

Modern Slavery Statement 2026

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) (the MSA) for the financial year ending 30 June 2026 (FY26). This is a joint statement made on behalf of the reporting entities listed in [Appendix 1](#).

In this Modern Slavery Statement (**statement**), unless otherwise stated, references to 'APA Group', 'we', 'us' and 'our' refer to APA comprising the APA Group Limited (an ASX-listed entity) and the APA Infrastructure Trust and the APA Investment Trust. Any reference in this statement to a 'year' relates to the financial year ended 30 June 2026 (FY26).

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-operated energy infrastructure investments.

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

On 1 December 2025, APA Group announced it had completed the divestment of its Networks business, including entities which undertake certain gas distribution operations and maintenance services. This Statement continues to factor in the divested business for the purposes of covering the FY26 supply chain during the period the business was previously owned by APA. As required under the MSA, this statement was developed through consultation with each of the reporting entities it covers (listed in [Appendix 1](#)), as well as owned or controlled entities. The consultation process involved active engagement and consultation by the Modern Slavery Working Group with APA's executive management covering all companies we own or control or 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 the Boards' Risk Management Committee. In accordance with the MSA, it was approved on 19 August 2026 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 and APA Investment Trust

Head office: Level 10, 121 Castlereagh Street, Sydney NSW 2000

Cover image: Port Hedland Power Station, WA

Reporting suite map

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

All reports are available at apa.com.au.

Contents

About this statement	IFC
Message from CEO and Managing Director	2
About APA	3
How we identify and assess modern slavery risks	11
How we address and manage modern slavery risks	16
How we assess the effectiveness of our actions	29
Appendix 1 – Our reporting entities	33

How our statement addresses the mandatory criteria

This statement is aligned to the mandatory criteria under section 16 of the MSA.

Mandatory criteria	Section
a. Identify the reporting entity	About this statement Appendix 1 – Our reporting entities
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
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 Supplier due diligence
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	Risk management and due diligence Governance and reporting Grievance and remediation Training and awareness raising Stakeholder engagement and collaboration
e. Describe how the reporting entity assesses the effectiveness of these actions	Message from our CEO and Managing Director How we assess the effectiveness of our actions
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

We are Australia's energy infrastructure partner

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

During the past 12 months we have continued to build momentum with our growth strategy, progressing new infrastructure in our focus growth areas of gas transmission and storage and power generation.

For our securityholders, FY26 marked another year of revenue, earnings and distributions growth. As we deliver for our stakeholders, we remain committed to addressing modern slavery risks across our operations and also in supply chains. Central to this commitment is a focus on continuous improvement through applying lessons learned, strengthening our due diligence practices, and deepening our engagement with our suppliers.

APA's key actions for FY26 included:

- Development of a new FY26–28 Modern Slavery Action Plan to support the identification, management and reporting of modern slavery risks through strengthened governance and meaningful collaboration across our operations and supply chains
- Delivery of three targeted supplier training attended by 109 suppliers, including tailored engagement for goods and services suppliers, Aboriginal and Torres Strait Islander businesses, and small suppliers, to build capability and raise awareness of modern slavery risks and expectations
- Continued employee communications, training and briefings to strengthen awareness and understanding of modern slavery and broader human rights risks
- Expansion of our cross-functional Modern Slavery Working Group, strengthening governance, enterprise-wide collaboration and oversight of modern slavery risks
- Participating in the Australian Anti-Slavery Commission's industry engagement on the development of a Human Rights Risk Assessment Guidance
- Becoming a founding member of the Energy Anti-Slavery Industry Forum (EASI-F), a pre-competitive collaboration established by leading energy infrastructure organisations to address modern slavery and human rights risks in electric vehicle (EV) supply chains
- Development and approval of a Human Rights Policy, setting out our approach to respecting human rights.

Looking forward to FY27

Building on our progress in FY26, we will continue to strengthen our approach to identifying, assessing and managing modern slavery risks across our operations and supply chain.

Our focus will include enhancing supply chain due diligence and risk management processes, maintaining a robust governance and policy framework, and strengthening organisational capability to identify and respond to modern slavery risks and emerging issues. We will continue to invest in employee education and supplier engagement to support greater awareness, understanding and effective management of modern slavery risks.

APA will also continue to review and enhance grievance, investigation and remediation mechanisms to support the effective identification, escalation and management of concerns. In addition, we will seek opportunities to collaborate with industry, government, investors and other stakeholders to share insights, strengthen capability and contribute to broader efforts to address modern slavery.

We remain committed to playing our part in addressing modern slavery, and working collaboratively with our stakeholders in this area.



Adam Watson,
Chief Executive Officer and Managing Director

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 experience and expertise uniquely 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 ASX-listed energy infrastructure business, owning and operating a portfolio of more than \$20 billion in assets. Our portfolio spans gas transmission and storage including associated infrastructure, gas-fired and renewable power generation, battery storage and electricity transmission assets.

As one of Australia's largest energy infrastructure companies, APA delivers around half of the nation's domestic gas through more than 15,000 kilometres of pipelines that we own, operate and maintain. Consistent with our purpose of securing Australia's energy future, we are working closely with our customers, communities and stakeholders to keep energy safe, reliable and affordable for decades to come.

Our diverse energy infrastructure portfolio

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

Our Group structure

APA Group comprises two registered investment schemes, APA Infrastructure Trust (ARSN 091 678 778) and APA Investment Trust (ARSN 115 585 441), the securities of which are stapled together. APA Group Limited (ACN 091 344 704) is the responsible entity of APA Infrastructure Trust and APA Investment Trust.

For a full list of our reporting entities, see [Appendix 1](#).

APA is headquartered in Sydney, New South Wales.

We take a Group-wide approach to managing modern slavery risks in our operations and supply chain.

Our operating model is organised around our customer markets and existing asset portfolio, reinforcing our focus on growing and running the business.

Energy Solutions	Infrastructure Delivery	Operations
Responsible for developing and delivering growth opportunities across gas transmission and storage, power and gas-powered generation. The team works with customers on tailored energy infrastructure solutions and commercial outcomes.	Responsible for delivering APA's growth infrastructure projects. This includes planning, approvals, engineering, procurement, construction, commercial management and commissioning. The team also leads APA's engineering standards and processes.	Responsible for the operations, maintenance, stay-in-business capital projects and asset management of APA's infrastructure portfolio. This includes electricity and gas transmission, renewable power generation and gas distribution networks, as well as Market Services, which connects APA's assets, energy markets and customers.

Finance, Strategy and Technology	Sustainability and Corporate Affairs	Legal, Governance and Regulatory	People, Safety and Culture
Responsible for APA's finance, investor relations, strategy, corporate development, technology, procurement, real estate and enterprise project management activities.	Responsible for building and protecting APA's reputation, brand and social licence to support APA's customer-focused strategy.	Responsible for APA's legal, governance, risk, regulatory, policy and compliance functions, as well as optimising regulatory outcomes.	Responsible for driving safety, care, workforce capability and performance, fostering the right culture to attract, retain and grow people in a safe and inclusive environment.

Our strategy

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 two primary asset classes critical to our customers as they navigate the energy transition: gas transmission and storage (including associated infrastructure) and contracted power generation.

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 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 the Australian economy. 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 strive to operate efficiently, targeting the level of performance and availability our customers need.

We execute 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 and service offerings

across our networks servicing the east coast and Western Australian energy markets.

We manage our cost base with discipline, enhancing the efficiency and effectiveness of our solutions and allocating our capital to target optimum return for our securityholders.

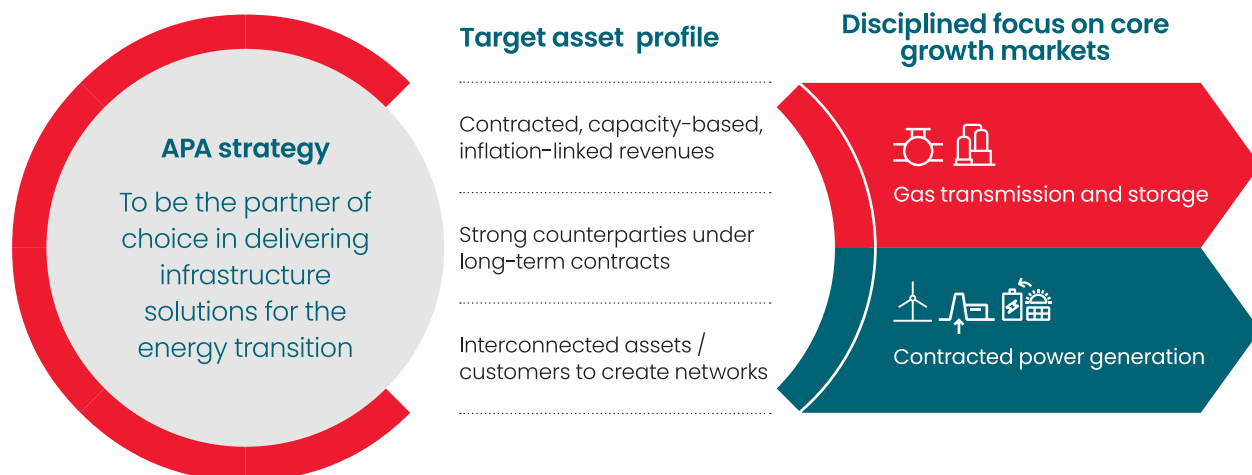
We will continue to grow and invest in asset classes that are critical for our customers as we support them through the electrification of their operations by investing and optimising our portfolio of gas assets to meet the capacity and storage future needs of our customers and offering differentiated contracted solutions.

