

# FY23 Modern Slavery Statement

## GDI (EII) Pty Limited

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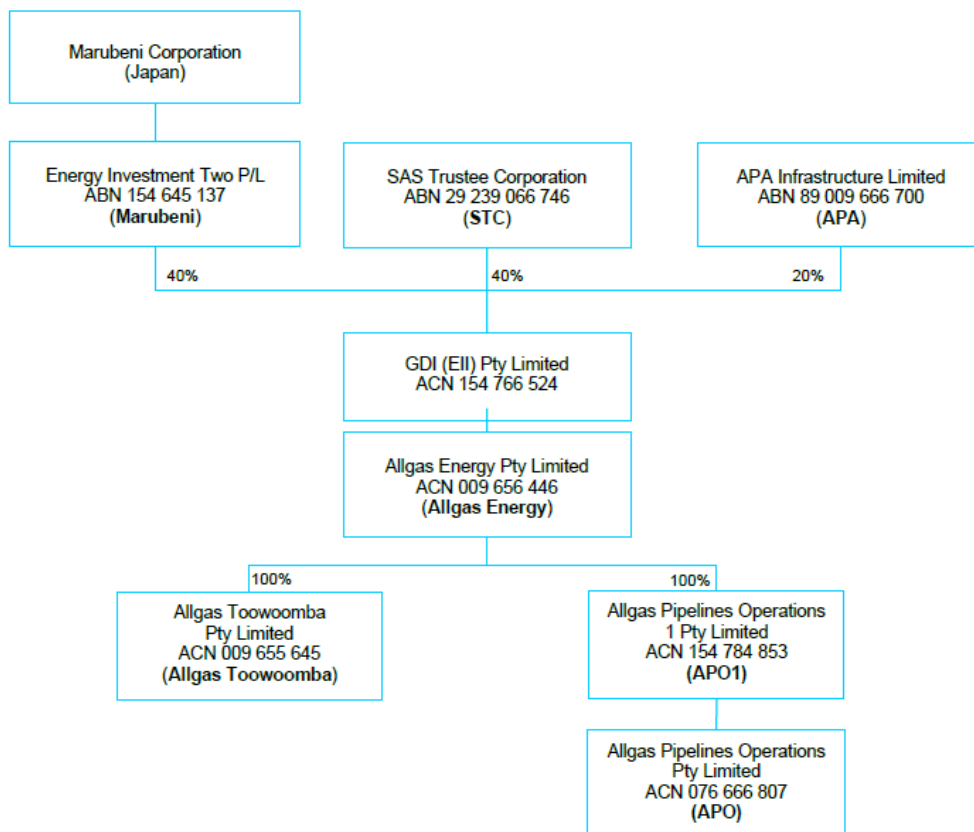
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# 1 About GDI

## 1.1 Introduction

GDI (EII) Pty Limited (ACN 154 766 524) (**GDI (EII)**) is an unlisted investment vehicle that wholly owns the Allgas natural gas distribution network (**Allgas Network**). GDI (EII) Pty Limited has 100% ownership of the trading entity Allgas Energy Pty Limited (ACN 009 656 446) (**Allgas**).

Allgas has three wholly owned subsidiaries which do not trade, Allgas Toowoomba Pty Limited ACN 009 655 645 (which holds network infrastructure assets), Allgas Pipelines Operations 1 Pty Limited ACN 154 784 853 (which holds the investment in Allgas Pipelines Operations Pty Limited), and Allgas Pipelines Operations Pty Limited ACN 076 666 807 (which holds easements).



The Allgas Network extends from Brisbane, south of the river, to the northern tip of New South Wales, with separate networks in Toowoomba and Oakey. It is supplied with natural gas from a variety of upstream producers that connect into APA’s East Coast Grid via the Roma – Brisbane Pipeline (**RBP**). The Allgas Network connects to the RBP at Oakey, Toowoomba and Brisbane.

The Allgas Network consists of over 3,900km of pipelines and distribution mains, delivering gas to over 114,000 connections in QLD and NSW. Its major customers are energy retailers and commercial and industrial users.

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The Allgas Network is subject to light regulation pursuant to the National Gas Law and National Gas Rules by the Australian Energy Regulator.

APA Group (**APA**) (20% equity owner) provides operations and maintenance and corporate services to GDI via a long-term services agreement. APA is responsible for the supply chain of GDI and their owned or controlled entities.

In line with the UN Guiding Principles on Business and Human Rights (**UNGPs**), we respect all internationally recognised human rights as set out in the Universal Declaration of Human Rights and the International Labour Organization's Declaration on Fundamental Principles and Rights at Work.

### 1.2 About this statement

In this statement, when we refer to "GDI" it is a reference to GDI (EII) and Allgas, which are both reporting entities under the *Modern Slavery Act 2018* (Cth) (**Act**).

This Modern Slavery Statement (**statement**) has been prepared by APA, the operator of the Allgas Network, to meet the requirements of the Act for the financial year ending 30 June 2023 (FY23). The entities covered by the statement are identified in Appendix 1.

This statement has been prepared by APA's Modern Slavery Team, in conjunction with APA's Modern Slavery Working Group, with the assistance of external subject matter experts. Information about the approach to consultation with reporting entities and owned or controlled entities to develop this statement is set out in Section 5.

This statement was approved by the GDI Board on 4 December 2023 on behalf of all reporting entities covered by this statement. The statement has been signed by the Chairman of GDI (page 4).

## FY23 Modern Slavery Statement

### 1.3 Statement from Chairman

I am pleased to present this Modern Slavery Statement for GDI covering the financial year ending 30 June 2023. The statement outlines our understanding of the modern slavery risks in our operations and supply chain. It describes how we are assessing those risks and the actions we have taken to date.

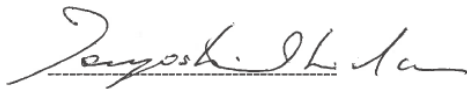
GDI does not have any employees. The long-term services agreement we have with APA means that our operations, maintenance and corporate services are managed by APA.

Our FY23 statement builds on previous year's efforts by the APA Modern Slavery Team, to continue building maturity and capability to identify, assess and take action to mitigate potential modern slavery risks.

The schematic on page 5 highlights how our modern slavery response is evolving.

