

Securing Australia's energy future

Modern Slavery
Fact Sheet 2024

APA

Acknowledgement of Country

At APA, we acknowledge the Traditional Owners and Custodians of the lands on which we live and work throughout Australia. We acknowledge their connections to land, sea and community.

We pay our respects to their Elders past and present and commit to ensuring APA operates in a fair and ethical manner that respects First Nations Peoples' rights and interests.

We responsibly develop, build, own and operate energy infrastructure assets, leveraging our organisational know-how to enable safe generation and transportation of energy for our customers and communities.

As part of communities across the country, including many our people call home, we're often unseen, connecting industry, manufacturing and households to the energy they need to keep our nation moving forward.

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

APA remains committed to addressing modern slavery and acknowledges the importance of being vigilant to the risks of modern slavery in our operations and supply chains. Throughout FY24 we continued to mature our actions and worked to further embed our Modern Slavery Risk Management Approach across the business.

This Fact Sheet details the policies and controls we have in place to manage the risk of modern slavery to APA's operations and supply chain. It has been designed to address the modern slavery questions you may have as an existing, or prospective, customer, supplier, or investor.

All information provided as at 30 June 2024. An update to this Fact Sheet will be published in December 2025. For more details, please refer to the APA FY24 Modern Slavery Statement or contact the APA Modern Slavery Team

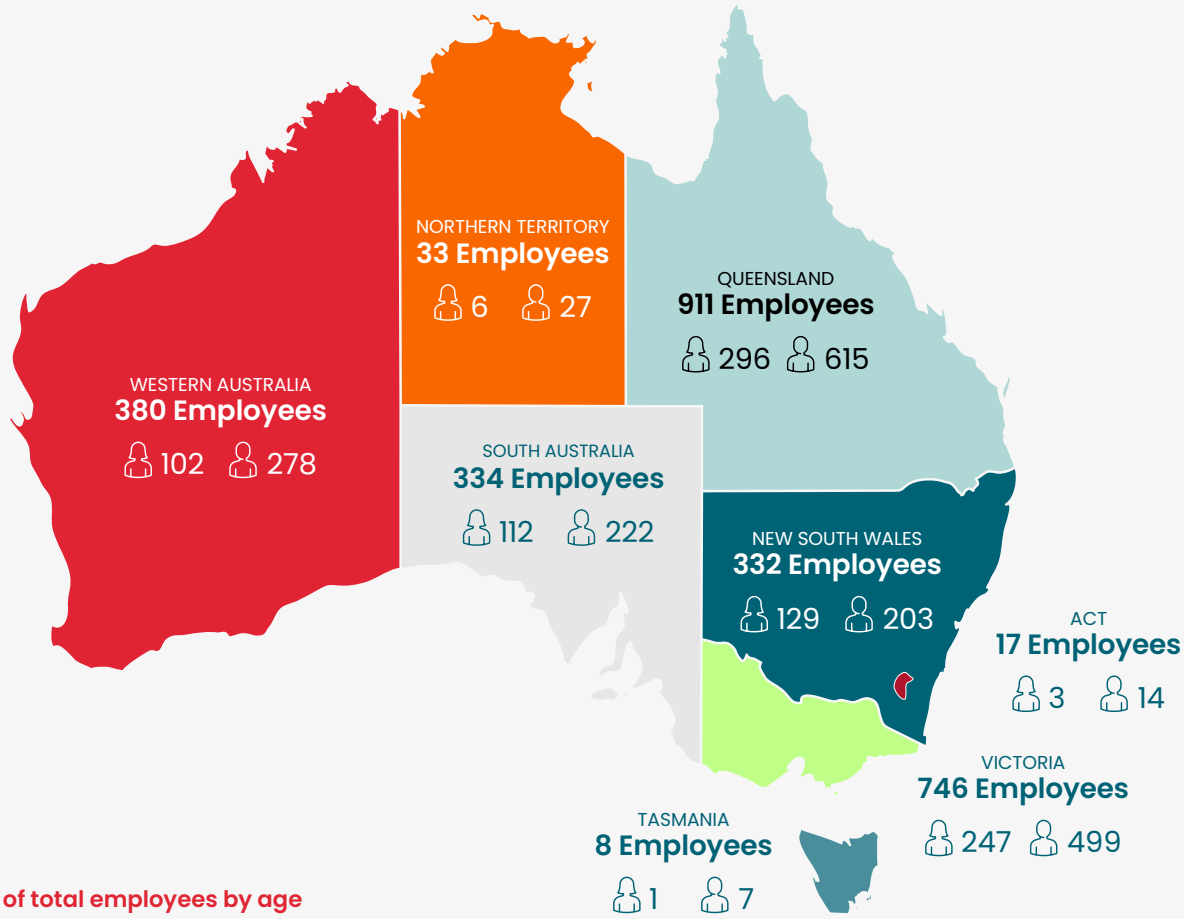
APA Group

Company name:
APA Group Limited
ACN 091 344 704

Ownership and legal form:
APA Group (APA) comprises two registered investment schemes, APA Infrastructure Trust (APA Infra) and APA Investment Trust (APA Invest)

Head office:
Level 25, 580 George Street, Sydney NSW 2000

Our workforce



Diversity of total employees by age





2762[1]
Employees

360
Contingent workers

Female

Under 30 years	5%
30-49 years	19%
50+ years	9%

Male

Under 30 years	6%
30-49 years	38%
50+ years	23%

Employment Category	Male	Female
Full-time permanent	1734	729
Part-time permanent	13	80
Full-time fixed term	94	61
Part-time fixed term	0	7
Casual	24	19
Grand total	**1,865**	**896**

1. In FY24, one employee and three contingent workers identify as gender non-binary.

Policies and procedures

Our group-wide policy framework sets the foundation for our approach to managing modern slavery risks in our operations and supply chain.

