

apa

MODERN SLAVERY STATEMENT 2021



always
powering
ahead

ABOUT THIS STATEMENT

At APA we respect all internationally recognised human rights as set out in the Universal Declaration of Human Rights and the International Labour Organisation’s Declaration on Fundamental Principles and Rights at Work.

We continue to consider how best to implement the United Nations Guiding Principles on Business and Human Rights (UNGPs).

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

This joint statement has been prepared by APA Group to meet the requirements of the Australian *Modern Slavery Act 2018* (Cth) for the financial year ending 30 June 2021 (FY2021). The reporting entities covered by this statement are identified in Appendix 1.

References in this statement to “we”, “us”, or “our” is a reference to the APA Group, our subsidiaries and the entities owned and controlled by our Company as outlined in Appendix 1 unless specified otherwise.

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-controlling 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 captures our activities from FY2021. It has been prepared by Procurement in conjunction with our Modern Slavery Working Group, with the assistance of external subject matter experts. Information about our approach to consultation with reporting entities and owned or controlled entities to develop this statement is set out on page 30.

This statement was approved in November 2021 by the Board of APT Pipelines Limited (APTPL) for each of the reporting entities listed in Appendix 1, as the principal governing body of the highest entity in the APA Group. This statement has been signed by Rob Wheals, CEO and Managing Director of APTPL.





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Feedback

We value all feedback. Please forward any comments on this statement or requests for additional information to apamodernslaveryteam@apa.com.au

STATEMENT FROM CEO & MANAGING DIRECTOR

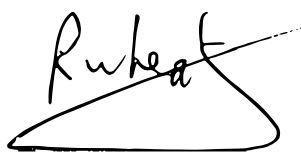
I am pleased to introduce APA Group's Modern Slavery Statement for the financial year ending 30 June 2021.

APA's purpose is to strengthen communities through responsible energy. Consistent with that commitment to acting responsibly, we are committed to taking meaningful action to respond to potential modern slavery risks in our operations and supply chains.

During FY2021, we have taken a number of important steps to deepen our understanding of modern slavery and strengthen our actions to manage potential modern slavery risks. Consistent with our commitment to continuous improvement we have:

- Updated our modern slavery risk management approach;
- Embedded a modern slavery clause in a number of our Precedent Agreements;
- Rolled out modern slavery awareness training across the procurement function and issued modern slavery awareness communications to the broader business;
- Strengthened our approach to supplier onboarding processes as they relate to modern slavery; and
- Undertaken risk assessments for a number of suppliers in accordance with the risk management approach, outlined on page 18 and 19, to understand and assess their approach to modern slavery and their supply chains.

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



Rob Wheals
CEO & Managing Director



Rob Wheals ▶
CEO & Managing Director



ABOUT APA

APA is a leading energy infrastructure business. APA owns and/or manages and operates a diverse, \$21 billion portfolio of gas, electricity, solar and wind assets across Australia.

Company strategy

In FY2021, APA refreshed its strategy to create a stronger alignment with its purpose and vision. The strategy enables APA to capture the vast opportunities to invest in contracted and regulated energy infrastructure in our target markets of Australia and North America. APA estimates that the investment opportunities in these target markets is in excess of US\$2.8 trillion over the next 40 years across renewable energy, firming and storage, gas pipelines and electricity infrastructure.

Our strategy is underpinned by our ambition to achieve net zero operations emissions by 2050 and our commitment to playing a constructive role in supporting Australia's transition to a lower carbon economy.

Strategy aligned to purpose and vision and unlocks the vast opportunities as the energy market transitions

- Invest in gas, electricity and renewables infrastructure (contracted and regulated) in Australia and North America
- Leverage our energy infrastructure capabilities into next generation energy technologies (Pathfinder Program)
- Respond to the changing needs of our customers and communities
- Maintain disciplined investment, securityholder returns and maintain a strong balance sheet (including BBB/ Baa2 credit ratings)

Consistent with APA’s purpose to strengthen communities through responsible energy, APA delivers about half of the nation’s gas to households, business and industry.

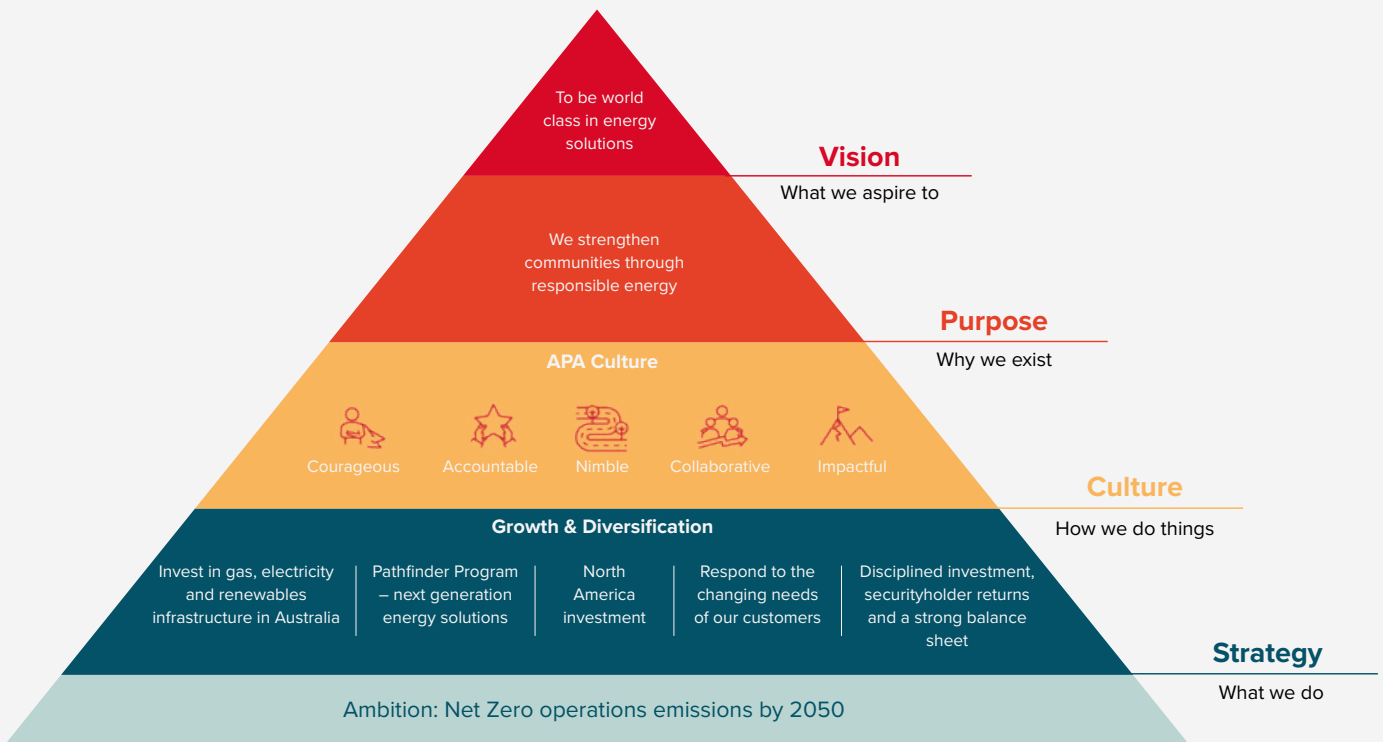
We connect Victoria with South Australia and New South Wales with Queensland through investments in electricity transmission assets. We are also one of the largest owners and operators of renewable power generation assets in

Australia, with wind and solar energy infrastructure assets across the country.

APA is listed on the Australian Securities Exchange (ASX) and is included in the S&P ASX 50 Index. APA has non-controlling interests in other energy infrastructure assets and businesses, including GDI (EII) Pty Ltd (GDI), Energy Infrastructure Investments (EII) and North Brown Hill Wind Farm (EII2).

