



Securing Australia's energy future

Modern Slavery
Statement 2024

APA



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.

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About this statement

This Modern Slavery Statement has been prepared by APA to meet the requirements of the Australian *Modern Slavery Act 2018* (Cth) (MSA) for the financial year ending 30 June 2024 (FY24). This is a joint statement made on behalf of the reporting entities listed in [Appendix 4](#).

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 2024 (FY24).

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.

The reporting entities covered by this statement, 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 and supply chains as well as the actions taken to assess and address those risks.

As required under the MSA, this statement was developed through consultation with each of the reporting entities it covers (listed in [Appendix 4](#)), as well as owned or controlled entities. The consultation process involved active engagement and consultation by the Modern Slavery Working Group with APA's executive management covering all companies we own or have an interest in, and manage, or operate. Topics of consultation included the reporting requirements under the MSA, information regarding the actions undertaken during the financial year, and planned actions to address the reporting requirements.

This statement was endorsed by APA's Executive Risk Management Committee and APA's Risk Management Committee. In accordance with the MSA, it was approved in November 2024 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

▶ For more information see
APA Group [FY24 results](#).

Message from our CEO and Managing Director

Securing Australia's energy future

During FY24 APA continued to pursue growth opportunities in our four chosen asset classes, which are essential to Australia's energy transition. This includes contracted power generation, electricity transmission, gas transmission and storage, and future energy, including low emission fuels such as hydrogen.

Subsequently, our modern slavery risk profile is continuing to evolve, with APA having increased exposure to renewable energy supply chains.

APA remains committed to addressing modern slavery and acknowledges the importance of being vigilant to the risks of modern slavery in our operations and supply chains. Throughout FY24 we continued to mature our actions and worked to further embed our Modern Slavery Risk Management Approach across the business. Key actions for FY24 include:

- delivered tailored training to the Executive Leadership Team and APA Board members;
- refreshed modern slavery clauses and obligations included in precedent agreements and terms and conditions;
- developed a draft Modern Slavery Supplier Risk Mitigation Engagement Guide;
- conducted deep dives for suppliers with an elevated-risk of modern slavery;
- developed a supplier performance improvement plan.

This year we reviewed APA's purpose, brand and culture to continue strengthening trust with our people, customers, and stakeholders.

Our new purpose, securing Australia's energy future, defines the unique role APA plays as an energy infrastructure partner and highlights the trust our customers and communities have in our ability to work with them to deliver reliable, affordable and low emissions energy. We understand that our commitment to responsible business conduct, including addressing modern slavery, underpins the trust our external stakeholders place in us and we will continue to strengthen our work in this area going forward.



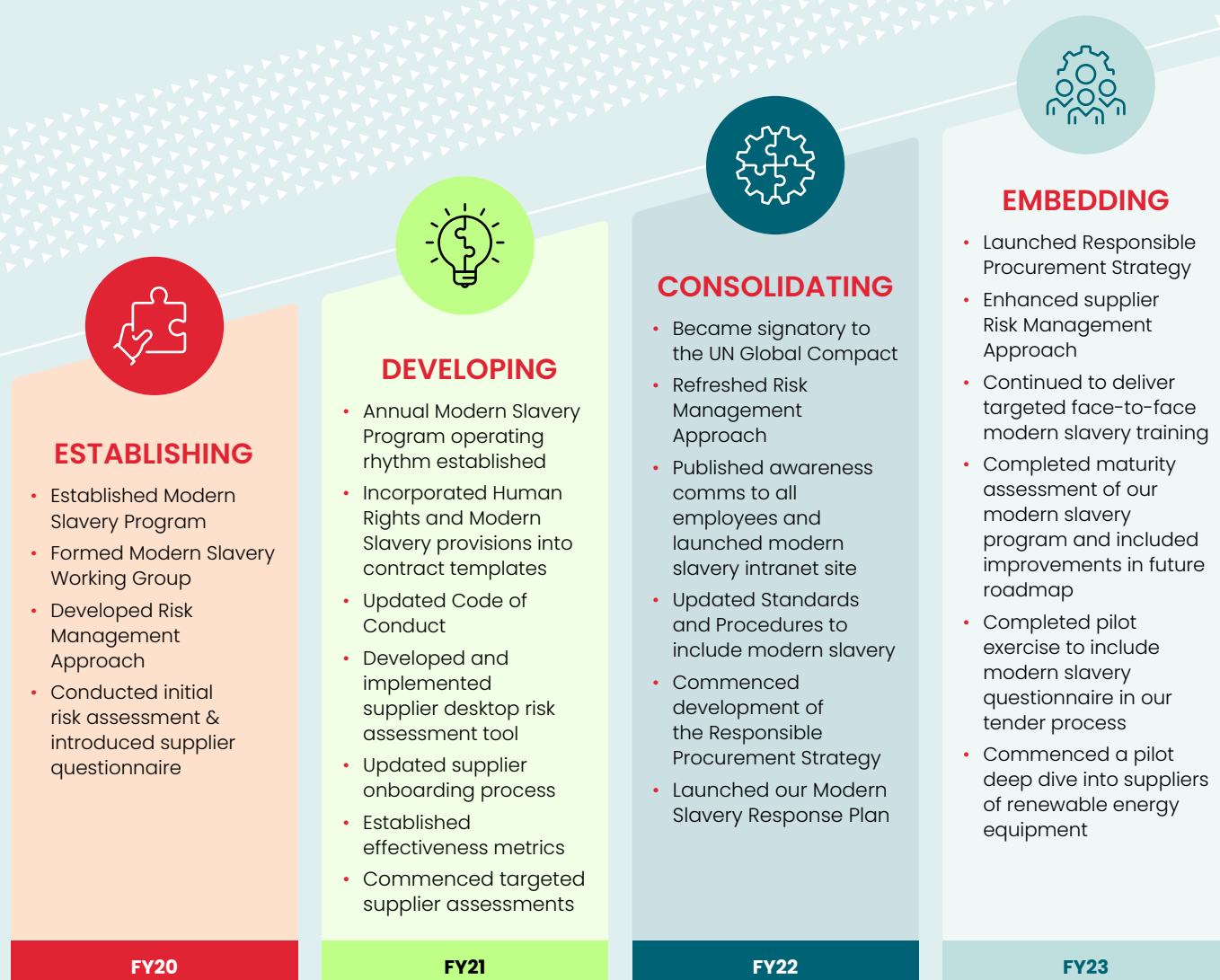
Adam Watson
Chief Executive Officer and
Managing Director

Advancing our modern slavery response

At APA, we are focused on refining our modern slavery response as we continue to learn from our experiences, strengthen our due diligence processes, and increase supplier engagement.

The visual below highlights our progress to date.

How our modern slavery response is evolving



Embedding FY24 actions



Continued to roll out modern slavery training



Monitored emerging modern slavery risks



Delivered tailored training to Executive Leadership Team and Board



Included modern slavery questionnaire in high-risk tender events



Conducted deep dives for suppliers identified as having an elevated risk of modern slavery



Partnered with a key supplier to action a continuous improvement plan



Refreshed modern slavery clauses and obligations included in precedent agreements and terms and conditions






Continued development of new Supplier Code of Conduct and developed a draft Modern Slavery Supplier Risk Mitigation Engagement Guide

Our future plans and progress on past commitments

FY23 commitment	Progress in FY24	FY25 commitment
Training and 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.	<p>Continued our modern slavery training program for identified key roles, delivering face-to-face training for new starters and an annual refresher module throughout the year.</p> <p>Held a lunch-and-learn awareness session for all employees on how to identify red flags and raise a modern slavery concern.</p> <p>Communications released on APA's internal networking site sharing information on modern slavery, including; key takeaways from the Australian Government's 2023 Modern Slavery Conference, Be Slavery Free's Chocolate Scorecard, Global Ethics Day and Anti-Slavery Day.</p>	<ul style="list-style-type: none"> • Reassess modern slavery training as part of business as usual. • Hold information sharing and awareness sessions for those employees managing high-risk categories. • Publish modern slavery fact sheet for FY24 reporting period.
Complete development and rollout of modern slavery training to our ELT and APA Board.	Tailored training delivered to our ELT and APA Board.	
Update and publish modern slavery fact sheet for FY23 reporting period.	Modern slavery fact sheet for FY23 published on our external website.	
Risk management		
Monitor emerging risks and conduct deep dives for suppliers operating in high-risk categories and/or countries.	Deep dives conducted for select high-risk suppliers.	
Develop and launch step-by-step playbook for addressing and mitigating identified risk for elevated-risk suppliers.	Developed a draft step-by-step playbook (Modern Slavery Risk Mitigation Engagement Guide), comprising mitigating actions for elevated-risk suppliers.	
Annual renewal of CIPS Corporate Ethics Mark.	Successfully renewed our Chartered Institute of Procurement and Supply (CIPS) Corporate Ethics Mark, as a demonstration of our ongoing commitment to ethical procurement practices.	<ul style="list-style-type: none"> • Continue to monitor emerging risks and proactively assess modern slavery risk prior to engaging suppliers. • Progress the development of our Modern Slavery Risk Mitigation Engagement Guide for engaging with suppliers presenting an elevated-risk of modern slavery. • Annual renewal of CIPS Corporate Ethics Mark.

