



Modern Slavery Statement 2025

25 Years of
securing Australia's
energy future

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.

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 2025 (FY25)**. 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' related to the financial year ended **30 June 2025 (FY25)**.

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 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 on 18th November, 2025 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, CEO and Managing Director

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 10, 121 Castlereagh Street, Sydney NSW 2000

Reporting suite map



Key information	Annual Report (including Climate Report)	Corporate Governance Statement	Investor Presentation	Modern Slavery Statement	Sustainability Data Book	Climate Transition Plan
Strategy	•		•			•
Financial performance	•		•			
Operational performance	•		•	•	•	•
Governance	•	•		•		•
Risk	•	•		•		•
Customers and partners	•			•		•
People and communities	•	•		•	•	•
Environment	•				•	•
Securityholder information	•	•				•

All reports are available at apa.com.au. For more information see APA Group FY25 results.

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25 years of securing Australia's energy future

On 13 June 2025 APA celebrated 25 years as an ASX-listed company and over the last 12 months we have continued to successfully execute our customer-focused growth strategy.

In FY25 we again achieved revenue, earnings and distributions growth, while working with our customers to deliver critical new infrastructure that supports energy security and transition across Australia. We have strong momentum in the delivery of our strategy, which is to be the partner of choice for energy infrastructure solutions in growth markets, including gas transmission and storage, remote power generation, and gas fired power generation.

As we progress our strategy and growth projects, we are committed to addressing modern slavery risks in our operations and supply chains. We are also committed to continuing to improve our approach by applying lessons learned, strengthening our due diligence practices, and deepening our engagement with our suppliers.

Throughout FY25 we worked to further embed our Modern Slavery Risk Management Approach Procedure across the business.

Key actions for FY25 included:

- Promoting employee awareness through information sessions, communications and mandatory e-Learning for all employees,
- Incorporating the requirements of the Modern Slavery Risk Mitigation Engagement Guide into our procurement process,
- Commencing supplier monitoring for inherent modern slavery risks in industries and locations where there is a greater likelihood of it occurring,
- Introducing our [Supplier Code of Conduct](#), and commencing engagement with suppliers to promote sustainable practices within our supply chains,
- Uplifting our Modern Slavery Response Procedure to incorporate lessons from the previous reporting period,
- Implementing a grievance mechanism into our new [Supplier Code of Conduct](#) and,
- Onboarding 620 new suppliers into the APA supplier ecosystem.

As we reflect on our milestones and achievements over the last 25 years and the important role our business plays in Australia's energy transformation, our commitment to responsible business conduct remains as strong as ever.

We will continue to work collaboratively with our stakeholders to mitigate modern slavery risk in our business over the years ahead.

Adam Watson
Chief Executive Officer and Managing Director



Our progress on past commitments

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

The following highlights reflect our progress over the reporting period.

Goals for FY25 as set out in our FY24 statement	FY25 Progress
Training and awareness	
Reassess modern slavery training as part of business as usual.	▶ Modern slavery training built into mandatory Procurement Fundamentals eLearning for all employees.
Hold information sharing and awareness sessions for those employees managing high-risk categories.	▶ Modern slavery awareness communications released on APA's internal networking site.
Publish modern slavery fact sheet for FY24 reporting period.	▶ Published the FY24 Modern Slavery Fact Sheet on our external website to answer common questions from our existing, or prospective, customers, suppliers, and investors.
Risk management	
Continue to monitor emerging risks and proactively assess modern slavery risk prior to engaging suppliers.	▶ Supplier monitoring is undertaken to assess alignment to APA Supplier Code of Conduct . This process includes monitoring for inherent modern slavery risk where there is an increased likelihood of modern slavery occurring, such as in specific industries and location. Where suppliers are found to have caused or contributed to modern slavery, APA's response would be guided by the United Nations Guiding Principles, including the implementation of relevant remediation and corrective actions.
Progress the development of our Modern Slavery Risk Mitigation Engagement Guide for engaging with suppliers presenting an elevated-risk of modern slavery.	▶ The requirements of the Modern Slavery Risk Mitigation Engagement Guide have been incorporated as guidance in the procurement process. The updated guidance provides step by step instructions on how to assess and evaluate modern slavery risks and actions that can be taken to manage those risks
Annual renewal of Chartered Institute of Procurement and Supply (CIPS) Corporate Ethics Mark.	▶ Successfully renewed our CIPS Corporate Ethics Mark, as a demonstration of our ongoing commitment to ethical procurement practices.
Procurement and supplier engagement	
Progress our new Supplier Code of Conduct.	▶ Published our Supplier Code of Conduct which sets out APA's principles and standards on human rights and labour, business ethics, diversity and inclusion and engagement with communities.
Work collaboratively with suppliers to build awareness of modern slavery risks and capability to support related due diligence, including supplier training.	▶ APA sponsored the World Commerce & Contracting 'Sustainable Procurement and Commercial Practices' event to build awareness and capability with suppliers and customer organisations. As a co-host, APA led a discussion on driving sustainable practices within our supply chains, including incorporation of social and environmental criteria to promote transparency and ethical practices and how to develop and share supplier scorecards to enable supplier development.
Preparation and readiness for future <i>Australian Modern Slavery Act 2018 (Cth)</i> changes	▶ We have continued to closely monitor developments relating to the <i>Australian Modern Slavery Act 2018 (Cth)</i> and the Government's response to the proposed recommendations, ensuring we remain aligned with evolving regulatory expectations.
Develop an action plan template to support the Modern Slavery Response Procedure, for use during investigations where it is determined that APA has caused or contributed to an incident.	▶ A review of our grievance mechanisms is underway to determine how best to strengthen the Modern Slavery Response Procedure and assess gaps in related protocols, including the feasibility of action plan templates. Improvement plans for suppliers have now been embedded into procurement processes.
Responsible procurement	
Continue support for Reconciliation Action Plan delivery.	▶ Procurement teams supported and contributed to the delivery of APA's Reflect RAP obligations for First Nations peoples and provided input on procurement focused actions in the Innovate RAP. We recognise First Nations communities have historically been subject to conditions that may be recognised as modern slavery today. Our Innovate RAP includes actions to improve employment outcomes by increasing First Nations recruitment, retention, and professional development as well as increase First Nations supplier diversity to support improved economic and social outcomes.
Industry collaboration	
Collaborative supplier engagement.	▶ Enhance our due diligence on current and potential suppliers in two categories; cleaning and accommodation. Refer to the case study on page 21 for more details.
Participate in Clean Energy Council (CEC) Modern Slavery Working Group.	▶ CEC Modern Slavery Working Group attendance and participation.
Grievance mechanisms and remediation	
Refresh our Modern Slavery Response Procedure.	▶ Modern Slavery Response Procedure was reviewed and updated to incorporate lessons from the previous reporting period, including to provide further clarity on APA's internal process and ensure it remains fit for purpose.
Continue the review of APA's grievance mechanisms in terms of awareness and accessibility.	▶ Grievance mechanism included in APA's new Supplier Code of Conduct to increase awareness and accessibility of the mechanism.

Looking forward to FY26

APA's approach to modern slavery risk management is built on continuous improvement, with the Modern Slavery Program reviewed annually by the Modern Slavery Working Group to ensure it remains effective and responsive to emerging risks.

In the year ahead, we will focus on identifying high impact initiatives to ensure we apply our resources and efforts in areas where we can strengthen our supply chain resilience and deliver measurable outcomes.

These focus areas will include responding to the government's review of the *Australian Modern Slavery Act 2018 (Cth)* and the accompanying recommendations. We will progress the following activities, and evaluate additional measures, as part of our ongoing commitment to continuous improvement in addressing modern slavery and ensuring alignment with the evolving policy and regulatory landscape.

