

Code of Conduct

2026

APA





APA's Code of Conduct guides how we work, the standards we uphold, and the role each of us plays everyday in APA's success.

At APA, our Code of Conduct goes beyond rules. It is a framework of standards that guides how we work together and with others. It defines our direction as a team, while at the same time helping each of us to understand the role we play in APA's success.

This includes guiding how we treat our customers, investors and communities and how we support each other and deliver on our purpose of securing Australia's energy future.

Our Code of Conduct is linked closely to our culture statement and our commitment to high performance, customer focus and to safety and care. It also reflects our behaviours of courageous, accountable, nimble, collaborative and impactful. This is how we do things at APA.

Our Code of Conduct is more than just meeting legal obligations - it's about always doing the right thing. Everyone at APA has a responsibility to uphold this Code and understand that our individual conduct reflects on all of us.

Our Code of Conduct applies to all employees, contractors and our Board. Please speak up if you think someone is not acting within the Code.

Thank you for constantly striving to uphold these standards.

Adam Watson
CEO and Managing Director

About our Code

Our Code 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 in adhering to the various policies, procedures and standards which are referred to in this Code as well as the relevant laws and regulations underpinning these principles.

Our people are expected to exercise sound judgement when evaluating an issue of business conduct. If they are in any doubt, they are expected to seek advice before taking any action which may compromise themselves or APA.

Our people also have an obligation under this Code to advise APA of any illegal or unethical practices of which they become aware. Directors and management will monitor compliance and will act on any actions that are inconsistent with this Code.

The standards set out in this Code cannot – and do not try to – anticipate every situation that may pose a legal, ethical or moral issue. Our reputation as an ethical organisation is important to our ongoing success. Adopting and complying with this Code will help ensure appropriate corporate behaviour.

Our Code is for everyone

Our Code is for all people working for or on behalf of APA. That includes our employees, contractors and board members. It does not specifically apply to customers or community members but should guide how we interact with them. For suppliers refer to APA's Supplier Code of Conduct.

Our Code applies whenever we represent APA, including when we are outside of our normal workplace or working hours. This Code of Conduct may be updated from time to time and the amended Code of Conduct will apply to you.

Everyone is expected to be familiar with the Code and its contents. It's available on our company website so that anyone interested in APA can read it to know the standards we expect when working for or on behalf of APA and it is part of our compliance training.

What happens is we don't follow Our Code?

All potential breaches of our Code will be assessed to determine the appropriate course of action which may include investigation in line with APA's policies and procedures, and there may be serious consequences for not complying. For employees, this could affect performance outcomes where behaviour does not align with our Code and expected standards. More serious issues may result in formal consequence management and disciplinary action, which could include formal warnings, monetary implications or, in the most serious cases, termination of employment.

Zero tolerance for retaliation and victimisation

APA expressly prohibits any form of punishment or retaliatory action being taken against anyone who raises or responds to a genuine grievance, complaint or conduct concern. Retaliation and victimisation are treated as grounds for discipline, which could include dismissal for the person found to be taking such action.

Our Commitments

We prioritise safety and care – For the things that matter

Safety is the number one priority for everything we do. Our culture statement reinforces our commitment to the safety and care of our people which is both the physical and psychosocial safety of our people for the things that matter. We come to work fit to do the job, unimpaired by alcohol, drugs or any substance and we stop work immediately, assess and act on risks if there is ever a safety related concern. We are committed to a workplace where everyone working for or with APA, goes home safely without injury or illness.

We maintain the safety of our assets

In addition to our commitment to the safety and care of our people, operating our assets safely is of paramount importance. We know that a failure to do so can lead to the unintentional release of energy or hazardous materials, which has the potential to cause serious or even catastrophic harm to people, communities and the environment. We are committed to ensuring safety-critical controls, processes and procedures are maintained and followed.