➔ In progress ✓ Completed



FY23 commitment	Progress in FY24		FY25 commitment
Procurement and supplier engagement			
Continue development of new Supplier Code of Conduct.	Progressed the development of a Supplier Code of Conduct.		<ul style="list-style-type: none">• Progress our new Supplier Code of Conduct.• Work collaboratively with suppliers to build awareness of modern slavery risks and capability to support related due diligence, including supplier training.• Preparation and readiness for future MSA changes.• 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.
Update tender process and rollout use of modern slavery questionnaire for all future tenders.	Modern slavery questionnaire included in sourcing events which pose a high risk of modern slavery for APA.		
Refresh modern slavery clauses and obligations in precedent agreements.	Refreshed modern slavery clauses included in precedent agreements and terms and conditions.		
Develop and rollout Modern Slavery Response Plan Guide for managing high risk supplier improvement plans.	Modern Slavery Response Procedure was reviewed and uplifted during FY24.		
Responsible procurement			
Support for RAP delivery.	Modern Slavery Team focused on supporting and contributing to the delivery of APA's RAP obligations for Indigenous peoples, including creating awareness of wage theft and conditions that would be recognised today as modern slavery.		<ul style="list-style-type: none">• Continue support for RAP delivery.
Industry collaboration			
Partner with suppliers to strengthen their modern slavery awareness and their approach to modern slavery risk management.	Initiated a performance improvement plan for a key supplier (refer to case study, page 21).		<ul style="list-style-type: none">• Collaborative supplier engagement.• Participate in CEC Modern Slavery Working Group.
Participate in Clean Energy Council (CEC) Modern Slavery Working Group.	CEC Modern Slavery Working Group attendance and participation.		
Grievance and remediation			
Further embed and operationalise the Modern Slavery Response Procedure.	Modern Slavery Response Procedure refreshed and published internally for all APA employees. Lunch-and-learn session provided staff with information on how to identify red flags and raise a modern slavery concern.		<ul style="list-style-type: none">• Refresh our Modern Slavery Response Procedure.• Continue the review of APA's grievance mechanisms in terms of awareness and accessibility.
Review awareness and accessibility of grievance mechanisms.	Precedent agreements updated to include grievance accessibility.		

→ In progress ✓ Completed

About APA



PURPOSE
Why we exist

Securing Australia's
energy future



STRATEGY
What we do

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

Our structure

We responsibly develop, build, own and operate energy infrastructure assets, leveraging our organisational know-how to enable safe generation and transportation of energy for our customers and communities.

APA operates a large, \$26 billion portfolio of diverse energy infrastructure assets. This includes more than 15,000 km of natural gas pipelines that connect sources of supply and markets across mainland Australia.

We operate high-voltage electricity transmission assets that connect Victoria with South Australia, New South Wales with Queensland and Tasmania with Victoria.

We also have gas storage facilities and operate and maintain networks connecting 1.5 million Australian homes and businesses to natural gas.

In addition, we have 692 MW of renewable energy assets and 884 MW of gas-fired generation assets.

As part of communities across the country, including many our people call home, we're often unseen, connecting industry, manufacturing and households to the energy they need to keep our nation moving forward.

Together, with our people, customers, communities and other stakeholders, we're securing Australia's energy future.

Company name:

APA Group Limited
ACN 091 344 704

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

Our behaviours

Our Code of Conduct (our Code) is underpinned by our five behaviours. They reflect the way we do things at APA and guide our everyday interactions with each other, and with all of our stakeholders. By embracing and upholding these five behaviours, we seek to create a culture that empowers us to be our best — for each other, our customers and suppliers, and the communities we serve.

Addressing modern slavery risks aligns with our behaviours:



Courageous

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

We aim to be transparent regarding modern slavery risks and challenges in our business and we encourage our suppliers to do the same. We partnered with a key supplier to strengthen their modern slavery awareness and risk management by supporting them to develop and implement a supplier performance improvement plan.

Refer to case study on [page 21](#).



Accountable

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

We invest time and resources into developing and refining our modern slavery response. During FY24 we commenced a review of the awareness and accessibility of our grievance mechanisms to help ensure they are fit for purpose. This work will continue into FY25.



Nimble

We are curious, adaptive and future focused.

We adapt our modern slavery response over time to strengthen our approach and factor in emerging risks. During the reporting period, we uplifted our tender processes to include modern slavery questions for high-risk sourcing events.



Collaborative

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

We aim to engage and learn from our stakeholders and other peers. This is why we have established a cross-industry modern slavery practitioner forum to share learnings, experiences and challenges.

Refer to [page 24](#).



Impactful

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

We prioritise actions that maximise our impact. We provided a modern slavery lunch and learn session accessible to all APA employees to raise awareness of potential red flags relevant to our industry and how to report concerns.

Refer to [page 23](#).

Our operations

At APA we focus on delivering reliable, future-focused energy solutions for the resources industry, energy supply and wholesale markets, government, and large commercial and industrial customers.

Our approach is customer driven and our solutions target four asset classes that are essential to Australia's energy transition and where we have a competitive advantage: contracted power generation and firming, electricity transmission, gas transmission and storage, and future energy (including lower emission fuels such as hydrogen and renewable methane).

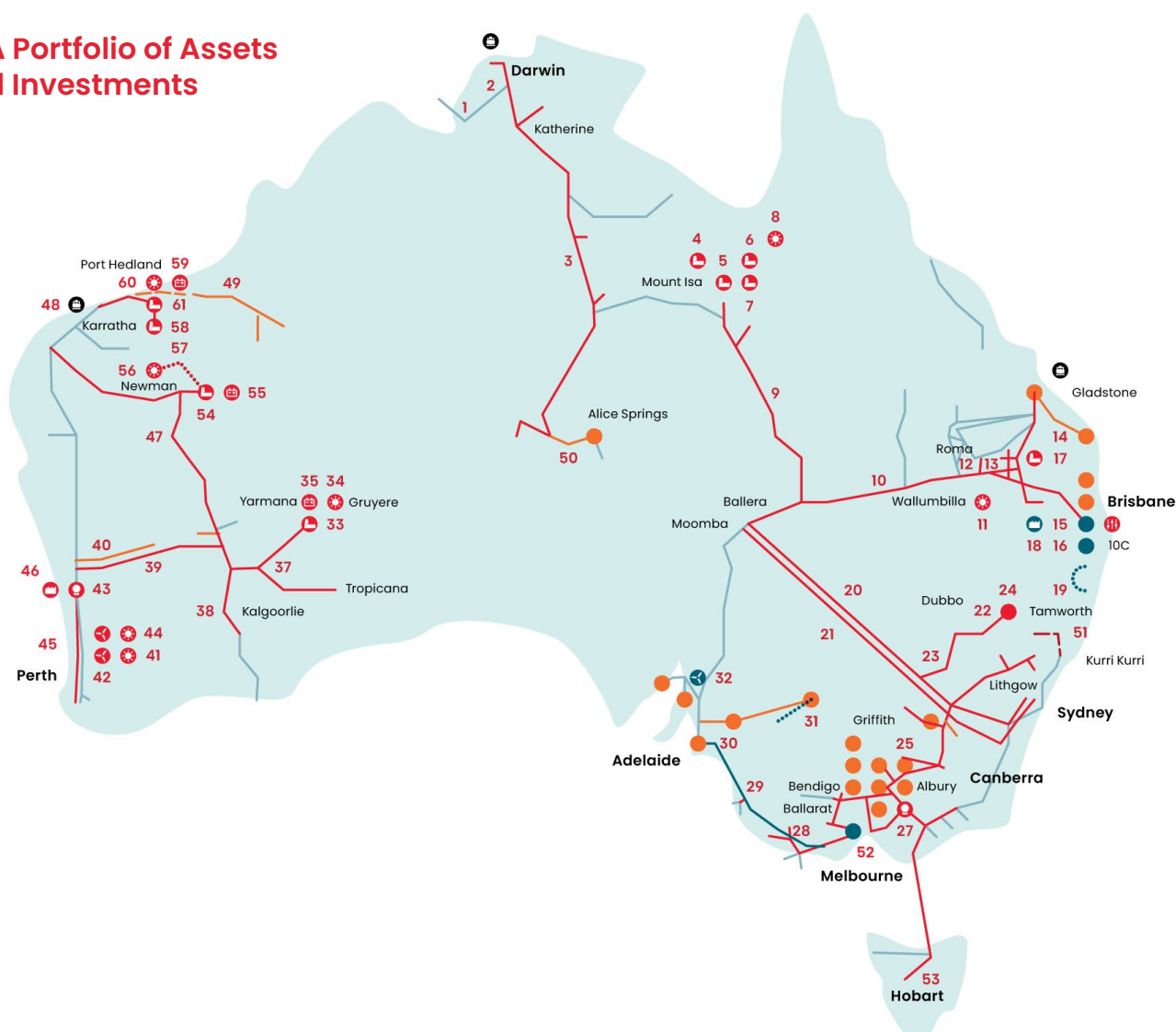
More detail about APA's operating structure and corresponding supply chains is detailed in [Appendix 1](#).