In FY26, we will:

- Embed supplier relationship management practices across the organisation, including a focus on suppliers identified as high risk for modern slavery
- Undertake a cross-functional review of grievance mechanisms to identify enhancements and improve accessibility
- Continue to build capability through targeted training and engagement on modern slavery, risk factors, red flags and labour practices, with a focus on high-risk, regional and remote areas
- Enhance supplier awareness through sharing our supplier assessment insights, prioritising those that are high risk
- Ongoing screening of modern slavery import bans as part of our supply chain risk management
- Review APA's modern slavery governance framework (including the cross-functional Modern Slavery Working Group) to ensure it remains effective and fit for purpose
- Continue to engage in multi-stakeholder initiatives and industry forums to share learnings and address sector-wide challenges.



About APA

At APA, we're taking on one of Australia's greatest challenges: the energy transition. We're not doing it alone. We're doing it as Australia's energy infrastructure partner – a role our unique experience and expertise positions us to play.



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 and operations

APA is a leading Australian Securities Exchange (ASX) listed energy infrastructure business. As Australia's energy infrastructure partner, we own and/or manage and operate a diverse, \$27 billion portfolio of gas, electricity, solar and wind assets.

Consistent with our purpose, securing Australia's energy future, we deliver around half of the nation's domestic gas through 15,000 kilometres of gas pipelines that we own, operate and maintain. Through our investments in electricity transmission assets, we connect Victoria with South Australia, Tasmania with Victoria and New South Wales with Queensland, providing vital flexibility and support for the grid. We also own and operate power generation assets, including gas powered, wind and solar assets across the country.

As Australia's energy infrastructure partner, we own and operate assets across gas transmission and storage (including associated infrastructure), electricity generation (gas and renewables) and transmission and battery energy storage systems.

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.

We operate and maintain networks connecting 1.5 million Australian homes and businesses to the benefits of natural gas. We also own or have interests in gas storage and 884 MW of gas-fired generation assets. We operate and have interests in 773 MW of renewable energy generation and battery storage infrastructure making us one of the largest renewable electricity suppliers in Australia.

We support our customers' energy transition and decarbonisation efforts through our ability to develop and operate energy solutions. At the same time, we're also working on decarbonising our own operations and we're committed to achieving net zero operational emissions by 2050.

Our Group structure

APA Group is comprised of two registered investment schemes, APA Infrastructure Trust and APA Investment Trust and is headquartered in Sydney, New South Wales. For a full list of our reporting entities, see [Appendix 4](#).

We take a Group-wide approach to managing modern slavery risks in [our operations](#) and [supply chain](#).

Our diverse energy infrastructure portfolio

Gas infrastructure	Contracted power generation	Electricity transmission
 <p>Transmission >15,000 km transmission pipelines</p>	 <p>Renewable energy 342MW Wind 356 MW Solar 75 MW BESS</p>	 <p>>800 km high-voltage electricity transmission</p>
 <p>Storage 12,000 tonnes LNG 18 PJ gas</p>	 <p>Gas fired 884 MW</p>	 <p>including 290 km deep-sea cable</p>
 <p>Distribution >29,500 km gas mains and pipelines >1.5 million gas</p>		

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

Our strategy is to be the partner of choice in delivering infrastructure solutions for the energy transition. We focus on creating value for our customers by offering competitive and differentiated energy solutions in four primary asset classes critical to our customers as they navigate the energy transition.

Australia's energy transition requires an ambitious and pragmatic approach to deliver reliable, affordable and lower emissions energy to our customers and communities. The transition must focus on the introduction of renewable generation firmed up by a combination of short-duration and medium-duration energy storage and generation.

Central to our strategy is the support we provide to our customers in navigating the transition. Natural gas is a critical part of the future energy mix, essential for powering Australian industry. It provides the firming capacity essential to supporting the expansion of the renewable energy generation required to replace retiring coal power stations.

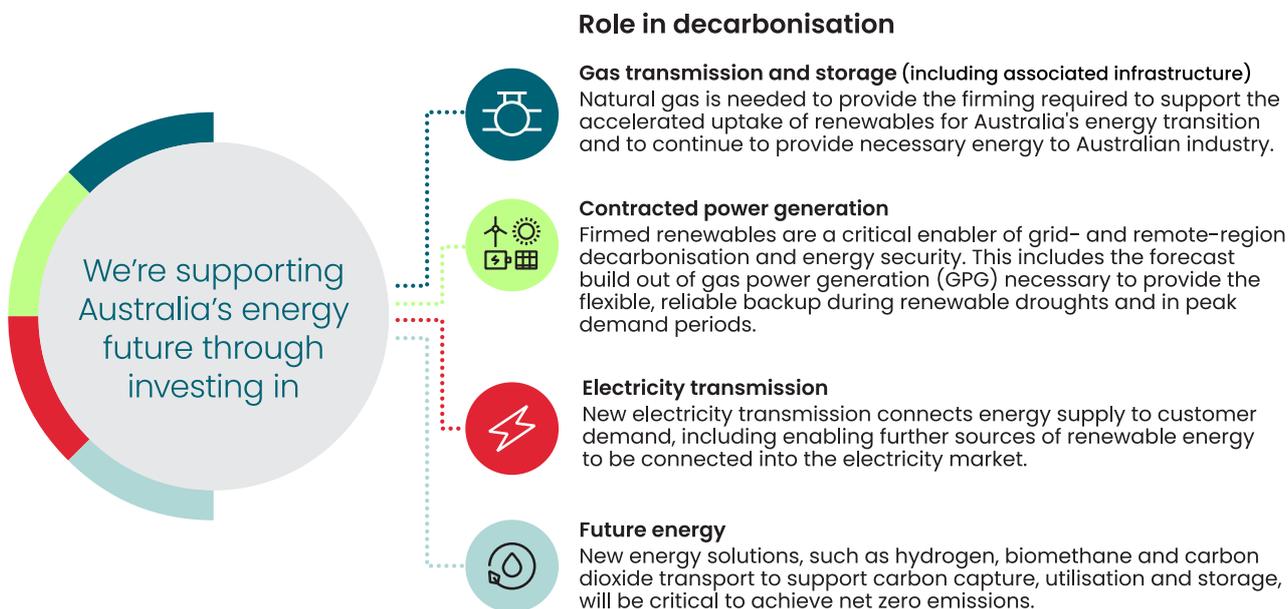
APA's strategy focuses on long-term contracted infrastructure with inflation-linked revenues. We build and expand networks of assets, which we operate efficiently, targeting the highest level of performance and availability for our customers.

We execute on our strategy by developing, delivering and operating a portfolio of connected assets, capable of providing safe, reliable and fit-for-purpose energy solutions. We deliver value for our customers through our operational performance, leveraging and strengthening our existing networks across the east coast and Western Australian energy markets.

We will continue to grow and invest in asset classes that are critical for our customers as we support them through the electrification of their operations. We will do this by investing and optimising our portfolio of gas assets to meet the capacity and storage future needs of our customers, offering differentiated solutions in power generation, investing in electricity transmission opportunities that complement our assets, and exploring how future energy can support decarbonisation further.