We foster inclusion and diversity

We are committed to providing an inclusive workplace with safe, fair and respectful working conditions, where everyone feels safe and supported to bring their best selves to work. We do not tolerate any form of discrimination, harassment or exclusionary behaviours and strive to give our people the opportunity to realise their full potential and contribute to APA's success.

We strive to build a workforce that reflects the diversity of our communities and are committed to equitable access to opportunities for all.

We cultivate a culture of Respect@Work

We do not tolerate any form of harmful behaviour, including unlawful discrimination, bullying, harassment, sexual harassment, sex-based harassment, vilification, victimisation and other inappropriate behaviour.

We respect human rights

APA draws upon the UN Guiding Principles on Business and Human Rights (UNGPs) to understand how to embed respect for human rights across our entire value chain.

We engage with our communities and respect our environment

We are committed to building relationships with our communities by engaging with them regularly, being open and honest about our plans and operations, and taking their concerns seriously in our planning and decision making. We are aware of our environmental footprint and seek to always minimise our impacts and contribute to long-term sustainability. We are focused on respectful engagement with First Nations Peoples, growing our cultural capability and delivering on our Reconciliation Action Plans, committed to embedding these as part of our work.

We protect our company assets, data and resources and ensure the security of our systems

We are all responsible for safeguarding our critical infrastructure, and the integrity of our operating systems. We deploy a suite of risk-based plans and controls designed to secure our critical infrastructure from malicious threats and negligent behaviours and expect everyone to be fully committed to embedding these as part of their work.

We are all responsible for protecting the integrity and security of data we collect and store on APA's systems, such as IT networks, computers and handheld devices. We do not tolerate the inappropriate use of IT or data that may expose us to risk (including virus attacks and security breaches).

We do not tolerate corruption and fraud

We do not tolerate corrupt practices and acts of fraud under any circumstances. These acts may also be a criminal offence, potentially resulting in criminal charges being laid. Any behaviour where a person uses their position for personal advantage or to improperly favour others is corruption. We understand our obligations to adhere strictly to company policies designed to protect our assets, finances and organisation from disrepute or harm.

Our Commitments

We comply with all laws and regulations including competition laws

Laws and regulations are a part of life, and complying with them is something we all have to do. It is the base line for us to be able to do business. We are committed to ensuring we are all aware of the laws and regulations we need to comply with as part of our roles, and make sure we do comply.

We adhere to our security trading policy

Because APA is a company listed on the Australian Securities Exchange (ASX), we are committed to our strict policy on security trading. We must not trade in the shares or securities of our own or another company, or encourage someone else to trade, if we are aware of inside or non-public information about that company that may have an influence on that company's share or security price. Insider trading is a serious criminal offence under the Corporations Act.

We use social media and the internet responsibly

We understand that social media is central to the way we connect with the outside world, including while we're working, and all employees and contractors using APA issued computers and other mobile devices have access to the internet and social media platforms for personal use.

We do not tolerate any misuse of social media and the internet in line with the requirements outlined in the performance requirements section of our Corporate Affairs Engagement Standard.

This includes revealing any information, content, photos or images pertaining to APA that are not already publicly available. We do not tolerate any comments in relation to APA or another person or entity which are defamatory, harassing or discriminatory.

We cultivate enduring and trust-based customer relationships

To be the partner of choice we are committed to building long term relationships with our customers that are based on trust and respect.

It's not just about the product or service we deliver for our customers, it's about working together to achieve an outcome.

We manage conflicts of interest

A conflict of interest arises when we have a personal interest that may influence, or be perceived to influence, our ability to act in the best interest of the company.

Conflicts of interest are not uncommon, and we all need to be vigilant to manage them appropriately when they arise. We are committed to disclosing any relationships and removing ourselves from any decision-making processes that may be perceived as a conflict of interest, and we are committed to having processes and systems in place to support the disclosure and management of conflicts of interests.

We procure goods and services ethically and responsibly

We are committed to enhancing supply chain visibility and to ethical, responsible procurement practices, ensuring that goods and services we purchase are procured without harm or exploitation to people or the environment.