APA Group comprises two registered investment schemes – Australian Pipeline Trust (APT) and APT Investment Trust (APTIT) – and their controlled entities. A list of the reporting entities covered by this Modern Slavery Statement can be found in Appendix 1.

During the reporting period, APA celebrated its 21st birthday, marking the day that the business formed and listed on the ASX under the name Australian Pipeline Trust. Together with the refresh of the corporate strategy, this milestone provided a timely opportunity to refresh the APA brand and to transform the ‘APA’ initials into the acronym: Always Powering Ahead.



ABOUT APA CONTINUED



Vision: To be world class in energy solutions.



Purpose: To strengthen communities through responsible energy.

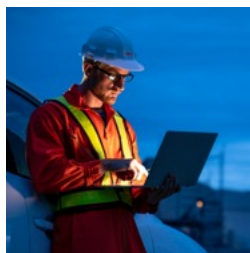
Embedding a culture of high performance

To support the refreshed vision, purpose and long-term strategy, and to embed a high-performance culture, in FY2021 APA defined its core behaviours as being:



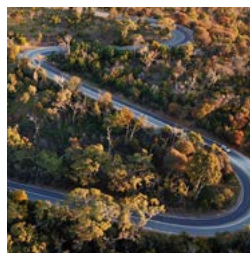
Courageous

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.



SUPPLIERS ENGAGED

3,304



TOTAL SPEND

~\$1.1BN



**AUSTRALIAN BASED
SUPPLIERS ENGAGED**

3,254



**INTERNATIONALLY BASED
SUPPLIERS ENGAGED**

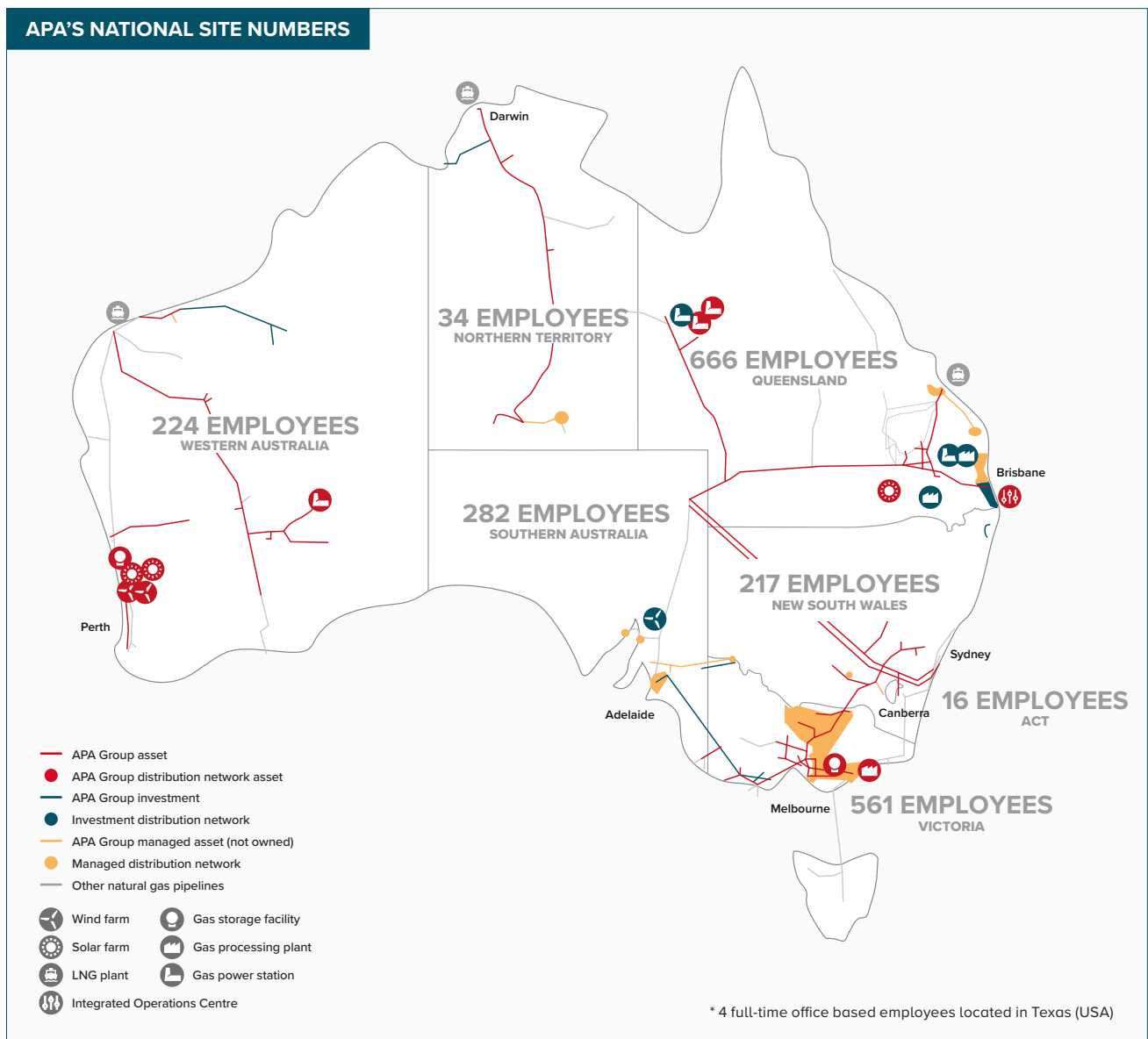
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OUR OPERATIONS AND SUPPLY CHAIN

Our operations

APA has 2004 employees and 160 contingent workers located in offices and sites across Australia, with 79% of our workforce located at five major offices (Sydney, Brisbane, Melbourne, Adelaide and Perth).

The types of roles performed by our people fall under a broad range of skill groups; Clerical and Administrative (such as site support officers), Managers (such as manager operations and maintenance), Professionals (such as engineering development lead), Technicians and Trade Workers (such as technical officer - electrical and instrumentation).





EMPLOYMENT CATEGORY

| | M | F | TOTAL |
|----------------------|--------------|------------|--------------|
| Permanent Full Time | 1,286 | 453 | 1,739 |
| Permanent Part Time | 5 | 76 | 81 |
| Fixed Term Full Time | 103 | 34 | 137 |
| Fixed Term Part Time | 4 | 7 | 11 |
| Casual | 29 | 7 | 36 |
| Grand Total | 1,427 | 577 | 2,004 |

WORKPLACE GENDER EQUALITY ACT SKILL GROUP

| | M | F | TOTAL |
|-----------------------------|--------------|------------|--------------|
| Clerical and Administrative | 39 | 180 | 219 |
| Managers | 256 | 97 | 353 |
| Professionals | 561 | 272 | 833 |
| Technicians and Trades | 571 | 28 | 599 |
| | 1,427 | 577 | 2,004 |

* Effective date is as of 31 March 2021 as per WGEA reporting submission.

APA'S AUSTRALIAN ENERGY INFRASTRUCTURE PORTFOLIO

Gas infrastructure



Transmission

>15,000 km transmission pipelines



Storage

12,000 tonnes LNG
18PJ gas



Processing

90TJ/day processing plants



Distribution

>29,500 km gas mains and pipelines
>1.4 million gas customers

Power generation



Renewable energy

342 MW Wind
149MW Solar



Gas Fired

440 MW

Electricity Transmission



243 km high voltage lines

OUR OPERATIONS AND SUPPLY CHAIN CONTINUED

Our supply chain

APA has a large and highly diverse supplier base. In FY2021, we engaged 3,304 Tier 1 suppliers (those suppliers with whom APA has a direct relationship) with a total spend of over \$1 billion in our supply chain.