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

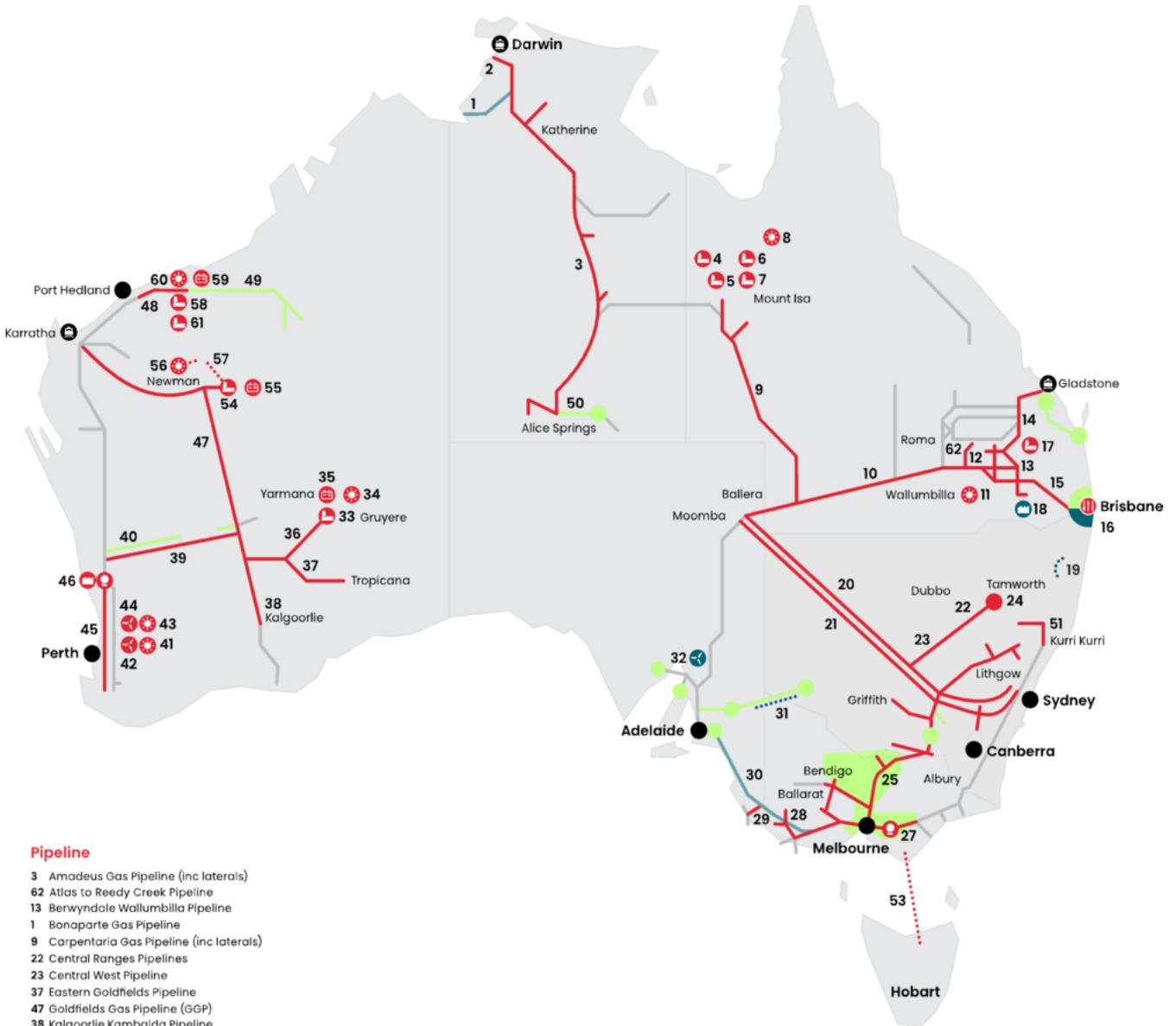
APA's customer-focused strategy delivers energy solutions that target asset classes that are essential to Australia's energy transition and where we have a competitive advantage



Our portfolio of assets and investments

Key

- APA Group gas transmission 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



Pipeline

- 3 Amadeus Gas Pipeline (inc laterals)
- 62 Atlas to Reedy Creek Pipeline
- 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
- 51 Kurri Kurri Lateral Pipeline (KCLP)
- 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)
- 12 Pilbara Pipeline System
- 48 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/Niity Gas Pipelines and lateral
- 25 Victorian Transmission System (VTS)
- 14 Wallumbilla Gladstone Pipeline (inc laterals)
- 2 Wickham Point Pipeline
- 36 Yamarna Gas Pipeline

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

- 53 Basslink
- 19 Directlink
- 2 Murraylink
- 31 Pilbara - HV Transmission Lines

Generation

- 61 🏭 Boodarie (84 MW)
- 17 🏭 Daandine (30 MW)
- 6 🏭 Diamantina (242 MW)
- 33 🏭 Gruyere (47 MW)
- 35 🏭 Gruyere Battery Station (4.4 MW/4.4 MWh)
- 7 🏭 Leichhardt (60 MW)
- 54 🏭 Newman (232 MW)
- 55 🏭 Newman Battery (36 MW/36 MWh)
- 58 🏭 Port Hedland (210 MW)
- 59 🏭 Port Hedland Battery (35 MW/34.1 MWh)
- 5 🏭 Thomson (22 MW)
- 4 🏭 X41 (41 MW)

* Under construction

Solar Farm

- 43 ☀️ Badgingarra (19 MW)
- 56 ☀️ Chichester (60 MW)
- 11 ☀️ Darling Downs (110 MW)
- 8 ☀️ Dugal River (88 MW)
- 41 ☀️ Emu Downs (20 MW)
- 34 ☀️ Gruyere (13.2 MW)
- 60 ☀️ Port Hedland (46 MW)

Wind

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

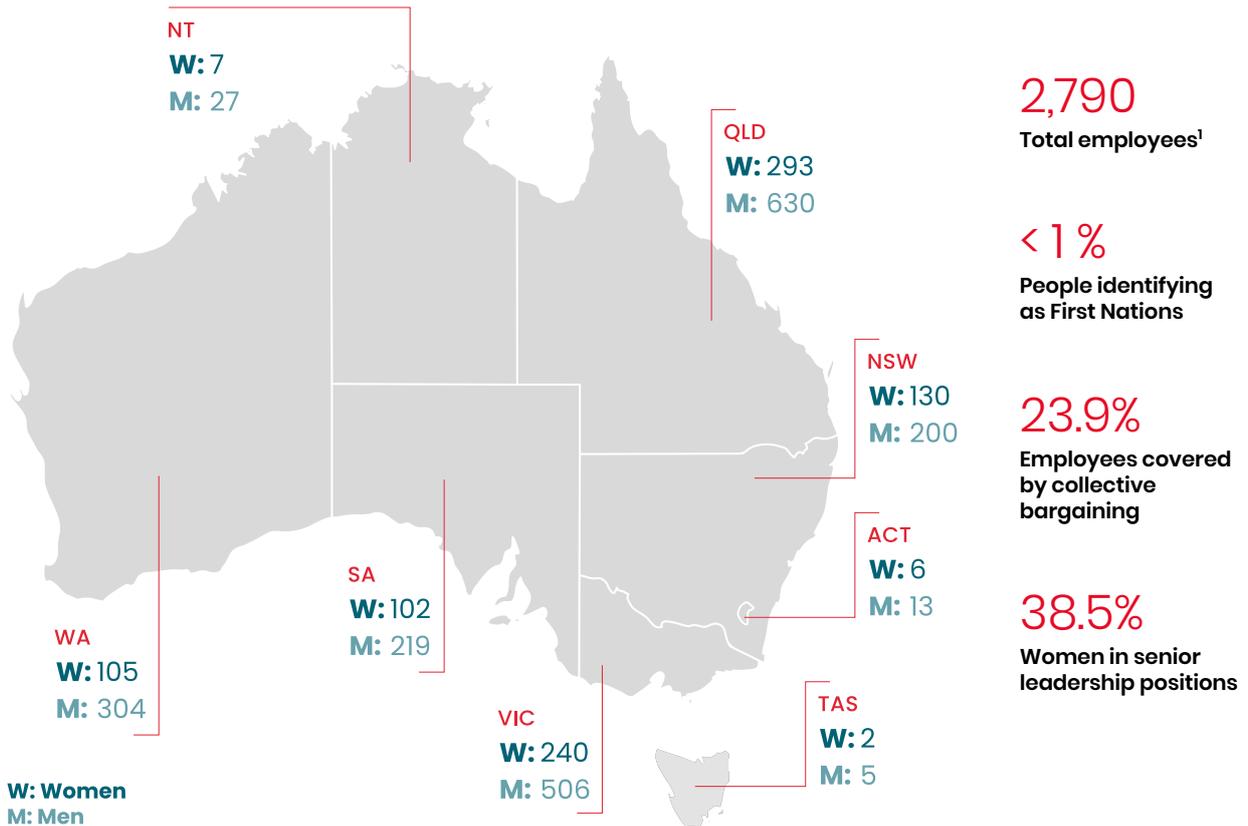
Our people

We've assembled a team of experts who are innovative, customer-focused and pragmatic. We support our people with a culture that's positive about change and fosters high performance.