In FY24, we will continue to support APA's ongoing commitment to responsible procurement practices.

Signed,

A handwritten signature in black ink, appearing to read "Tsuyoshi Ikeda". The signature is written in a cursive style and is positioned above a horizontal dashed line.

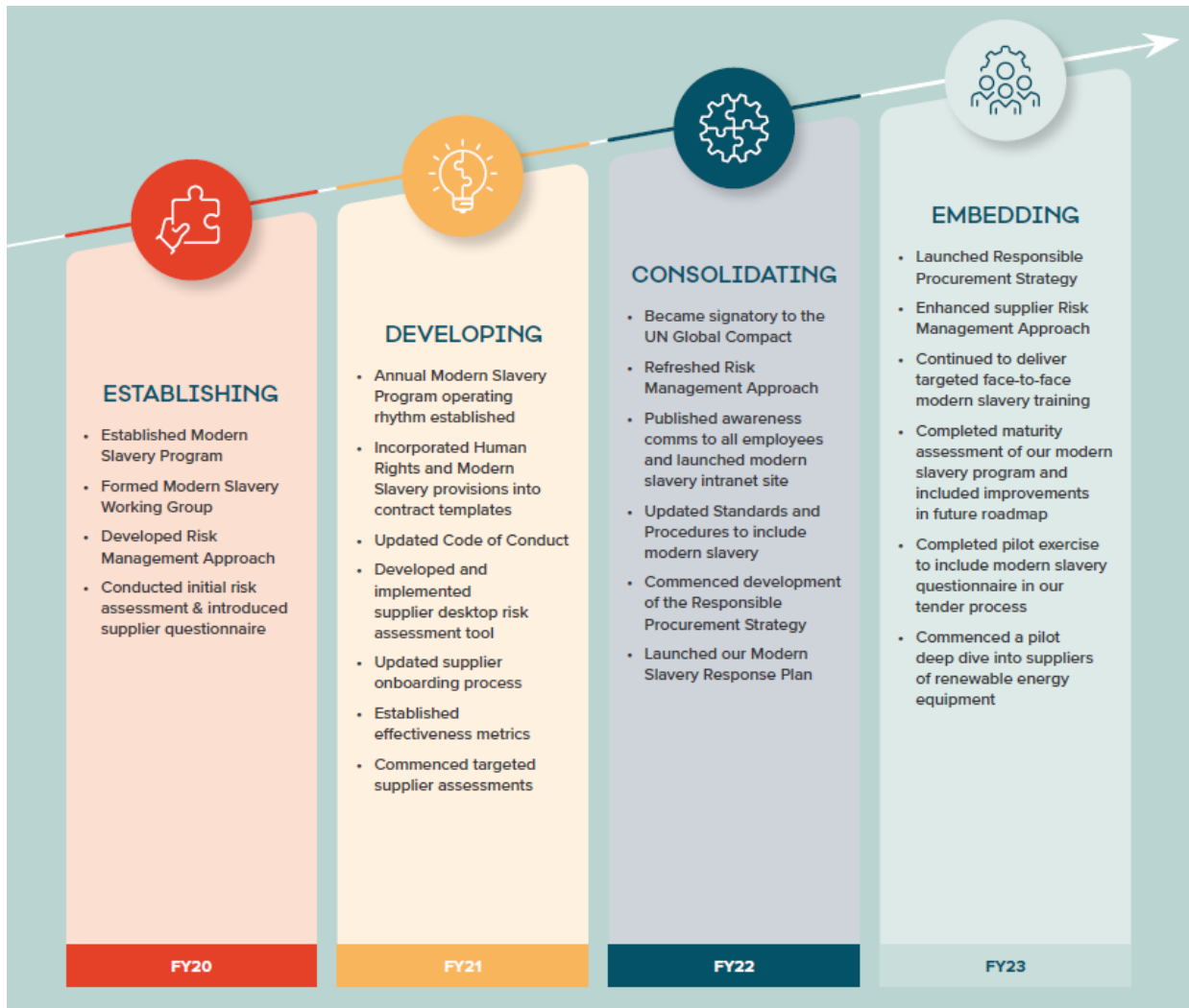
Tsuyoshi Ikeda, Chairman

4 December 2023

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### 1.4 Developments in APA's modern slavery response

APA has continued focusing on refining its modern slavery response to strengthen its understanding of effective identification and management of modern slavery risks. The visual below captures APA's efforts to build its modern slavery response to date, and key achievements.



## 2 Reporting Criteria 1 & 2

### 2.1 Operating Model

The Allgas Network is operated by APA under the terms of a long-term services agreement in which APA performs all the services necessary for the management of the gas distribution network. This includes managing the operations, procurement policies and procedures, and supply chains.

### 2.2 Operations and supply chain

**Total procurement spend = ~\$66million**

**Direct suppliers engaged = 9**

**Indirect suppliers engaged = 562**

During FY23, GDI's procurement spend was approximately \$66 million, with 9 tier 1 suppliers. APA, on behalf of GDI, procured products and services from 562 tier 2 suppliers. The term 'tier 1 suppliers' refers to GDI's direct suppliers of goods or services. References to 'tier 2 suppliers' are the suppliers or subcontractors of GDI's tier 1 suppliers, 'tier 3 suppliers' are the suppliers or subcontractors of GDI's tier 2 suppliers, and so forth.

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

- purchase orders governed by master agreement terms and conditions, such as agreements for professional services or supply of goods,
- bespoke agreements for the procurement of complex and high value goods, including for products such as valves, regulators and water bath heaters to support the development of new assets,
- multi-year standing arrangements governed by Precedent Agreements such as long-term services agreement.

Corporate credit card purchases contribute to a small portion of the overall procurement spend. Expenses on credit cards typically relate to domestic travel, hospitality, professional memberships and training.

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

The following groups are focussed on specific procurement activities on behalf of GDI:

- Procurement Operations and Governance – responsible for managing procurement process governance across APA, supplier relationship management, system governance, reporting and also provides requisitioning and purchasing support via the Central Purchasing team,
- Responsible Procurement – builds capability and capacity to execute the Responsible Procurement Strategy, aligned to enterprise sustainability objectives.