Beyond our immediate \$3.5 billion growth pipeline, APA continues to progress a number of longer-term growth opportunities including Beetaloo gas transmission pipelines, contracted gas-powered generation, remote grid power generation and integrated energy solutions to support the data centre industry. We are advancing pre-feasibility work, technical assessments and government and regulatory planning and approval processes across these opportunities to ensure that we are moving forward and ready for potential customers.

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

More detail about APA's operating structure and corresponding supply chains is detailed in [Supply Chain risks in our business functions](#).

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



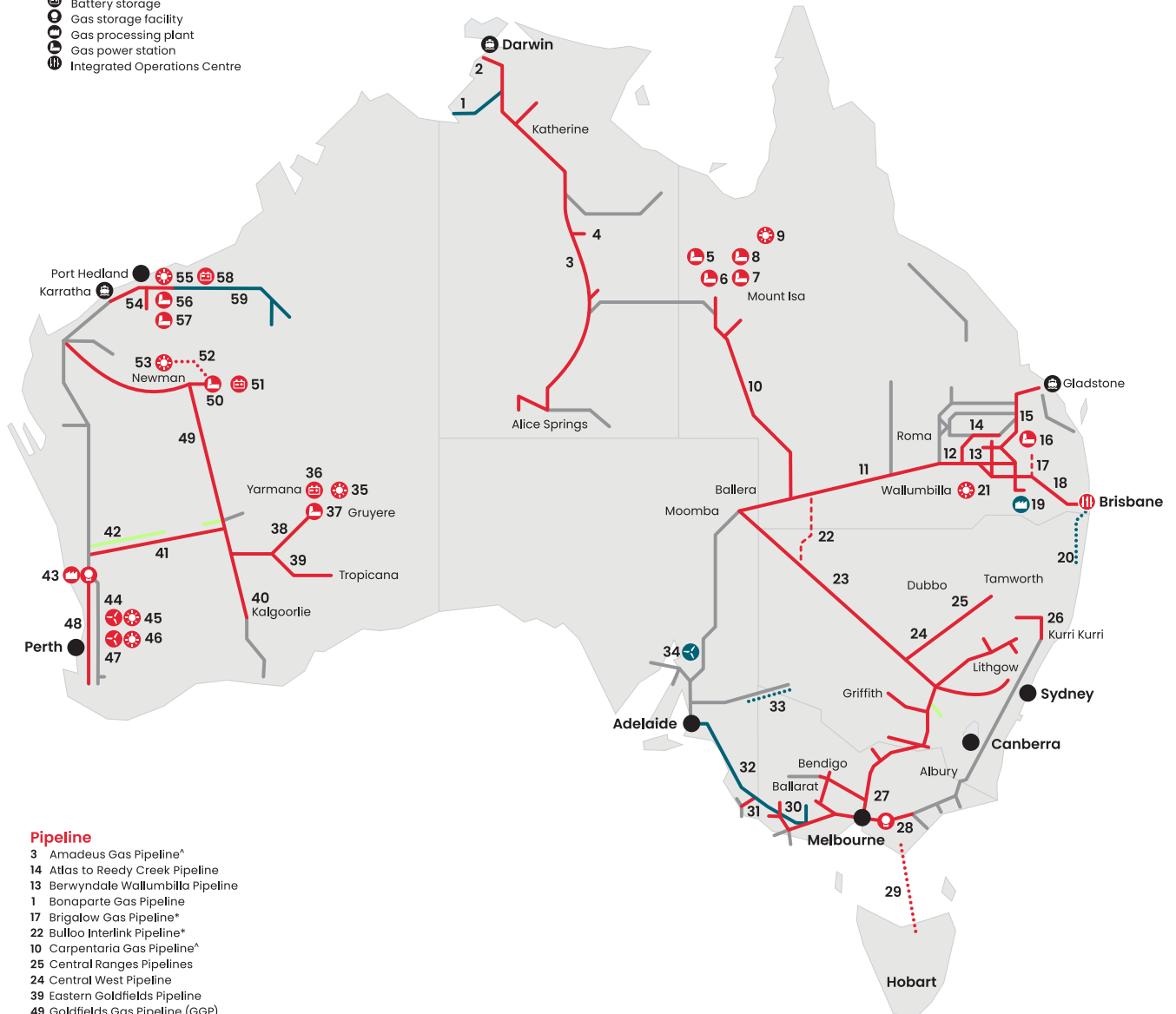
Our portfolio of assets and investments

Key

- APA Group gas transmission
- APA Group gas transmission (part-owned)
- APA Group gas transmission (managed/not owned)
- Other major gas pipelines
- ... APA Group electricity transmission
- ... APA Group electricity transmission (part-owned)
- - - Under development

- APA Group owned asset
- APA Group part-owned asset

- ☼ Wind farm
- ☀ Solar farm
- 🚢 LNG terminal
- 🔋 Battery storage
- 🏠 Gas storage facility
- 🏭 Gas processing plant
- ⚡ Gas power station
- 📶 Integrated Operations Centre



Pipeline

- 3 Amadeus Gas Pipeline^a
- 14 Atlas to Reedy Creek Pipeline
- 13 Berwyndale Wallumbilla Pipeline
- 1 Bonaparte Gas Pipeline
- 17 Brigalow Gas Pipeline^a
- 22 Bulloo Interlink Pipeline^a
- 10 Carpentaria Gas Pipeline^a
- 25 Central Ranges Pipelines
- 24 Central West Pipeline
- 39 Eastern Goldfields Pipeline
- 49 Goldfields Gas Pipeline (GGP)
- 40 Kalgoorlie Kambalda Pipeline
- 26 Kurri Kurri Lateral Pipeline (KKLP)
- 42 Mid West Pipeline
- 23 Moomba Sydney Pipeline^a (MSP)
- 30 Mortlake Gas Pipeline
- 41 Northern Goldfields Interconnect
- 48 Parmelia Gas Pipeline (PGP)
- 54 Pilbara Pipeline System
- 12 Reedy Creek Wallumbilla Pipeline
- 18 Roma Brisbane Pipeline^a
- 32 SEA Gas Pipeline
- 31 SESA Pipeline
- 11 South West Queensland Pipeline (SWQP)
- 4 Sturt Plateau Pipeline (SPP)
- 59 Telfer/Nifty Gas Pipeline^a
- 27 Victorian Transmission System (VTS)
- 15 Wallumbilla Gladstone Pipeline^a
- 2 Wickham Point Pipeline
- 38 Yamarna Gas Pipeline

Gas Processing & Storage

- 28 🏭 Dandenong
- 19 🏭 Kogan North
- 43 🏭 Mondarra

Electricity Transmission

- 29 📶 Basslink
- 20 📶 Directlink
- 33 📶 Murraylink
- 52 📶 Pilbara – HV Transmission Lines

^a Under construction/development
[^] Includes laterals

Generation

- 57 🏭 Boodarie 84 MW
- 16 🏭 Daandine 30 MW
- 8 🏭 Diamantina 242 MW
- 37 🏭 Gruyere 47 MW
- 38 🏭 Gruyere Battery 4.4 MW/1.1 MWh
- 7 🏭 Leichhardt 60 MW
- 50 🏭 Newman 232 MW
- 51 🏭 Newman Battery 35 MW/11.8 MWh
- 56 🏭 Port Hedland 126 MW
- 58 🏭 Port Hedland Battery 35 MW/35 MWh
- 6 🏭 Thomson 22 MW
- 5 🏭 X41 41 MW

Solar Farm

- 45 🏭 Badgingarra 19 MW
- 53 🏭 Chichester 60 MW
- 21 🏭 Darling Downs 110 MW
- 9 🏭 Dugald River 88 MW
- 46 🏭 Emu Downs 20 MW
- 35 🏭 Gruyere 13.2 MW
- 55 🏭 Port Hedland 46 MW