APA's strategy is focused on four asset classes



About APA continued

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 (GGP)
- 38 Kalgoorlie Kambalda Pipeline
- 40 Mid West Pipeline
- 20 Moomba Sydney Pipeline (inc laterals) (MSP)
- 21 Moomba Sydney Ethane Pipeline
- 28 Mortlake Gas Pipeline
- 39 Northern Goldfields Interconnect
- 45 Parmelia Gas Pipeline (PGP)
- 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 (SWQP)
- 49 Telfer/Nifty Gas Pipelines and lateral
- 25 Victorian Transmission System (VTS)
- 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 & Storage

- 27 Dandenong
- 18 Kogan North
- 46 Mondarra

Gas Distribution

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

Electricity Transmission

- 19 Directlink
- 31 Murraylink
- 53 Basslink
- 57 Pilbara – HV Transmission Lines

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)
- 54 Newman (232 MW)
- 58 Port Hedland (126 MW)
- 61 Boodarie (84 MW)
- 35 Gruyere Battery Station (4.4 MW/4.4 MWh)
- 55 Newman Battery (35 MW / 11.4 MWh)
- 59 Port Hedland Battery* (35 MW / 34.1 MWh)

* Under construction.

Solar Farm

- 43 Badgingarra (19 MW)
- 11 Darling Downs (108 MW)
- 41 Emu Downs (20 MW)
- 34 Gruyere (13.2 MW)
- 8 Dugald River (88 MW)
- 56 Chichester (60 MW)
- 60 Port Hedland* (47 MW)

Wind

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

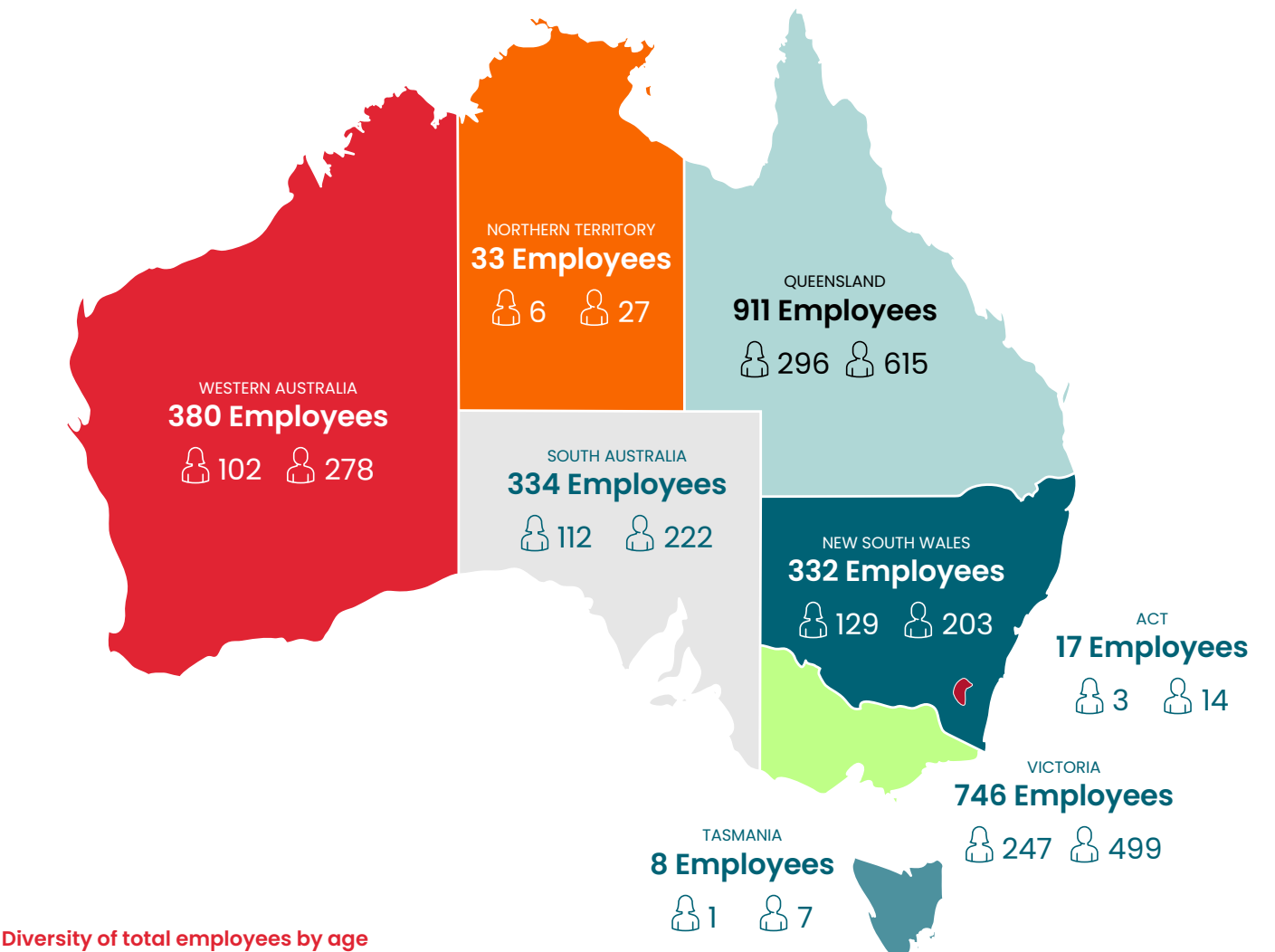
Key

- APA Group asset
- APA Group distribution network asset
- APA Group investment
- Investment distribution network
- Electricity transmission
- APA Group managed asset (not owned)
- Managed distribution network
- Other natural gas pipelines
- Under construction
- ☼ Wind farm
- ☀ Solar farm
- 🏠 LNG plant
- 🔋 Battery storage
- 🏢 Gas storage facility
- 🏢 Gas processing plant
- 🏢 Gas power station
- 🏢 Integrated Operations Centre

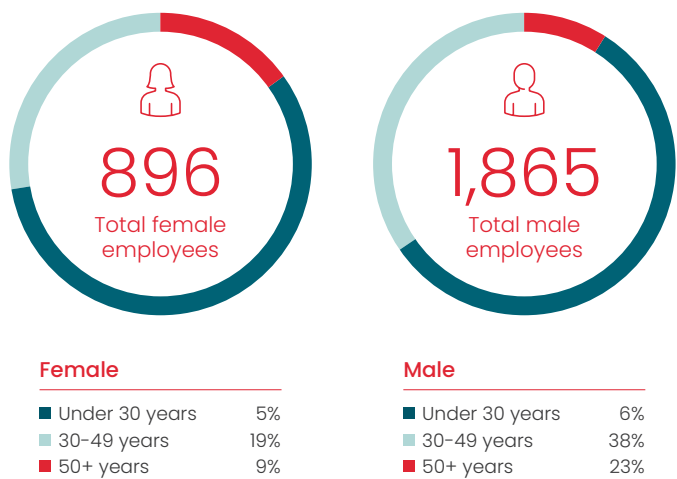
Our workforce

APA has 2,762¹ employees and 360 contingent workers located in offices and sites across Australia. 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 [Sustainability Report Data Book FY24](#). A summary is provided below.



Diversity of total employees by age



Employment Category	Male	Female
Full-time permanent	1734	729
Part-time permanent	13	80
Full-time fixed term	94	61
Part-time fixed term	0	7
Casual	24	19
Grand total	1,865	896

1. In FY24, one employee and three contingent workers identify as gender non-binary.



2762¹

Employees



360

Contingent
workers

1. In FY24, one employee and three contingent workers identify as gender non-binary.

Our supply chain

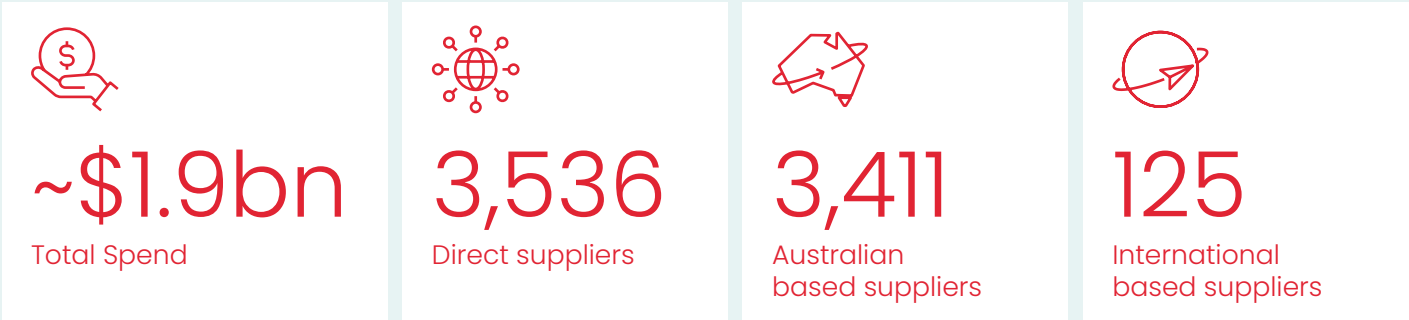
APA procures a diverse range of goods and services to support our energy infrastructure business.