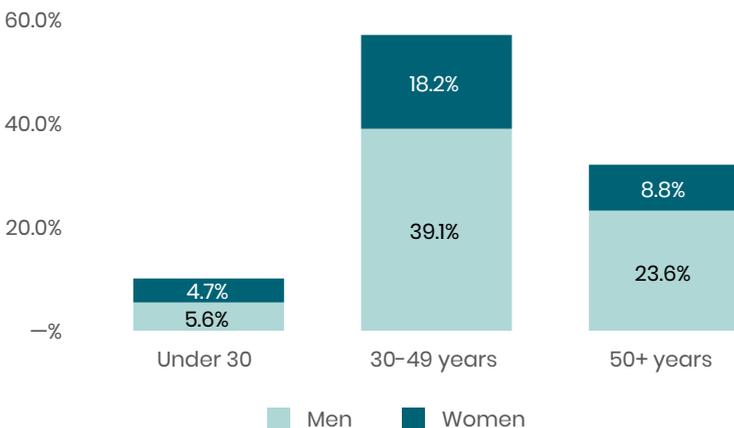
And our commitment to a safe and respectful workplace means our people can get on with the job, knowing they're valued and that their safety always comes first.

As at 30 June 2025, APA has 2,790¹ employees and 170 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 our [FY25 Sustainability Data Book](#).

Employees per state¹



Diversity of total employees by age



Employment category¹

91% of our people are employed on a permanent full-time basis.

	Men	Women
Full-time permanent	1,795	746
Part-time permanent	15	77
Full-time fixed term	75	43
Part-time fixed term	0	4
Casual	19	15
Grand total	1,904	885

¹ In FY25, one employee identifies as gender non-binary.

² The "% Identify as Indigenous" measure relies on voluntary information. This measure represents APA employees who have voluntarily self-identified to APA that they are an Aboriginal and/or Torres Strait Islander person.

Our supply chain

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

~\$1.6bn

Total supplier spend

3,297

Direct suppliers

3,203

Australian-based suppliers

94

International-based suppliers

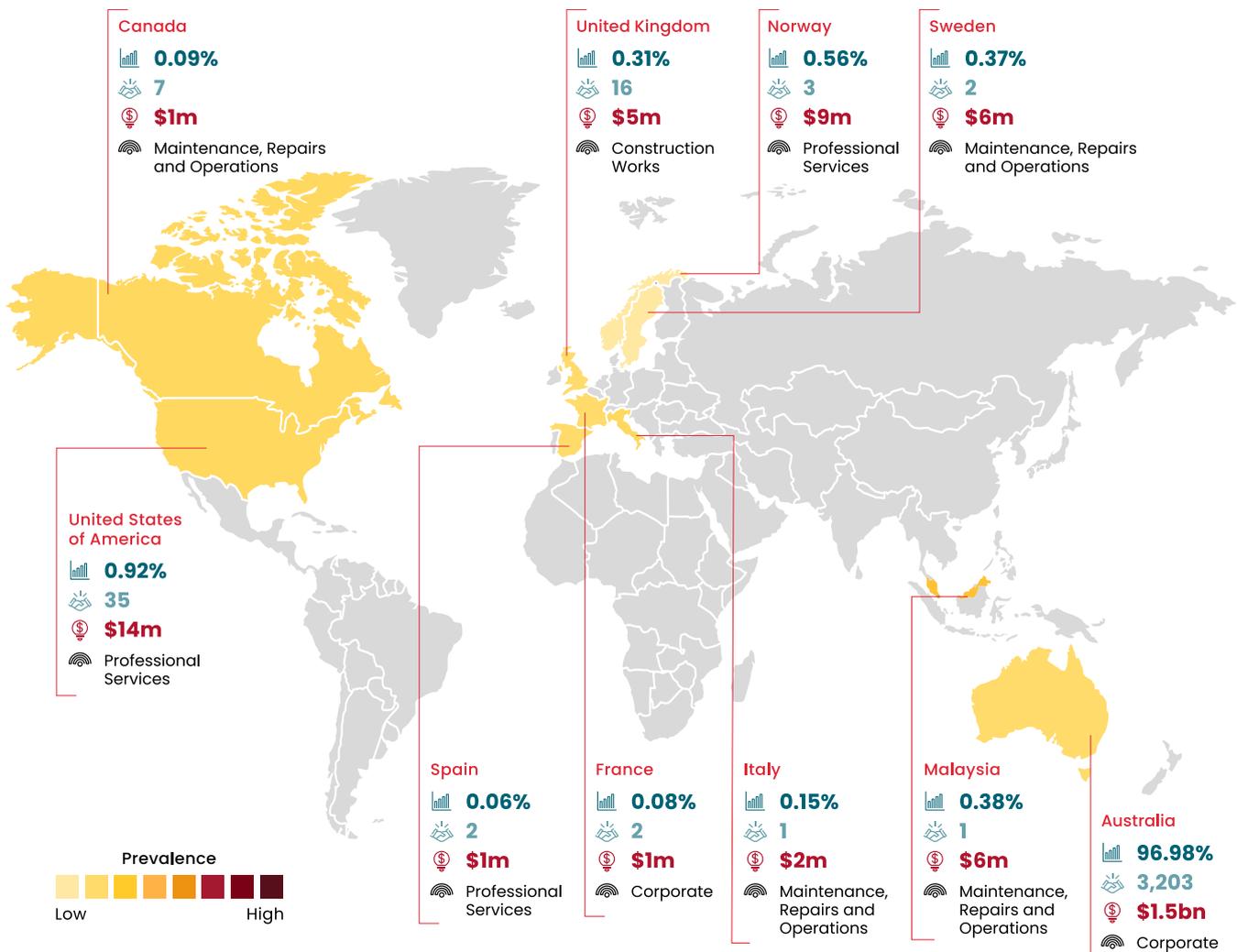
Our procurement spend is predominantly managed through contractual arrangements. This includes:

Procurement pathways

1. Purchase order terms and conditions, used for the procuring of goods and services as directed by the APA procurement pathways
2. Agreements, where the APA procurement pathways direct is to be entered into. This can include discrete, one-off engagements and multi-year engagements.

Where we procure goods and services

The map below shows the top 10 countries of our overall spend. Our direct suppliers (tier 1)² are predominantly based in Australia although we recognise they may also operate in or source from other countries. The coloured shading of the countries illustrates the estimated prevalence of modern slavery according to [Walk Free Global Slavery Index](#) published in 2023.