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- Corporate Procurement – responsible for the strategic category management, strategic sourcing, contract lifecycle management fleet management and supplier management activities for Corporate spend.
- Networks Procurement – responsible for strategic sourcing, contract lifecycle management, and supplier management activities for the Networks business units, comprising of capital replacement program, growth projects and third party works, along with operations and maintenance of third party owned gas distribution networks.
- Real Estate Services – responsibilities include capital works and project management to meet APA's real estate requirements.

The following table shows GDI's main areas of operation and its corresponding supply chains.

| Area               | Main Operations   | Supply Chain  |
|--------------------|---|---|
| Network Operations | <p>Operation and maintenance of third party owned gas distribution networks.</p> <p>Development and delivery of capital replacement, growth projects and third party works, such as new mains and services, extensions and reticulation of new developments.</p>  | <ul style="list-style-type: none"> <li>• 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.</li> <li>• Australian based construction and maintenance contractors, mains and service layers, main renewal contractors, plumbers and gas fitters.</li> <li>• 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.</li> </ul> |
| Head Office*       | <p>Corporate services, such as:</p> <ul style="list-style-type: none"> <li>• Finance &amp; Technology</li> <li>• Strategy &amp; Corporate Development</li> <li>• People, Safety &amp; Culture</li> <li>• Procurement</li> <li>• Risk, Compliance &amp; Insurance</li> <li>• Legal and Governance</li> <li>• Sustainability (including Climate) &amp; Corporate Affairs</li> <li>• Health, Safety, Environment &amp; Heritage</li> </ul> <p>*The GDI head office is APA's head office. All corporate functions are provided by APA staff. In the same way APA provides all operational support. GDI does not have its own employees.</p> | <ul style="list-style-type: none"> <li>• Fleet management</li> <li>• Professional services</li> <li>• Information Technology</li> <li>• Safety clothing and personal protective equipment for corporate and site-based staff</li> <li>• IT equipment and telecommunications</li> <li>• Recruitment and labour hire</li> <li>• Office products</li> <li>• Corporate real estate and facilities</li> <li>• Marketing and advertising</li> <li>• Travel and accommodation</li> <li>• Catering</li> </ul>   |

### 3 Reporting criteria 3

#### 3.1 Identifying our modern slavery risks

GDI relies on APA’s analysis of its own operational and supply chain risks, as APA provides GDI with operations and maintenance and corporate services, and GDI’s suppliers are a subset of APA’s suppliers.

APA draws on the UN Guiding Principles on Business and Human Rights (UNGPs) to understand the exposure to modern slavery risks.

The UNGPs are the authoritative global standard for addressing business-related adverse human rights impacts and set out a three-part continuum to explain how companies could be involved in human rights harms, such as modern slavery. The Australian Government recommends companies use this continuum to understand and communicate about their modern slavery risks.

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

#### 3.2 Modern slavery risks in our operations

As noted in previous modern slavery statements, and in this statement, GDI does not have any employees. APA employees and contractors work on the network on behalf of GDI. As such, there remains a low risk that GDI has caused, contributed or was directly linked to, adverse human rights via its operations.

In FY23, APA assessed the risk of modern slavery in its operations as low, based on the location of operations in Australia, compliance with all applicable legislative requirements in Australia regulating workplace relations, and the well-defined internal policies and processes in place.



### 3.3 Modern slavery risk in our supply chain

GDI’s primary supplier is APA. APA provides operations and maintenance and corporate services to GDI via a long-term services agreement.

APA’s greatest exposure to modern slavery risks is through its supply chain. APA recognises they could be directly linked to a range of modern slavery risks through their suppliers, including for both goods and services. For example, APA may be directly linked to modern slavery through the sourcing and processing stages of the raw materials that make their way into the products ultimately supplied to us, and in the manufacturing plants located in higher risk locations that supply goods to our suppliers or their wholesalers.

APA understands that they could also potentially contribute to modern slavery if the controls outlined in this statement failed or were not fit for purpose.

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



We also recognise that elements of GDI’s supply chain, via APA’s supply chain, could include risks of state sponsored forced labour, including in relation to complexity of supply chain. We monitor evolving industry approaches and recommendations from governments, civil society and other stakeholders in relation to assessing and managing these risks.

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

| Modern slavery risk factors                         | Product / service procured by APA  | Generally known modern slavery risks - (key risks relating to each category are outlined below)   | Controls   |
|---|--|---|--|
| <b>High risk category – construction materials</b>  |  |   |  |
|   | <ul style="list-style-type: none"> <li>Lubricants, oils, greases and anti-corrosives</li> <li>Valves, hardware and fittings</li> <li>Pipe and pipe fittings</li> </ul> | <p>Certain manufacturing and mining regions and materials carry higher risks of modern slavery, including where materials may be produced or sourced in higher risk countries or involve sectors known to have high modern slavery risks. For example, APA procures building materials such as concrete, timber, steel, quarried stone products, glass, and construction films, which may involve modern slavery risks due to the way these materials are produced or manufactured.</p> <p>APA also procures a range of machinery and equipment used in construction, which can involve modern slavery risks if they are manufactured in countries with a higher prevalence of modern slavery risks or include components such as electronics manufactured in high-risk countries.</p> <p>Similarly, mining operations for copper, tin, lead, lithium, quartz, silicon, selenium, tellurium, arsenic, cadmium, aluminium, boron, gallium or indium, can involve modern slavery risks related to forced and child labour, including the worst forms of child labour. Therefore, any equipment containing components which include these minerals may involve modern slavery risks.</p> | <p><b>Key controls:</b></p> <p>New suppliers required to declare their commitment to respect workers' fundamental human rights, page 14.</p> <p>All existing suppliers are assessed as per APA's Modern Slavery Risk Management Approach, page 14, 15, 16.</p> <p>Modern slavery clauses and obligations included in relevant precedent agreements.</p> <p>APA's policy framework, appendix 2.</p> |
| <b>High risk category – freight &amp; logistics</b> |  |   |  |
|   | <ul style="list-style-type: none"> <li>Logistics services for infrastructure delivery projects</li> </ul>  | <p>There is a risk that freight and logistics services provided by third parties (including warehousing) could involve the exploitation of base-skilled workers. These risks are likely to be higher where these services are provided overseas. There are also particular risks associated with working conditions for seafarers.</p>  | <p><b>Key controls:</b></p> <p>As per above</p>  |