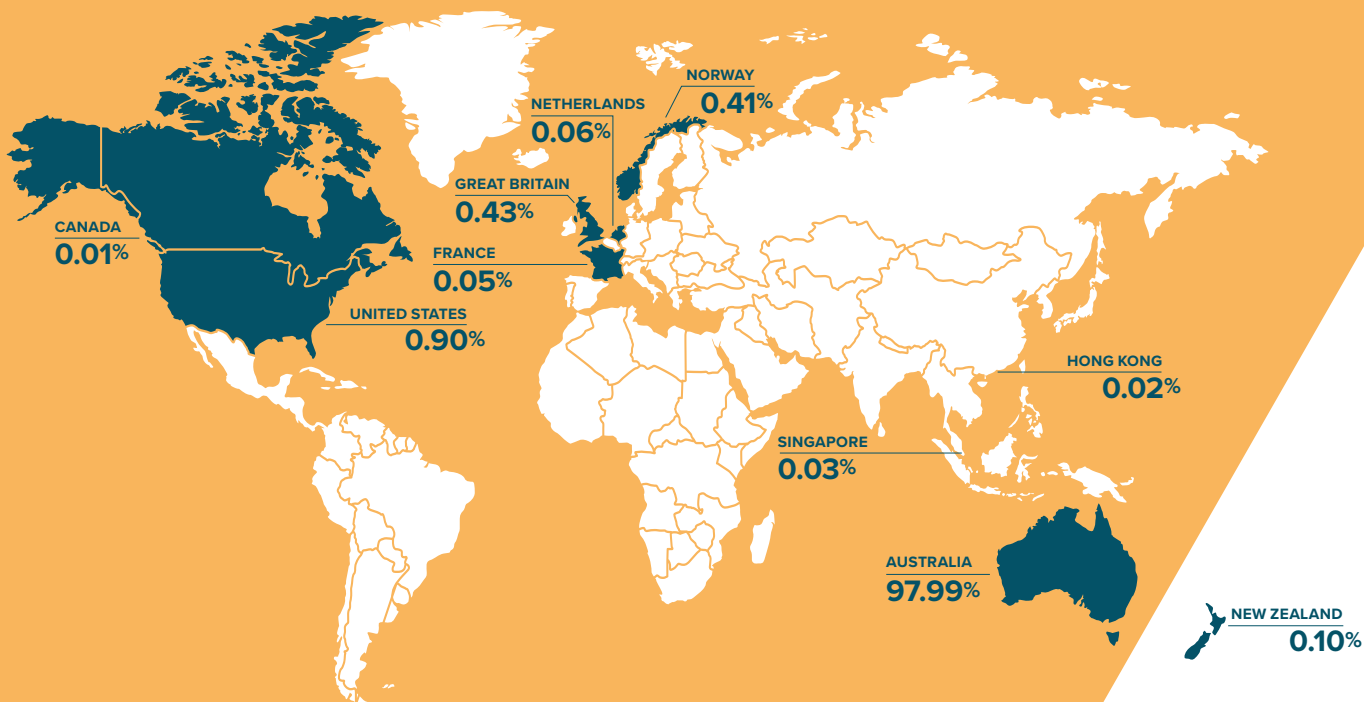
Our procurement function, with approximately 50 employees across Australia, is responsible for providing strategic and tactical purchasing and procurement solutions, supporting cost effective service delivery and growth for APA. Procurement, in conjunction with the business, manages the ongoing relationship with contracted suppliers.

We have four procurement groups focussed on specific accountabilities:

- Infrastructure Procurement (Capital and Stay in Business Projects)
- Operations Procurement and Supply Chain
- Corporate Procurement
- Networks Procurement

*Refer to page 13 for the types of activities performed by these procurement groups.

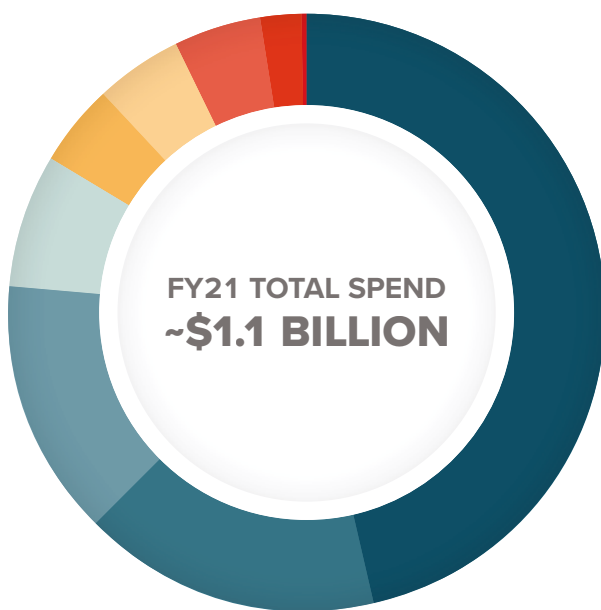
The majority of spend (98%) is with suppliers in Australia. Outside of this we directly procure products and services from locations such as the United States of America, Great Britain, Norway, New Zealand and indirectly from locations such as Singapore and Hong Kong.



*APA recognises that suppliers' locations may not correspond to where suppliers produce the goods or deliver services and that suppliers may themselves source from a range of countries.



During FY2021 we procured goods and services across a wide range of product and services categories including:



- **40%** Works Contractors (Major and Minor), who also supply various construction materials
- **14%** Professional Services (including Engineering Design Services)
- **12%** Operations Consumables
- **6%** Piping Materials (including valves)
- **4%** Infrastructure Fixed Equipment, including construction equipment and materials
- **4%** Facilities Management
- **4%** Information Technology
- **2%** Recruitment and Labour Hire
- **0.1%** Safety clothing