Percentage of spend in each of the top 10 countries of spend
 Total number of direct suppliers (tier 1) in each of the top 10 countries of spend
 Supply spend by country or region
 Largest spend category

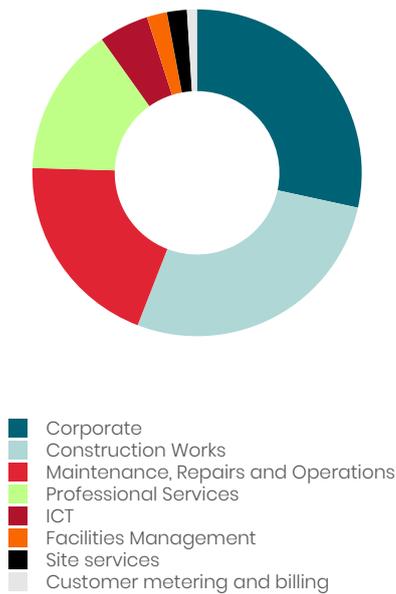
² The term 'tier 1 suppliers' refers to our direct suppliers of goods or services. References to 'tier 2 suppliers' are the suppliers or subcontractors of our tier 1 suppliers, 'tier 3 suppliers' are the suppliers or subcontractors of our tier 2 suppliers, and so forth.

The goods and services we procure

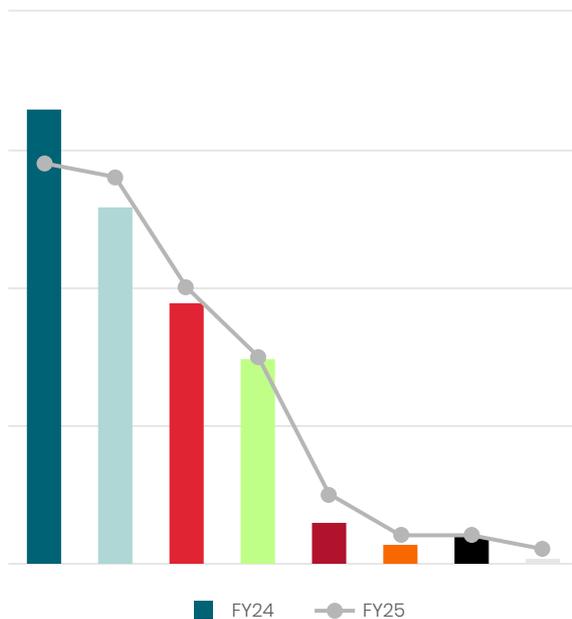
A diverse range of goods and services were procured throughout FY25.

A significant portion of APA spend during FY25 was in the Construction Works category, where known risks include materials may be produced or sourced in higher risk countries or involved sectors known to have higher modern slavery risks. Refer to [Appendix 2](#) for more information on those risks and controls that APA have in place to mitigate and manage those risks.

Percentage of spend (\$AUD) by supplier category



Percentage of spend – FY24 to FY25 comparison



Category	Main sub-categories (in alphabetical order)	% spend
Corporate	<ul style="list-style-type: none"> Accommodation 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 	28%
Construction Works	<ul style="list-style-type: none"> Civil and Minor Works Facilities Construction Services Other Construction Services Renewable Energy Construction Services 	29%
Maintenance, Repairs and Operations	<ul style="list-style-type: none"> Cathodic Protection Chemicals and Fuels Consumables Consumables Distribution and Conditioning Systems, Equipment and 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 	18%
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 	5%
Site Services	<ul style="list-style-type: none"> Aerial Surveillance & Services Easement and Vegetation Management Plant & Equipment Hire Waste Management 	2%
Facilities Management	<ul style="list-style-type: none"> Building Management Cleaning Emergency Response and Security Utilities Services 	2%
Customer Metering and Billing	<ul style="list-style-type: none"> Meter Testing and Calibration Metering Equipment (Network Specific) Metering Services 	1%

How we identify and assess modern slavery risks

Guided by our Board-approved Risk Management Framework, we draw on the UN Guiding Principles on Business and Human Rights (UNGPs) to inform how we assess potential modern slavery risks.



Assessing modern slavery risks

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

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

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

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 committed to complying with all applicable legislative requirements regulating workplace relations in Australia and have systems in place to monitor and support ongoing compliance
- we have well-defined internal policies and processes in place to maintain a safe and fair working environment, such as: recruitment and onboarding processes including employment, visa and health checks, induction processes and training, and comprehensive policies and procedures.

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

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

Modern slavery risk in the communities where we operate

APA operates across metropolitan, rural, and remote regions of Australia.

We acknowledge that, the geographic location of our operations may influence our exposure to modern slavery risks. For instance, suppliers based in rural or remote areas are sometimes smaller in scale and may have less developed risk management frameworks.

Additionally, limited supplier options in certain locations can reduce our ability to influence and collaborate with suppliers on modern slavery and broader responsible procurement practices.

Modern slavery risks in our supply chain

APA recognises modern slavery risks are likely to be present in parts of our supply chain. 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 we have in place fail or are not fit for purpose.

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

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 category and supplier assessments (see case study on page 21); and our supplier due diligence approach.

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, lithium-ion batteries and automotive's including electric vehicles.

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

Modern slavery risks areas in our supply chain

APA has identified eight key modern slavery risk areas in our supply chains. These risk areas are influenced by a number of relevant factors that may increase the likelihood of modern slavery occurring. Key controls to address these risk areas are set out in [Appendix 2](#).

Our key modern slavery risk areas

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

Influencing risk factors

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

How we address and manage modern slavery risks

Building on the foundations established in previous reporting periods, we continue to embed ethical practices at the heart of our business.

This section outlines the actions taken during the reporting period to mitigate the risks of modern slavery.



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Governance framework

At APA, we have integrated responsibility for modern slavery mitigation measures into our overarching APA governance framework.

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

This is illustrated in the diagram below.

Throughout FY25, the Working Group met six times to monitor progress against our roadmap initiatives, review due diligence practices and assess emerging risks. In FY26, the Working Group will close out the existing roadmap and establish a new action plan to guide future priorities.

The modern slavery governance framework including our Modern Slavery Working Group will be reviewed in FY26 to ensure it remains fit for purpose.

The purpose of the Risk Management Committee of the Board is to assist the Board of Directors of APA in fulfilling its responsibility to monitor, oversee, inform and assess effective risk and compliance management across the Group. For modern slavery, this includes to review and recommend to the Board for approval APA's annual Modern Slavery Statement.

For detailed information about the duties and responsibilities of the Risk Management Committee, see our [Risk Management Committee Charter](#).

APA's modern slavery governance framework



Policies and processes

Our Compliance Management Framework governs policy and processes and underpins our approach to managing modern slavery risks across our operations and supply chain.

During FY25 we:

- introduced our first [Modern Slavery Policy](#), outlining APA's position, commitments, and responsibilities in relation to modern slavery. The policy is informed by leading international standards, including the UN Guiding Principles on Business and Human Rights. The policy affirms our commitment to preventing, mitigating, and addressing modern slavery risks in our operations and supply chains.
- introduced our [Supplier Code of Conduct](#), which sets out principles, standards and guides mutual expectations between APA and our suppliers, addressing human rights and labour, business ethics, diversity and inclusion and engagement with communities. Our [Supplier Code of Conduct](#), offers a single, concise set of expectations for suppliers, and aligns with our focus on having an effective policy framework.
- updated the procurement evaluation guidance process, used by our procurement team, to include modern slavery risks. The guidance provides step by step instructions on how to assess and evaluate modern slavery risks, actions that can be taken to manage those risks and controls that can be utilised (such as regular audits).

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

Our publicly available policies can be found on our [website](#).

Alongside our policies, we have frameworks and strategies that also support management of modern slavery risks.