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| Modern slavery risk factors                        | Product / service procured by APA   | Generally known modern slavery risks - (key risks relating to each category are outlined below)  | Controls  |
|--|---|--|---|
| <b>High risk category – fuels</b>                  |   |  |   |
|  | <ul style="list-style-type: none"> <li>Motor gasoline for use in fleet vehicles and asset sites</li> </ul>  | <p>There is a risk that raw material extraction, manufacture and disposal could be associated with vulnerable populations in higher-risk countries. There is also the risk that vessels used for the transport of fuel could expose crew to forced labour or unacceptable working conditions.</p>  | <p><b>Key controls:</b></p> <p>As per above</p>   |
| <b>High risk category – IT hardware / software</b> |   |  |   |
|  | <ul style="list-style-type: none"> <li>ICT hardware</li> <li>Telecommunications hardware</li> <li>Software maintenance and support</li> </ul>   | <p>Modern slavery risks are present in the supply chains that provide IT companies with the necessary materials to produce electronic goods, and parts of those goods. For example, there may be modern slavery risks (including the worst forms of child labour and forced labour) associated with the mining of cobalt and mica.</p> <p>Modern slavery risks may also be associated with suppliers and the use of offshore contact centres and other services by telecommunications and software companies and the construction and maintenance of telecommunications infrastructure.</p>  | <p><b>Key controls:</b></p> <p>As per above</p>   |
| <b>High risk category – professional services</b>  |   |  |   |
|  | <ul style="list-style-type: none"> <li>Labour hire and other temporary workers</li> <li>IT Service delivery</li> <li>Management consultants</li> <li>Construction design services</li> <li>Cleaning and security service providers</li> <li>Catering providers</li> </ul> | <p>Temporary and contract workers in Australia and overseas performing base-skilled labour can be vulnerable to modern slavery due to a range of factors, including opaque subcontracting arrangements, which can make it difficult to monitor working conditions.</p> <p>The use of migrant workers in sectors such as cleaning and construction can also involve modern slavery risks, including where these workers may not understand their workplace rights and entitlements. From time to time, where our construction contractors have a need for temporary or contract workers, they are generally highly skilled trades or educated professionals such as engineers or designers rather than base-skilled labour.</p> | <p><b>Key controls:</b></p> <p>As per above</p> <p><b>Additional controls:</b></p> <p>Labour hire companies to have relevant certification, where required.</p> |

| Modern slavery risk factors         | Product / service procured by APA  | Generally known modern slavery risks - (key risks relating to each category are outlined below)  | Controls  |
|-------------------------------------|--|--|---|
| <b>High risk category – apparel</b> |  |  |   |
|                                     | <ul style="list-style-type: none"> <li>• Uniforms</li> <li>• PPE</li> </ul>                              | <p>The textiles and apparel sector is recognised as a high-risk sector for modern slavery, including due to the use of raw materials such as cotton which may be produced using modern slavery, as well as exploitation in factories manufacturing textiles and apparel products.</p>  | <p><b>Key controls:</b></p> <p>As per above</p> <p><b>Additional controls:</b></p> <p>In FY23 APA continued to monitor and consolidate items of safety clothing and PPE to one approved supplier.</p> <p>Compliance to ethical sourcing and accreditation was monitored, with 92% of certificates of currency received from factory audits. These include:</p> <ul style="list-style-type: none"> <li>• Worldwide Responsible Accredited Production (WRAP),</li> <li>• Sedex Members Ethical Trade Audit (SMETA),</li> <li>• Ethical Clothing Australia (ECA),</li> </ul> <p>The approved supplier has recently aligned their practices to ISO 20400 Sustainable Procurement.</p> |
| <b>High risk category – travel</b>  |  |  |   |
|                                     | <ul style="list-style-type: none"> <li>• Domestic accommodation</li> <li>• Domestic transport</li> </ul> | <p>The provision of travel and accommodation related services may involve modern slavery risks, including in relation to the use of base-skilled, subcontracted workers by accommodation providers. APA’s travel is primarily domestic and would not generally involve travel to countries where modern slavery is comparatively more prevalent.</p> | <p><b>Key controls:</b></p> <p>As per above</p> <p><b>Additional controls:</b></p> <p>Suppliers for domestic accommodation are vetted annually through a tender process in consultation with APA’s travel management partner. Preferred suppliers are selected based on their responses to questions, such as, compliance with local employment laws, and organisation policies and grievance mechanisms.</p>   |

## 4 Reporting criteria 4

### 4.1 Actions taken to assess and address risk

GDI remains committed to taking meaningful action to address risks in its operations and supply chain. All of the actions outlined in this section were undertaken by APA on behalf of GDI, given APA operates GDI's assets and is responsible for its supply chain. APA's modern slavery statement provides additional details in relation to its actions, for APA and on behalf of GDI.

### 4.2 Governance Framework

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

The response to modern slavery is overseen by a cross-functional Modern Slavery Working Group, which is made up of representatives from APA's Responsible Procurement, Finance, Risk and Compliance, Procurement, Sustainability and Community, and Legal teams.

The Working Group meets regularly to drive the continuous improvement in APA's approach to managing modern slavery risk. Key issues discussed by the working group during FY23 included progress on FY23 supplier due diligence, implementation of the new supplier risk management tool, and the effectiveness of our actions.

### 4.3 Policy Framework

GDI's risk management framework leverages APA's group wide policy framework, which sets the foundation for the approach to managing modern slavery risks.

During FY23 APA launched a new Respect@Work Procedure and drafted a new Supplier Code of Conduct for which further internal stakeholder engagement and development will continue in FY24.