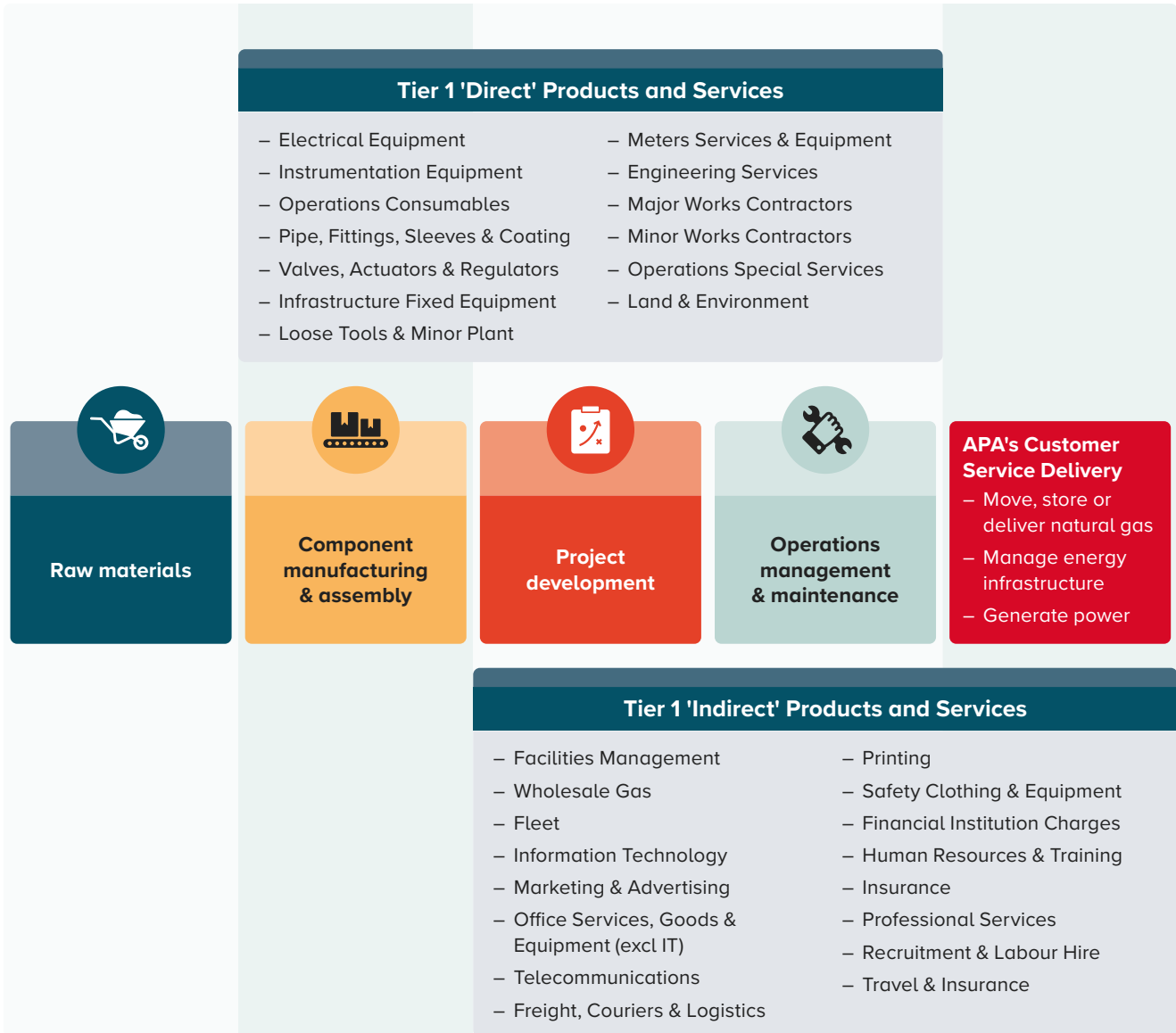
OUR OPERATIONS AND SUPPLY CHAIN CONTINUED

Our spend is managed through contractual arrangements ranging from purchase orders governed by standard terms and conditions, through to bespoke agreements for complicated procurement, and multi-year standing arrangements governed by Precedent Agreements.

Contractual arrangements allow us to better understand our suppliers' business models and potential risks. This is done through a question set in the request for tender package and evaluation process. For our suppliers on purchase order terms and conditions the supply chain evolves quickly, and we need to be able to move rapidly to assess possible risks.

APA's Supply Chain

Energy Infrastructure Construction, Works, Operations and Maintenance



The following table shows our areas of main operation and their corresponding Tier 1 supply chains.

| AREA | MAIN OPERATIONS | SUPPLY CHAIN |
|---|---|---|
| Infrastructure Development | Development and delivery of capital growth projects such as gas fired power stations, solar farms and pipeline laterals – new infrastructure asset construction management. | <ul style="list-style-type: none"> – Engineering consultants – Industrial construction materials and equipment sourced directly from Australia and indirectly from Europe, North America and Asia such as steel pipe, high pressure valves and compressors – Large construction contractors |
| Network Operations | <p>Operation and maintenance of third party owned gas distribution networks.</p> <p>Development and delivery of capital growth projects and third part works, such as new mains and services, extensions and reticulation of new developments.</p> | <ul style="list-style-type: none"> – Industrial construction materials and equipment sourced directly from Australia and indirectly from Europe, North America, and Asia, such as steel pipe and fittings, valves and gas measurement devices – 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 and fittings sourced locally in Australia |
| Operations | <p>Operation of APA's asset base in Australia including:</p> <ul style="list-style-type: none"> – Transmission pipelines – Gas processing facilities – Gas storage facilities – Gas fired power stations – Solar and wind farms – Electricity interconnectors | <ul style="list-style-type: none"> – Operations consumables, such as Odorant – Bulk chemicals – Spare parts and materials inventory – Australian based service and maintenance contractors, such as vegetation management – International service and maintenance contractors, such as OEM maintenance contractors for engines at our gas fired power stations |
| Managed Joint Ventures and Investments | <p>APA has non-controlling interests in a number of energy related infrastructure assets such as gas transmission pipelines, gas processing facilities, gas distribution networks, gas compression facilities, electricity transmission, and renewable and gas fired power generation assets through its investments in other energy infrastructure entities. Some of these entities are also operated by APA, including ownership interests in, and operational management of, GDI (EII) Pty Limited which operates the Allgas gas distribution network in Queensland and Northern NSW, and ownership interest in and operational management of Energy Infrastructure Investments (EII).</p> | <p>As Joint Ventures and Investments managed by APA the supply chain is common with those detailed for Infrastructure Development, Network Operations and Operations in this table.</p> |
| North America | <p>APA is exploring opportunities in energy infrastructure in North America.</p> | <p>Whilst APA has established an office in Houston it does not yet operate a business in North America or established supply chain.</p> |
| Head Office | <p>Corporate functions, such as:</p> <ul style="list-style-type: none"> – Finance – Human Resources – Information and technology – Procurement – Risk, Compliance, Insurance, Legal and Sustainability – Health, Safety, Environment & Heritage | <ul style="list-style-type: none"> – Fleet management – Professional services – Information technology and telecommunications – Safety clothing and personal protective equipment for corporate and site-based staff – Recruitment and labour hire – Office products – Corporate real estate and facilities – Marketing and advertising – Travel and accommodation |

IDENTIFYING OUR MODERN SLAVERY RISKS

Modern slavery risks in our operations

As an energy infrastructure business, we recognise that we may be exposed to a range of modern slavery risks. This section explains potential areas of modern slavery risks in our operations and supply chains.

Our employees and contingent workforce operate mostly in mainland Australia and the majority of our employees are employed on a direct and permanent basis. The risks of modern slavery such as child labour, forced labour, or other modern slavery practices occurring in our operations is low, having regard to our compliance with all applicable legislative requirements in Australia regulating workplace relations and our internal policies and processes in place to mitigate risks. These include:

- Our Health, Safety and Wellbeing policy and practices, which commits to providing workplaces that support good health, wellbeing, respect and inclusion for our employees, contractors and visitors
- Our recruitment and on-boarding processes including undertaking visa and health checks
- Our ongoing commitment to build a diverse and inclusive culture so all of our people, feel safe, valued and trusted to do their best every day
- Providing benefit entitlements in excess of statutory requirements and encouraging employees to enjoy the right to family, recreation, and work-life balance through flexibility initiatives
- Providing regular and ongoing training, including modern slavery awareness training, to our employees in their obligations regarding lawful, appropriate behaviour, discrimination and complaints and investigation processes.

Our employees are free to associate and enter into employment agreements that meet the requirements of the National Employment Standards (NES), including requests for flexible working arrangements, parental leave and long service leave.

Modern slavery risk in our investments

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



Modern slavery risks in our supply chain

Our most salient risks of modern slavery are likely to exist in the deeper tiers of our supply chain. Modern slavery risks, such as forced labour, deceptive recruiting for labour or services, debt bondage and the worst forms of child labour, may become more acute during the sourcing, production, packaging and processing stages of the various components used in the manufacturing of products from the procurement categories listed in the table below. Global supply chains are complex and fast moving and we will work towards achieving greater visibility of modern slavery risks beyond the first tier of our supply chain going forward.

In our FY2020 statement we reported on our methodology to identify modern slavery risks in our supply chain which continues to guide our work to identify and understand potential risk areas.