Wind

- 44 🏭 Badgingarra 130 MW
- 47 🏭 Emu Downs 80 MW
- 34 🏭 North Brown Hill 132 MW

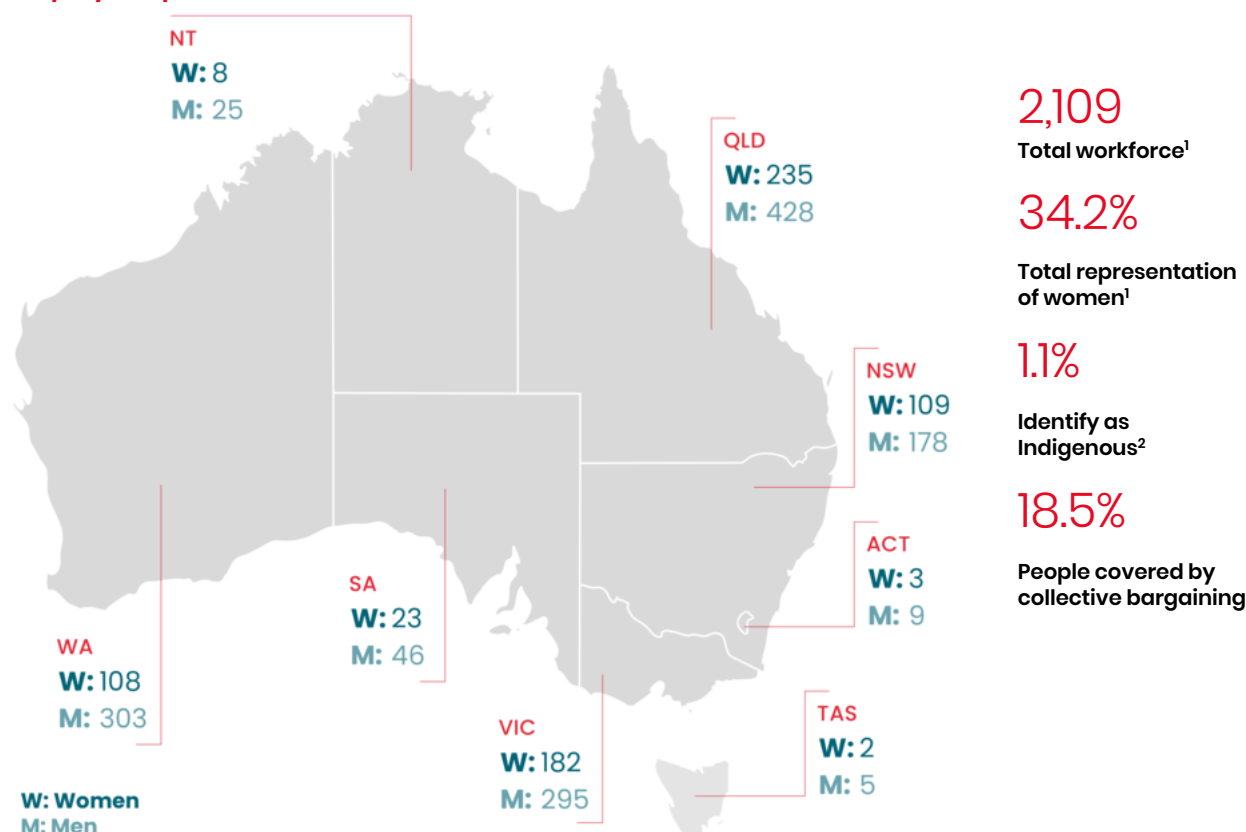
Our people

Starting as a team of six when first listed in 2000, we've grown significantly over the past 25 years and now our people work with customers and local communities in every state and territory.

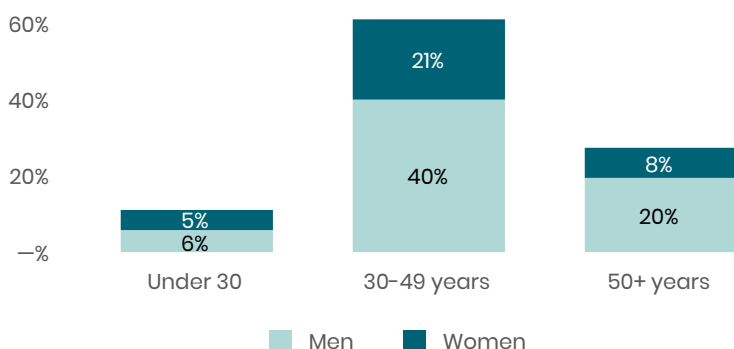
APA is a high-performing, customer-focused organisation, committed to the safety and care of our people. We drive a high-performance culture recognising the important role leadership and culture play in enabling our people and our organisation – to perform at their best.

As at 30 June 2026, APA has 1,960 employees and 149 contingent workers located in offices and sites across Australia. Our employees and contingent 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, safety & culture. A more detailed breakdown of our workforce information can be found in our [FY26 Sustainability Data Book](#).

Employees per state¹



Diversity of total employees by age



Employment by category

93% of our employee are employed on a permanent full-time basis.

	Men	Women
Full-time permanent	1,233	587
Part-time permanent	12	51
Full-time fixed term	38	25
Part-time fixed term	1	2
Casual	5	5
Total employees	1,289	670
Contingent workers	103	46
Total workforce¹	1,392	716

¹ In FY26, one employee identified as gender unspecified. Number includes contingent workers.

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.

~\$1.37bn

Total supplier spend

2,808

Direct suppliers

2,707

Australian-based suppliers

101

International-based suppliers

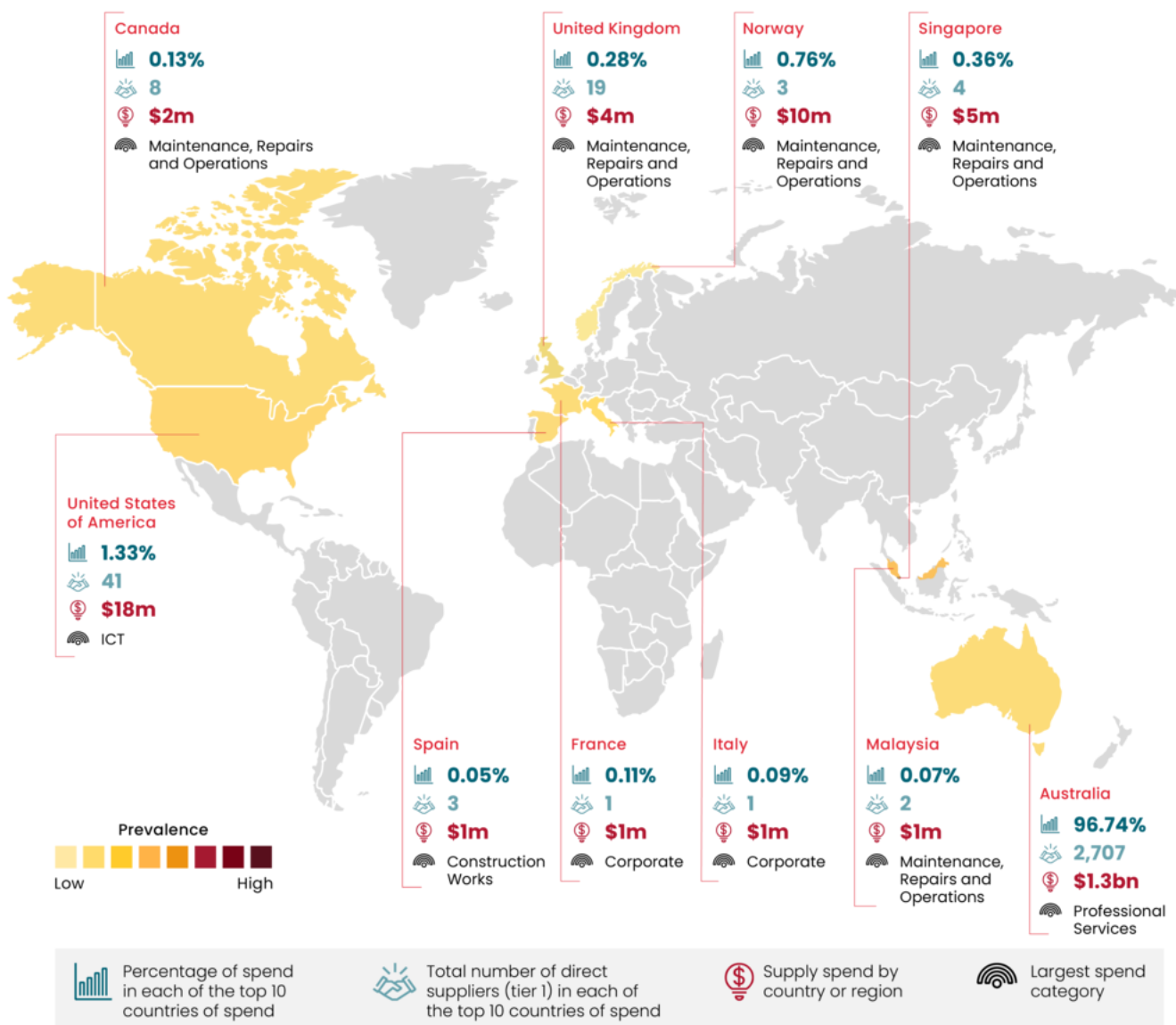
Our procurement spend is predominantly managed through contractual arrangements. This includes:

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 that a contract 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)¹ 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.



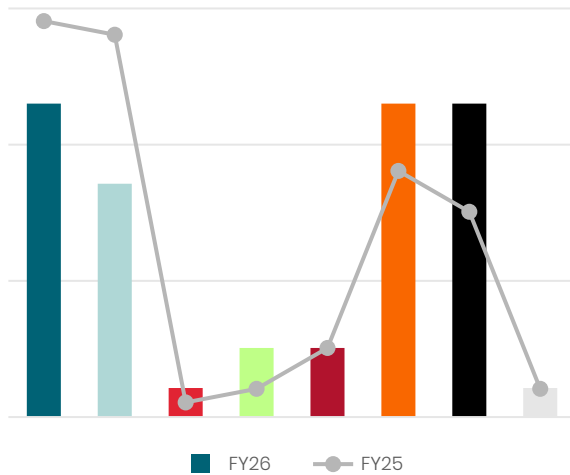
¹The term 'tier 1 suppliers' refers to our direct suppliers of goods or services. References to 'tier 2 suppliers' are the suppliers or subcontractors of our tier 1 suppliers, 'tier 3 suppliers' are the suppliers or subcontractors of our tier 2 suppliers, and so forth.

The goods and services we procure

A diverse range of goods and services were procured throughout FY26.

In FY26, a significant portion of APA spend related to Construction Works and Maintenance, Repairs and Operations, where materials may be produced or sourced in higher-risk countries, or involve sectors known to have higher modern slavery risks. More information on risks and controls that APA have in place to mitigate and manage those risks are captured in the [Risk management and due diligence](#) section.