Our procurement spend is predominantly managed through contractual arrangements including:

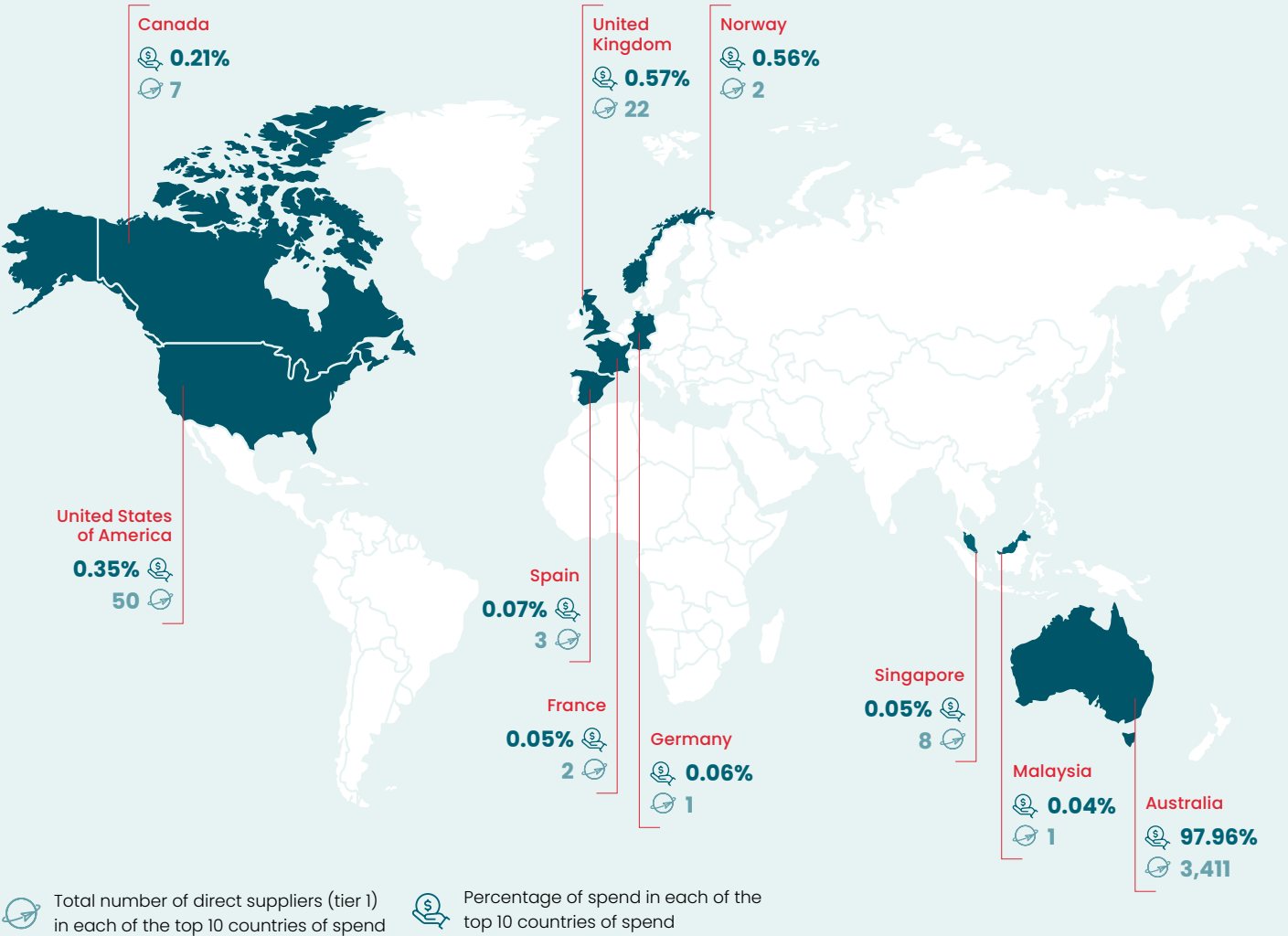
Purchase orders governed by master agreement terms and conditions, such as agreements for professional services or supply of goods

Bespoke agreements for the procurement of complex and high value goods, including for products such as solar panels

Multi-year standing arrangements governed by Precedent Agreements such as long-term services agreements



The map below shows the top 10 countries of our overall spend. Our direct suppliers (tier 1)¹ are predominantly based in Australia although we recognise they may also operate in or source from other countries.

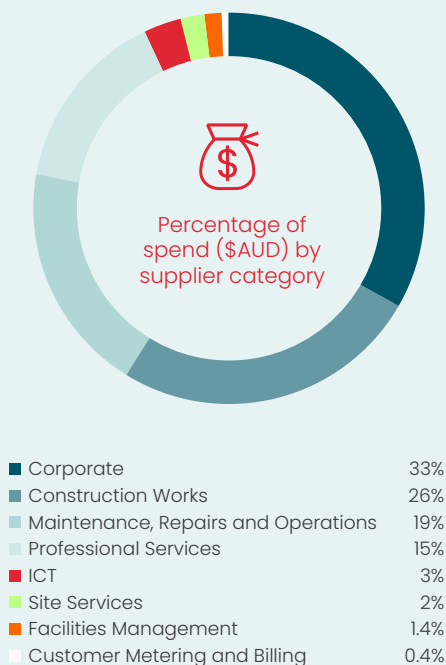


1. The term 'tier 1 suppliers' refers to our direct suppliers of goods or services. References to 'tier 2 suppliers' are the suppliers or subcontractors of our tier 1 suppliers, 'tier 3 suppliers' are the suppliers or subcontractors of our tier 2 suppliers, and so forth.

About APA continued

The goods and services we procure

A diverse range of goods and services were procured throughout FY24.



This year we successfully implemented Workday, our new enterprise resource planning system, to improve people, procurement and finance processes. The move to the new system has increased the granularity of our procurement spend data which provides us greater visibility of our spend categories, including high-risk modern slavery categories. For this reason the categories reported below are different to those covered in previous statements.

Categories	Main Sub-categories	% of spend ¹ (category level)
Corporate	<ul style="list-style-type: none"> Corporate Affairs Fees Fleet Management Freight and Logistics Government Charges & Rates Human Resources and Training Insurance Labour Hire Marketing Office Supplies Recruitment Travel and Entertainment 	33%
Construction Works	<ul style="list-style-type: none"> Civil and Minor Works Facilities Construction Services Other Construction Services Renewable Energy Construction Services 	26%
Maintenance, Repairs and Operations	<ul style="list-style-type: none"> Cathodic Protection Chemicals and Fuels Consumables Consumables Distribution and Conditioning Systems, Equipment & Components Electrical Equipment and Instrumentation Fabrication Hardware Consumables Hot Taps and Stop (HTS) In-service Welding Operations and Maintenance Services Pigging Pipe, Fittings, Sleeves and Coating Rotating Equipment Valves, Actuators and Regulators 	19%
Professional Services	<ul style="list-style-type: none"> Business Advisory Services Business and Operations Services Financial Services Legal Services Project Services Technical Services Technology Consulting 	15%
ICT	<ul style="list-style-type: none"> Information Technology Telecommunications 	3%
Site Services	<ul style="list-style-type: none"> Aerial Surveillance and Services Easement and Vegetation Management Plant and Equipment Hire Waste Management 	2%
Facilities Management	<ul style="list-style-type: none"> Building Management Emergency Response and Security Utilities Services 	1.4%
Customer Metering and Billing	<ul style="list-style-type: none"> Meter Testing and Calibration Metering Equipment (Network Specific) Metering Services 	0.4%




1. Due to rounding numbers may not add up to 100%.

How we assess modern slavery risks

APA draws upon the UN Guiding Principles on Business and Human Rights (UNGPs) to understand our connection 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.¹

 Cause	 Contribute	 Directly Linked
<p>Entities can cause modern slavery if their operations ‘directly result in modern slavery practices’.</p>	<p>Entities can contribute to modern slavery where their ‘acts or omissions ... facilitate or incentivise’ modern slavery practices.</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: 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>Hypothetical example: 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>Hypothetical example: An infrastructure company sources personal protective equipment (PPE) produced by a supplier using cotton harvested by a sub-supplier using forced labour.</p>

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).

We 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 compliant with all applicable legislative requirements in Australia regulating workplace relations
- 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.

¹. ‘Definitions contained in the table have been taken from the Australian Government’s Official Modern Slavery Act Guidance, page 40.

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.