We hold ourselves and our Suppliers accountable with respect to human rights, labour practices, and environmental stewardship, through robust due diligence, collaborative supplier relationships, and continuous monitoring.

We proactively identify and address risks within our supply networks, upholding our behaviours and strengthening supply chain resilience, enabling us to anticipate and mitigate potential disruptions to our operations.

By embedding ethical principles into our procurement strategy, we protect both people and planet while ensuring the reliability and continuity of our business.

We respect privacy and confidentiality

APA has information that must be protected to allow it to operate as a business in a competitive environment, both as an ASX-listed company and as a responsible corporate citizen. Respecting our privacy obligations is also central to us earning and sustaining the trust of our stakeholders. We are committed to keeping all information gained during the course of working with APA confidential, unless we are required by law to disclose it.



We uphold continuous disclosure expectations

We are committed to always presenting a true and fair view of our performance and position of APA, by continuously disclosing the information that investors and analysts need to gain an informed view about the financial and operational health of our business.

We do this to meet our obligations as an ASX-listed company, and to build trust and confidence with our security holders and other stakeholders. We have strict business processes to ensure that all relevant information is shared with stakeholders in a timely way. APA's Market Disclosure Policy sets out the requirements we are to follow.

We do not make any direct political donations and we treat gifts and hospitality responsibly

APA does not make any direct political donations. Payment for attendance at political fundraising functions and forums (indirect donations) is permitted in limited circumstances and subject to approval as defined in the Political Donations and Sponsorship Policy and the Corporate Affairs Engagement Standard. APA employees undertaking political activities in a personal capacity must do so outside of APA hours and must not purport to represent APA at the event.

Gifts and hospitality are part of general business practice, but we must always make sure that we are never influenced (or look like we are being influenced) by the provision or receiving of gifts or hospitality. We must follow the requirements and limits in relation to giving and receiving gifts, hospitability and other benefits set out in APA's Anti-Bribery and Corruption Policy and Standard, including recording and gaining the appropriate approvals for gifts, benefits, and hospitality in accordance with the Standard.

Speaking Up

If anyone at APA sees behaviour at work that we believe may not be in line with Our Code, we have a responsibility to raise our concern. We recognise that inclusion means creating space for every voice. APA encourages speaking up and ensures that all concerns are treated with respect and confidentiality.

This can be done in a number of ways:

In person

- Speak to the individual directly about your concern if you feel comfortable in doing so.
- Speak to your people leader , General Manager or General Executive directly if you feel comfortable in doing so.
- If you do not feel comfortable discussing with your own leaders, you may choose to discuss with another leader, or a member of either the People, Safety and Culture team or APA's Disclosure Officer (General Manager Risk, Compliance, Security and Insurance).

Whistleblower line

Our Whistleblower line is an independent service which operates external to APA. The Whistleblower service is available to all people working for or on behalf of APA, including former employees.

It is also available to contractors and to any other third party who wants to report a concern or issue about the behaviour of APA or its people.

This line is available if you wish to remain anonymous.

- Phone: 1300 304 550
- Email: **apa@stopline.com.au**
- Online: **apa.stoplinereport.com**
- Post: c/o The Stopline, **P.O.Box** 403, Diamond Creek, Victoria 3089

What happens when a concern is raised?

APA takes any concerns or claims raised seriously.

At APA, we want everyone to feel confident when raising their concerns about reportable conduct. Whether you begin the process with an informal chat with an APA Disclosure Officer or by contacting Stopline (where you can choose to remain anonymous) – you will be protected.

Disclosures about reportable conduct when made to an eligible recipient - including a senior manager , APA Disclosure Officer or Stopline - are protected by law under the Australian Corporations Act 2001 (Cth).

This means that if/when a whistleblower raises a concern, they:

- Will not be disadvantaged.
- Will be protected from any form of detriment or retaliation as a result of making the disclosure.

All disclosures about reportable conduct are investigated appropriately, promptly and confidentially.