There were no significant changes to the existing policies during the reporting period. Details of APA's Policy Framework can be found in Appendix 2.

| Policy                                 | Relevance to Modern Slavery   | How this policy continued to be implemented at APA during the reporting period  |
|--|---|---|
| <a href="#">Respect@Work Procedure</a> | <p>APA is committed to providing and fostering an inclusive and respectful workplace with safe, fair and positive working conditions.</p> <p>APA does not tolerate any form of harmful behaviour including unlawful discrimination, bullying, harassment, sexual harassment, sex-based harassment, vilification, victimisation and other inappropriate behaviour.</p> | <p>In FY23 APA launched our Respect@Work procedure.</p> <p>This aligns with the Inclusion &amp; Diversity Policy and the Code of Conduct.</p> <p>This procedure encourages all APA workers (including but not limited to employees, contractors and sub-contractors) to speak up if they witness harmful behaviours including unlawful discrimination, bullying, harassment, sexual harassment, sex based harassment, vilification and victimisation.</p> |

| Policy                          | Relevance to Modern Slavery   | How this policy continued to be implemented at APA during the reporting period  |
|---------------------------------|---|---|
| <b>Supplier Code of Conduct</b> | The Supplier Code of Conduct sets the minimum standards for supplier engagement with APA and will cover our expectations on labour, safety and worker treatment, human rights and modern slavery. | Initial draft of the Supplier Code of Conduct was completed in FY23. Further internal stakeholder engagement and development will continue in FY24. |

#### 4.4 Modern Slavery Risk Management Approach

##### New supplier selection and onboarding

APA has integrated modern slavery into the new supplier onboarding and risk assessment process, which requires suppliers, including those providing goods to services pertaining to the Allgas Network, to declare their commitment to respect workers' fundamental human rights before they are added to internal systems. This commitment includes:

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

For all procurement-managed spend >\$200k a precedent agreement is also considered, in accordance with APA's Procurement Policy. The precedent agreement includes modern slavery clauses and obligations that were added in FY21. These template clauses support the Risk Management Approach, ongoing due diligence, and the Modern Slavery Response Plan. This includes any necessary investigation process in circumstances where risk is identified, and/or incidents are reported.

##### Existing supplier risk management

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

#### 4.5 CASE STUDY – Enhancing supplier risk management

APA partnered with an ESG data provider to support the enhancement of its supplier risk management. Following a successful pilot due diligence exercise for a number of high-risk suppliers identified by sector, APA has implemented a technology solution for use from FY24. This will provide improved capability to assess modern slavery and broader ESG risk in APA's supply chain. A baseline of indicative modern slavery risk profiles for suppliers that extend to Tier 10 level will be created.

The stages below explain how APA undertook the pilot due diligence exercise. From FY24 it is anticipated that all existing and potential future suppliers will be screened through this process.

##### **Stage 1 – initial screening / supply chain mapping:**

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

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

It examines supply chains against international standards:

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

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

##### **Stage 2 – self-assessment questionnaires:**

The questionnaires assess the level of modern slavery risk in the supply chain and the maturity of supplier's modern slavery risk management responses.

APA received responses from 43% of suppliers of the pilot cohort who were sent the questionnaire. This response rate may reflect a range of factors, including effort required to clarify supplier contact details and the introduction of a new process for smaller suppliers. Survey responses were reviewed and assessed with Procurement Managers and next steps determined for suppliers identified as higher risk, such as;

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

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### Stage 3 – deep dives:

A deep dive exercise was performed on the individual suppliers identified as high risk following the first two stages of the risk management approach.

The deep dive provided APA with a modern slavery risk profile for each of the suppliers and supported the identification of potential risk mitigation actions.

### Stage 4 – supplier performance management:

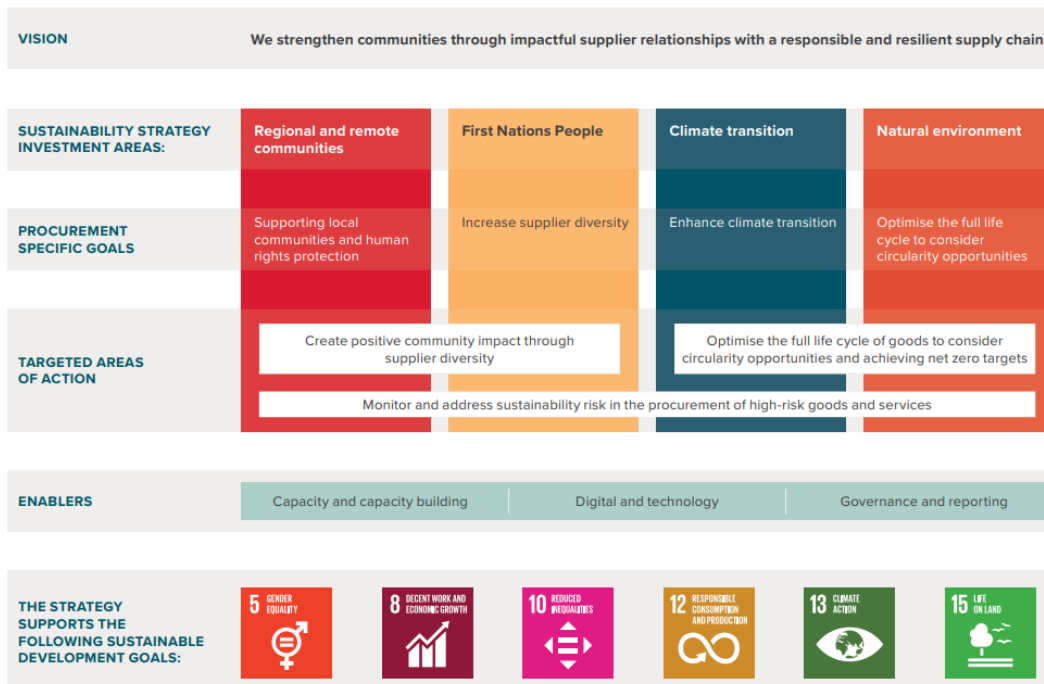
Supplier performance management is required for existing and future suppliers who have been classified with a high-risk rating and where further due diligence is required. This stage will commence with direct supplier engagement. The supplier will be provided with relevant information highlighting the risk and given the opportunity to respond.