In FY2021, we drew upon a combination of external resources to deepen our understanding of potential modern slavery risks. These included:

- Global Slavery Index 2018 www.globalslaveryindex.org
- Dow Jones due diligence reports; and
- Robobai (APA contracted third party IT solution which provides for Artificial Intelligence on our goods and services categories)

These resources, together with our risk management approach, have informed our assessment of the main areas of exposure to modern slavery risks within our supply chain, as summarised below:

| PROCUREMENT CATEGORY | EXAMPLES OF PRODUCT / SERVICE PROCURED BY APA | GENERALLY KNOWN MODERN SLAVERY RISKS |
|----------------------|---|---|
| Construction | <p>We procure a range of items in this category, such as:</p> <ul style="list-style-type: none"> – Photovoltaic Panels – Instrumentation equipment – Pipe, fittings, sleeves and coating – Valves, actuators and regulators – Batteries – Gas engines – Compressors | <p>Key risks relating to this category are outlined below:</p> <p>Certain manufacturing and mining regions and materials carry higher risks of modern slavery, including where materials may be produced or sourced in higher risk countries or involve sectors known to have high modern slavery risks.</p> <p>For example, we procure building materials such as concrete, timber, steel, quarried stone products, solar panels, glass, construction films, which may involve modern slavery risks due to the way these materials are produced or manufactured.</p> <p>We also procure a range of machinery and equipment used in construction, which can involve modern slavery risks if they are manufactured in countries with a higher prevalence of modern slavery risks or include components such as electronics manufactured in high risk countries.</p> <p>Similarly, mining operations for copper, tin, lead, quartz, silicon, selenium, tellurium, arsenic, cadmium, aluminium, boron, gallium or indium, can involve modern slavery risks related to the exploitation of miners, including the worst forms of child labour. Therefore, any equipment containing components which include these minerals may involve modern slavery risks.</p> <p>We also recognise that there is increasing evidence about the risks of modern slavery in the manufacture of polysilicon, which is a key component of solar modules. APA has not procured any solar panels in this reporting period.</p> |

IDENTIFYING OUR MODERN SLAVERY RISKS CONTINUED

| PROCUREMENT CATEGORY | EXAMPLES OF PRODUCT / SERVICE PROCURED BY APA | GENERALLY KNOWN MODERN SLAVERY RISKS |
|--|---|---|
| IT hardware / services and electronic equipment | Computer and telecommunications hardware and services | <p>Key risks relating to this category are outlined below:</p> <p>We procure a range of computer and telecommunications hardware and services, including to support our corporate operations.</p> <p>Modern slavery risks are present in the supply chains that provide IT companies with the necessary materials to produce electronic goods, and parts of those goods.</p> <p>For example, there are modern slavery risks (including the worst forms of child labour and forced labour) associated with the mining of cobalt and mica.</p> <p>Modern slavery risks may also be associated with our suppliers and the use of offshore contact centres and other services by telecommunications companies and the construction and maintenance of telecommunications infrastructure.</p> |
| Safety clothing and Personal Protective Equipment (PPE) | Safety clothing and equipment | <p>Key risks relating to this category are outlined below:</p> <p>We procure a variety of textiles and apparel products, including PPE. The textiles and apparel sector is recognised as a high risk sector for modern slavery, including due to the use of raw materials such as cotton which may be produced using modern slavery, as well as exploitation in factories manufacturing textiles and apparel products. PPE such as masks and rubber gloves can also involve particular modern slavery risks, which have been exacerbated by increased demand for these products during the COVID-19 pandemic.</p> |



| PROCUREMENT CATEGORY | EXAMPLES OF PRODUCT / SERVICE PROCURED BY APA | GENERALLY KNOWN MODERN SLAVERY RISKS |
|---|--|---|
| Labour hire and short term recruitment | Temporary work Contractors | <p>Key risks relating to this category are outlined below:</p> <p>We engage contract workers and other temporary workers. We also engage key service providers such as construction services and cleaning and security services providers, who may rely on temporary and contract workers.</p> <p>Temporary and contract workers in Australia and overseas can be vulnerable to modern slavery due to a range of factors, including high levels of subcontracting, 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.</p> |
| Fuels | Fuels used in services, such as, aerial surveillance, transport and logistics. | <p>Key risks relating to this category are outlined below:</p> <p>There is a risk that raw material extraction, manufacture and disposal could be associated with vulnerable populations in higher-risk countries. There is also the risk that vessels used for the transport of fuel could expose crew to forced labour or unacceptable working conditions.</p> |

Work undertaken as part of our supplier due diligence is incorporated into our overall supply chain risk assessment work and helps inform our understanding of modern slavery risks.

We continue to review our modern slavery risks on an ongoing basis to prioritise our efforts where there is greatest impact to people in our supply chain and identify new or emerging risk areas. Our future roadmap on page 29 sets out our approach to achieving ongoing improvements.

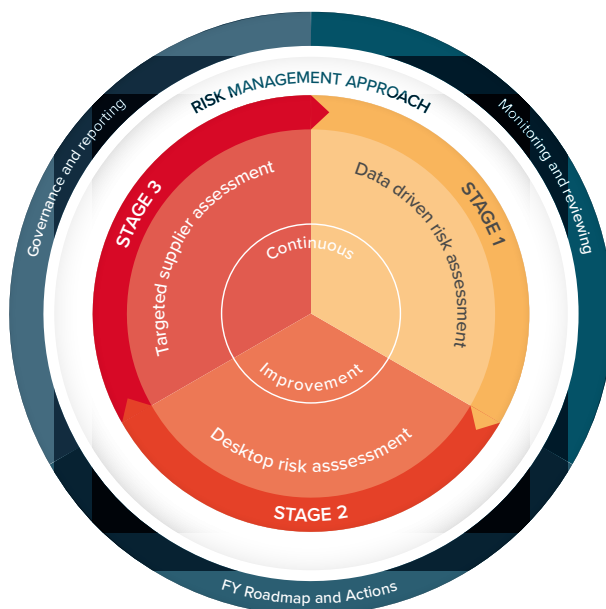


ACTIONS TAKEN TO ASSESS AND ADDRESS RISK

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

Modern Slavery Operating Rhythm

In the twelve-month period July 2020 to June 2021, we have been working to an operating rhythm for our Modern Slavery Program.



The operating rhythm integrates the three stages of our modern slavery risk management approach with the following key activities:

- **Risk management reporting** to our Executive Risk Management Committee and our Audit & Risk Management Committee.
- Review and tracking of our modern slavery **roadmap** of activities and **actions** for the financial year.
- **Monitoring and reviewing** the effectiveness of our actions to assess and address the risks of modern slavery.
- Review and **continuous improvement** of our modern slavery risk management approach.

APA's modern slavery risk management approach comprises three stages:

Stage 1 – data driven risk assessment: using spend data from FY2020 we conducted supplier screening using an external AI platform. Our products and service categories were mapped against the United Nations Standard Products and Services Codes (UNSPSC) and together with other databases utilised which provide for modern slavery analysis including social hotspots database (SHDB), supplier and country risk information identified potentially very high and high risk suppliers. The results were analysed and 32 suppliers were shortlisted for further review.

Stage 2 – desktop risk assessment: in early FY2021 we completed desktop risk assessments for the 32 shortlisted suppliers. The outcomes were assessed by Procurement Managers and the Modern Slavery Working Group. Of these 32 suppliers that were reviewed, eight were identified as requiring further targeted supplier assessment as they were lacking information in their initial responses.

– The desktop risk assessments were completed by procurement and consisted of the gathering of relevant information from each of the suppliers, including their modern slavery statement where one existed. Sources such as the APA Supplier prequalification system and the Global Slavery Index 2018 were used during this process to assess country risk.

- The desktop risk assessment was used to determine whether the supplier had the necessary controls in place to manage modern slavery risks in their supply chain.
- Where the desktop risk assessment did not provide assurance, the supplier was referred for targeted assessment.

Stage 3 – Targeted Supplier Assessments: we engaged a reputable external consultancy, Dow Jones Factiva, to provide additional due diligence information for each of the eight suppliers selected for targeted assessment. Each report provided additional information on the supplier including:

- Corporate registration information
- Sectors and countries of operation
- Officers/Directors/senior Management
- Parent company/shareholder details
- Modern Slavery risk indicators
- Regulatory risk indicators
- Adverse media
- Research across a range of sources to identify indicators of risk relating to modern slavery practices.

Our Procurement Managers and Modern Slavery Working Group assessed the reports for the suppliers and completed the targeted assessment. Of the eight suppliers, three suppliers yielded results warranting further communications directly with the supplier. This is underway and is due to be completed in FY2022.