Modern slavery risks in our supply chain

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

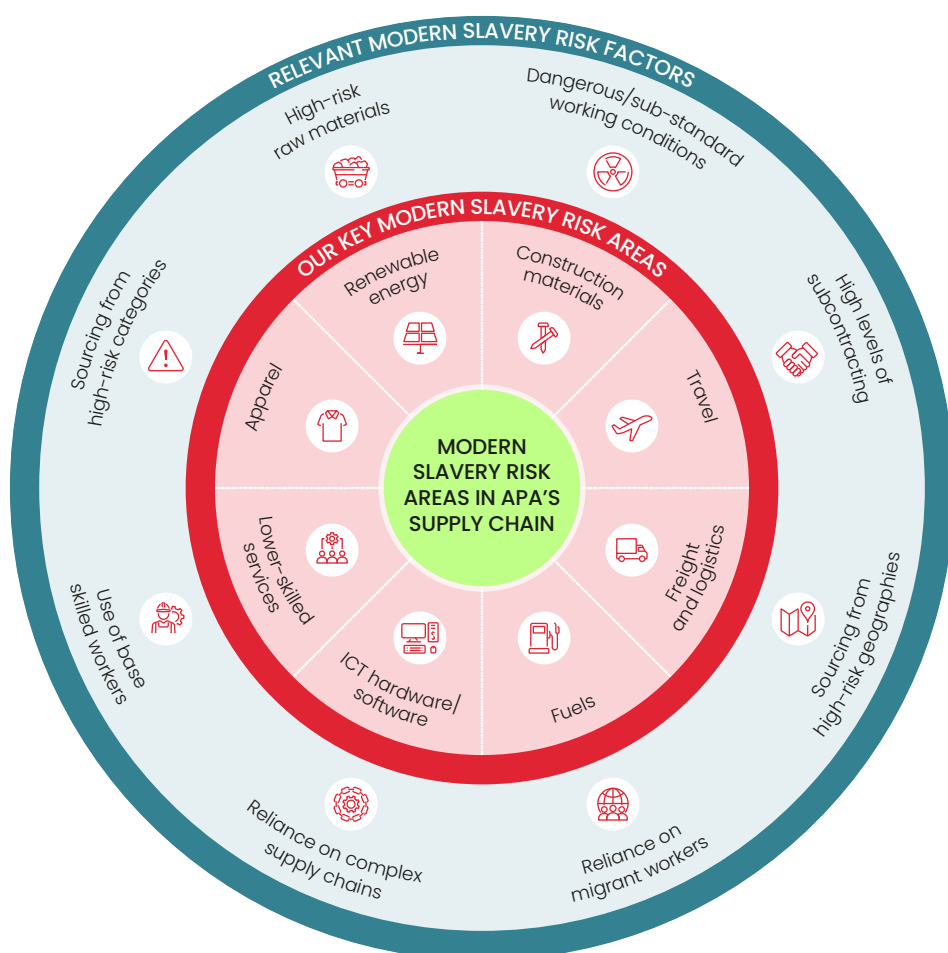
We recognise we could be directly linked to a range of modern slavery risks through our suppliers, including for both goods and services. For example, APA may be directly linked to modern slavery through the sourcing and processing stages of the raw materials that make their way into the products ultimately 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 outlined in this statement failed or were 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. Key controls to address these risk areas are set out in [Appendix 2](#).

We have identified these risks through a range of activities, including: reviewing credible third-party reports on current and emerging risks; assessing the results of supplier specific deep dive assessments (see case study on [page 20](#)); and our supplier due diligence approach.

Modern slavery risks in our supply chain

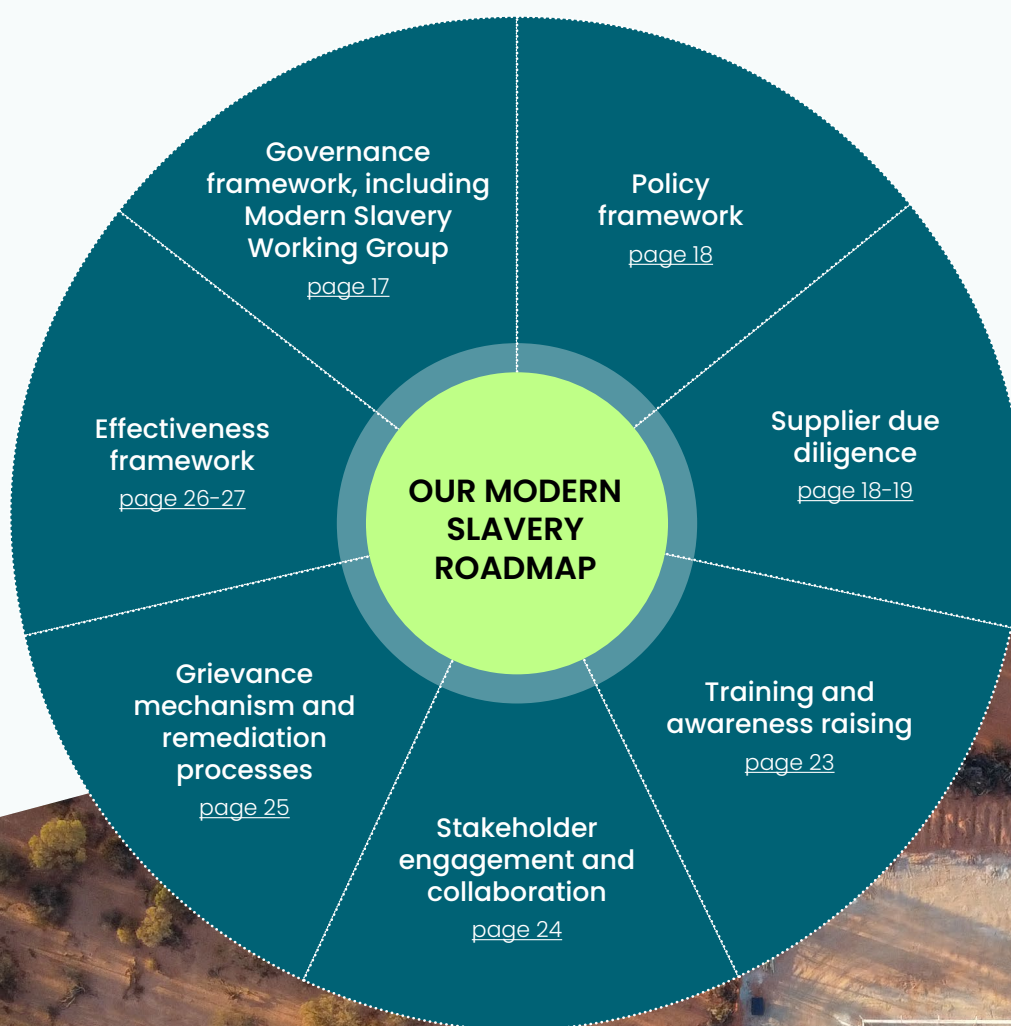


We also recognise that elements of our supply chain could include risks of reported state-sponsored forced labour, including in relation to sourcing of materials used in solar panels.

We monitor evolving industry approaches and recommendations from governments, civil society and other stakeholders in relation to assessing and managing these risks.

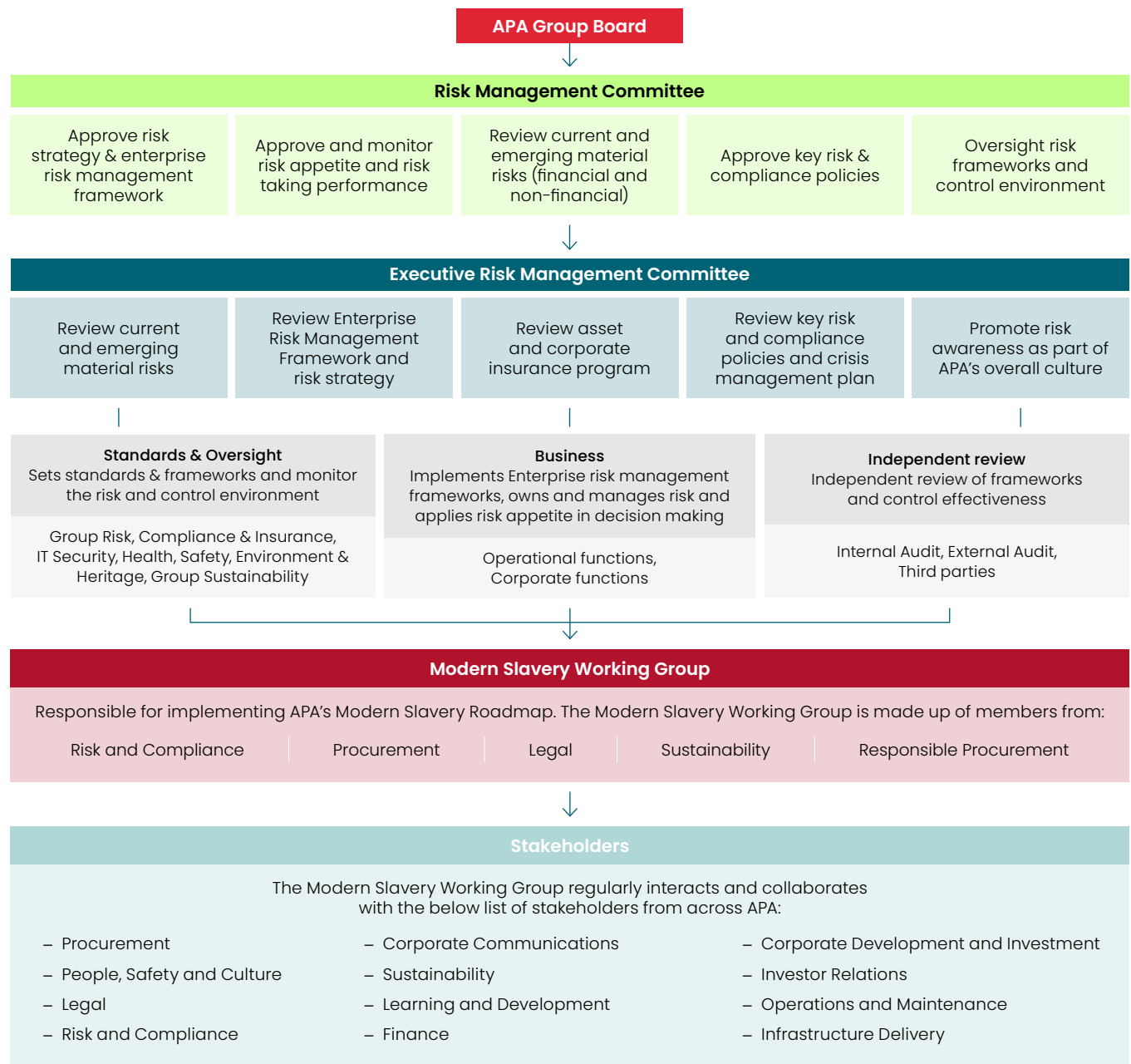
How we manage modern slavery risks

This section details the actions taken during the reporting period as part of our modern slavery roadmap. We continue to enhance our modern slavery response, focusing on identifying and mitigating risks in our operations and supply chain. By building on our initiatives from previous reporting periods, we aim to ensure that ethical practices are at the core of our business.