In FY25 we:

- refreshed the APA First Nations Procurement Strategy, including introducing micro-training to deepen understanding of historical practices, discriminatory laws, and policies that restricted Indigenous worker's access to wages and forced them into conditions now recognised as modern slavery. We also continued our Supply Nation membership, Social Traders, Kinaway Chamber of Commerce, NSW Indigenous Chamber of Commerce and NT Indigenous Business Network and joined the Pilbara Aboriginal Business and Industry Association, providing access to a national database of First Nations and Social enterprise businesses.
- approved our Sustainable Procurement Framework which defines the core principles (such as respect for law and human rights) to guide development of the strategy, governance, objectives, integration, training and performance considerations in FY26. The framework will allow us to clearly define, balance and embed environmental, social and economic impact considerations seamlessly throughout the end-to-end procurement process. This includes supporting modern slavery risk management by embedding systemic safeguards and accountability mechanisms throughout the entire procurement process.

For more information about our approach to corporate governance, see our [Corporate Governance Statement](#).



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 integrated modern slavery content into our mandatory Procurement e-Learning module for all employees.

Micro-training was delivered to APA employees to provide them with the knowledge and tools to identify potential modern slavery red flags across accommodation, cleaning and Warehousing and Logistics in hotels and other accommodation settings. For more information, see our case study on page [21](#).

Internal communications

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

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

Board engagement

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

CIP Corporate Ethics Mark

During FY25, we renewed our Chartered Institute of Procurement and Supply (CIPS) Corporate Ethics Mark¹

The CIPS Corporate Code of Ethics was developed as part of CIPS' commitment to reinforcing global ethical values across all procurement and supply practices.

The voluntary code can be adopted by organisations across the world, of any size and from any sector, and sets out the values, business culture and practices the organisation must demonstrate.

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

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

¹ [Ethics Register | CIPS](#)



Supplier due diligence

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. We support the assessment of modern slavery risks through due diligence activities in our supplier management process. This includes a series of levers outlined below.

Supplier Screening and Supply Chain Mapping

In FY25, we mapped the theoretical supply chain risk as deep as tier 10 for 3,536 suppliers.

Supply chain mapping is completed for all suppliers, tracing economic inputs typically required to produce products and services sourced from tier 1 up to tier 10 suppliers. This supply chain mapping then links supply chain data from 190 countries and over 15,000 industry sectors. Data is typically sourced from:

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

This process also examines supply chains against international standards:

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

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

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

Supplier Onboarding

During FY25, 620 new suppliers were onboarded into the APA supplier eco-system with all completing human rights declarations.

This process included suppliers declaring their commitment to respect workers' fundamental human rights before they are added to our internal systems.

This includes committing to:

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

Supply Chain Risk monitoring

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

Supplier Assessment

In FY25, we completed supplier assessments for 634 suppliers and deep dives on two suppliers.

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

- company information and related policies
- modern slavery supplier risk screening and assessment
- training and education
- due diligence
- grievance and remediation mechanisms
- measuring effectiveness
- industry collaboration.

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

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

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

Supplier performance management

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

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

Supplier development plans

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

Contracting and contract management practices

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

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

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

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

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

Case study: Targeting High Risk Areas and Regional Labour Practices

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

Managing elevated risk in regional locations

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

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

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

Building capability in our people

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

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

Focusing our efforts

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

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

Leveraging employee diversity and enhancing accessibility

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

Overall outcomes and strategic impact

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

Stakeholder engagement and industry collaboration

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

Throughout FY25, the Modern Slavery Team engaged with a range of external stakeholders, including customers, investors, industry peers and external human rights experts.

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

Clean Energy Council (CEC)

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

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

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

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

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

United Nations Global Compact (UNGC) Membership

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

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

United Nations Global Compact Network Australia Modern Slavery Community of Practice

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

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

Fair Supply

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



Grievance mechanisms and remediation

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

We recognise that grievance mechanisms are only effective if they are accessible, trusted, transparent and clear to stakeholders who may wish to raise concerns. To support this, our grievance mechanism has been incorporated into the new [Supplier Code of Conduct](#).

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

Our Grievance Mechanisms and Modern Slavery Response Procedure

Whistleblower Line			
<p>Our Whistleblower Line is maintained through an externally managed disclosure service as an independent, impartial and confidential means of reporting potential incidents, including any concerns related to modern slavery or broader labour rights issues. The Whistleblower Line is available to employees, contractors and other stakeholders, including suppliers and their workers. Information about the whistleblower mechanism is included in our modern slavery training. During the reporting period, no complaints relating to modern slavery were received through our whistleblower mechanism. However, we understand that modern slavery is complex to identify and that not identifying any incidents does not mean modern slavery could not occur in APA's supply chains.</p>			
Other available mechanisms to raise concerns:			
<ul style="list-style-type: none"> Complaints made directly to APA employees/management Self-reporting by a supplier (in relation to its own activities or those of a sub-supplier) Reports made to Modern Slavery Team APA's modern slavery risk management activities APA employees identifying modern slavery red flags on sites Media or civil society reporting 			
1. IDENTIFY	2. REVIEW	3. INVESTIGATE	4. REMEDIATE
<p>Modern slavery report received</p> <p>Reports are received through the mechanisms mentioned above</p>	<p>Assessment of report</p> <p>All reports will be assessed and considered by APA and a decision will be made as to what type of investigation is required</p> <p>Addressing the report</p> <p>APA will establish a cross-functional Incident Response Team. Reports may be addressed informally or through a formal investigation, depending on the nature of the report</p>	<p>Incident identified</p> <p>Where an investigation identifies an instance of modern slavery, appropriate action will be taken. We will consider the most appropriate approach to engage with law enforcement and other external stakeholders</p> <p>Formal investigation</p> <p>Formal investigations may be confidential, will be conducted in a timely manner and will be fair and independent from any persons to whom the report relates</p>	<p>Determining our involvement under the UNGPs</p> <p>The Incident Response Team will determine if APA has caused, contributed, or is directly linked to the incident in line with the UNGPs. External expert business and human rights advice will be sought to inform the assessment</p> <p>Responding to the incident</p> <p>We have a clear commitment to taking a victim-first approach to remediation</p>

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.



Measuring our impact

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.