Speaking on behalf of APA

For most of us, where we work is a big part of our identity, and we should all feel proud to tell our friends that we work for APA. We also respect the right of our people to enter into public debate on issues that they are interested in. However, APA authorises only specific roles or individuals to speak on behalf of the company, including through media and social media and at external conferences and events.

If you are not one of those people, you must not engage media, speak at external events or post on social media on behalf of APA. If you are doing so, it cannot be as a representative of APA.

We will

- Speak or engage with media with reference to APA only if we are authorised to do so.
- Speak and present on behalf of APA externally only if we are authorised to do so.
- Never make any comments on social media that could be interpreted as a comment or endorsement by APA, unless authorised to do so.
- Never make any comments in relation to APA (including any of our people, customers and suppliers) that are vulgar, defamatory, harassing, hateful, threatening or discriminatory.

Further information on requirements and approval processes for media and social media can be found in the **Corporate Affairs Engagement Standard** – please familiarise yourself with it and ensure you comply with its requirements. Approval processes for speaking opportunities can be found on **Empower**.





Our Behaviours

Our Code is underpinned by our five behaviours.

They reflect the way we do things at APA and guide our everyday interactions with each other, and with all our stakeholders.



COURAGEOUS

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



ACCOUNTABLE

We spend time on what matters, we do what we say and deliver customer focused solutions.



NIMBLE

We are curious, adaptive and future focused.



COLLABORATIVE

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



IMPACTFUL

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

Decision Making Considerations

Our Code is designed to set the standards by which APA and its people will operate. It doesn't cover every possible situation we may encounter so, if in doubt, consider the following:

- Will my actions abide by legal regulations and standards?
- Will my actions comply with APA's policies and procedures?
- Do my actions align with our behaviours?
- Will my actions comply with APA's Code of Conduct?
- How would my actions look if it were reported in the news?
- How would I feel explaining my actions to my family and friends?

If you are unsure about how you are meeting APA's Code of Conduct expectations then you should seek advice and support. Speak to:

- Your Group Executive, people leader or a trusted colleague.
- Your P&C Business Partner or someone from the People Safety and Culture team.
- APA's Disclosure Officer (General Manager Risk, Compliance, Security and Insurance) or Group Legal team within Legal, Regulatory and Governance Team.

Courageous

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

This means we:

Speak up when something isn't right

- Challenge or report discriminatory, harassing, bullying or inappropriate behaviour when we see it or experience it in the workplace or on social media.
- Speak up if we think our company, or a company we engage with, is not complying with our standards.
- Speak up if we see practices or decisions that are not open and honest or if you think something has not been properly disclosed.

Have open and honest conversations even when it is tough

- Fully disclose any relationships (personal or work related) or financial interests that may involve us in a conflict of interest and excuse ourselves from any decision-making process where we have an interest that influences, or could be perceived to influence, our ability to act in the best interest of APA.
- Speak up if we think we are being offered a gift, entertainment or hospitality in exchange for something. If you do receive a gift, you must record any gifts or hospitality given or received, valued at $250 or more, to the Group Compliance Manager and require approval from a Group Executive.
- Are honest and open with our customers about what we can (and can't) do for them and why.

Say what we think in a respectful way

- Never use the superior power and influence of our position to bully or intimidate another employee, supplier, contractor or other stakeholder. If there is an issue, say what you think in a respectful, constructive manner.
- Respectfully speak up and question if we think someone may not be acting impartially.
- When discussing APA, we say what we think in a respectful manner and avoid making any personal comments that could be interpreted as being made by APA.

Ask questions and be open to new ideas

- Speak up and ask questions if we don't understand. Be open to listening to new ideas or ways of working.

Challenge the status quo and have a go

- Actively discover new opportunities to shift our approach in aim of supporting our customers, communities and our environment.
- Challenge current ways of working in a respectful manner and always put your best foot forward to lead change.

Being Courageous:

We believe that being Courageous means speaking up, taking ownership, and doing what's right — even when it's hard. It's about leading with integrity, making bold decisions, and standing by our values.