Case Study

Beyond the first tier

PRODUCT AND SUPPLIER ANALYSIS FOR SAFETY AND PROTECTIVE CLOTHING

In FY2020, we recognised the increased modern slavery risks associated with our procurement of textiles and clothing products. We undertook a review of our existing and prospective safety clothing suppliers, extending into their supply chains to the factory where final manufacturing occurred. As we were going to the market for competitive bids, we took the opportunity to develop a comprehensive modern slavery questionnaire, investigating each clothing item's country of manufacturing and supply chain down to a factory level. A total of six suppliers participated and they all completed the questionnaire.

As foreshadowed in our inaugural statement, we selected a single supplier for all APA safety clothing in FY2021 based on their brand manufacturer's compliance with:

- Worldwide Responsible Accredited Production (WRAP), one of the world's largest independent facility certification programs;

- Sedex Members Ethical Trade Audit (SMETA), which provides a globally recognised way to assess responsible supply chain activities and good practice in ethical audit technique; and
- Ethical Clothing Australia, an accreditation body working collaboratively with local textile, clothing and footwear businesses.

In FY2021, we continued to monitor and consolidate all items of safety clothing purchased through our approved supplier to ensure their brand manufacturers have current certifications.

Procurement, working with our Health Safety & Environment, operations and project teams, reduced the number of brands on our range based on the ability of the suppliers to comply with our new processes. We have continued to source any new requirements for safety clothing and PPE through these compliant brands where possible.

DUE DILIGENCE

Our due diligence processes assess and respond to modern slavery risks as set out below:

Supplier due diligence for existing suppliers

The APA Supplier Prequalification (ASP) Program continues to be used as a central repository for all our key supplier information, including financial data, safety performance, environmental and social issues, and importantly, the supplier's position and level of maturity with respect to awareness and mitigation of modern slavery in their supply chains.

APA has 231 tier 1 contracted suppliers participating in the ASP Program.

The ASP Program modern slavery questionnaire was set up with other industry participants on the Avetta platform and includes 40 questions relating to the suppliers' actions taken to manage modern slavery in their operations and supply chains.

The system flags any suppliers that respond in the negative to questions relating to their commitment to these issues.

New contractual clauses

In 2021, we updated our contract templates to include modern slavery provisions. These clauses oblige an APA counterparty to:

- comply with modern slavery laws;
- use reasonable endeavours to ensure that the supplier's personnel and supply chain participants comply with modern slavery laws; and
- provide APA with, such access, information and documentation that APA reasonably requests to permit APA to undertake due diligence on its supply chain.

The clauses are being rolled out when any new agreements are executed. For the most part, these clauses have been widely accepted by our suppliers.

Supplier selection and onboarding

Each procurement group manages their own supplier onboarding, but a common process is used to request new suppliers to be created in APA accounts payable systems. During FY2021, a working group, consisting of Procurement and Accounts Payable, established a new form that was updated to include a human rights declaration for all new suppliers as described in the case study below.

For all procurement-managed spend >\$200k a precedent agreement is considered which requires a decision on whether further due diligence is required based on factors such as the goods or services, country of origin and supplier.

A photograph of an industrial facility, likely a refinery or chemical plant, featuring large cylindrical storage tanks, a complex network of silver metal pipes, and a steel structural framework. The scene is set against a clear blue sky. The image is partially obscured by a large, diagonal graphic element consisting of teal and red geometric shapes.

Case Study

Raising awareness through our new supplier procedure

IMPLEMENTATION OF MANDATORY HUMAN RIGHTS DECLARATION BY ALL NEW SUPPLIERS.

Towards the end of FY2021 the Procurement Group rolled out the use of a new supplier onboarding procedure which included a questionnaire that is mandatory for all new suppliers to complete irrespective of size, spend and category of risk. The implementation of this procedure required a coordinated approach between our Sustainability, Procurement and Shared Services Teams.

The new form calls for suppliers to declare that they will respect their workers' fundamental human rights including but not limited to:

- providing a safe working environment (and appropriate accommodation facilities if being provided)
- paying a fair wage in accordance with all relevant State and Commonwealth laws and regulations
- equal treatment without distinction based on gender, race, age, religion
- freedom from forced labour, including access to employee documentation and passports (if internationally sourced labour), and
- freedom to join a union or other similar collective bargaining arrangement.

We will track the number of suppliers that provide the declaration and work with the suppliers who indicate difficulties in providing the declaration.

To date the new form has been well received by our suppliers and we are yet to receive any negative feedback or reluctance to commit. Non-compliance will be managed via the remediation process.

POLICY & GOVERNANCE

APA's governance framework ensures material risks and opportunities, including modern slavery, are escalated through our executive leadership team to the Board with the support of the Executive Risk Management Committee, and the Audit and Risk Management Committee.

Oversight of our response to modern slavery is overseen by our cross-functional Modern Slavery Working Group, which is responsible for implementing our modern slavery roadmap. The Working Group was established in late 2019 and is made up of representatives from Procurement, Risk & Compliance, Sustainability & Community, and Legal. The Working Group meets throughout the year and reports to the Executive Risk Management Committee and the Audit and Risk Management Committee bi-annually on the progress of the planned activities from the roadmap, the progress of risk assessments, and the modern slavery risks identified through those assessments.



Governance Structure

The following diagram depicts the key aspects of APA's governance arrangements. Please see our FY2021 Corporate Governance Statement for more information on our governance framework, practices and documentation.



POLICY & GOVERNANCE CONTINUED

Policy Framework

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

Key policies governing ethics and integrity at APA include:

- **Code of Conduct (Our Code):** Our principles and business standards to support safety, anti-harassment, anti-bullying, antidiscrimination, human rights, community engagement, environmental protection, anti-corruption, data privacy and security, and prevent anti-competitive behaviour.

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. Suppliers have an obligation under this Code to advise APA of any illegal or unethical practices of which they become aware. Consequences of non-compliance with the Code can include termination of contract.

Take a long-term focus

We are here for the long term, so we need to prioritise the long-term interests of APA over a quick win. That means:



Procuring goods and services ethically and responsibly

We take steps to ensure that the goods and services we source are procured ethically and responsibly, without harm or exploitation to people of the environment, and require our suppliers and contractors to do likewise.

We will:

- ✓ Ask suppliers about their manufacturing processes and supply chain procurement to assess their commitment to ethical and responsible supply.
- ✓ Not use suppliers that we know supply unsafe or environmentally irresponsible goods or services, or use exploitative or unlawful practices (including modern slavery or violation of human rights standards) to produce their goods or services.
- ✓ Require in our procurement agreements that goods and services be ethically and responsibly manufactured and sourced.
- ✓ Speak up if we think APA has purchased unsafe or environmentally irresponsible goods or services or has used a supplier that uses exploitative or unlawful practices to produce their goods or services.
- ✓ Routinely consider compliance by suppliers and contractors with our Code as part of the management of our ongoing relationship.



- **Diversity and Inclusion Policy** (Including EEO): Our principles for a diverse and inclusive workplace, including guidelines on acceptable behaviour and anti-discrimination practices.
- **Anti-Bribery and Corruption Policy:** Our commitment to foster a culture of compliance and responsible, ethical decision-making, helping us to prevent, detect and eliminate bribery, corruption, and fraud.
- **Health, Safety and Wellbeing Policy:** To provide workplaces free of injury and support the good health, wellbeing, respect and inclusion of our employees, contractors and visitors.
- **Whistleblower Policy:** Our process for people to report matters of concern and suspected wrongdoings that constitute reportable conduct. The policy provides for disclosures regarding modern slavery practices occurring in APA's supply chain. Whistleblower reports or disclosures made are investigated by the Disclosure Officer, and where substantiated, process or control improvements implemented.
- **APA maintains a Whistleblower Line** via an externally managed disclosure service as an independent, impartial and confidential means of reporting potential incidents. Our Whistleblower Line is available to everyone working for, and with, APA including our suppliers and contractors and their workers. Through the Whistleblower Line and our internal reporting channels, we record all reportable conduct complaints made including breaches of our Code of Conduct, potential or actual fraud, bribery and corruption and any conduct which may indicate modern slavery practices occurring in our supply chain.