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

Key actions taken	How we measure its effectiveness	Outcomes
Governance framework		
Maintain Modern Slavery Working Group	<ul style="list-style-type: none"> Tracking frequency of meetings and progression of key action items. 	<ul style="list-style-type: none"> Modern Slavery Working Group met 6 times throughout the year. Key actions implemented or progressed as planned.
Policies and processes		
Refresh Modern Slavery Risk Management Approach Procedure	<ul style="list-style-type: none"> Annual review and refresh of Modern Slavery Risk Management Approach Procedure to help ensure it remains fit for purpose 	<ul style="list-style-type: none"> Modern Slavery Risk Management Approach Procedure embedded during FY25. Further uplift will be considered at the next review stage.
Supplier due diligence		
Map supply chains for high-risk suppliers	<ul style="list-style-type: none"> Number of high-risk suppliers identified as a result of the supply chain mapping and modern slavery risk assessment. 	<ul style="list-style-type: none"> FY24 spend data was used in FY25 to map theoretical supply chain risk as deep as tier 10 for 3,536 suppliers, with supplier assessments completed for 634 suppliers, and deep dives for two suppliers.
Identify high-risk suppliers and issue supplier assessments for completion	<ul style="list-style-type: none"> Number of supplier assessments completed by suppliers, the quality of these responses, and the proportion of suppliers requiring a deep dive assessment. 	
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. 	
Training and awareness raising		
Continue to rollout face-to-face training to priority groups across the business	<ul style="list-style-type: none"> Mandatory training rolled out to all APA employees. Feedback from training sessions monitored and lessons learned incorporated into future sessions. 	<ul style="list-style-type: none"> All APA employees were enrolled in mandatory Procurement Fundamentals eLearning during FY25. Tailored training pack created for employees staying in accommodation in remote areas.
Raise awareness of modern slavery and red flags for APA through internal communications	<ul style="list-style-type: none"> Number of modern slavery related articles published, and feedback received throughout the financial year. 	<ul style="list-style-type: none"> 5 articles published on APA's intranet homepage and internal networking site. Modern slavery fact sheet for FY24 published on APA website.
Completion of the CIPS Ethics Test	<ul style="list-style-type: none"> All employees responsible for sourcing, supplier selection and supplier management activities complete CIPS training. 	<ul style="list-style-type: none"> All employees (61) responsible for sourcing, supplier selection and supplier management activities completed the CIPS Ethics Test during FY25.
Stakeholder engagement and industry collaboration		
Participation in Clean Energy Council	<ul style="list-style-type: none"> Number of meeting attended in the Clean Energy Council Working Group 	<ul style="list-style-type: none"> APA participated in three Clean Energy Council meetings in FY25 APA participated as a member CEC subgroup to draft the Code of Practice
Grievance mechanisms and remediation		
Monitor whistleblower mechanism	<ul style="list-style-type: none"> Number of modern slavery related complaints raised each financial year and the outcome of any complaints raised. 	<ul style="list-style-type: none"> A concern was raised at a Modern Slavery training session. The early stages of the Modern Slavery Response Procedure was initiated and upon assessment of the concern, it was referred for review via the Whistleblower team. The review found the allegation was unsubstantiated.
Maintain Modern Slavery Response Procedure	<ul style="list-style-type: none"> Number of times the Modern Slavery Response Procedure was activated for each financial year and the outcomes of any investigation. 	

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, main renewal contractors, plumbers and gas fitters • Pipe and fitting products, such as polyethylene pipe (PE) sourced and manufactured in Australia. PE raw materials are sourced in Australia and offshore via prequalified tier 2 suppliers
Operations	<p>Operation of APA's asset base in Australia including:</p> <ul style="list-style-type: none"> • transmission pipelines • gas processing facilities • gas storage facilities • gas-fired power stations • solar and wind farms • electricity interconnectors. 	<ul style="list-style-type: none"> • Operations consumables, such as odorant • Bulk chemicals • Spare parts and materials inventory • Australian-based service and maintenance contractors, such as vegetation management • International service and maintenance contractors, such as original equipment manufacturer (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 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 (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>	<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 HVAC parts) 	<p>Certain manufacturing and mining regions and materials carry higher risks of modern slavery, including where materials may be produced or sourced in higher risk countries or involve sectors known to have high modern slavery risks. For example, we procure building materials such as concrete, timber, steel, quarried stone products, glass, polyvinyl chloride and construction films, which may involve modern slavery risks due to the way these materials are produced or manufactured. We also procure a range of machinery and equipment used in construction, which can involve modern slavery risks if they are manufactured in countries with a higher prevalence of modern slavery risks or include components such as electronics manufactured in high-risk countries. Similarly, mining operations for copper, tin, lead, lithium, quartz, silicon, 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.</p>	<p>Key controls: New suppliers are required to declare their commitment to respect workers' fundamental human rights. For more information, see page 19.</p> <p>All existing suppliers are assessed as per APA's Modern Slavery Risk Management Approach Procedure, see page 19.</p> <p>Modern slavery clauses and obligations are included in relevant precedent agreements.</p> <p>Modern slavery questions are included in tenders.</p> <p>APA's policy framework.</p>
Renewable energy	<ul style="list-style-type: none"> Photovoltaic modules 	<p>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.</p>	<p>Key controls: As per above</p>
	<ul style="list-style-type: none"> Batteries, cells and accessories 	<p>Key minerals used in batteries such as cobalt and lithium may carry higher risks for modern slavery, including where they are sourced from higher risk countries.</p>	
	<ul style="list-style-type: none"> Wind turbines 	<p>While we did not undertake any significant procurement in this area for FY25, 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.</p>	
Freight and logistics	Logistics services for infrastructure delivery projects	<p>There is a risk that freight and logistics services provided by third parties could involve the exploitation of base-skilled workers. These risks are likely to be higher where these services are provided overseas. There are also particular risks associated with working conditions for seafarers.</p>	<p>Key controls: As per above</p>
Fleet Vehicles	Purchase of fleet vehicles	<p>There is a risk that raw material extraction, manufacture and disposal could be associated with vulnerable populations in higher-risk countries. This includes the worst forms of child labour and forced labour in the extraction of cobalt used in the production of batteries found in a variety of technology products and electric vehicles.</p>	<p>Key controls: As per above</p>

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 and confirms their tier 1 (our tier 2) suppliers for compliance to ethical sourcing and accreditation, with 100% of certificates of currency received from factory audits. These include: <ul style="list-style-type: none"> Sedex Members Ethical Trade Audit
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

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

Policy	Overview and relevance to modern slavery	How this policy continued to be implemented at APA during the reporting period
Code of Conduct (Our Code)	The APA Code of Conduct brings our purpose and culture to life so we can make the right choices every day. It is underpinned by our behaviours of being courageous, accountable, nimble, collaborative and impactful. It includes principles and business standards that support safety, inclusion and diversity, human rights, community engagement, environmental protection, data privacy and security, and prevent discrimination, bullying, harassment, corruption and anti-competitive behaviour.	Our Code is available to all our employees on the APA website. It sets out the behaviour required of APA employees in adhering to various policies, procedures and standards as well as relevant laws and regulations underpinning the principles of Our Code. All employees are required to maintain up to date training of Our Code.
Compliance Policy	<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>	<p>The Compliance Management Framework (CMF) ensures APA complies with the applicable legal, regulatory, standards, codes and licence requirements, including the <i>Modern Slavery Act 2018 (Cth)</i>.</p> <p>The CMF also ensures processes are established for identification of regulatory change to provide for timely change implementation activities. APA has adopted a risk-based approach to managing the risks of modern slavery in our operations and supply chains and is supported by a model of continuous improvement.</p>
Health, Safety, Environment and Heritage Policy	Our foremost priority is the safety and care of our people, environment and the communities in which we operate. We are committed to establishing a workplace culture that values and prioritises safety and care of our people which includes physical and psychological safety, respect and inclusion	<p>The Health, Safety, Environment and Heritage Policy is publicly available on our website.</p> <p>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.</p>
Modern Slavery Policy	Our Modern Slavery Policy defines APA’s commitments and responsibilities, guiding how we identify, manage, and report modern slavery risks in our operations and supply chain.	<p>Our Modern Slavery Policy is publicly available on our website.</p> <p>The Policy applies to all APA Group Directors, management, employees, consultants, contractors and third parties who act on behalf of APA, its wholly owned subsidiaries.</p> <p>The Policy was launched on 9 December 2024 and will be reviewed and updated in line with future regulatory changes. It is also subject to review every two years.</p>
Modern Slavery Risk Management Approach Procedure	<p>Our Modern Slavery Risk Management Approach Procedure sets out APA approach to managing our obligations under the <i>Modern Slavery Act 2018 (Cth)</i>.</p> <p>It applies to all activities relating to APA’s supply chains. The Procedure is focused on management of APA’s supply chain and procurement activities through identification and management of potential modern slavery risks.</p>	The Modern Slavery Risk Management Approach procedure was further embedded across APA during the reporting period, with a continued focus on Modern slavery due diligence activities. These activities included supplier screening and mapping, new supplier onboarding and ongoing risk monitoring. See page 19
Procurement Policy	The Procurement Policy and associated performance requirements and procedures reflect our approach to identifying and mitigating modern slavery risk and to align with our Supplier Code of Conduct .	<p>The Procurement Policy and associated Procurement Standards, and Modern Slavery Response Procedure, are available for all employees via our intranet.</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>
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>Respect@Work training is mandatory for all APA employees.</p> <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>