Percentage of spend (\$AUD) by supplier category – FY25 to FY26 comparison



Category	Category Description	% spend
■ Construction Works	Capital and project expenditure for construction projects including civil works, pipeline construction, facilities construction and renewable energy construction services	23%
■ Corporate	Corporate and administrative expenditure including fleet vehicles, freight, logistics, human resources, insurance, labour hire, marketing, office supplies, recruitment, and travel	17%
■ Customer Metering and Billing	All metering equipment (network specific), testing, calibration, metering services and unaccounted-for gas billing	2%
■ Facilities Management	Supporting services for building management, cleaning, emergency response, security, and utilities	5%
■ Information and Communications Technology	Software, hardware and services related to the provision of information technology, operational technology and telecommunications	5%
■ Maintenance, Repairs and Operations	Goods and services procured for maintenance, repair and operations of assets	23%
■ Professional Services	Provision of services and resources of a technical, advisory or professional nature, excluding Information and Communication Technology consulting	23%
■ Site Services	Field and site-based operational support services including aerial surveillance, vegetation management, plant hire and waste management services	2%

Image: Mica Creek Metering Station, QLD

Supply chain operations within our business functions

The following table shows our main areas of 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. This also includes new infrastructure asset construction management.	• Engineering consultants • Industrial construction materials and equipment sourced directly from Australia and indirectly from Europe, North America and Asia such as steel line pipe, high-pressure valves, compressors, solar panels, wind turbines and battery energy storage systems • Construction contractors
 Network Operations	Operation and maintenance of third party owned gas distribution networks. Development and delivery of asset replacement, growth projects and third-party works, such as new mains and services, extensions and reticulation of new developments. On 1 December 2025, APA Group announced it had completed the divestment of its Networks business, including entities which undertake gas distribution operations and maintenance services. This Statement continues to factor in networks for the purposes of covering the FY26 supply chain for the period that the Networks business was owned by APA.	• Industrial construction materials and equipment sourced directly from Australian tier 1 suppliers, who in turn source materials (such as steel pipe, fittings, valves and gas measurement devices) from offshore suppliers • Australian-based construction and maintenance contractors, mains and service layers, main renewal contractors, plumbers and gas fitters • Pipe and fitting products, such as polyethylene pipe (PE) sourced and manufactured in Australia. PE raw materials are sourced in Australia and offshore via prequalified tier 2 suppliers
 Operations	Operation of APA's asset base in Australia including: • transmission pipelines • gas processing facilities • gas storage facilities • gas-fired power stations • solar and wind farms • electricity interconnectors.	• Operations consumables, such as odorant • Bulk chemicals • Spare parts and materials inventory • Australian-based service and maintenance contractors, such as vegetation management • International service and maintenance contractors, such as original equipment manufacturer (OEM) maintenance contractors for engines at our gas-fired power stations
 Managed Joint Ventures and Investments	APA has non-controlling interests in a number of energy-related infrastructure assets such as gas transmission pipelines, gas processing facilities, gas distribution networks, gas compression facilities, electricity transmission, and renewable power generation through its investments in other energy infrastructure entities. Some of these entities are also operated by APA, including ownership interest in and operational management of Energy Infrastructure Investments (EII).	• The joint ventures and investments which are managed by APA have a supply chain common with those detailed for Infrastructure Delivery, Network Operations and Operations in this table.
 Corporate services	Corporate services, such as: • Finance, Strategy and Technology (including procurement and real estate) • People, Safety and Culture • Legal, Regulatory and Governance • Sustainability (including Climate) and Corporate Affairs	• 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

How we identify and assess modern slavery risks

Guided by our Board-approved Risk Management Framework and the United Nations Guiding Principles on Business and Human Rights (UNGPs), we continuously improve how we identify, assess and address modern slavery risks across our operations and supply chain.



Image: Mica Creek Metering Station, Qld

Introducing our FY26–28 Modern Slavery Action Plan

Over recent years, we have strengthened our approach to managing modern slavery risks through the establishment of core systems, governance structures, and targeted initiatives. In 2025, we developed a refreshed FY26–28 Modern Slavery Action Plan to build on this progress. This Plan is structured around five strategic pillars for modern slavery action: risk management and due diligence, governance and reporting, grievance and remediation, training and awareness and stakeholder engagement and collaboration. This aims to mark a shift in our maturity in the modern slavery space from building foundations to embedding within our business model.

FY26–28 Strategic Intent
To identify, address and report modern slavery risks through strong governance and meaningful collaboration across our operations and supply chains

Strategic Pillars

 Risk management & due diligence	 Governance & reporting	 Grievance & remediation	 Training & awareness	 Stakeholder engagement & collaboration
---	--	---	---	--

Our Target

Engage with suppliers, third parties and customers to strengthen the identification and management of modern slavery risks, supported by appropriate and proportionate due diligence processes.	Support our modern slavery response through systems, processes and policies, with oversight and monitoring from the cross-functional Modern Slavery Working Group, Executive Risk Management Committee (ERMC), Risk Management Committee (RMC).	Maintain and strengthen grievance mechanisms so they are accessible, trusted and robust, with clear processes to address incidents and provide remedies where required.	Strengthen modern slavery training and awareness to equip employees and key suppliers to identify and manage modern slavery risks.	Leverage opportunities to collaborate with suppliers, industry peers and external stakeholders to strengthen APA's modern slavery response and respond to a changing regulatory landscape.
---	---	---	--	--

Enabler

Monitoring & measurement	Data completeness & integrity	Transparent processes	Capability building	Partnering
--------------------------	-------------------------------	-----------------------	---------------------	------------

Assessing modern slavery risks

Our approach to identifying, assessing and addressing modern slavery risks is guided by the United Nations Guiding Principles on Business and Human Rights (UNGPs), the globally recognised standard for preventing and addressing business-related human rights impacts. The UNGPs help us to understand our potential links to modern slavery risks and support a risk-based approach across our operations and value chain.

In assessing risk, we draw on the UNGPs three-part continuum of involvement, which explains how companies may be connected to adverse human rights impacts, including where we may cause, contribute to, or be directly linked to modern slavery through our business activities or relationships. This framework supports us to prioritise actions based on risk to people, focusing on the areas where the potential harm is greatest.

Understanding our exposure to modern slavery risks is an ongoing process. As our risk profile evolves, we continue to strengthen our capability to identify, assess and respond to potential impacts, recognising that effective risk management requires continual learning and improvement.

The UNGPs continuum of involvement¹

 CAUSE An organisation may cause the impact through its own activities	 CONTRIBUTE An organisation may contribute to the impact through its own activities – either directly or through some outside entity	 DIRECTLY LINKED TO An organisation may neither cause nor contribute to the impact, but be involved because the impact is caused by an entity with which it has a business relationship and is linked to its own operations, products and services.
--	--	---

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 employees). 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 maximum term basis. Furthermore:

- 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
- our Code of Conduct provides clear business standards for what is expected at APA. It sets out the behaviour required of its employees, contractors and other personnel including the Board
- we are committed to providing an inclusive workplace with safe, fair and respectful working conditions. We have well-defined policies, procedures and controls, including recruitment and onboarding processes incorporating employment, visa and health checks and comprehensive induction processes and training.

Our people 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, in areas such as civil construction and fabrication, is open to school leavers aged 16 and above. We aim to provide a safe, fair and respectful working environment for our apprentices in line with Australian workplace law. All Apprenticeship Program

participants undergo an induction program of a few weeks, which includes training courses on areas including safety, wellbeing, and internal systems and procedures.

Our five behaviours (courageous, accountable, nimble collaborative and impactful) align with our Code of Conduct and guide our everyday interactions, decisions and ways of working. By embracing and upholding these behaviours, we create a culture that empowers us to be our best – for each other, our customers and the communities we serve.

Modern slavery risks in the communities where we operate

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

We recognise that the geographic location of our operations can influence our exposure to modern slavery risks. For example, suppliers operating in rural and remote areas are often smaller in scale and may have less mature risk management frameworks.

In some locations, a limited supplier base can reduce our ability to substitute suppliers, requiring a greater focus on engaging with and supporting suppliers to strengthen their practices over time. Additionally, certain operational environments may involve the use of labour hire, subcontracting arrangements or transient workforces, which can increase the complexity of identifying and managing modern slavery risks. These factors inform our approach, with a focus on targeted engagement, capability building and ongoing collaboration with suppliers and partners in higher-risk contexts.

¹ Source: UN Human Rights Office of the High Commissioner, [The Corporate Responsibility to Respect Human Rights – An Interpretive Guide](#)

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 19); and our supplier due diligence approach.

We recognise that parts of our supply chain may be exposed to heightened modern slavery risks, including forced labour risks associated with the sourcing of materials and components used in solar panels, lithium-ion batteries and 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 risk areas in our supply chain

APA's modern slavery risk areas and influencing risk factors remain broadly consistent with previous disclosures. However, emerging geopolitical, regulatory, and operational factors present new challenges to effective due diligence, which APA is actively monitoring and responding to as outlined below.

Our key modern slavery risk areas

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

Influencing risk factors which can apply in multiple areas

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

Emerging risks

APA has identified a number of emerging risks, including broader geopolitical factors, that may impact our ability to always effectively identify and address modern slavery across our supply chain.

During the reporting period, legislative developments in certain jurisdictions created additional complexity in relation to supply chain information gathering, supplier engagement and compliance, with potentially overlapping legal requirements. APA monitors these developments, continues to adapt its due diligence processes and seeks to maintain effective risk-based due diligence to comply with applicable laws.

Practical limitations of supply chain tier mapping

APA recognises that effective modern slavery due diligence is constrained by the practical reality that many third parties have limited visibility of their own supply chains. This is particularly evident beyond tier 2, where:

- Third parties often cannot identify or map their own suppliers with confidence
- Subcontracting arrangements can create layers of opacity that are difficult to penetrate through standard audit or questionnaire-based approaches
- Smaller third parties may lack the systems, resources, or expertise to conduct their own supply chain due diligence, limiting the quality of information available to APA.

These limitations mean that it can be difficult to fully apply certain controls in practice.

Global issues and displacement

Ongoing global instability and conflict-driven displacement continue to elevate modern slavery risks across international supply chains, particularly where labour-intensive industries rely on vulnerable or migrant workforces.

APA continues to conduct risk management and due diligence activities to identify, assess, and respond to modern slavery risks across our supply chain as detailed in the next section.

Where possible, APA leverages data already collected for the purpose of other legislative and contractual requirements to extend visibility beyond tier 1. This approach is detailed further in our Extending Visibility Beyond Direct Suppliers case study on page [19](#).