Governance framework

We have integrated responsibility for addressing modern slavery into our governance framework, as shown in the diagram below.



APA's cross-functional Modern Slavery Working Group (Working Group) supports the Executive Risk Management Committee to provide assurance to the Board, through the Risk Management Committee, that APA's approach to managing modern slavery risks is effective and compliant with APA's internal policies and standards.

During the reporting period, we also provided a separate strategic briefing on modern slavery to the Board and senior executives (see [page 23](#)).

The Working Group met quarterly throughout FY24 and reports annually to the Executive Risk Management Committee and the Risk Management Committee on the progress of roadmap initiatives, to provide an update of modern slavery due diligence across the business, and raise modern slavery risks identified through those assessments.

Working Group agenda items during FY24 included:

- progress against the roadmap of initiatives
- approaches to modern slavery due diligence across the business
- emerging modern slavery risks
- effectiveness of our actions
- update on the three-year review of the MSA and potential next steps.

Policy framework

Our group-wide policy framework sets the foundation for our approach to managing modern slavery risks in our operations and supply chain.

We conduct reviews of our key policies to help ensure they remain fit for purpose to mitigate modern slavery as well as other broader human rights issues.

During FY24 we:

- refreshed APA's Code of Conduct in line with our updated Respect@Work Procedure and Inclusion and Diversity Policy
- uplifted our suite of procurement precedent agreements to support our continuous improvement approach to our modern slavery response, including developing a draft 'playbook' to support our procurement personnel in their engagement with suppliers on modern slavery risk and issue management
- progressed the development of a new Supplier Code of Conduct which will be progressed in FY25. The Supplier Code of Conduct will set out our expectations for suppliers in relation to modern slavery mitigation and other human rights issues. As part of the considered design, we have taken into account the differing sizes and capacities of our suppliers, including to set proportionate expectations for suppliers
- implemented a new Sanctions Policy designed to foster a culture of compliance and responsible, transparent and ethical decision making within APA
- drafted a Modern Slavery Supplier Risk Mitigation Engagement Guide which will be progressed in FY25. The guide provides a step-by-step framework for engaging with higher-risk suppliers around modern slavery and the actions that can be taken to manage these risks.

Details of relevant policies can be found in [Appendix 3](#).

Our modern slavery due diligence approach

As our most likely connection to modern slavery risks is through our supply chain, our modern slavery due diligence approach is focused on our suppliers.

New supplier onboarding

Modern slavery checks are part of our supplier onboarding and pre-engagement risk management process.

During FY24, 648 new suppliers were onboarded to APA. The onboarding process requires suppliers to declare 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 to employee documentation and passports (if internationally sourced labour)
- ensuring workers are free to join a union or other similar collective bargaining arrangement.

APA's precedent agreements include modern slavery clauses and obligations that were reviewed and uplifted during FY24. These commitments mitigate risk to personnel, including if they:

- 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 (including race, national or social origin, birth, age, disability, gender, sexual orientation, religion, union membership or political opinions)
- 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.

The template clauses support our Modern Slavery Risk Management Approach, ongoing supplier due diligence, access to grievance mechanisms, and our Modern Slavery Response Procedure. This includes any necessary remediation process in circumstances where risk is identified, and/or incidents are reported.

How we manage modern slavery risks continued

Existing supplier risk management

APA suppliers, regardless of spend, are screened for inherent modern slavery risk using the Fair Supply platform using the process outlined below.

Initial screening/supply chain mapping:

The platform traces the economic inputs typically required to produce products and services sourced from tier 1 up to tier 10 suppliers. The supply chain mapping was performed by linking supply chain data from 190 countries and over 15,000 industry sectors. Data is 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.

It 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 suppliers with a higher inherent risk are asked to complete a self-assessment questionnaire.

Self-assessment questionnaires (SAQ):

The SAQ responses are used to assess the level of modern slavery risk in the supply chain and the maturity of suppliers' modern slavery risk management response. Questions asked are in relation to:

- 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.

Results from the SAQ process are reviewed through an automated assessment in the first instance and, if required, further due diligence actions will be put in place for residual high-risk suppliers. Mitigation actions may include:

- conducting deep dive assessments (refer to case study on [page 20](#))
- contacting suppliers to request further information
- collaborative supplier engagement
- offering supplier training
- supplier improvement plans
- on-site auditing and worker interviews.

Supplier performance management:

Supplier performance management will be required for existing and future suppliers where we identify the need for further modern slavery due diligence, and/or opportunities for improvement.

This will commence with direct supplier engagement following consideration given to the outcomes of any deep dive assessment undertaken following the SAQ. The supplier will be provided with relevant information detailing the modern slavery risk or concern and given the opportunity to respond. We would then seek to address any remaining concerns not addressed through the supplier's response upon agreeing remediation actions and timing for review and discussion with the supplier. This process may also be supported by third-party social audits, particularly where deeper supply chain visibility is deemed necessary.



CASE STUDY

Supplier deep dives

Further due diligence was undertaken for nine suppliers during the reporting period. The suppliers were selected for individual deep dive assessments for any one of the following reasons:

- initial screening and supply chain mapping identified an elevated-risk of modern slavery that requires further investigation
- results from the SAQ demonstrate a supplier has relatively low organisational awareness relating to potential modern slavery issues in its supply chain and operations
- goods or services procured from a sector or country where modern slavery is reported to be more prevalent.

The selected suppliers provide a range of products and services, such as, fleet management, construction contractors, and telecommunications hardware and services.

The deep dive process is a desktop exercise of all publicly available information covering all aspects of an organisation from its production sites, ownership structure, directors, and any other relevant information pertaining to the company to further ascertain the risk of modern slavery in its operations and supply chain.

This information is then assessed for whether direct engagement with a supplier is required as a further step. In the reporting year, direct engagement was initiated with three suppliers. Mitigating actions are still in progress at the time of writing and will be included in the statement for the next reporting period.

As part of future initiatives planned for launch, APA's new Modern Slavery Supplier Risk Mitigation Engagement Guide will provide a framework for engagement with high-risk suppliers.

CASE STUDY

Impact of implementing a supplier performance improvement plan to combat modern slavery

In our FY23 statement, we outlined our commitment to partnering with suppliers to strengthen their modern slavery awareness and management of associated risks.

In late 2023, APA implemented our first modern slavery performance improvement plan with a key supplier to support them in better understanding, developing and implementing strategies to mitigate modern slavery risk in their own operations and supply chain. The supplier was identified as having a high risk of modern slavery in their supply chain due to the sourcing origins of the raw materials used in manufacturing, as well as scoring low in our assessment of their modern slavery risk management response.

The performance improvement plan contained a set of clear objectives which were derived from the gap analysis performed on the supplier's responses to the APA's modern slavery SAQ. The objectives and milestone dates were mutually agreed upon between the parties with an overall timeline for completion of 12 months.

Four key target areas were identified for improvement and are detailed in the table below.

Key target area	Objective
Controls and processes to assess modern slavery risk	Supplier uplift in the following areas: <ul style="list-style-type: none">internal governance and policy frameworks (i.e. implement a Supplier Code of Conduct)risk identification and assessment.
Supply chain awareness and understanding	Supplier to demonstrate awareness and understanding of their supply chain with the provision of a supply chain map.
Modern slavery training	Supplier to offer modern slavery training to senior leadership and key stakeholders within their business.
Grievance mechanisms	Supplier to establish mechanisms to report identification of modern slavery concerns and ensure these mechanisms are communicated to staff, contractors and suppliers.

Progress meetings were scheduled with the supplier and minutes were issued to manage the actions, track against milestones, and maintain accountability of all involved. As a result, the regular engagement and progress meetings strengthened our relationship with the supplier.

APA considers fit-for-purpose, tailored performance improvement plans can provide long-term mutual benefits including:

- Enhanced knowledge and skills: Organisations can play a pivotal role in uplifting their suppliers' knowledge, skills, and capabilities in identifying and mitigating risks associated with modern slavery. This collaborative journey fosters a culture of continuous learning and improvement, ensuring that all parties are well-equipped to address complex issues.
- Scheduled check-ins and feedback: Regularly scheduled meetings serve as critical touchpoints for providing feedback and monitoring progress. These check-ins ensure that suppliers remain on track to meet the milestones outlined in the performance improvement plan. They also provide the opportunity to address any challenges promptly, ensuring that corrective actions are taken in a timely manner.
- Strengthened stakeholder relationships: A structured performance improvement plan, coupled with regular check-ins, fosters transparency and trust between APA and its suppliers. This collaborative approach not only enhances compliance but also strengthens the overall stakeholder relationship. Active, collaborative engagement with suppliers leads to an increased shared commitment to ethical practices.

Implementing a performance improvement plan with suppliers has the ability to deliver significant benefits, as demonstrated above.

A further update on the performance improvement plan with this supplier will be provided in APA's next Modern Slavery Statement.





Achieving the CIPS Corporate Ethics Mark

During FY24, we successfully renewed our Chartered Institute of Procurement and Supply (CIPS) Corporate Ethics Mark¹, as a demonstration of our ongoing commitment to ethical procurement practices.

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.