Our journey of courage starts with each of us. Whether it's raising a concern, trying something new, or challenging the status quo, we act with confidence and care. Teams across APA show courage by owning outcomes, learning from mistakes, and staying true to our purpose.

Being Courageous helps us grow, build trust, and make a real impact. It's how we lead with conviction and create a culture where people feel safe, supported, and empowered to do their best work.



Accountable

We spend time on what matters, we do what we say and deliver customer focused solutions.

This means we:

Take ownership

- Comply with our legal obligations, license requirements and risk controls, including those measures designed to protect the security of our critical infrastructure and systems.
- Follow all APA policies, procedures and standards and we report incidences of non-compliance immediately.
- Take ownership for ensuring all APA policies, procedures and standards are consistent with legal and regulatory compliance.
- Use APA assets and resources only for their intended purpose, and in a professional manner and immediately report the loss or damage of an APA asset or resources.

Are proactive

- Proactively speak up we are approached to engage in corrupt or fraudulent behaviour, or if we see it in the workplace.
- Avoid holding positions or investments with companies that have dealings with APA including competitors, customers or suppliers if we are in the position to influence decisions and proactively report on any potential conflicts.
- Proactively speak up if we think there has or may be a compliance breach.

Focus, prioritise and deliver outcomes

- Meet all our contractual obligations, by prioritising and delivering outcomes including paying on time.
- Are fair and reasonable in our requests and expectations. Prioritise deliverables and produce outcomes in accordance with our own expectations.
- Always prioritise our APA work ahead of our personal social media interactions.

See things through to completion

- Complete all APA reporting processes and seek the Managing Director's approval prior to attending a political function as an APA representative.
- Never undertake activities prior to completing all necessary compliance-related training required for our role.

Looking outside the organisation to learn

- Never implement activities where the detriment to the local community outweighs the broader benefit delivered to external stakeholders or solely promotes internal growth.

Being Accountable:

We believe that being Accountable means owning our actions, decisions, and outcomes. It's about doing what we say we'll do, following through with integrity, and holding ourselves to high standards.

Our journey of accountability starts with each of us. Whether it's delivering on commitments, acknowledging mistakes, or supporting others to succeed, we take responsibility for the impact we have.

Teams across APA build trust by being reliable, transparent, and focused on doing the right thing — even when it's challenging.

Being Accountable means we're clear on expectations, take initiative, and stay committed to outcomes. It's how we create a culture of trust, performance, and shared success — together.

Nimble

We are curious, adaptive and future focused.

This means we:

Are quick to act

- Stop work if we think it's unsafe and escalate safety issues immediately.
- Create, maintain and dispose of APA information securely and in line with legal requirements and be quick to act if, even inadvertently, anyone has compromised the security of our systems and data including opening links or attachments that threaten APA systems.
- Take every measure to look after the hardware, software and data in our care, and proactively report it if lost, stolen or misused.

Ask why

- Are prepared to ask why and challenge ideas in a respectful way.
- Identify process improvement and development by asking questions in a respectful manner, gathering information and finding solutions to benefit our customers, colleagues and our environment.

Are willing to do things differently

- When a process related incident occurs, we are willing to implement new measures, learn from process safety trends, implement improvements and share learnings within or from outside of APA.
- Routinely assess and consider alternative contractors as part of the management of our ongoing relationship. We are open and willing to change our approach and do things differently if it benefits our customers and our community.

Lead change to improve

- Enact and lead change to improve our outcomes to benefit our customers, colleagues and our environment.

Design for tomorrow

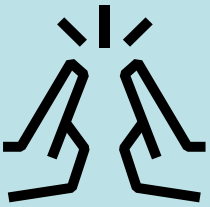
- Discover new ideas and challenge ourselves to consider new technologies and new ways of working.
- Adopt and discover measures to reduce our own environmental footprint, including our greenhouse emissions, as part of our daily work.