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

## 4.6 Launch of the Responsible Procurement Strategy

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

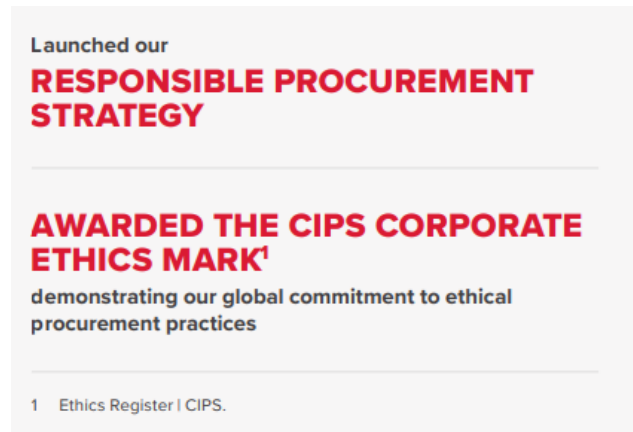
Management of modern slavery risk is a key consideration in all initiatives to ensure a responsible approach to procurement, and as such the targeted area of action to monitor and assess sustainability risks, including modern slavery, underpins all four pillars of the Responsible Procurement Strategy.





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Early initiatives included building awareness of the strategy across business groups and improving supplier diversity capability by engaging with First Nations businesses as part of APA's Supply Nation membership. In collaboration with APA's Net Zero and Climate Team, and to support APA's net zero ambitions, an initiative to better understand supply chain emissions and identify a roadmap of future opportunities to reduce emissions was developed. The roadmap has been included in actions for FY24.



### 4.7 Achieving the CIPS Corporate Ethics Mark

The Chartered Institute of Procurement and Supply (CIPS) Corporate Code of Ethics was developed as part of its commitment to reinforcing global ethical values across all procurement and supply practices. The voluntary code can be adopted by organisations across the world, of any size and from any sector, and sets out the values, business culture and practices the organisation must demonstrate.

By adopting the voluntary code, APA commits to:

- ensuring consistent understanding of business ethics across the organisation at all levels,
- continually enhance knowledge of all relevant laws and regulations in the countries in which the organisation operates, either directly or indirectly,
- eradicating unethical business practices including bribery, fraud, corruption and human rights abuses, such as modern slavery and child labour.

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

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

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### 4.8 Modern slavery maturity assessment

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

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

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

Going forward, APA is drawing on the findings of this assessment to help inform the workplan. The assessment and key recommendations have been discussed with the Modern Slavery Working Group. Importantly, the findings of the maturity assessment are also relevant to the work to assess the effectiveness of the measures in place to mitigate the risks of modern slavery in the operations and supply chains of the Allgas Network.

### 4.9 Training

APA prioritises modern slavery training for employees to help ensure they are equipped to manage key risks and identify and respond appropriately to any concerns. This approach will be refined in FY24 by delivering a modern slavery training session to the GDI Board.

During FY23 1.5 hour face-to-face modern slavery training was rolled out for those employees who deal directly with suppliers and/or contractors, this included employees who provide procurement services and management for GDI.

The face-to-face training highlights key potential risk areas for APA, details how they are taking action to manage modern slavery risks and provides guidance on how employees can identify red flags and report concerns or suspicions about modern slavery. It also includes a range of interactive components including interactive quizzes and polls and a series of dilemma scenarios. Each session is delivered by senior staff from APA, a human rights advisory firm and APA representatives.

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

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

### 4.10 Raising awareness

APA's targeted training program is complemented by a broader focus on raising awareness of modern slavery across the business. Throughout the year modern slavery awareness communications were published to all employees via the internal news site and internal social networking site. For example, a guide to ethical Christmas shopping produced by a civil society organisation was shared. While not directly related to APA, this helps demystify modern slavery in everyday purchasing and helps promote a general understanding by personalising it to the

## FY23 Modern Slavery Statement

individual. APA also shared key learnings from attendance at the Australian Government's 2023 Modern Slavery Conference.

The internal Modern Slavery Program intranet site was maintained throughout the year, which includes links to relevant content, including:

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

### 4.11 Engagement and collaboration

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

APA has worked closely with an ESG data provider and human rights consultancy to map the high-risk suppliers beyond Tier 1. Providing it with guidance on appropriate due diligence requirements for further engagement with suppliers at different risk classification.

#### United Nations Global Compact (UNGC) Membership

APA is a signatory to the UN Global Compact and is committed to the 10 key principles, including relating to addressing forced and child labour, as well as other human rights impacts. As members of the UN Global Compact Network Australia's Modern Slavery Community of Practice, APA completed a progress update for 2023. This demonstrates a commitment to making the UNGC and its principles part of APA's strategy, culture and day-to-day operations.

#### 4.12 CASE STUDY - tender process improvements

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

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

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

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

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

### 4.13 Grievance mechanisms and remediation

As outlined in this statement, APA has a range of steps to prevent and mitigate modern slavery risks. However, APA recognise the importance of preparedness in the event of an actual or suspected instance of modern slavery.

APA's externally managed whistleblower line (available by phone and email) provides an independent, impartial and confidential means of reporting potential incidents, including any concerns related to modern slavery or broader labour rights issues. The whistleblower mechanism is available to all employees, contractors and other stakeholders, including suppliers and their workers. Information about the Whistleblower mechanism is included in APA's modern slavery training.

APA understands that communication of its grievance mechanisms should be tailored and accessible for potentially impacted stakeholder groups. An initiative on the APA FY24 roadmap includes reviewing accessibility of the grievance mechanisms for potential improvement.

During the reporting period, APA did not receive any reports or complaints relating to modern slavery. This is not evidence of there being no circumstances of modern slavery, but rather, it points to the complexity and barriers faced by affected persons to access grievance mechanisms.

### 4.14 Modern Slavery Supplier Response Procedure

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

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

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

## 5 Reporting Criteria 5

### 5.1 Effectiveness assessment

Assessing the effectiveness of modern slavery risk management helps understanding the impact of actions taken and identify opportunities for continuous improvement.

An effective response to modern slavery risks as one that is fit for purpose, tailored to organisational context and risk profile, and meaningfully implemented across the business.

APA aim to take an evidence-based approach to assessing the effectiveness of its actions. The Modern Slavery Working Group is primarily responsible for assessing the effectiveness of the actions taken as part of the annual operating rhythm. The table below sets out how APA monitor the effectiveness of actions against key areas of the modern slavery response.