APA also invests in supplier capability building to support them to understand and manage modern slavery risks within their own operations and supply chains. This is detailed further in our case study on page [26](#).



Image: Dimantina Power Station, Qld

How we address and manage modern slavery risks

During FY26, the first year of our three-year Modern Slavery Action Plan, we continued to strengthen and evolve our approach to identifying and addressing modern slavery risks across our operations and supply chain.

Building on the foundations established in previous reporting periods, the Action Plan sets out a structured program of work to further embed ethical practices across our business.

This section outlines the actions taken during the reporting period and our progress against the priorities and commitments in the Action Plan.



Risk management and due diligence
Page [17](#)



Governance and reporting
Page [20](#)



Grievance and remediation
Page [24](#)



Training and awareness
Page [25](#)



Stakeholder engagement and collaboration
Page [27](#)

Image: Port Headland Solar Farm construction, WA

Risk management & 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.

Initial supplier screening and supply chain mapping

In FY26, we mapped our supply chain risk exposure as deep as tier 10 for 3,297 suppliers using FY25 spend data.

Our 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 UNGPs on Business and Human Rights
- Walk Free Global Slavery Index
- International Labor Organization'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 lifecycles.

Supplier onboarding

During FY26, 441 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 were approved to be 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 the [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 locations. Where suppliers are found to have caused or contributed to modern slavery, APA's response is guided by the UNGPs on Business and Human Rights continuum of involvement, including the implementation of relevant remediation and corrective actions.

Supplier assessment

In FY26, we completed modern slavery supplier self-assessments for 69 suppliers.

Supplier assessments may include desktop assessments with systematic verification of evidence; supplier self-assessment questionnaires; and 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 development 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 development plans are defined and implemented throughout contracting and contract management phases. Suppliers that fail to meet our requirements may result in exclusion from procurement and purchasing activities.

Supplier risk treatment and development plans

Where APA identifies modern slavery risks, gaps in due diligence, or opportunities for improvement through our monitoring and assessment activities, supplier risk treatment and/or development plans may be initiated.

Supplier risk treatment plans

Where specific modern slavery risks or concerns are identified, risk treatment plans are initiated with existing suppliers. Where remediation is required, responsibilities and timeframes are defined to address identified risks.

Supplier development plans

Development plans are established where APA identifies opportunities to build supplier capability in managing modern slavery risks. These may include:

- **Technical support:** Providing guidance, tools, or resources to help suppliers strengthen their own due diligence practices
- **Education and training:** Targeted sessions to build awareness of modern slavery risks relevant to the supplier's industry and operating context (see our Building Supply Chain Capability case study on page [26](#))

- **Supply chain visibility:** Supporting suppliers to better understand and map their own upstream supply chains
- **Industry collaboration:** Working with suppliers and industry bodies to lift capability across the broader supply chain. For more information, see the Industry Collaboration to Address Modern Slavery Risks in EV Supply Chains case study on page [28](#).

Risk treatment and development plans may operate independently or in combination, depending on the nature and severity of the issues identified.

Contracting and contract management practices

APA's Procurement Governance Framework provides details and requirements related to contracting, contract management and supplier management to increase awareness of an 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 trained in 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 high standards 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, including by requiring:

- suppliers not to cause or contribute to modern slavery
- suppliers to comply with modern slavery laws
- suppliers to notify APA as soon as reasonably practicable of any instance of modern slavery identified in the supplier's operations or supply chains, and any steps the supplier has taken, or proposes to take, in response and
- in the event of a modern slavery impact being identified, suppliers to undertake appropriate remediation actions in accordance with any directions or standards required by APA.

Case study: Extending visibility beyond direct suppliers

During the reporting period, APA undertook a structured evidence-based tier 2 supply chain analysis to assess modern slavery risk across 335 key tier 2 suppliers, extending due diligence beyond our tier 1 suppliers.

APA recognises that modern slavery risk may exist beyond our tier 1 suppliers, in the deeper, less visible layers of the supply chain where oversight is limited and risk can be inherently elevated. In addition, tier 2 suppliers' operations, workforce practices, and geographic footprint can differ from those of APA's direct suppliers.

The analysis enabled us to move beyond surface-level supplier visibility and gain structured, independently verified insight into the operations, supply chains, and environmental, social and governance (ESG) risk profiles of our most strategically significant tier 2 suppliers.

Our approach

APA leveraged existing legislative obligations where we collect information from suppliers including mapping of their key supply chains. This self-reported supplier tier mapping data, combined with publicly available information, including media reports, NGO findings, regulatory actions, and government risk databases, was used to identify and assess tier 2 suppliers for modern slavery risks through a specialist supplier screening tool.

The screening tool provided structured assessments across key areas for each tier 2 supplier, including:

- **Company information:** Organisational profile and operating context
- **Operational analysis:** Assessment of the supplier's own operations and workforce practices
- **Supply chain analysis:** A comprehensive view of the supplier's upstream supply chain with sector-weighted exposure and geographic risk modelling down to tier 10
- **Reported issues:** Documented incidents of worker rights violations sourced from media, NGOs, and regulatory bodies
- **Flagged products:** Commodity-level risk identification using sources including the US Department of Labor's List of Goods Produced by Child Labour or Forced Labour and the NSW Government Inherent Risk Identification Tool
- **Regulatory compliance:** An overview of relevant Modern Slavery Statements submitted by the entity to the Australian Modern Slavery Statements Register.

Outcomes

The analysis delivered a focused set of risk profiles across 152 suppliers enabling prioritisation and verified adverse impact intelligence to support informed engagement and remediation discussions.

It also provided extended supply chain visibility, identifying risks that would otherwise remain less visible. Early analysis highlighted supplier products and materials with elevated modern slavery indicators that would have not been captured by entity-level assessments alone.

The final report is due in FY27.

Next steps

APA will continue to apply this methodology to higher-risk suppliers identified through the analysis and integrate findings into procurement decisions and supplier engagement plans.

Governance and reporting

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

APA's cross-functional Modern Slavery Working Group supports the ERM in overseeing APA's approach to identifying and managing modern slavery risks. Reports are provided to the Board through the RMC to ensure our approach remains aligned with internal policies, standards and regulatory requirements. This is illustrated in the diagram below.

In FY26, we reviewed the Working Group's purpose and membership to ensure it remains fit for purpose as regulatory requirements evolve. Membership was expanded to include representatives from all divisions across APA, strengthening cross-organisational coordination and accountability.

The Working Group provides a cross-functional oversight, coordination and advice to support APA's management of modern slavery risks. Its responsibilities include:

- overseeing delivery of the Modern Slavery Action Plan
- supporting development of the annual Modern Slavery Statement
- monitoring emerging legislation and regulatory developments to support ongoing compliance with the MSA.

The Working Group met five times during FY26 to monitor progress against key initiatives, assess emerging risks and review regulatory developments. During the year, APA also engaged external advisors to review our Modern Slavery Statement and provide recommendations to ensure it continues to accurately reflect our activities and position APA to effectively respond to proposed reforms.

Modern Slavery Action Plan

Following completion of our previous Modern Slavery Roadmap in FY25, APA developed a new Modern Slavery Action Plan for FY26–28, reviewed by the Modern Slavery Working Group and approved by the Sustainability Management Committee (SMC). The Action Plan is structured around five strategic pillars:

- Risk management and due diligence
- Governance and reporting
- Grievance and remediation
- Training and awareness
- Stakeholder engagement and collaboration

Each pillar is supported by defined activities and performance metrics. The Working Group monitors implementation of the Action Plan and provides oversight of progress against these priorities.

Modern Slavery Statement

The Working Group provides quarterly updates to the ERM on developments in the modern slavery regulatory landscape, including proposed reforms, government-led consultations and emerging expectations.

The purpose of the RMC 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 RMC, see our [Risk Management Committee Charter](#) and [Corporate Governance Statement](#).

APA's modern slavery statement governance framework



Policies and processes

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

During FY26 we introduced our first Human Rights Policy that sets out our approach to respecting human rights in our operations and business relationships. The policy recognises our responsibility to respect human rights, including avoiding adverse impacts on people, addressing impacts where they occur, and supporting the wellbeing of our employees, contractors, suppliers and the communities in which we operate. The policy is informed by internationally recognised human rights standards and frameworks, including the UN International Bill of Human Rights and the UNGPs on Business and Human Rights.

We also introduced our inaugural First Nations Policy that guides our engagement and partnership practices with First Nations peoples in a practical, respectful and responsible way. It supports our commitment to respect and protect First Nations peoples' rights and interests and appropriately manages and mitigates potential adverse impacts. The policy supports our workforce, ensuring First Nations employees are provided with a culturally safe and inclusive workforce, with access to internal grievance mechanisms and whistleblower provisions to address concerns relating to discrimination, harassment, or breaches of our policy. The policy is informed by recognised human rights standards and leading practice frameworks, including the UN Declaration on the Rights of Indigenous Peoples, the UNGPs on Business and Human Rights, and the First Nations Clean Energy Networks Leading Practice Principles.

APA policies apply to all APA Group directors, management, employees, and where appropriate, suppliers, contractors and third parties acting on behalf of APA Group and its wholly owned subsidiaries. Details of our key policies governing modern slavery, ethics and integrity can be found below.