Being Nimble:

We believe that being Nimble means staying curious, adaptable, and ready to respond to change. It's about thinking ahead, embracing new ideas, and acting quickly to keep pace with a fast-moving world.

Our journey of being nimble starts with each of us. Whether it's asking better questions, trying new approaches, or adjusting plans when things shift, we stay open to possibilities. Teams across APA bring agility and creativity to their work, solving problems and finding smarter ways forward.

Being Nimble means we're not afraid to challenge the status quo or learn from setbacks. We move with purpose, make informed decisions, and stay focused on what matters most. This mindset helps us stay ahead, improve how we work, and deliver better outcomes together.



Collaborative

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

This means we:

Openly respect input and ideas from others

- Treat others with dignity, fairness and respect and openly and actively listen to other ideas.
- Foster belonging by listening actively, respecting diverse perspectives, and creating space for inclusive collaboration.

Work together for shared outcomes

- Employ, promote and manage people based only on their job related capabilities and performance. Do not engage in favouritism or only look inward.
- Pursue solutions that benefit both our customers and us, recognising we do well when our customers do well.

Put ourselves in each other's shoes

- Put ourselves in our customer's shoes and speak up if we think we are acting in a way that is not in the customer's best interests.

Share what works well

- Openly share what works well and help support others in their career and skill development.
- Support and upskill our colleagues to improve operational efficiency.

Help when our colleagues need support

- Always help our colleagues when they need support in delivering outcomes or speaking up if they don't see something that's right.
- Support and respect others and always be willing to lend a helping hand.

Being Collaborative:

We believe that when we are Collaborative, taking time to listen to each other and respect everyone's ideas, we can achieve anything. This teamwork is what unites us and helps us achieve our goals, creating a supportive and inclusive workplace.

Our journey of collaboration starts with every one of us. From sharing information across teams to talking through big plans, everyone's input is important. This environment encourages everybody to contribute their ideas, knowing that working together will lead to the best solutions. When we tackle projects as a team, our combined efforts really shine.

Teams across APA all bring diverse skills and views to the table, working through problems and coming up with creative solutions together.

Our approach to collaboration ensures that every voice is heard, every concern is addressed, and every victory is shared. Being Collaborative creates a place where everyone feels valued and empowered to contribute. This teamwork not only shows what we can achieve when we come together, it also builds a sense of belonging and purpose. Our projects stand out because they are created with care and cooperation, breaking down barriers to bring out the best in us.

Impactful

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

This means we:

Make safety a priority

- Treat the health and psychological wellbeing of our people as being as important as physical safety.
- Never undertake work unless we are trained, competent, or if there is a risk to ourselves or others physical safety. We always speak up and report hazards if we see them and we do not put budget or timing above of anyone's physical safety.
- Comply and maintain safety-critical controls, processes and procedures. Immediately report any non-compliance with safety-critical controls or on any actual or near-miss unintended release of energy or hazardous material. Activate effective and fully tested emergency response plans if required.
- Stop work if we think it is unsafe.
- Come to work fit to do the job, unimpaired by alcohol, drugs or other substances.

Care about each other

- Never be derogatory or abusive to, or about, another person.
- Never engage in jokes, comments or other banter that makes another person uncomfortable (even when it's well meant).

Leave things better than we found them

- Always contribute to the betterment of our colleagues, communities and our environment.
- Understand, respect and assess the potential and future environmental and community impacts of our operations and safely stop work if there is a risk to our natural or working environment and communities.

Listen to and working with our customers and communities

- Respect the needs and issues of local communities.
- Keep local communities informed about the progress and impact of our activities and proactively engage with communities to seek feedback on issues and input on solutions.
- Consider the impact on our customer of every action.

Think about the long-term impact

- Take a long-term approach to build relationships that are in our mutual interests.

Being Impactful:

We believe that being Impactful means making a meaningful difference through our actions, decisions, and the way we work together. It's about delivering outcomes that matter, not just for today, but for the future.

Our journey of impact starts with each of us. Whether it's improving safety, supporting communities, or finding better ways to do things, every contribution counts.

