APA

Australia's energy infrastructure partner

Pilbara Deed Poll Annual Internal Review Report

Internal Review Report

April 2026

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Acknowledgement of Country

We acknowledge the Traditional Owners and Custodians of the land on which our assets are operated and maintained.

We acknowledge their connections to land, sea and community.

We pay our respects to their Elders past and present. We commit to ensuring the Pilbara Pipeline System, Goldfields Gas Pipeline and Northern Goldfields Interconnect operate in a fair and ethical manner that respects First Nations peoples' rights and interests.

1. Overview

APA has a 15-year undertaking for its existing and future gas transmission customers in the Pilbara, formalised through the Pilbara Pipeline System, Goldfields Gas Pipeline and Northern Goldfields Interconnect Deed Poll (**Deed Poll**).

The Deed Poll relates to the gas transmission assets set out in Table 1 below.

Table 1 Pilbara Gas Transmission Assets

Asset	Legal Entity
Pilbara Pipeline System (**PPS**) • Burrup Extension Pipeline; • Pilbara Energy Pipeline; • Karratha Lateral; • HBI Lateral; and • Boodarie Gas Lateral	APA (Pilbara Pipeline) Pty Ltd (**APA PPS**) (ACN 081 971 173)
Goldfields Gas Pipeline (**GGP**)	Southern Cross Pipelines Australia Pty Ltd (**SCPA**) (ACN 084 521 997) Southern Cross Pipelines (NPL) Australia Pty Ltd (**SCPNPL**) ACN 085 991 948) APA GGT Pty Ltd (**APA GGT**) (ACN 167 710 590)
Northern Goldfields Interconnect (**NGI**)	APA Northern Goldfields Interconnect Pty Ltd (**APA NGI**) (ACN 646 298 142)

APA Infrastructure Limited is the ultimate holding company of each of APA PPS, SCPA, SCPNPL, APA NGI and APA GGT. APA Infrastructure Limited is also the operator of these assets.

This document reports on APA's compliance with clauses 3 and 4 of the Deed Poll for the period commencing from 1 January 2025 to 31 December 2025 (**Internal Review Report**).

While the Deed Poll only requires APA to publish a short Review Report that confirms the Internal Review has been undertaken and publishes key conclusions, APA has chosen to publish a more comprehensive report that explains how APA is meeting all its obligations under the Deed Poll. This report also includes the statement of work agreed with the independent person, KPMG.

Any questions about this Internal Review Report can be directed to ringfencing@apa.com.au.

1.1. Deed Poll requirements

A Deed Poll is a legally binding agreement given by one party, where the beneficiaries of the agreement do not have to enter into the agreement to obtain the benefit offered under the agreement.

The Deed Poll is published on the APA website.

As part of its commitments, APA has undertaken each year to:

- Conduct an annual review of its compliance with its commitments under the Deed Poll; and
- Prepare and publish a report that outlines the findings of the review.

The following is a summary of clause 3 Ring-fencing Commitment and clause 4 Contracting Commitment of the Deed Poll:

APA undertakes to customers of the PPS, GGP and NGI to:

- comply with ring-fencing procedures that ensure its gas transmission business is ring-fenced from its power generation business in the Pilbara; and
- prevent the disclosure of confidential information about its pipeline customers to the power generation business in the Pilbara without customer consent. This includes reasonable IT system and security measures to safeguard inadvertent access.

Additional undertaking to customers of the Pilbara Energy Pipeline to:

- comply with ring-fencing policies and procedures that apply to the Pilbara Energy Pipeline;
- provide some flexibility on delivery points (detailed in the Deed Poll clause 4(a)(i)) if requested by the customer in any new contract for firm transportation on the PPS, or in respect of a new firm transport service under an existing contract on the PPS. 'New' means post 1 November 2023 (see Deed Poll clause 4(b) for exemptions and 4(c) for content of written notices); and
- offer 'postage stamp' pricing for a firm transport service (see Deed poll clause 4(a)(ii) for details and exemptions).

1.2. Independent Review requirements

Clause 5 of the Deed Poll outlines the process of an annual independent review, as extracted below:

5 Independent review

(a) APA undertakes to:

(i) conduct an annual review of its compliance with clauses 3 and 4 over the previous 12-month period (Internal Review);

(ii) prepare a report in respect of each Internal Review (Review Report), and publish the following on APA's website:

(A) a confirmation that the latest Internal Review has been conducted and

(B) an outline the key conclusions of the latest Internal Review; and

(iii) appoint an Independent person, which has appropriate skills and expertise, to:

(A) agree the methodology for the Internal Review with APA and endorse the agreed methodology;

(B) report its findings against the scope of appointment;

(C) report on APA's progress in implementing any actions recommended by the Independent person in the previous Independent review; and

(D) endorse:

(aa) its scope of appointment; and

(ab) the Review Report (including the finding as to whether APA has complied with clauses 3 and 4 over the previous 12-month period).

(b) APA undertakes to publish on APA's website:

(i) the scope of appointment of the last Independent person to be appointed under clause 5(a)(iii); and

(ii) the endorsement referred to in clause 5(a)(iii)(D) in respect of the latest Internal Review.