In addition to the actions set out below, APA also engaged a third-party advisory firm to undertake a maturity assessment of the response during the reporting period (see page 18), which GDI is using to inform its understanding of the effectiveness.

| Key actions taken                           | How we seek to measure the effectiveness of our actions   | Outcomes  |
|---|---|---|
| <b>Governance of Modern Slavery Program</b> |   |   |
| Modern Slavery Working Group                | <ul style="list-style-type: none"> <li>Tracking frequency of meetings and progression of key action items.</li> </ul>   | <ul style="list-style-type: none"> <li>Active participation by all Working Group members at meetings held throughout the year.</li> <li>Key actions implemented as planned.</li> </ul>  |
| Responsible Procurement Strategy            | <ul style="list-style-type: none"> <li>Annual review and refresh of the Responsible Procurement Strategy to reflect progress of key initiatives and help ensure it remains fit for purpose, including as our capability matures.</li> </ul> | <ul style="list-style-type: none"> <li>Roadmap of initiatives developed to implement and execute on the Responsible Procurement Strategy.</li> </ul>  |
| Refresh Risk Management Approach            | <ul style="list-style-type: none"> <li>Annual review and refresh of Risk Management Approach to help ensure it remains fit for purpose</li> </ul>   | <ul style="list-style-type: none"> <li>The Risk Management Approach was updated to reflect key learnings from FY23.</li> <li>Following the FY23 pilot, deep dive initiatives will be incorporated for categories, rather than only individual suppliers, enhancing our risk assessments.</li> <li>A supplier risk assessment playbook is under development for FY24.</li> </ul> |
| <b>Grievance mechanisms and remediation</b> |   |   |
| Monitoring of whistleblower mechanism       | <ul style="list-style-type: none"> <li>Number of modern slavery related complaints raised each financial year and the outcome of any complaints raised.</li> </ul>  | <ul style="list-style-type: none"> <li>Zero whistleblower complaints raised in respect to modern slavery during FY23 (although we recognise this does not mean no modern slavery occurred).</li> </ul>  |

## FY23 Modern Slavery Statement

| Key actions taken   | How we seek to measure the effectiveness of our actions  | Outcomes  |
|---|--|---|
| Initiate Modern Slavery Response Plan   | <ul style="list-style-type: none"> <li>Number of times the Modern Slavery Response Plan has been activated for each financial year and the outcomes of any investigation.</li> </ul>   | <ul style="list-style-type: none"> <li>Zero instances for FY23 required investigation using the plan.</li> <li>References to the Response Plan and guidance on reporting concerns continued to be included in training for our people.</li> </ul>       |
| Create and publish Team Leader Information Sheet  | <ul style="list-style-type: none"> <li>Number of Team Leaders provided with the Information Sheet.</li> <li>Monitor engagement with Team Leaders, including any feedback</li> </ul>  | <ul style="list-style-type: none"> <li>Information Sheet provided to Team Leaders and published on APA intranet site to provide guidance on their role as leaders and how to respond and report modern slavery concerns raised by employees.</li> </ul> |
| <b>Training and communications</b>  |  |   |
| Continue to rollout face to face training to priority groups across the business        | <ul style="list-style-type: none"> <li>Number of employees trained.</li> <li>Feedback from training sessions monitored and lessons learned incorporated into future sessions.</li> </ul>   | <ul style="list-style-type: none"> <li>Employees trained, with informal feedback suggesting increased awareness of modern slavery risks for those employees who deal directly with suppliers and/or contractors.</li> </ul>                             |
| Raise awareness of modern slavery and red flags for APA through internal communications | <ul style="list-style-type: none"> <li>Number of articles published, and feedback received throughout the financial year.</li> </ul>   | <ul style="list-style-type: none"> <li>Articles published on APA intranet homepage.</li> <li>Dedicated modern slavery intranet site refreshed.</li> <li>Frequently asked questions refreshed for FY23.</li> </ul>                                       |
| <b>Risk Management</b>  |  |   |
| Map supply chains for high-risk suppliers   | <ul style="list-style-type: none"> <li>Number of high-risk suppliers identified as a result of the supply chain mapping and modern slavery risk assessment.</li> <li>Number of SAQs completed by suppliers, the quality of these responses, and the proportion of suppliers requiring a deep dive assessment.</li> </ul> | <ul style="list-style-type: none"> <li>Supply chain risk mapped as deep as Tier 10 for high-risk suppliers, with SAQs completed for select high-risk suppliers.</li> <li>Direct engagement with 1 supplier from SAQ due diligence exercise.</li> </ul>  |
| Identify high risk suppliers, issue self-assessment questionnaires (SAQ) for completion |  |   |
| New suppliers tracked for compliance against our New Supplier Procedure                 | <ul style="list-style-type: none"> <li>Number of new suppliers onboarded and compliant with the New Supplier Procedure (including completion of the Human rights declaration)</li> </ul>   | <ul style="list-style-type: none"> <li>Human rights declaration completed for new suppliers.</li> </ul>   |

**5.2 Looking forward**

The priorities in the coming year are:

|   |
|---|
| <p><b>Training &amp; awareness:</b></p> <p>Continue to rollout and embed modern slavery training as part of business as usual, rollout refresher training, extend information sharing and awareness communications for those employees managing high risk categories.</p> <p>Complete development and rollout of modern slavery training for the GDI Board.</p> |
| <p><b>Risk management:</b></p> <p>Monitor emerging risks and conduct deep dives for selected suppliers operating in high-risk categories and/or countries.</p> <p>Develop and launch step-by-step playbook for addressing and mitigating identified risk for high-risk suppliers.</p> <p>Annual renewal of CIPS Corporate Ethics Mark.</p>                      |
| <p><b>Continuous improvement:</b></p> <p>Update tender process and rollout use of modern slavery questionnaire for all future tenders. Develop and rollout Response Plan Guide for managing high risk supplier improvement plans.</p>   |
| <p><b>Documentation:</b></p> <p>Continue development of new Supplier Code of Conduct.</p> <p>Refresh modern slavery clauses and obligations in precedent agreements.</p>  |
| <p><b>Responsible Procurement Strategy:</b></p> <p>Ongoing development of pipeline and initiative execution.</p> <p>Support for RAP delivery.</p>   |
| <p><b>Industry collaboration:</b></p> <p>Partner with suppliers to strengthen their modern slavery awareness and their approach modern slavery risk management.</p>   |
| <p><b>Grievance and remediation:</b></p> <p>Further embed and operationalise the Modern Slavery Response Procedure.</p> <p>Review awareness and accessibility of grievance mechanisms.</p>  |



## **6 Reporting criteria 6**

### **6.1 Process of consultation with reporting entities and owned or controlled entities**

GDI (EII), Allgas and their owned or controlled entities (which do not trade) have a common directorship and management team. They also share a supply chain, which is managed by APA. This statement was prepared in tandem with APA's statement. Accordingly, APA and GDI have a common modern slavery risk in their operations and supply chains, which is described in this statement.