Our current APA policies and procedures

Collectively, these policies operate as an integrated control framework that governs the identification, assessment and mitigation of modern slavery risks across our operations and supply chain (in alphabetical order):

Policy	Overview	How this policy continued to be implemented at APA during the reporting period
Anti-Bribery and Corruption Policy	Our commitment to fostering business integrity, including detecting and preventing bribery, corruption and fraud.	The Anti-Bribery and Corruption Policy and associated Anti-Bribery and Corruption Standard are available to all employees via our intranet, and together, inform our staff of their responsibilities and accountabilities. Our more senior employees, and employees in specific roles, also undertake annual Anti-Bribery and Corruption training.
Code of Conduct (Our Code)	Our Code brings our purpose and culture to life so we can make the right choices every day. It is underpinned by our behaviours of being courageous, accountable, nimble, collaborative and impactful. It includes principles and business standards that support safety, inclusion and diversity, human rights, community engagement, environmental protection, data privacy and security, and prevent discrimination, bullying, harassment, fraud and corruption.	Our Code is publicly available on our 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	Our Compliance Policy supports the effective management of compliance obligations and incorporation of compliance into the broader Enterprise Risk Management Framework. The Compliance Policy aligns with the principles and requirements in the international good practice standard for compliance (ISO 37301:2021 – Compliance Management Systems), sets out compliance management objectives and clarifies responsibilities for compliance within APA.	The Compliance Management Framework provides for a consistent approach for APA to comply with the applicable legal, regulatory, standards, codes and licence requirements, including the Modern Slavery Act 2018 (Cth). The Framework 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.
First Nations Policy	Our First Nations policy guides our engagement and partnerships with First Nations peoples in a practical, respectful, and responsible way. It supports our commitment to respect and protect their rights and interests and manage and mitigate potential adverse impacts.	Our First Nations Policy is publicly available on our website. The First Nations Policy applies across all assets, projects, and enterprise activities, and covers all stages of the asset lifecycle – planning, development, construction, operations, and decommissioning – ensuring consistent application of the Policy's principles and baseline commitments. The policy was released July 2026.
Health, Safety, Environment and Heritage Policy	Our aspiration is to respect both the past and protect its values for the future. We do this by protecting the health, safety and wellbeing of our people and the environment, heritage and the communities in which we operate.	The Health, Safety, Environment and Heritage Policy is publicly available on our website. The policy is implemented through our Health, Safety, Environment and Heritage Management system Safeguard which identifies and establishes controls to meet the objectives of the policy.

HOW WE ADDRESS AND MANAGE MODERN SLAVERY RISKS (CONTINUED)

Policy	Overview	How this policy continued to be implemented at APA during the reporting period
Human Rights Policy	Our Human Rights Policy sets out our approach to respecting human rights in our operations and business relationships.	Our Human Rights Policy is publicly available on our website. The Human Rights policy was released July 2026.
Modern Slavery Policy	Our Modern Slavery Policy defines APA's commitments and responsibilities, guiding how we identify, manage, and report modern slavery risks in our operations and supply chain.	Our Modern Slavery Policy is publicly available on our website. Modern slavery content remains integrated into our mandatory Procurement e-Learning training module for all employees.
Modern Slavery Risk Management Approach Procedure	Our Modern Slavery Risk Management Approach Procedure sets out APA's approach to managing our obligations under the MSA. 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.	We commenced a review of APA's Modern Slavery Response Procedure to strengthen its alignment with broader governance and reporting frameworks.
Procurement Policy	Our Procurement Policy and associated performance requirements and procedures reflect our approach to identifying and mitigating supply chain risks, including modern slavery risk and to align with our Supplier Code of Conduct .	The Procurement Policy and associated Procurement Standards, and Modern Slavery Response Procedure, are available for all employees via our intranet. The approach to identifying and managing modern slavery risk is embedded within the policy and associated documents. The policy is supported by role-specific training, tailored towards educating employees to identify red flags, and business-wide communications, designed to raise awareness of modern slavery.
Respect@Work Procedure	Our commitment to providing and fostering an inclusive and respectful workplace with safe, fair and positive working conditions. APA has zero tolerance for any form of harmful behaviour, including unlawful discrimination, bullying, harassment, sexual harassment, sex-based harassment, vilification, victimisation and other inappropriate behaviour.	Respect@Work training is mandatory for all APA employees. Our Respect@Work Procedure aligns with the Inclusion and Diversity Policy and the Code of Conduct. This procedure encourages all APA workers (including but not limited to employees, contractors and sub-contractors) to speak up if they witness harmful behaviours including unlawful discrimination, bullying, harassment, sexual harassment, sex-based harassment, vilification and victimisation.
Risk Management Policy	Our Risk Management Policy sets out APA's overall risk management principles and approach to risk management and is aligned with the principles in the international risk standard ISO 31000:2018 and the ASX Corporate Governance Principles and Recommendations - Fourth Edition 2019 (Principle 7 - Recognise and manage risk).	Our Risk Management Policy is publicly available on our website. The policy informs our Modern Slavery Risk Management Approach Procedure. 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.
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. The Sanctions Policy inform APA personnel of their responsibilities with respect to sanctions and support APA to ensure it remains compliant with its sanctions obligations. In addition, APA's Group Compliance team maintain a Sanctions Compliance Program.

HOW WE ADDRESS AND MANAGE MODERN SLAVERY RISKS (CONTINUED)

Policy	Overview	How this policy continued to be implemented at APA during the reporting period
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.	Our Supplier Code of Conduct is publicly available on our website. 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. It makes it clear that we expect our suppliers, contractors and business partners to uphold the principles and standards of our Code. Our Code applies whenever we represent APA, including when we are outside of our normal workplace or working hours. Suppliers have an obligation under this Code to advise APA of any illegal or unethical practices of which they become aware, which would include modern slavery. 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.
Whistleblower Policy	This policy, together with our Whistleblower Management procedure support our obligations under the Corporations Act 2001 (Cth) to create safe and protected channels to escalate potential matters of concern and suspected wrongdoing for those working with and for APA, including our employees, past employees, contractors, suppliers and consultants. The Whistleblower Policy also outlines the process and structures in place for assessing, addressing and reporting on whistleblower disclosures.	Our Whistleblower Policy is publicly available on our website. APA maintains a robust whistleblower governance framework to support the reporting, investigation and oversight of whistleblower matters. Defined roles include a Whistleblower Disclosure Officer responsible for receiving and managing disclosures, a Whistleblower Protection Officer responsible for safeguarding and supporting whistleblowers, and a Whistleblower Committee that provides end-to-end governance and oversight of each matter. Committee decisions and role changes are reported to the Board Risk Management Committee. The framework promotes confidentiality and protection for individuals who raise concerns.

Grievance and remediation

We take a range of steps to prevent and mitigate modern slavery risks at APA.
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			
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 or anyone who has formerly held such a role, and relatives, spouses or dependents of any of these roles. Information about the whistleblower mechanism is included in our modern slavery training. During the reporting period, no complaints relating to modern slavery were received through our whistleblower mechanism. However, we understand that modern slavery is complex to identify and that not identifying any incidents does not mean modern slavery could not occur in APA's supply chains.			
Other available mechanisms to raise concerns:			
- Complaints made directly to APA employees/management - Self-reporting by a supplier (in relation to its own activities or those of a sub-supplier) - Reports made to the Modern Slavery Working Group - APA's modern slavery risk management activities - APA employees identifying modern slavery concerns at sites - Media or civil society reporting			
1. IDENTIFY	2. REVIEW	3. INVESTIGATE	4. REMEDIATE
Modern slavery report received Reports are received through the mechanisms mentioned above.	Assessment of report All reports will be assessed and considered by APA and a decision will be made as to what type of investigation is required. Addressing the report APA will establish a cross-functional Incident Response Team. Reports may be addressed informally or through a formal investigation, depending on the nature of the report.	Incident identified Where an investigation identifies an instance of modern slavery, appropriate action will be taken. We will consider the most appropriate approach to engage with law enforcement and other external stakeholders. Formal investigation Formal investigations may be confidential, will be conducted in a timely manner and will be fair and independent from any persons to whom the report relates.	Determining our involvement under the UNGPs The Incident Response Team will determine if APA has caused, contributed to, or is directly linked to the incident in line with the UNGPs. External expert business and human rights advice may be sought to inform the assessment. Responding to the incident We have a clear commitment to taking a victim-first approach to remediation.

Training and awareness

Building awareness and capability across our organisation is central to our approach to managing modern slavery risks. Through targeted training, communication and active governance engagement, we seek to support our people to understand their responsibilities and identify and respond to potential risks.

Training for our people

Providing tailored modern slavery training to key employees across our business remains a cornerstone of our modern slavery response. We see training as critical to building and maintaining awareness of modern slavery risks, particularly in higher-risk areas of our operations and supply chains, and to ensure relevant staff are equipped to identify and safely report concerns.

In FY26, we expanded our training efforts to reach a broader range of teams. We delivered targeted training sessions to key functions, including our Operational Risk and Resilience team, Procurement team, Commercial teams and our cross-functional Modern Slavery Working Group members. These sessions were designed to build capability in identifying modern slavery risks, understanding responsibilities, understanding proposed MSA reforms and integrating controls into day-to-day decision-making.

We also continued embedding modern slavery awareness across our broader workforce. Modern slavery content remains integrated into our mandatory Procurement e-Learning module for all employees, facilitating a baseline level of awareness.

Internal communications

We reinforced awareness throughout the year through regular internal communications, helping to keep modern slavery risks visible and understood across the organisation. Topics included:

- Understanding modern slavery and the identification of risks
- Understanding and promoting our Whistleblower line
- Building Modern Slavery awareness across our supply chains
- Release of our FY25 Modern Slavery Statement
- Release of the 7th edition of the Chocolate Scorecard

Board engagement

During FY26, informed by external benchmarking and expert input, a number of proposed enhancements to our FY26 Modern Slavery Statement were incorporated. These proposed changes were reviewed and endorsed by the Modern Slavery Working Group.