(c) The scope of appointment for the Independent person referred to in clause 5(a)(iii) will be agreed between APA and the Independent person from time to time, and must require the Independent person to:

(i) act impartially; and

(ii) maintain in strict confidence all information received by the Independent person on terms acceptable to APA (acting reasonably), including providing a written undertaking to APA in relation to same.

(d) Nothing in this clause 5(a)(ii) or 5(b) requires APA to publish any information on APA's website that is confidential or commercially sensitive.

2. Scope of appointment

In accordance with the independent review (outlined in section 1.2 of this report), APA has appointed KPMG as the Independent person to:

- agree the methodology for the Internal Review with APA;
- report its findings against the scope of appointment; and
- report on APA's progress in implementing any actions recommended by the Independent person in the previous Independent review.

The scope of KPMG's engagement is to conduct a review of APA's compliance with clauses 3 and 4 of the Deed Poll and provide a report that outlines the findings of the review that can be published on APA's website.

In doing so, KPMG is required under the Deed Poll to act impartially and maintain in strict confidence all information received.

2.1. Methodology

KPMG has undertaken the following actions to monitor APA's compliance with clauses 3 and 4 of the Deed Poll:

- Hold meetings with relevant APA stakeholders to understand the current year process for implementing procedures and controls to delivery compliance with the Deed Poll, including obtaining an overview of the compliance framework, core business activities and compliance systems.
- Understand the status of actions taken to address risks to compliance and/or breaches identified during the period.
- Obtain and review relevant policies, procedures and data for a desktop assessment of practices and controls in place to support compliance.
- Develop and execute testing procedures to assess controls supporting compliance and investigate whether there have been any non-identified compliance breaches during the period.
- Where relevant, investigate and test a sample of compliance breaches identified and communicated during the period.
- Discuss indicative draft findings and recommendations with key stakeholders to validate factual accuracy and appropriateness.
- Prepare a report for publishing on the APA Website.

3. How APA ensures compliance with clauses 3 and 4 of the Deed Poll

APA has undertaken a wide range of activities to ensure compliance with the Deed Poll. These activities form part of APA's wider Compliance and Risk Management framework.

3.1. Ring-fencing policy, standard and procedure

APA has ring fencing obligations for its gas assets in Western Australia as set out in the *National Gas Access (WA) Act 2009* (a modified version of the National Gas Law). APA has a mature established compliance framework to implement ring-fencing obligations. APA has complied with ring fencing obligations under the National Gas Law and National Electricity Law for many years across its portfolio of regulated gas pipelines and electricity transmission assets.

APA has an existing suite of ring-fencing policies and procedures that all APA staff must abide by. These documents include:

- **Ring fencing policy** – sets out APA's approach to ring fencing including the principles, roles and responsibilities of individuals within the business
- **Ring fencing standard** – sets out what behaviours and processes are required to comply with ring fencing obligations
- **Ring fencing procedure** – contains the detailed processes and procedures that support ring fencing compliance

3.1.1. Updating the Framework

During 2025, a detailed review of the policy, standard and procedure was conducted. The documents were updated to be more user friendly, with guidance notes created to assist staff in understanding their obligations. The documents were finalised in January 2026.

3.2. Internal communication, and training

APA has in place various systems and processes to ensure compliance. These include:

- Regular ring fencing updates to the Executive Policy Committee and a staff level Monthly Policy Forum
- A monthly Ring-fencing Steering Committee
- A staff intranet page that provides a clear process for reporting suspected breaches and all ring-fencing policies, procedures and guidance notes
- Annual ring-fencing training (conducted either in person or online)
- Within APA's existing compliance framework, controls are reviewed annually and allocated to the appropriate person within APA (see section 3.4).

3.3. IT systems

APA has appropriate security measures and controls to maintain customers' confidential information in the form of a dedicated Customer Contract Management (**CCM**) and Customer Relationships Management (**CRM**). These security measures include:

- Security roles are assigned to a user to implement ringfencing of data;
- Weekly automated testing is in place for CRM which covers ring fencing between the Transmission and the Power Team plus CCM functionalities;
- General Manager level approval of requests for system access and monthly user access reviews.

3.4. Annual review of ring-fencing controls

APA leverages its existing compliance management system to identify, implement and assign ring-fencing controls to individuals across the organisation. Over the past year, APA has undertaken a more detailed review of its ring-fencing obligations and controls, which has resulted in the development of a dedicated ring-fencing compliance plan. All Deed Poll obligations and controls are included within this compliance plan.

Assigning clear ownership of each obligation and control, supports a culture of compliance and ensures accountability across the business. These controls have been implemented within APA's internal compliance system, Vigilant. The controls have also been assigned to individuals who are responsible for ensuring compliance and attesting on an annual basis that the controls are effective, and the obligations are complied with.

The list of Deed Poll obligations and associated controls are outlined in Table 2.