By adopting the voluntary code, APA commits to:

- ensuring consistent understanding of business ethics across the organisation at all levels;
- continually enhancing 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.

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.

1. [Ethics Register | CIPS](#)

Training and awareness raising

Training for our staff

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 continued our training program by delivering nine modern slavery training sessions. This included four 1.5-hour sessions and five 30-minute refresher sessions for staff who had previously completed the 1.5-hour session. We delivered these training sessions online in partnership with an expert business and human rights advisory firm.

We tailored the training content to create a bespoke training program for APA. The 1.5-hour sessions included information about what modern slavery is and how it could occur in ways relevant to APA, as well as guidance about stakeholder expectations, legislation, and key human rights standards such as the UNGPs.

The training also explored the actions APA is taking to manage modern slavery risks, key modern slavery red flags to monitor when engaging with vulnerable third-party workers and supplier management, and key 'dos and don'ts' for responding to modern slavery concerns. The refresher training included a condensed version of this information.

Going forward, we are considering ways to further expand our training capacity, including by developing an e-learning module suitable for roll out across our business.

Strategic briefings for our Board and Executive Leadership Team (ELT)

During the reporting period, we provided strategic briefings to our Board and ELT to support them to continue to effectively oversee APA's modern slavery response.

We partnered with an external law firm to develop tailored content for each session.

The Board briefing included information about what modern slavery is, how modern slavery relates to directors' duties, emerging trends and evolving stakeholder expectations, and practical questions Directors can ask as they engage with APA's modern slavery response.

The ELT briefing included an expanded version of the Board briefing content, including a focus on the role of the ELT.

Both the Board and ELT sessions resulted in positive feedback from participants and we are continuing to consider further opportunities for additional briefings as our modern slavery response continues to mature.

Modern slavery lunch-and-learn

To complement our targeted training for key staff, we also held a modern slavery lunch-and-learn session in June 2024. The aim of this online session was to raise awareness of modern slavery across the business through an interactive presentation.

We worked closely with an expert business and human rights advisory firm to develop the training content.

To help make the issue of modern slavery accessible to all staff, the session included interactive exercises exploring how modern slavery is relevant to our daily personal lives (such as through the products we purchase), as well as to the commercial procurement activities undertaken by APA.

The session also included hypothetical examples of how modern slavery could occur in ways relevant to APA and an explanation of the steps APA is taking to manage these risks.

In addition, we used the session to remind staff about key modern slavery red flags they should be aware of and how to report concerns.

The lunch-and-learn session was attended by 366 staff. We received a variety of positive feedback about the session and will continue to explore other opportunities to continue to raise awareness of modern slavery risks across our business.

Other resources for staff

We also maintained the internal Modern Slavery Program intranet site throughout the year.

The site includes links to relevant content, such as:

- team leader information sheet
- modern slavery statements
- modern slavery fact sheet
- Modern Slavery Response Procedure
- modern slavery e-learning, frequently asked questions and awareness video
- internal communications articles published throughout the year
- details on how to safely report concerns.

Stakeholder engagement and collaboration

In addition to our engagement with our suppliers (outlined above), we engage with other external stakeholders on modern slavery.

Throughout FY24, 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 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 is an active participant at the workshops and the CoP is currently in draft.

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 [FY24 Sustainability Data Book](#).

United Nations Global Compact Network Australia (UNGCA) Modern Slavery Community of Practice (CoP)

APA continued to participate in the CoP during the reporting period.

We attended two CoP meetings, which enabled us to discuss issues such as Commonwealth Government expectations of demonstrating continuous improvement in disclosure reporting, and global development of modern slavery and human rights legislation at our Modern Slavery Working Group meetings.

Cross-industry modern slavery practitioner group

To complement our other engagement activities, we have established an informal cross industry group to bring together practitioners working on modern slavery risks.

The group includes voluntary representatives from eight companies from sectors such as arts and entertainment, energy, government, and consumer goods.

We convened the first meeting of the group in March 2024, set on a quarterly cadence, held under [Chatham House Rule](#). To date, the group has provided a forum for participants to share learnings and discuss challenges, such as:

- lack of standardisation of due diligence across organisations and industry sectors
- labour intensiveness of varied customer due diligence information requests
- variation of governance frameworks
- effectiveness of actions taken and measurable KPIs.

Our grievance mechanisms and remediation process

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 actual or suspected incidents of modern slavery.

During the reporting period, no complaints relating to modern slavery were received through our whistleblower mechanism or other relevant channels. However, we understand the difficulties and barriers faced by victims of modern slavery to speak up, and having not identified any incidents does not necessarily mean that APA's supply chain is free from modern slavery.

We also recognise that our grievance mechanisms will only be effective if they are accessible to stakeholders who may wish to raise concerns.

This is why an initiative on our FY24 roadmap included reviewing our grievance mechanisms and opportunities for potential improvement.

As a first step, we reviewed and updated APA's suite of precedent agreements to provide contracted suppliers, their staff, and subcontractors with clarity on the availability of our grievance mechanisms. We will continue to progress this work in FY25.

We have also communicated information about using our grievance mechanisms to our own staff through our modern slavery training program (see [page 23](#)).

The visual below outlines APA's grievance mechanisms and remediation process; the latter is documented in APA's Modern Slavery Response Procedure.

Our Grievance Mechanisms and Modern Slavery Response Procedure

Whistleblower Line

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.

Other available mechanisms to raise concerns:

- 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

Modern slavery report received

Reports are received through the mechanisms mentioned above

2. REVIEW

Assessment of report

All reports will be assessed and considered by APA and a decision will be made as to what type of investigation is required

Addressing the report

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

3. INVESTIGATE

Incident identified

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

Formal investigation

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

4. REMEDIATE

Determining our involvement under the UNGPs

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

Responding to the incident

We have a clear commitment to taking a victim-first approach to remediation

How we assess our effectiveness

Assessing the effectiveness of APA's modern slavery risk management helps us understand the impact of our actions and to 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. 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.



How we assess our effectiveness continued

The table below details the measures we monitor and our outcomes for FY24.

Key actions taken	How we seek to measure the effectiveness of our actions	Outcomes
Governance of Modern Slavery Program		
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"> The Working Group met three times. All Working Group members actively participated in meetings held throughout the year. Key actions implemented or progressed as planned.
Refresh Risk Management Approach	<ul style="list-style-type: none"> Annual review and refresh of Risk Management Approach to help ensure it remains fit for purpose 	<ul style="list-style-type: none"> The Risk Management Approach was updated to reflect key learnings from FY24.
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"> Zero whistleblower or other complaints raised in respect to modern slavery during FY24 (although we recognise this does not mean no modern slavery occurred).
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. 	<ul style="list-style-type: none"> There were no circumstances in FY24 that triggered the Response Procedure. References to the Response Procedure and guidance on reporting concerns continued to be included in training for our people.
Training and communications		
Continue to rollout face-to-face training to priority groups across the business	<ul style="list-style-type: none"> Number of employees trained. Feedback from training sessions monitored and lessons learned incorporated into future sessions. 	<ul style="list-style-type: none"> 115 employees trained, with informal feedback suggesting increased awareness of modern slavery risks for those employees who deal directly with suppliers and/or contractors. Strategic briefings attended by 100% of our Board and ELT. Tailored training pack created for employees involved with apparel purchases.
Raise awareness of modern slavery and red flags for APA through internal communications	<ul style="list-style-type: none"> Number of employees in attendance at our modern slavery lunch and learn session. Number of articles published, and feedback received throughout the financial year. 	<ul style="list-style-type: none"> Lunch-and-learn session attended by 366 staff. Articles published on APA's intranet homepage and internal networking site. Refreshed content on modern slavery intranet site. Modern slavery fact sheet for FY23 published on APA website.
Completion of the CIPS Ethics Test	<ul style="list-style-type: none"> Number of employees who completed CIPS training. 	<ul style="list-style-type: none"> 71 employees responsible for sourcing, supplier selection and supplier management activities completed the CIPS Ethics Test for FY24.
Risk management		
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"> FY23 spend data used to map theoretical supply chain risk as deep as tier 10 for 3265 suppliers, with SAQs completed for 67 suppliers, and deep dives completed for nine suppliers.
Identify high-risk suppliers and issue SAQs for completion	<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. Number of SAQs completed by suppliers, the quality of these responses, and the proportion of suppliers requiring a deep dive assessment. 	
Conduct supplier deep dives for high-risk suppliers	<ul style="list-style-type: none"> Number of deep dives completed, and the level of engagement achieved with each supplier. 	
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 648 new suppliers.