Our approach to deliver the Modern Slavery Statement and its associated controls is reviewed by the Boards' Audit and Finance Committee. The FY26 Modern Slavery Statement was also reviewed by the Executive Risk Management Committee, Risk Management Committee, and subsequently approved by the Board of APA.

Oversight and awareness of modern slavery risks and regulatory developments continue to be maintained across governance forums. The Board Risk Management Committee is updated on a quarterly basis on any relevant developments in the period.

Case study: Building supply chain capability

In FY26, APA launched a series of free supplier webinars designed to build capability across our supplier base and the broader business community. Delivered by a specialist advisory firm, the sessions were intended to equip suppliers with practical knowledge to identify and manage modern slavery risks in their operations and supply chains.

Our approach

Three tailored webinar sessions were delivered to ensure content was relevant and accessible regardless of business size or sector. Across the three sessions, 109 suppliers participated.

- **Session 1 — APA Suppliers of Goods:** Focused on modern slavery risks most prevalent in goods supply chains such as raw material sourcing, manufacturing conditions, and multi-tier subcontracting.
- **Session 2 — APA Suppliers of Services:** Focused on modern slavery risks associated with service delivery including labour hire arrangements, subcontracting practices, and workforce exploitation.
- **Session 3 — Open to all:** Designed for APA and non-APA Suppliers, including First Nations businesses, social enterprises and small-to-medium enterprises (SME). Targeted engagement was undertaken with industry bodies such as Supply Nation, Indigenous Chambers of Commerce, Indigenous Business Networks, Social Traders, WE Connect, and Reconciliation Victoria, to promote the program to their member networks and encourage participation in this session. Developed in response to feedback from these cohorts of businesses that compliance requirements from large corporates are increasing in complexity and can be difficult to navigate. The session explained modern slavery obligations and practical steps in a simple, accessible way.

Outcomes

Internal awareness and capability building

While the primary audience for the program was APA's suppliers, First Nations and SME businesses, all sessions were made available to APA employees. By opening the webinars to our own teams, APA leveraged the webinars to reinforce internal awareness helping employees understand how modern slavery can occur in supply chains, recognise red flags in their day-to-day interactions with suppliers, and understand APA's expectations and reporting mechanisms. When our people are informed and vigilant, they become an active line of defence in identifying and escalating potential modern slavery risks across our operations.

Why this matters

This initiative reflects APA's broader commitment to supplier development, recognising that a capable, informed supply chain is fundamental to managing modern slavery risk effectively. Compliance is not achieved through policy alone; it requires genuine investment in the capability of our suppliers. Through this initiative, APA is:

- **Building supplier capability:** Helping suppliers understand what modern slavery is, how to identify risks specific to their industry, and what practical steps they can take to address those risks
- **Customising education to risk context:** Recognising that modern slavery manifests differently across goods and services supply chains, and tailoring guidance accordingly
- **Reducing barriers:** Acknowledging that First Nations and small businesses may lack the resources to interpret complex corporate compliance requirements, and providing accessible, practical support
- **Strengthening supply chain integrity:** Educating suppliers so that they are better equipped to identify and report risks early, improving the overall resilience of APA's supply chain
- **Supporting social procurement objectives:** Committed to using procurement processes to generate positive social and economic outcomes for First Nations, small businesses and social enterprises. Investing in supplier development directly supports this commitment
- **Connecting to our broader strategy:** This initiative aligns with APA's Supplier Relationship Management framework and our ambition to become the partner of choice. Supplier development is a core element of responsible business practice and building genuine relationships with our suppliers.

What suppliers said

Positive feedback was received from participating suppliers. The overall quality of the webinars was rated 4.7 out of 5, and 100% of respondents agreed or strongly agreed that the training improved their capacity to manage modern slavery risks. Suppliers described the sessions as "well structured," "informative and concise," and "easily able to be understood so we can transfer to our own workplace". This feedback reinforces that the program is delivering meaningful value and building the capability needed to strengthen our collective response to modern slavery.

Next Steps

In FY27, APA plans to further expand this initiative with additional targeted sessions for suppliers operating in industries with inherent elevated modern slavery risk. These sessions will provide deeper, industry-specific guidance on identifying and addressing the modern slavery risks most relevant to their operating environment. By progressively tailoring our supplier development program, APA is building a layered education approach from broad awareness through to targeted capability building where it matters most.

Stakeholder engagement and collaboration

In addition to our engagement with suppliers, we engage with a range of external stakeholders to strengthen our approach to identifying, assessing and addressing modern slavery risks. These engagements support us to monitor emerging risks and share insights with our peers, contribute to industry capability building and deliver a more consistent approach to managing modern slavery risks.

Industry initiatives and peer collaboration

During FY26, we continued our participation within the United Nations Global Compact (UNGC), reaffirming our commitment to its Ten Principles.

We actively contributed to five sessions of the UNGC Network Australia Modern Slavery Community of Practice, which provides a platform for peer learning, practical capability building and engagement with external experts and government stakeholders. Through this forum, we shared experiences and insights with other organisations and explored common challenges and opportunities in managing modern slavery risks across our operations and value chains.

We also progressed industry collaboration as a founding member of the EASI-F, a pre-competitive initiative focused on addressing modern slavery and human rights risks in EV supply chains. For more information, see our case study on page [26](#).

Broader stakeholder and thought leadership engagement

We participated in broader UNGC-led engagement, including the UN Global Compact Dialogue on Business and Human Rights and the inaugural UN Business and Human Rights Regional Forum (Australia and New Zealand). These forums provided opportunities to examine emerging issues and practical responses, including the impacts of global uncertainty on human rights, evolving regulatory expectations, and emerging areas of risk such as the energy transition, inequality, conflict-affected contexts and the role of technology.

Representatives from the Modern Slavery Working Group attended a Pillar Two and Australian Council of Superannuation Investors (ACSI) led seminar featuring the Australian Anti-Slavery Commissioner, which brought together investors and businesses to explore emerging global and domestic developments, practical challenges in addressing modern slavery risks, and the role of boards, executives and investors in driving accountability and continuous improvement.

In addition, we continued our regular engagement with Ausgrid, our industry peer, led by our procurement teams, to exchange insights, share lessons learned and identify opportunities to strengthen our respective modern slavery programs.

Government and regulatory engagement

During the year, we engaged with government through participation in Modern Slavery Act reform consultations led by the Department of the Attorney-General and the Office of the Australian Anti-Slavery Commissioner.

We also provided high-level input to guidance being developed by the Office of the Australian Anti-Slavery Commissioner on conducting robust modern slavery risk assessments.

Statement engagement and consultation

This Statement was developed as part of APA's annual reporting suite. As part of this process, the Statement was reviewed by a range of internal stakeholders. This included members of the Modern Slavery Working Group, responsible General Managers and members of the Executive Leadership Team.

Members of APA's Executive Leadership Team, including the Group Executive Sustainability and Corporate Affairs, Group Executive Legal, Regulatory and Governance, Group Executive People, Safety and Culture and the Chief Financial Officer, also reviewed and provided feedback on the Statement during the drafting process. It was also reviewed by APA's legal team.

The AFC oversaw the assurance and verification processes for the Modern Slavery Statement. The RMC reviewed the Statement before it was approved by APA's Board.

Case Study: Industry collaboration to address modern slavery risks in EV supply chains

In FY26, APA, together with Ausgrid, collaborated with Fair Supply to establish the Energy Anti-Slavery Industry Forum (EASI-F), a pre-competitive industry collaboration focused on strengthening human rights and modern slavery due diligence within EV supply chains.

The transition to lower emissions technologies, including EV fleet procurement, presents emerging supply chain risks linked to the sourcing of battery materials, manufacturing practices, and complex global supply chains. APA recognises that individual organisations can face challenges in obtaining consistent supplier disclosure and influencing large global manufacturers. In this context, collective industry engagement can provide a stronger and more effective mechanism for driving transparency and responsible sourcing practices.

Our approach

The forum was established with an independent Chair and secretariat and designed as a strictly compliance-focused and pre-competitive initiative to support participating organisations in aligning their approach to EV-related human rights due diligence.

The forum enables members to:

- align on a shared baseline approach for identifying and assessing EV-related modern slavery risks
- coordinate non-commercial engagement with EV manufacturers and suppliers
- commission and share practical due diligence tools and risk insights
- support greater consistency in procurement governance and modern slavery reporting practices across the energy sector.

The forum operates under formal governance arrangements, including confidentiality protocols and antitrust safeguards. Discussions are strictly limited to pre-competitive activities such as risk identification, standards alignment, shared research and non-commercial supplier engagement. Procurement decisions, supplier selection and statutory reporting remain the independent responsibility of each participating organisation.

Outcomes

Through participation in the forum, and as a founding member, APA contributed to the development of sector-wide tools and resources designed to improve supply chain transparency and strengthen due diligence practices for EV procurement.

Key outputs from the Forum include:

- a baseline risk mapping report covering EV battery minerals, forced labour exposure points and high-risk geographies
- a co-developed human rights due diligence protocol aligned to the UNGPs on Business and Human Rights and OECD guidance
- a consolidated supplier questionnaire tailored for EV manufacturers to support improved supplier disclosure and engagement outcomes
- coordinated engagement with EV manufacturers and local distributors through a unified industry approach.

The initiative also strengthened collaboration across the energy sector and supported greater consistency in how organisations assess and manage emerging modern slavery risks associated with the energy transition.

Next steps

APA will continue participating in the Forum and apply insights from the collaboration to support responsible procurement practices for EV fleet procurement and broader supply chain due diligence activities. APA also intends to leverage the tools and learnings developed through the Forum to further strengthen supplier engagement and risk assessment processes in future reporting periods.

How we assess the effectiveness of our actions

Assessing effectiveness is critical to understanding how well we are managing modern slavery risks and where further action is required. We monitor a range of indicators to evaluate the impact of our activities, inform decision-making and drive continuous improvement across our operations and value chain.