Policy	Overview and 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 Risk Management Policy is publicly available on our website.</p> <p>The policy informs our Modern Slavery Risk Management Approach Procedure.</p> <p>Consideration of the risk across countries, suppliers and product /service categories, recognising social performance and specific international social impact risk data, to drive supplier reviews and interventions.</p> <p>These reviews consider the control environment supporting key risk areas for suppliers including legal requirements, confidence in assurance provided, together with brand and reputation impacts of transacting with the supplier.</p>
Sanctions Policy	Our Sanctions Policy sets out the principles and processes all APA personnel are expected to adhere to in order to comply with our sanctions obligations.	The policy is available on our intranet and informs APA personnel of their responsibilities with respect to sanctions and demonstrates APA's commitment to compliance with its sanctions obligations.
Supplier Code of Conduct	Suppliers have an obligation under the Supplier Code of Conduct to advise APA of any illegal or unethical practices of which they become aware, which would include modern slavery. Consequences of non-compliance with the Code can include termination of contract and new contracts not awarded.	<p>Our Supplier Code of Conduct is publicly available on our website.</p> <p>The Supplier Code of Conduct applies to our suppliers, its officers and employees, including when they represent APA, both during and outside of our normal workplace or working hours. It is available to all our suppliers on the APA website and is referred to in our precedent agreements, in our purchase order terms and conditions, and our new supplier request form.</p> <p>Our Code makes it clear that we expect our suppliers, contractors, and business partners to uphold the principles and standards of our Code. Our Code applies whenever we represent APA, including when we are outside of our normal workplace or working hours.</p> <p>Suppliers have an obligation under this Code to advise APA of any illegal or unethical practices of which they become aware, which would include modern slavery.</p> <p>The Supplier Code of Conduct outlines the shared expectations between APA and its suppliers and sets out supplier's responsibility to uphold the Supplier Code of Conduct and the conduct expected for both organisations.</p>
Whistleblower Policy	This policy creates a safe and protected environment to escalate potential matters of concern and suspected wrongdoing for those working with and for APA, including our current and former employees, contractors, suppliers and consultants. The Whistleblower Policy also outlines the process and structures in place for assessing, addressing and reporting on whistleblower disclosures.	<p>Our Whistleblower Policy is publicly available on the APA website.</p> <p>Whistleblower reports or disclosures made are investigated by the Disclosure Officer, and where substantiated, process or control improvements implemented.</p>

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 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 and 11.85% of Goldfield Gas transmission via it's 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 it's 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 APA Infrastructure Trust and APA Investment Trust and their controlled entities.
APA Infrastructure Trust	One of two registered investment schemes that comprise APA Group ("APA"), and parent of APA Infrastructure Limited. APA owns and operates energy infrastructure assets and businesses, including: <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
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 it's controlled entities.
APA Power Holdings Pty Ltd	Owner and operator of Gruyere Power Station and parent of Darling Downs Solar Farm ("DDSF"), owner and operator of DDSF. Parent of APA Power PF Pty Ltd, which holds APA's interest in Diamantina Power Station via its controlled entities.
APA Power PF Pty Limited	Holds APA's interest in Diamantina Power Station via Diamantina Holding Company Pty Limited. The entity is non operating.
APA Sub Trust No 2	Parent of APA EE Holdings Pty Limited which holds APA's interest in the Epic gas pipelines (Pilbara Pipeline and South West Queensland Pipeline) via its controlled entities. Trustee is APA Group Limited.
APA Transmission (Roy Hill) Holdings Pty Ltd	Holds APA's interest in APA Transmission (Roy Hill) Sub Pty Ltd. The entity is non-operating.
APA Transmission (Roy Hill) Pty Ltd	Principal activities include the development, ownership and management of power generation assets, electricity transmission and related activities
APA Transmisson (Roy Hill) Sub Pty Ltd	Holds APA's interest in APA Transmission (Roy Hill) Pty Ltd. The entity is non-operating.
APA Transmission Pty Limited	Wholly owned subsidiary of APA Infrastructure Limited. Holds APA's interest in the Wallumbilla Gas Pipeline (WGP), Reedy Creek Wallumbilla Pipeline and the APA Western Slopes Pipeline project via its controlled entities.
APA VTS Australia (Holdings) Pty Limited	Parent entity of APA VTS Australia (Operations), which owns and operates the VTS. The entity is non operating.
APA VTS Australia (Operations) Pty Limited	Wholly owned subsidiary of APA VTS Australia (Holdings) Pty Limited. Owner and operator of the VTS.
APA VTS Australia Pty Limited	Parent of APA VTS Australia (Holdings) Pty Limited, which holds APA's interest in the Victoria Transmission System (VTS). The entity is non operating.
APA WGP Pty Ltd	Owner and operator of the WGP
APT AM Holdings P/L	Wholly owned subsidiary of APA Infrastructure Limited. Parent of APT O&M Holdings Pty Ltd, whose controlled entities are responsible for the asset management and operations of Australian Gas Networks Limited (AGN)
APT Pipelines Investments (WA) Pty Ltd	Holding entity for APA's interests in the Goldfields Gas Pipeline, Parmelia Gas Pipeline, and Northern Goldfields Interconnect.
Diamantina Holding Company Pty Limited	Holds APA's interest in Diamantina Power Station. The entity is non-operating.
Diamantina Power Station Pty Limited	Owner and operator of Diamantina Power Station.
East Australian Pipeline Limited	Owner and operator of the Moomba to Sydney Pipeline.
Epic Energy East Pipelines Trust	Holds APA's interest in SWQP and Pilbara Pipeline via its controlled entities. The entity is non operating.
Power Solutions 2 Holdco Pty Limited	Wholly owned subsidiary of APA Infrastructure 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 it's 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 it's controlled entities. The entity is non operating.
SCP Investments (No 1) Pty Ltd	Holding entity for APA's 88.175% interest in the Goldfields Gas Pipeline. The entity is non operating.
SCP Investments (No 2) Pty Ltd	Wholly owned subsidiary of SCP Investments (No 1) Pty Ltd. The entity is non operating.
Southern Cross Pipelines Aust Pty Ltd	Wholly owned subsidiary of SCP Investments (No 2) Pty Ltd. One of the JV owners of Goldfields Gas Pipeline, holding 62.664% interest.

Appendix 5 – How our statement addresses the mandatory criteria

This statement is aligned to the mandatory criteria under section 16 of the Modern Slavery Act 2018 (Cth).

Mandatory criteria	Section
a. Identify the reporting entity	About this statement Appendix 4
b. Describe structure, operations and supply chains of the reporting entity	About this statement About APA Our structure and operations Our people Our supply chain Appendix 1
c. Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity, and any entities that the reporting entity owns or controls	Assessing modern slavery risks Modern slavery risks in our operations Modern slavery risks in the communities where we operate Modern slavery risks in our supply chain Appendix 2
d. Describe the actions taken by the reporting entity and any entity it owns or controls to assess and address these risks, including due diligence and remediation processes	Governance framework Policies and processes Supplier due diligence Case study - Targeting high risk areas and regional labour practices Training and awareness raising Stakeholder engagement and industry collaboration Our grievance mechanisms and remediation process Appendix 3
e. Describe how the reporting entity assesses the effectiveness of these actions	Our progress on past commitments Looking forward to FY26 How we assess our effectiveness
f. Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls	About this statement
g. Include any other information that the reporting entity, or the entity giving the statement, considers relevant	Message from our CEO and Managing Director Our progress on past commitments Looking forward to FY26

APA

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