Teams across APA bring purpose and care to their work, thinking ahead and acting responsibly.

Being Impactful means we take ownership, consider long-term outcomes, and work with intention. It's how we create lasting value and lead positive change — together.



Additional information

Related Policies

For further information please refer to APA's Empower page to locate our policies including, but not limited to:

- Whistleblower Policy
- Termination of Employment Policy
- IT Acceptable Use Policy
- Disciplinary Action Policy
- Grievance Procedure
- Inclusion and Diversity Policy
- Security Trading Policy
- Conflict of Interest Policy
- Political Donations and Sponsorship Policy
- Corporate Affairs Engagement Standard
- Health, Safety, Environment and Heritage Policy
- Respect@Work Procedure
- Ring Fencing Policy
- Supplier Code of Conduct

Responsibilities

	Responsibility
Employees	Our people have a responsibility to comply with this Code of Conduct and act in accordance with APA policies, procedures, standards, commitments and behaviours.
People Leaders	People Leaders have a responsibility to comply with this Code and act in accordance with APA policies, procedures and standards. People Leaders are required to promote Our Code and support all our people to comply with this Code by role modelling our commitments and behaviours. People Leaders should hold our people accountable by dealing with any instances where behaviours do not meet the expectations of the Code or it is not followed, including reporting them where appropriate.
Contractors	All contractors have a responsibility to comply with this Code and act in accordance with APA standards, commitments, and behaviours.
Board members	APA Board members have a responsibility to comply with this Code and act in accordance with APA standards, commitments, and behaviours.

Glossary

Our Code	This Code of Conduct policy is referred to as Our Code, this Code or APA's Code of Conduct which sets the expectations for standards and behaviours for our people working at APA to uphold at all times.
Bullying	Workplace bullying is repeated, unreasonable behaviour directed towards another person, which creates a risk to health and safety. Bullying behaviour can range from obvious verbal or physical assault to subtle psychological harm.
Corrupt Practices	Corrupt practices include bribery, (also known as kickbacks or facilitation payments) where a person makes a payment or promise to someone, in order to receive a benefit for themselves or someone close to them.
Fraud	Fraud is when someone dishonestly obtains a benefit, or causes a loss, by deception or other means. This applies whether the benefit is for an individual or for the organisation.
Harmful Behaviours	Harmful behaviours are those which impede on a safe, respectful and inclusive workplace. These behaviours (which may include, but not limited to, bullying, harassment, unlawful discrimination and inappropriate behaviour) have the potential to result in psychological harm, or can make an individual feel uncomfortable in the workplace.
Harassment	Harassment is any form of behaviour that is unwelcome or uninvited, that a reasonable person would have anticipated would humiliate, offend or intimidate the person, and may be sexual in nature, even when that is not the intention of the person doing it.
Sexual Harassment	Sexual harassment is any unwelcome sexual advance, request for sexual favours, or other unwelcome conduct of a sexual nature that in the circumstances, a reasonable person would anticipate could offend, humiliate, or intimidate. It can be verbal, written, visual or physical, and may occur as a single incident without intent to harass.
Sex-based Harassment	Sex-based harassment is a particular form of unlawful harassment that occurs where a person is harassed because of their sex and a person engages in unwelcome conduct of a seriously demeaning nature in relation to the person harassed.
Unlawful Discrimination	Unlawful discrimination (which can be direct or indirect) is treating someone (or a group of people) less favourably than another because of an attribute they have, which is defined as a protected attribute.
Victimisation	Victimisation happens when a person is treated unfavourably or unfairly because they made a complaint (or intend to) or because they provided evidence or information in connection with a complaint.
Vilification	Vilification is doing something in a public place (including a workplace) that encourages others to hate, disrespect, or abuse a person or group of people because of their race, religion, sexuality or gender identification.

Want to know more

Employees: Please contact your People Leader or submit a support ticket here.

External viewers: Submit your query here.

APA

Australia's energy infrastructure partner

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