply chain	16, 17, 18
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	Governance framework	19, 20
	Policy framework	21, 34, 35
	Modern slavery risk management approach	21
	Case study - enhancing our risk management approach	22
	Launch of our Responsible Procurement Strategy	23
	Achieving the CIPS Corporate Ethics Mark	24
	Modern slavery maturity assessment	24
	Employee training	24
	Raising awareness	25
	Engagement and collaboration	25
	Case study - deep dive into suppliers of renewable energy equipment	26
	Case study - tender process improvements	27
	Grievance mechanisms and remediation	27
	Modern slavery supplier response procedure	27
e. Describe how the reporting entity assesses the effectiveness of these actions	Effectiveness assessment	28
	Looking back	29
	Looking forward	30
f. Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls	Process of consultation	31
g. Any other information that the reporting entity, or the entity giving the statement, considers relevant	Update on our payroll review	15
	Message from CEO and Managing Director	2
	How our modern slavery response is evolving	3

Appendix 3: Policy Framework

Key policies governing ethics and integrity at APA include:

Policy	Relevance to Modern Slavery	How this policy continued to be implemented at APA during the reporting period
Code of Conduct (**Our Code**)	Our Code of Conduct serves as a roadmap to help ensure that we all work together and operate ethically, with integrity and in a compliant way. The purpose of our Code of Conduct is to embed a common understanding of our commitments, what APA stands for and what type of behaviour is expected at APA. Our Code focuses on our 19 commitments, our behaviours and our people. These commitments outline APA's principles and standards which we expect employees, officers, suppliers and contractors to demonstrate at all times. Our commitments include, but is not limited to, respecting human rights, preventing bullying and harassment and procuring our goods and service ethically and responsibly.	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. 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. 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 and new contracts not awarded.
Inclusion & Diversity Policy	The current policy sets out our principles for an inclusive and diverse workplace, including guidelines on acceptable behaviour and anti-discrimination practices. Member of the Diversity Council Australia (**DCA**).	Fair treatment awareness training is mandatory for all APA employees, and an inclusive leadership course is available for people leaders. The Inclusion and Diversity 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. In FY23 the Inclusion & Diversity Policy was refreshed and is available on the APA website.
Respect@Work Procedure	APA is committed to providing and fostering an inclusive and respectful workplace with safe, fair and positive working conditions. We do not tolerate any form of harmful behaviour including unlawful discrimination, bullying, harassment, sexual harassment, sex-based harassment, vilification, victimisation and other inappropriate behaviour.	In FY23 APA launched our Respect@Work procedure. This aligns with the Inclusion & 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.
Anti-Bribery and Corruption Policy	Our commitment to fostering business integrity including detecting and preventing bribery, corruption and fraud, which we recognise can facilitate modern slavery. Our Anti-Bribery and Corruption Policy prohibits bribery and corruption in any form.	Training is provided annually to senior leadership and managers of employees. APA recorded zero confirmed incidents of fraud, bribery, or corruption in FY23.

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

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