During the year, management continued to raise awareness internally of the Whistleblower Policy, process and hotline to all personnel via intranet messaging, posters provided at our offices and key sites,

and providing access to more information through “useful links” on the front page of our intranet site. There were no modern slavery or human rights complaints received during the reporting period. The awareness campaign will be continued in FY2022 to reinforce Whistleblower options to raise concerns leveraging APA's culture program of work.

- **Risk Management policy:** To maintain appropriate risk exposures in response to uncertainty and contribute to effective decision making, our Risk Management System sets out our risk appetite, risk management approach and supporting enablers. It is aligned to the international risk management standard ISO 31000. Applying our risk management policy to modern slavery requires a consideration of the risk across countries, suppliers and product /service categories, recognising social performance driven by volume of spend 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 Management Policy:** To provide for effective identification and management of regulatory compliance covering laws, regulations, permits, industry codes and rules that APA is required to comply with, the Compliance Management System aligns with the principles and requirements of the international compliance standard ISO 19600. Key obligations under the relevant legislation have been reviewed with key controls clearly identified to form a compliance plan which is reviewed periodically to ensure sustainability and control currency and effectiveness.

Case Study

Selecting Suppliers

We are aware of the modern slavery risks associated with solar panel componentry manufacturing in certain regions of the world and are developing specific sourcing strategies to support us to better manage these risks.

As a developer of solar farms, APA's typical approach to project delivery had been to enter into an Engineering, Procurement and Construction (EPC) contract with contractors for the delivery of the project. These are usually lump sum, fixed price contracts. The nature of EPC contracts is that the 'Owner' (APA) is one step removed from the supply chain, which means that day-to-day operational responsibility for supply chain management, including assessing and addressing modern slavery risk lies with the EPC contractor. As the contracts are lump sum, we acknowledge this approach has the potential to conflict a contractor as the lowest priced option, which results in improved margins for a contractor, may not be the lowest risk alternative from a modern slavery perspective.

In FY2021, APA reviewed our sourcing strategy for solar panels, with one of the drivers being the risks of modern slavery occurring in the manufacture of the panels used on our solar farms. An alternate project delivery model was developed, where APA procures solar PV modules directly from international suppliers. In FY2022, should an appropriate solar farm project reach final investment decision, APA will endeavour to trial this approach.

This new approach will allow APA to directly engage the solar PV market and ensure appropriate modern slavery due diligence is undertaken. An update on this will be provided in the FY2022 Modern Slavery Statement.

IMPACT OF COVID-19

The Covid-19 pandemic is affecting most organisations across the world, with impacts felt across all aspects of business activity. We have seen an impact on our operations and suppliers.

Impact on our people

Our greatest asset is our people and we recognise that their health and wellbeing is critical to our success. Maintaining a safe and fair work environment for our employees also supports our work to manage any potential modern slavery risks relating to our operations. The Crisis Management Team, activated at the start of the pandemic, continued to operate throughout the financial year and is responsible for a coordinated approach to issues and challenges impacting the business.

Some of the initiatives that have been implemented by APA to look after our people's health and wellbeing and maintain a safe working environment are:

- Provision of remote computing facilities for staff working from home.
- Workplace risk assessments and updates with appropriate health and safety measures established including temperature checks, making hand sanitiser/masks available, office cleaning, office seating arrangements to accommodate physical distancing, changes in camp arrangements at our construction sites etc.
- Regular communications to all APA staff on government updates, health and safety protocols, office snap lockdowns, wellbeing advice, and access to tools and guidance through a dedicated intranet site for restrictions relating to each State/Territory.
- Counselling and support offered to staff and their immediate family members via our employee assistance program.
- Protocols for staff covering testing and isolation.

Case Study

Enabling resilience in regional and small business suppliers

APA believes that supporting small business suppliers with shorter payment time frames can in turn support vulnerable workers in global operations and supply chains. By maintaining cash flow through the supply chain, shorter payment times can help ensure that suppliers and their workers continue to be paid and that smaller suppliers remain viable. Uncertainty of future contracts or payments is one of the reasons why the risk of modern slavery has increased during the COVID-19 pandemic.¹ This uncertainty has exacerbated the vulnerability of some workers, particularly displaced workers, workers employed by smaller entities and those located in jurisdictions where infection rates have been high.

When the COVID-19 lockdowns began in April 2020, APA reduced payment timeframes for regional and smaller suppliers (<50 employees) to 7 days, to increase their cash flow and help reduce uncertainty for small suppliers. In line with the AER Statement of Expectations, APA did not refer outstanding debt to any external debt collection agencies.

To continue to support small businesses in our supply chain, APA decided to permanently offer these businesses preferential payment terms, changing maximum payment terms to 21 days for all flagged small businesses, regional businesses and strategic suppliers. Suppliers with pre-existing agreed payment terms of 7 or 14 days will remain on their original terms.

This permanent change ensures ~93% of our small business suppliers are paid within the 0-30 days payment timeframe (up from 63% on a 30 day payment term) for the period from 1 January 2021 to 30 June 2021, helping to make these suppliers more resilient to future volatility. We hope that this commitment will also provide greater job security for the employees of these suppliers arising from greater payment certainty and have positive flow on effects throughout the supply chain.

1. [Modern Slavery Act: Information for reporting entities about the impacts of Coronavirus \(homeaffairs.gov.au\)](https://www.homeaffairs.gov.au/modern-slavery-act)

EFFECTIVENESS ASSESSMENT

We understand the importance of assessing the effectiveness of the actions we are taking to manage the modern slavery risks in our operations and supply chain.

As part of our annual operating rhythm the Modern Slavery Working Group reviews the effectiveness of our modern slavery program. In FY2021, the Working Group focused on assessing the effectiveness of our actions in the following areas:

- Monitoring any Whistleblower complaints received. There were no Whistleblower complaints raised in respect to modern slavery in FY2021. We recognise this does not mean there is no modern slavery in our supply chains and we will continue to consider options to increase the effectiveness of our Whistleblower hotline in this context.
- Reviewing the status of our modern slavery program roadmap to evaluate our effectiveness in implementing key actions, including through bi-annual reporting to our Enterprise Risk Management Committee and the Audit & Risk Management Committee.
- Tracking supplier compliance in the use of our APA Supplier Prequalification (ASP) Program including by reviewing their responses to the modern slavery questionnaire when required.
- Conducting an annual review of the supplier desktop risk assessment process. Improvements were identified and changes will be reflected to the modern slavery assessment criteria for FY2022. These include:
 - additional guidance notes for the use of APA's desktop risk assessment tool;
 - including links to external websites for easy access to reference material;
 - providing a mechanism to capture additional notes for audit and tracking purposes; and
 - updating questions to enhance consistency across the assessors.