The members of all of the GDI boards are common and have been notified of the key requirements of the Act and the actions undertaken to address and access the risk of modern slavery as detailed in this statement.

## 7 Appendix 1 – Entities

| Name   | Description   |
|--|---|
| GDI (EII) Pty Limited<br>ACN 154 766 524                     | Reporting Entity<br>An unlisted investment vehicle that wholly owns the Allgas natural gas distribution network.  |
| Allgas Energy Pty Limited<br>ACN 009 656 446                 | The trading entity for the Allgas Network which extends from Brisbane, south of the river, to the northern tip of New South Wales, with separate networks in Toowoomba and Oakey. |
| Allgas Toowoomba Pty Limited<br>ACN 009 655 645              | Holds network infrastructure assets   |
| Allgas Pipelines Operations 1 Pty Limited<br>ACN 154 784 853 | Holds the investment in Allgas Pipelines Operations Pty Limited.  |
| Allgas Pipelines Operations Pty Limited<br>ACN 076 666 807   | Holds easements.  |

## 8 Appendix 2 – APA’s Policy Framework

Key policies governing ethics and integrity at APA<sup>1</sup> include:

| Policy   | Relevance to Modern Slavery  | How this policy continued to be implemented at APA during the reporting period  |
|--|--|---|
| <p><a href="#"><u>Code of Conduct</u></a></p>                    | <p>APA’s Code of Conduct serves as a roadmap to help ensure that we all work together and operate ethically, with integrity and in a compliant way.</p> <p>The purpose of our Code of Conduct is to embed a common understanding of our commitments, what APA stands for and what type of behaviour is expected at APA.</p> <p>Commitments include, but are not limited to, respecting human rights, preventing bullying and harassment and procuring goods and service ethically and responsibly.</p> | <p>APA’s Code of Conduct is available to all suppliers on the APA website and is referred to in APA’s precedent works and contractor agreements, in purchase order terms and conditions, and new supplier request form.</p> <p>The Code of Conduct makes it clear that it is expected that suppliers, contractors, and business partners uphold the principles and standards.</p> <p>Suppliers have an obligation under the Code to advise APA of any illegal or unethical practices of which they become aware, which would include modern slavery.</p> <p>Consequences of non-compliance with the Code can include termination of contract and new contracts not awarded.</p> |
| <p><a href="#"><u>Inclusion &amp; Diversity Policy</u></a></p>   | <p>The current policy sets out APA’s principles for an inclusive and diverse workplace, including guidelines on acceptable behaviour and anti-discrimination practices.</p> <p>Member of the Diversity Council Australia (DCA).</p>  | <p>Fair treatment awareness training is mandatory for all APA employees, and an inclusive leadership course is available for people leaders.</p> <p>The Inclusion and Diversity Policy applies to all APA workplaces, employees, contractors, consultants, visitors and other workplace participants.</p> <p>The Policy extends to conduct in any work-related context, including outside of normal working hours.</p> <p>In FY23 the Inclusion &amp; Diversity Policy was refreshed and is available on the APA website.</p>   |
| <p><a href="#"><u>Respect@Work Procedure</u></a></p>             | <p>APA is committed to providing and fostering an inclusive and respectful workplace with safe, fair and positive working conditions.</p> <p>APA does not tolerate any form of harmful behaviour including unlawful discrimination, bullying, harassment, sexual harassment, sex-based harassment, vilification, victimisation and other inappropriate behaviour.</p>  | <p>In FY23 APA launched our Respect@Work procedure.</p> <p>This aligns with the Inclusion &amp; Diversity Policy and the Code of Conduct.</p> <p>This procedure encourages all APA workers (including but not limited to employees, contractors and sub-contractors) to speak up if they witness harmful behaviours including unlawful discrimination, bullying, harassment, sexual harassment, sex based harassment, vilification and victimisation.</p>   |
| <p><a href="#"><u>Anti-Bribery and Corruption Policy</u></a></p> | <p>APA’s commitment to fostering business integrity including detecting and preventing bribery, corruption and fraud, it is recognised these can facilitate modern slavery.</p> <p>The Anti-Bribery and Corruption Policy prohibits bribery and corruption in any form.</p>  | <p>Training is provided annually to senior leadership and managers of employees.</p> <p>APA recorded zero confirmed incidents of fraud, bribery, or corruption in FY23.</p>   |

<sup>1</sup> References to “we”, “us” or “our” in this Appendix 2 refers to APA.

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

## 9 Appendix 3 - How our statement addresses the mandatory criteria

| Mandatory criteria  | Section  | Page number/s                   |
|---|--|---------------------------------|
| a) Identify the reporting entity  | About this statement<br>Appendix 1 - Entities  | Page 2, 3<br>Page 26            |
| b) Describe the reporting entity's structure, operations and supply chains  | About GDI<br>Operating model<br>Operations and supply chain  | Page 3<br>Page 6<br>Page 6, 7   |
| c) Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls                              | Identifying our modern slavery risks<br>Modern slavery risks in our operations<br>Modern slavery risks in our supply chain | Page 8<br>Page 8<br>Page 9 - 12 |
| d) Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes | Actions taken to assess and address risk   | Page 13 - 21                    |
| e) Describe how the reporting entity assesses the effectiveness of these actions  | Effectiveness assessment<br>Looking forward  | Page 22<br>Page 24              |
| f) Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls   | Process of consultation  | Page 25                         |
| g) Any other information that the reporting entity, or the entity giving the statement, considers relevant  | Statement from Chairman<br>Developments in APA's modern slavery response   | Page 4<br>Page 5                |