Image: Diamantina Power Station, Qld

Key effectiveness indicators for FY26

We consider an effective response to modern slavery risks to be one that is fit for purpose, aligned to our risk profile, and meaningfully embedded across our operations and supply chain. Our approach is focused on enabling us to identify and assess modern slavery risks, strengthen our due diligence and governance processes, and take appropriate action to address potential impacts.

Assessing effectiveness requires both qualitative and quantitative insights, overseen by the Modern Slavery Working Group. We recognise that assessing the effectiveness of our actions is complex, and we are committed to continually improving our approach to better understand what is working and where further improvement is needed.

Aligned to our Modern Slavery Action Plan strategic pillars, the table below outlines how we assess effectiveness across key activities and the outcomes achieved during FY26.

Key actions taken	How we assess effectiveness	Examples of FY26 outcomes
Risk management and due diligence		
Enhance and embed supplier relationship management processes across APA	We assessed this through: • Supplier Segmentation • Risk Management Evaluation Completion Rate • Risk Management Evaluation Cycle Time • Supplier Information Management Cycle Time • Percentage of Strategic Suppliers with Supplier Relationship Management Plan in place.	• We monitored the frequency and quality of supplier engagement activities and reviewed how modern slavery risks were being identified and managed through supplier governance processes.
Systematically integrate supplier assessment outcomes from high-risk categories into procurement processes to address modern slavery risks in our supply chain	We assessed this through: • Supplier Onboarding • Supplier Assessments • Inherent Risk Assessments • Supplier Deep Dives • Detailed Risk Assessments.	• In FY26, supplier assessment outcomes, including risk ratings and deep dive findings were incorporated into procurement decision-making and supplier management activities.
Continue to conduct supply chain risk assessments to map, assess, and mitigate modern slavery risks	• We assessed the coverage and depth of supply chain mapping activities and evaluated whether identified risks resulted in targeted mitigation actions.	• FY25 spend data was used to map supply chain risk exposure as deep as tier 10 for 3,297 suppliers. • In FY26, supplier assessments were completed for 69 suppliers, and deep dives for two suppliers.
Ongoing screening of modern slavery import bans as part of supply chain risk management	• We reviewed ongoing screening activities against relevant import ban lists and monitored how potential matches or risks were investigated and addressed.	• In FY26 insights captured as part of screening activities were incorporated into Category Planning process to communicate risks and inform procurement decisions.
Governance and reporting		
Delivery of the Modern Slavery Statements	• Annual review of our Statement to align with evolving regulatory and stakeholder expectations.	• Delivered the FY25 Modern Slavery Statement. • Maintained an A rating with the Monash Modern Slavery Disclosure Quality Ratings ASX100. • The FY26 Statement will be delivered as part of APA's broader Annual Reporting Suite to support greater alignment and completeness across our sustainability disclosures.
Review and update the Modern Slavery Working Group Terms of Reference	• We undertook a comprehensive review of our Modern Slavery Working Group Terms of Reference and developed a refreshed document to support clearer accountabilities, increased cross-functional collaboration and effective oversight of modern slavery risks and actions. The Terms of Reference was benchmarked against our peers. • Tracking frequency of meetings and progression against key action items.	• Developed and approved updated Terms of Reference for the Modern Slavery Working Group, including clearer roles, responsibilities, and governance structures. • Established a cross-functional Working Group representing all key business functions across APA. • Convened five Modern Slavery Working Group meetings throughout the year to oversee progress on the Modern Slavery Action Plan.

HOW WE ASSESS THE EFFECTIVENESS OF OUR ACTIONS (CONTINUED)

Key actions taken	How we assess effectiveness	Examples of FY26 outcomes
Development and tracking of the Modern Slavery Action Plan	The Modern Slavery Working Group is responsible for monitoring progress against planned actions and completion of key deliverables. Annual review of the Action Plan activities is carried out to ensure ongoing relevance to business priorities and regulatory environment.	Developed a Modern Slavery Action Plan which was approved by the SMC to support coordinated delivery and oversight of key activities and commitments.
Continue to review and uplift relevant policies and standards	We monitor how engagement with relevant subject matter experts and Working Group members during policy development and review, strengthens policy quality and aligns with good practice.	- Developed and received Board approval for the First Nations Policy and Human Rights Policy during FY26 - Updated the Sustainability Policy, which was approved by the Board during FY26 - Incorporated input from cross-functional stakeholders, including Modern Slavery Working Group members to ensure policies reflect organisational priorities and good practice examples.
Grievance and remediation		
Review and propose uplifts for APA grievance mechanisms and their associated governance structures	Members of the Modern Slavery Working Group assessed APA's existing approach to grievance to improve alignment with existing Whistleblower mechanisms.	Commenced a review of our Modern Slavery response procedure to strengthen its alignment with broader governance and reporting frameworks
Review our Modern Slavery Response Procedure and further define each of the four stages		
Training and awareness		
Build capability through targeted training and engagement on modern slavery	We monitor participation rates across all training sessions and request feedback to inform future sessions.	- Delivered three online modern slavery training sessions for suppliers to an audience of 109. Relevant APA employees were invited to attend supplier training sessions to strengthen shared understanding of supplier risks and expectations. - One session for the Goods Suppliers. - One session for the Services Suppliers. - One session for SME and First Nations Suppliers. - All APA employees also remained enrolled in mandatory Procurement Fundamentals e-Learning module.
Enhance supplier awareness through sharing our supplier assessment insights, prioritising high risk suppliers	We monitor supplier engagement and participation in awareness initiatives.	We focussed on effectively communicating supplier assessment insights to high-risk suppliers to support improved understanding of modern slavery risks and expectations.
Deliver targeted communications to increase employee awareness of Modern Slavery and associated risks	We explored how our communications could improve awareness and understanding of modern slavery risks, strengthen internal capability and support more informed engagement across relevant business functions.	- Five articles published on APA's intranet and internal networking site. - We refined our communication approach to focus on building awareness and capability within our newly formed cross-functional working group sessions. External subject matter experts were also engaged to provide an overview of key modern slavery risks and emerging domestic and global issues to support uplift in internal understanding and capability.
Stakeholder engagement and collaboration		
Participate in the UN Global Compact Australia Business and Human Rights Dialogue and Modern Slavery Community of Practice	We monitored how insights and learnings from external forums were translated into tangible improvements to our modern slavery and human rights approach, including updates to policies, processes, and reporting practices.	- Attended five Modern Slavery Communities of Practice sessions and the annual Business and Human Rights Dialogue - Applied insights from these forums to enhance our Human Rights Policy and broader modern slavery program - Invited to contribute to the Office of the Anti-Slavery Commissioner's risk assessment guidance.

HOW WE ASSESS THE EFFECTIVENESS OF OUR ACTIONS (CONTINUED)

Key actions taken	How we assess effectiveness	Examples of FY26 outcomes
Attend the Regional UN Business and Human Rights Forum: Australia and New Zealand	We monitored how insights from the Forum informed our understanding of emerging human rights risks, regulatory developments and stakeholder expectations, and were incorporated into the development of Human Rights and Modern Slavery related activities.	- Attended the inaugural Regional UN Business and Human Rights Forum for Australia and New Zealand. - Strengthened understanding of emerging regulatory developments, including evolving mandatory human rights due diligence requirements and good practice approaches to remediation. - Applied insights from the Forum to inform the development of our Modern Slavery Action Plan
Engage with the Attorney General's Department and participate in MSA consultations	We monitor how our participation in consultations strengthens our understanding of emerging legislative and policy developments, and supports proactive updates to our modern slavery governance, due diligence, and reporting processes.	- Attended three consultations hosted by the Attorney-General's Department, the Office of the Anti-Slavery Commissioner and the UN Global Compact Network Australia. - Insights gained informed our understanding of proposed reforms to Australia's MSA and supported consideration of proposed enhancements to FY27 activities within our Modern Slavery Action Plan - Sought external expert input on proposed reforms and presented these insights to the Modern Slavery Working Group to support internal consideration of potential implications for FY26/FY27 reporting.
Explore collaborative opportunities with other leading Australian businesses to share knowledge and good practice	We monitor how collaboration with industry peers strengthens our understanding of emerging risks, enhances our approach through shared learnings, and supports alignment with evolving industry good practice.	- Became a founding member of the EASI-F, a pre-competitive collaboration established by leading energy infrastructure organisations to address modern slavery and human rights risks in electric vehicle supply chains. 4 EASI-F meetings completed in FY26.

Appendix 1 – 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. The entity is non operating.
APA DEWAH PTY LTD	Parent entity of APA DEWAP Pty Ltd which owns and operates Port Hedland and Roy Hill Power Stations 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 Hedland 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: – Energy infrastructure: energy infrastructure assets across gas transmission, compression, processing, gas and battery storage, electricity generation (gas and renewables) and electricity transmission; – Asset Management: provision of asset management and operating services for certain APA Energy Investments; and – Energy Investments: interests in energy infrastructure investments.
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 Hedland 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 ("DPS") via its controlled entities.
APA Power PF Pty Limited	Holds APA's interest in DPS 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 Transmission (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 Victorian Transmission System ("VTS"). The entity is non operating.
APA VTS Australia (Operations) Pty Limited	Wholly owned subsidiary of APA VTS Australia (Holdings) Pty Limited. Owner and operator of the VTS.
APA VTS Australia Pty Limited	Parent of APA VTS Australia (Holdings) Pty Limited, which holds APA's interest in VTS. The entity is non operating.
APA WGP Pty Ltd	Owner and operator of the WGP.
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 Hedland 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 Hedland 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 62.66% interest.

APA

Australia's energy
infrastructure partner



apa.com.au