The following table shows a summary of our achievements for FY2021 and how we have measured our progress in each activity area. In addition to the work outlined above, tracking our progress across these five activity areas helps us to assess our effectiveness by indicating where we are making progress and where further action may be needed.

| ACTIVITY | ACHIEVEMENTS | OUTCOME |
|------------------------|---|--|
| Governance | APA's Modern Slavery Program update outlined to the Board | Six monthly updates reported to the Executive Leadership Team and to the Audit & Risk Management Committee (ARMC). |
| Risk Management | APA's top 231 suppliers participated in the APA Supplier Prequalification (ASP) Program | Of the 231 suppliers, 191 were compliant in the ASP Program as at the end of June 2021. Due to the comprehensive review process, this work is ongoing until FY2022. Based on preliminary findings APA does not anticipate any issues with the remaining suppliers. |
| | Annual monitoring of supply chain through AI platform. | Potential Modern Slavery risks identified for further risk assessment. |
| | Six monthly checks for Sanctions | |
| | 32 potential high-risk suppliers identified and assessed | Desktop risk assessments for each of the 32 suppliers completed, with 8 suppliers identified for further assessment. |
| | Targeted supplier assessments conducted | Targeted assessments for 8 suppliers identified for further assessment completed. |
| | | Follow up required with 3 suppliers to commence in Q1 FY2022. |
| Training | Modern Slavery awareness training developed and delivered | Target to have 100% of Procurement employees trained by end July 2021 on track. |
| Documentation | Precedent Agreements with Modern Slavery provisions | Acceptance by the majority of suppliers who have entered into agreements with APA, of the modern slavery provisions within the agreements. |
| Processes | Supplier on boarding process improvements | New supplier request form released for use by all APA and user guide updated. |



LOOKING BACK

THIS IS WHAT WE SAID WE WOULD DO: THIS IS WHAT WE DID:

| | |
|--|--|
| Establish yearly operating rhythm for our Modern Slavery Program | The Modern Slavery Working Group has established and agreed a yearly operating rhythm for our Modern Slavery Program. |
| Strengthen due diligence process | We have strengthened our due diligence process by reviewing and updating our supplier onboarding process. Our Procurement team, in consultation with our Modern Slavery Working Group, developed an excel based desktop risk assessment tool. |
| Complete desktop risk assessments | Desktop risk assessments completed for 32 suppliers identified as high risk in the FY2020 reporting period. |
| Commence targeted supplier assessments | We commenced targeted supplier assessments for the 8 suppliers categorised as high risk following the results of the desktop risk assessments. |
| Review standards and procedures | We reviewed our Procurement standards and procedures and have identified the following which will require an update to include specific Modern Slavery references during FY2022: Procurement Policy; Procurement Guide; Purchase Order Policy; Procurement Standard. |

IN ADDITION TO THIS WE HAVE ACHIEVED SOME OF THE MILESTONES SET FOR FY2022:

| | |
|--|--|
| Establishment of effectiveness metrics | Brought forward to allow us to measure the effectiveness of our actions in FY2021. |
| Develop and deliver training | Awareness training was successfully rolled out to all procurement. Completion of the training by end July 2021 was made mandatory for all Procurement employees. |
| Targeted supplier risk assessments | Commenced for three suppliers identified as very high risk. |

LOOKING FORWARD

APA's approach to Modern Slavery risk management is based on a model of continuous improvement. The roadmap is reviewed annually by the Modern Slavery Working Group.

In the year ahead, our priorities are:

Develop and deliver training – further targeted mandatory training to be developed and rolled out to operational staff and employees who deal directly with suppliers.

Risk management approach – continue with our data driven risk assessment and identify any high risk suppliers which would require a targeted review through a desktop risk assessment and supplier follow-up.

Update Standards and Procedures – update the standards and procedures identified during the review in FY2021.

Develop supplier incident response plans – include a response strategy / plan for use if an incident of modern slavery is identified in our supply chain.

Collaboration with industry – APA intends to collaborate with industry networks and peer groups to better understand approaches being taken to assess suppliers beyond the first tier.

Responsible sourcing – APA intends to begin development of its responsible sourcing strategy.



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 control. Topics of consultation included the reporting requirements under the *Modern Slavery Act 2018* (Cth), information regarding the actions undertaken and planned actions to address the reporting requirements.

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

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





APPENDIX 1 OUR REPORTING ENTITIES

| NAME | DESCRIPTION |
|---|--|
| Australian Pipeline Trust | <p>This is 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:</p> <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; and – energy investments in unlisted entities. |
| APT Pipelines Limited | The principal activities of this entity are 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. |
| APT Pipelines Investments (NSW) Pty Ltd | This is the parent entity of East Australian Pipeline Limited ("EAPL"). The entity is non operating. |
| East Australian Pipeline Limited | This entity is the owner and operator of the Moomba to Sydney Pipeline. |
| APT Pipelines Investments (WA) Pty Ltd | This is the holding entity for APA's interests in the Goldfields Gas Pipeline, Parmelia Gas Pipeline, and Northern Goldfields Interconnect (under construction). |
| SCP Investments (No 1) Pty Ltd | This is the holding entity for APA's 88.2% interest in the Goldfields Gas Pipeline. The entity is non operating. |
| APA VTS Australia Pty Limited | This is the parent entity of APA VTS Australia (Holdings) Pty Limited, which holds APA's interest in the Victoria Transmission System (VTS). The entity is non operating. |
| APA VTS Australia (Holdings) Pty Limited | This is the parent entity of APA VTS Australia (Operations), which owns and operates the VTS. The entity is non operating. |
| APA VTS Australia (Operations) Pty Limited | This entity is a wholly owned subsidiary of APA VTS Australia (Holdings) Pty Limited. It is the owner and operator of the VTS. |
| APT AM Holdings P/L | It is a wholly owned subsidiary of APT Pipelines Limited. Also, it is the parent entity of APT O&M Holdings Pty Ltd, whose controlled entities are responsible for the asset management and operations of Australian Gas Networks Limited (AGN). |



| NAME | DESCRIPTION |
|---|--|
| APA Power Holdings Pty Ltd | It is the 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 | This entity holds APA's interest in Diamantina Power Station via Diamantina Holding Company Pty Limited. The entity is non operating. |
| Diamantina Holding Company Pty Limited | This entity holds APA's interest in Diamantina Power Station. The entity is non-operating. |
| Diamantina Power Station Pty Limited | This entity is the owner and operator of Diamantina Power Station. |
| APA Sub Trust No 2 | This is the parent entity 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. The Trustee is Australian Pipeline Limited. |
| APA EE Holdings Pty Limited | This entity holds APA's interest in SWQP and Pilbara Pipeline via its controlled entities. The entity is non operating. |
| Epic Energy East Pipelines Trust | This entity holds APA's interest in SWQP and Pilbara Pipeline via its controlled entities. The entity is non operating. |
| APA EE Pty Limited | This entity holds APA's interest in SWQP and Pilbara Pipeline via its controlled entities. The entity is non operating. |
| APA EE Australia Pty Limited | This entity holds APA's interest in SWQP and Pilbara Pipeline via its controlled entities. The entity is non operating. |
| APA (SWQP) Pty Limited | This is the owner and operator of the South West Queensland Pipeline (SWQP). |
| APA Transmission Pty Limited | This is the wholly owned subsidiary of APT Pipelines Limited. It holds APA's interest in the Wallumbilla Gas Pipeline (WGP), Reedy Creek Wallumbilla Pipeline and the APA Western Slopes Pipeline project via its controlled entities. |
| APA BidCo Pty Limited | This is the holding entity for APA's interest in the WGP. It is a non operating entity. |
| APA WGP Pty Ltd | This entity is the owner and operator of the WGP. |

APPENDIX 2 HOW OUR STATEMENT ADDRESSES THE MANDATORY CRITERIA

| MANDATORY CRITERIA | PAGE NUMBER/S | |
|---|--|-------------------------------|
| a) Identify the reporting entity | About this Statement Appendix 1 | Page IFC Page 32 |
| b) Describe the reporting entity's structure, operations and supply chains | About APA Our operations and supply chain | Page 04 Page 08 |
| 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 our investments Modern Slavery risks in our supply chains | Page 14 Page 14 Page 15 |
| d) Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes | Actions taken to assess and address the risks Due diligence Policy and governance | Page 18 Page 20 Page 22 |
| e) Describe how the reporting entity assesses the effectiveness of these actions | Effectiveness assessment Looking back Looking forward | Page 27 Page 28 Page 29 |
| f) Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls | Process of consultation | Page 30 |
| g) Any other information that the reporting entity, or the entity giving the statement, considers relevant | Impact of COVID-19 | Page 26 |