Appendix 1 — Additional information about our operations and supply chain

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

Area	Main operations	Key supply chain elements
Infrastructure Delivery	Delivery of capital growth projects for energy infrastructure such as gas pipelines and related infrastructure, renewable (solar farm, wind farm, and battery energy storage systems) and conventional power projects and related electrical infrastructure – new infrastructure asset construction management.	<ul style="list-style-type: none"> • Engineering consultants • Industrial construction materials and equipment sourced directly from Australia and indirectly from Europe, North America and Asia such as steel line pipe, high-pressure valves, compressors, solar panels, wind turbines and battery energy storage systems • Construction contractors
Network Operations	<p>Operation and maintenance of third party owned gas distribution networks.</p> <p>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>	<ul style="list-style-type: none"> • Industrial construction materials and equipment sourced directly from Australian tier 1 suppliers, who in turn source materials (such as steel pipe, fittings, valves and gas measurement devices) from offshore suppliers • Australian-based construction and maintenance contractors, mains and service layers, mains renewal contractors, plumbers and gas fitters • Pipe and fitting products, such as polyethylene pipe (PE) sourced and manufactured in Australia. PE raw materials are sourced in Australia and offshore via prequalified tier 2 suppliers
Operations	<p>Operation of APA's asset base in Australia including:</p> <ul style="list-style-type: none"> • transmission pipelines • gas processing facilities • gas storage facilities • gas-fired power stations • solar and wind farms • electricity interconnectors. 	<ul style="list-style-type: none"> • Operations consumables, such as odorant • Bulk chemicals • Spare parts and materials inventory • Australian-based service and maintenance contractors, such as vegetation management • International service and maintenance contractors, such as original equipment manufacturer (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 power generation 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 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.	<ul style="list-style-type: none"> • 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.
Head Office	<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



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 	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, selenium, 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.	Key controls: <ul style="list-style-type: none"> New suppliers are required to declare their commitment to respect workers' fundamental human rights, page 18 All existing suppliers are assessed as per APA's Modern Slavery Risk Management Approach, page 19 Modern slavery clauses and obligations are included in relevant precedent agreements. Bespoke contract agreements include modern slavery clauses specific to high-risk suppliers. Modern slavery questions are included in tenders for high-risk categories. APA's policy framework.
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.	
	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 procurement in this area for FY24, 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 and 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. The NSW Anti-slavery Commissioner's Inherent Risk Identification Tool (IRIT) identifies that rail logistics may rely on labour hire for infrastructure maintenance and cleaning, carrying a risk of labour exploitation.	
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.	

Appendix 2 — Key supply chain modern slavery controls continued

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
IT hardware/software	<ul style="list-style-type: none"> 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. 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.	Key controls: As per above
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 	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 must hold regulatory registration, where required
Apparel	<ul style="list-style-type: none"> 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. 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.	Key controls: As per above Additional controls: Approved preferred supplier is engaged for the procurement of safety clothing and PPE. The supplier monitors their tier 1 (our tier 2) suppliers for compliance to ethical sourcing and accreditation, and requests certificates of currency from factory audits. These include: <ul style="list-style-type: none"> Worldwide Responsible Accredited Production Sedex Members Ethical Trade Audit Ethical Clothing Australia
Travel	<ul style="list-style-type: none"> 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.

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 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, diversity and inclusion, human rights, community engagement, environmental protection, and data privacy and security, and prevent discrimination, bullying, harassment, corruption and anti-competitive behaviour.	<p>Our Code is available to all our suppliers on the APA website and is referred to in our precedent works and contractor agreements, in our purchase order terms and conditions, and our new supplier request form.</p> <p>Our Code makes it clear that we expect our suppliers, contractors, and business partners to uphold the principles and standards of our Code. Our Code applies whenever we represent APA, including when we are outside of our normal workplace or working hours.</p> <p>Suppliers have an obligation under this Code to advise APA of any illegal or unethical practices of which they become aware, which would include modern slavery.</p> <p>Consequences of non-compliance with the Code can include termination of contract and new contracts not awarded.</p>
Inclusion and Diversity Policy	Our commitment and strategy to build a diverse, equitable and truly inclusive workplace where everyone belongs, feels valued, and respected and comfortable to bring their authentic and best selves to work.	<p>Respect @ Work training is mandatory for all APA employees, and an inclusive leadership course is available for people leaders.</p> <p>The Inclusion and Diversity Policy applies to all APA workplaces, employees, contractors, consultants, visitors and other workplace participants.</p> <p>The policy extends to conduct in any work-related context, including outside of normal working hours.</p>
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.	<p>Our Respect @ Work Procedure aligns with the Inclusion and Diversity Policy and the Code of Conduct.</p> <p>This procedure encourages all APA workers (including but not limited to employees, contractors and sub-contractors) to speak up if they witness harmful behaviours including unlawful discrimination, bullying, harassment, sexual harassment, sex-based harassment, vilification and victimisation.</p>
Anti-Bribery and Corruption Policy	Our commitment to fostering business integrity including detecting and preventing bribery, corruption and fraud.	<p>Training is provided annually to senior leadership and managers of employees.</p> <p>APA recorded zero confirmed incidents of fraud, bribery, or corruption in FY24.</p>
Health, Safety, Environment and Heritage Policy	Our aspiration is to not only respect the past but to also protect values for the future. We do this by protecting the health, safety and wellbeing of our people and the environment, heritage and the communities in which we operate.	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.

Appendix 3 — Policy framework continued

Policy	Relevance to modern slavery	How this policy continued to be implemented at APA during the reporting period
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 policy informs our Risk Management Approach to modern slavery.</p> <p>Consideration of the risk across countries, suppliers and product /service categories, recognising social performance and specific international social impact risk data, to drive supplier reviews and interventions.</p> <p>These reviews consider the control environment supporting key risk areas for suppliers including legal requirements, confidence in assurance provided, independent third-party reviews together with brand and reputation impacts of transacting with the supplier.</p>
Sanctions Policy	Our Sanctions Policy sets out the principles and processes all APA employees 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.
Compliance Policy	<p>The Compliance Policy supports the effective management of compliance obligations and incorporation of compliance into the broader Enterprise Risk Management Framework.</p> <p>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.</p>	The Compliance Management System (CMS) ensures APA complies with the applicable legal, regulatory, standards, codes and licence requirements, including the MSA. 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	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 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 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>
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.	<p>The Procurement Policy and associated Procurement Standards, and Modern Slavery Response Procedure, are available for all employees via our intranet. The draft Modern Slavery Risk Mitigation Engagement Guide will be progressed in FY25.</p> <p>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.</p>

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.

Appendix 4 — Our reporting entities

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

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 Wallumbilla Gladstone Pipeline (WGP). It is a non-operating entity.
APA DEWAH PTY LTD	Parent entity of APA DEWAP Pty Ltd which owns and operates Port Headland and Roy Hill Power Stations and 11.85% of Goldfield Gas transmission via its controlled entities. The entity is non-operating.
APA DEWAP PTY LTD	Owner and operator of Port Headland Power Station, parent entity of APA GGT Holdings Pty and APA Transmission (Roy Hill) Holdings Pty Ltd, which owns and operates Roy Hill Power Station and 11.85% of Goldfield Gas transmission via its controlled entities.
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 Australian Pipeline Trust and APT Investment Trust and their controlled entities.
APA Infrastructure Trust	One of two registered investment schemes that comprise APA Group (APA), and parent of APT Pipelines Limited. APA owns and operates energy infrastructure assets and businesses, including: <ul style="list-style-type: none"> 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 energy investments in unlisted entities
APA Pilbara Holdings Pty Ltd	Parent entity of APA Pilbara Solar Holdings Pty Ltd and APA DEWAH Pty Ltd which owns and operates Chichester, Roy Hill and Port Headland Power Stations and 11.85% of Goldfield Gas transmission via its controlled entities. The entity is non-operating.
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 SWQP) via its controlled entities. Trustee is Australian Pipeline Limited.
APA Transmission Pty Limited	Wholly owned subsidiary of APT Pipelines Limited. Holds APA's interest in the WGP, Reedy Creek Wallumbilla Pipeline and the APA Western Slopes Pipeline project via its controlled entities.
APA VTS Australia (Holdings) Pty Limited	Parent entity of APA VTS Australia (Operations), which owns and operates the Victorian Transmission System (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 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 APT Pipelines 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.
APT Pipelines Investments (WA) Pty Ltd	Holding entity for APA's interests in the Goldfields Gas Pipeline, Parmelia Gas Pipeline, and Northern Goldfields Interconnect (under construction).
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.
Power Solutions 2 Holdco Pty Limited	Parent entity of Power Solutions 2 Pty Limited, which owns and operates Chichester, Roy Hill and Port Headland Power Stations and 11.85% of Goldfield Gas transmission via its controlled entities. The entity is non-operating.
Power Solutions 2 Pty Limited	Parent entity of APA Pilbara Holdings Pty Ltd which owns and operates Chichester, Roy Hill and Port Headland Power Stations and 11.85% of Goldfield Gas transmission 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 joint venture owners of Goldfields Gas Pipeline, holding 62.664% interest.

Appendix 5 — How our statement addresses the mandatory criteria

Key policies governing ethics and integrity at APA include:

Mandatory criteria	Section	Page number/s
a. Identify the reporting entity	About this statement Appendix 4	IFC 34
b. Describe the reporting entity's structure, operations and supply chains	About APA Our operations Our workforce Our supply chain Appendix 1	6, 7 8, 9 10, 11 12, 13 28
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 Modern slavery risks in the communities where we operate Modern slavery risks in our supply chain Appendix 2	14 15 15 30, 31
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 Policy framework Our modern slavery due diligence approach Case study - Supplier deep dives Case study - Impact of implementing a supplier performance improvement plan to combat modern slavery Training and awareness raising Stakeholder engagement and collaboration Our grievance mechanisms and remediation process Appendix 3	17 18 18, 19 20 21 23 24 25 32, 33
e. Describe how the reporting entity assesses the effectiveness of these actions	How we assess our effectiveness Our future plans and progress on past commitments	26, 27 4, 5
f. Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls	About this statement	IFC
g. Any other information that the reporting entity, or the entity giving the statement, considers relevant	Message from our CEO and Managing Director Advancing our modern slavery response	1 2, 3