3.5. Operating module restructure

Over the last 12 months APA has made changes to its operating structure, including divesting its Networks business.[1] These changes form part of a broader simplification effort aimed at reducing corporate costs and improving organisational efficiency.

[1] Media release of APA's divestment of its gas distribution operations and maintenance entities can be found here - https://www.apa.com.au/news/asx-and-media-releases/apa-executes-agreement-to-divest-gas-distribution-operations-and-maintenance-entities

Table 2 APA Pilbara Deed Poll ring fencing compliance controls

Obligation	APA Controls
OBL_001471 - [Deed Poll] In respect of the PPS, the GGP and the NGI, APA must have in place reasonable information technology system and security measures to safeguard confidential customer information.	CTRL_012650 - A User Access Review pack has been developed to ensure access to ring fenced information for the PPS, the GGP and the NGI is monitored and restricted as per Ring Fencing requirements. The list of users and storage locations is reviewed regularly by the General Manager (GM).
OBL_001472 - [Deed Poll] APA must comply with its ring-fencing policies and procedures that apply in respect of the PPS, GGP and NGI.	CTRL_005770 - Ring-fencing policy and procedures kept up to date by Reg & Policy. CTRL_000747 - Ring-fencing training is monitored to ensure that Annual training is completed by relevant staff based on their day-to-day role.
OBL_001473 - [Deed Poll] APA must comply with contracting commitments relating to: - Shipper request for existing Delivery Point access and transfer - postage stamp pricing	CTRL_012644 - The document execution process takes into account offer for existing Delivery Point access and transfer if requested by a Shipper and includes applicable written notification where APA is not able to give effect to a request. CTRL_012645 - With respect to the PEP, opportunity screening process in place (standard price is postage stamp price).
OBL_000790 - Separation of accounts: a Covered Pipeline service provider must prepare, maintain and keep separate accounts in respect of every covered pipeline, and a consolidated set out accounts for the whole business of the covered pipeline provider - applies to both December and June Year end reporting.	CTRL_000762 - Preparation of separate accounts for Covered Pipeline service providers - applies to both December and June year end.
OBL_000788 - Separation of APA People and Entities: - APA Covered Pipeline service provider entities must not carry on a Related Business. - Personnel engaged in marketing Covered Pipeline services cannot market services or act as agent for a Related Business and vice versa.	CTRL_005770 - Ring-fencing policy and procedures kept up to date by Reg & Policy. CTRL_000747 - Ring-fencing training is monitored to ensure that Annual training is completed by relevant staff based on their day-to-day role.. CTRL_000754 - The new corporate entity registration process takes ring-fencing compliance into account, including the appropriate appointment of directors. CTRL_000756 - Restriction of attendance at internal and external meetings, calls and on emails is reinforced in annual training and the ring fencing manual. Responsibility also lies with Exec and GMs to enforce the culture. CTRL_000757 - Deal-specific Protocols developed by Legal and signed by relevant personnel: Under the APA document execution process, all agreements for the sale or acquisition of gas (including natural and processable gas and LNG) require approval by APA Legal. This provides an additional check to ensure the contracting entity and corporate structure being used for such transactions is appropriate and in compliance with the NGL, Ring-fencing Policy, Ring-fencing Standard and Ring-fencing Procedure. CTRL_000770 - The document execution process takes ring-fencing compliance into account by requiring Regulatory and Legal sign-off for deals that would involve ring-fencing

Obligation	APA Controls
OBL_000791 - Associate contracts must not be anti-competitive: A Covered Pipeline service provider must not enter, vary or implement an associate contract that has an anti-competitive purpose, effect or likely effect in a natural gas market (unless approved by the AER).	CTRL_000770 - The document execution process takes ring-fencing compliance into account by requiring Regulatory and Legal sign-off for deals that would involve ring-fencing.
OBL_000792 - Associate contracts must comply with the Pricing Parity Rule: A Covered Pipeline service provider must ensure that any pipeline services on a Covered Pipeline are provided to associates as if they were unrelated entities (unless approved by the AER).	CTRL_000747 - Ring-fencing training is monitored to ensure that Annual training is completed by relevant staff based on their day-to-day role.. CTRL_000770 - The document execution process takes ring-fencing compliance into account by requiring Regulatory and Legal sign-off for deals that would involve ring-fencing.
OBL_000793 - Notify AER or ERA of Associate contracts: AER must be notified of any Associate Contracts entered into or varied within 5 Business Days (whether the AER approved the contract or not).	CTRL_000774 - APA Regulatory team advised upon execution and notify AER or ERA within 5 Business Days. CTRL_001596 - Customer & Commercial notifies the Regulatory team of all new associate contracts within 24 hours of execution.
OBL_001470 - [Deed Poll] APA must comply with requirements relating to: - the annual compliance review; - appointment of the Independent reviewer; and - publish key conclusions of annual review.	CTRL_012646 - The Reg & Policy Team is responsible for the preparation of a report on the key findings of that review of compliance with clauses 3 and 4 over the previous 12 month period CTRL_012647 - The Reg & Policy Team is responsible for engaging an independent person to endorse the scope of appointment and the Review Report on an annual basis