Key policies governing ethics and integrity at APA include:

Policy	Relevance to modern slavery	How this policy continued to be implemented at APA during the reporting period
Code of Conduct (Our Code)	Our Code brings our purpose and culture to life so we can make the right choices every day. It is underpinned by our behaviours of being courageous, accountable, nimble, collaborative and impactful. It includes principles and business standards that support safety, diversity and inclusion, human rights, community engagement, environmental protection, and data privacy and security, and prevent discrimination, bullying, harassment, corruption and anti-competitive behaviour.	Our Code is available to all our suppliers on the APA website and is referred to in our precedent works and contractor agreements, in our purchase order terms and conditions, and our new supplier request form. Our Code makes it clear that we expect our suppliers, contractors, and business partners to uphold the principles and standards of our Code. Our Code applies whenever we represent APA, including when we are outside of our normal workplace or working hours. Suppliers have an obligation under this Code to advise APA of any illegal or unethical practices of which they become aware, which would include modern slavery. Consequences of non-compliance with the Code can include termination of contract and new contracts not awarded.
Inclusion and Diversity Policy	Our commitment and strategy to build a diverse, equitable and truly inclusive workplace where everyone belongs, feels valued, and respected and comfortable to bring their authentic and best selves to work.	Respect @ Work training is mandatory for all APA employees, and an inclusive leadership course is available for people leaders. The Inclusion and Diversity Policy applies to all APA workplaces, employees, contractors, consultants, visitors and other workplace participants. The policy extends to conduct in any work-related context, including outside of normal working hours.
Respect @ Work Procedure	Our commitment to providing and fostering an inclusive and respectful workplace with safe, fair and positive working conditions. APA has zero tolerance for any form of harmful behaviour including unlawful discrimination, bullying, harassment, sexual harassment, sex-based harassment, vilification, victimisation and other inappropriate behaviour.	Our Respect @ Work Procedure aligns with the Inclusion and Diversity Policy and the Code of Conduct. This procedure encourages all APA workers (including but not limited to employees, contractors and sub-contractors) to speak up if they witness harmful behaviours including unlawful discrimination, bullying, harassment, sexual harassment, sex-based harassment, vilification and victimisation.
Anti-Bribery and Corruption Policy	Our commitment to fostering business integrity including detecting and preventing bribery, corruption and fraud.	Training is provided annually to senior leadership and managers of employees. APA recorded zero confirmed incidents of fraud, bribery, or corruption in FY24.
Health, Safety, Environment and Heritage Policy	Our aspiration is to not only respect the past but to also protect values for the future. We do this by protecting the health, safety and wellbeing of our people and the environment, heritage and the communities in which we operate.	The policy is implemented through our Health, Safety, Environment and Heritage Management system Safeguard which identifies and establishes controls to meet the objectives of the policy.

Policy	Relevance to modern slavery	How this policy continued to be implemented at APA during the reporting period
Risk Management Policy	Our Risk Management Policy sets out APA's overall risk management principles and approach to risk management and approach aligns with the principles in the international risk standard ISO 31000:2018.	The policy informs our Risk Management Approach to modern slavery. 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. 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.
Sanctions Policy	Our Sanctions Policy sets out the principles and processes all APA employees are expected to adhere to in order to comply with our sanctions obligations.	The policy is available on our intranet and informs APA personnel of their responsibilities with respect to sanctions and demonstrates APA's commitment to compliance with its sanctions obligations.
Compliance Policy	The Compliance Policy supports the effective management of compliance obligations and incorporation of compliance into the broader Enterprise Risk Management Framework. The Compliance Policy aligns with the principles and requirements in the international good practice standard for compliance (ISO 37301:2021 – Compliance Management Systems), sets out compliance management objectives and clarifies responsibilities for compliance within APA.	The Compliance Management System (CMS) ensures APA complies with the applicable legal, regulatory, standards, codes and licence requirements, including the MSA. 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.
Whistleblower Policy	This policy creates a safe and protected environment to escalate potential matters of concern and suspected wrongdoing for those working with and for APA, including our employees, contractors, suppliers and consultants. The Whistleblower Policy also outlines the process and structures in place for assessing, addressing and reporting on whistleblower disclosures.	Our Whistleblower Policy is available on the APA website. Whistleblower reports or disclosures made are investigated by the Disclosure Officer, and where substantiated, process or control improvements implemented.
Procurement Policy	The Procurement Policy and associated performance requirements and procedures reflect our approach to identifying and mitigating modern slavery risk and to align with our Code of Conduct.	The Procurement Policy and associated Procurement Standards, and Modern Slavery Response Procedure, are available for all employees via our intranet. The draft Modern Slavery Risk Mitigation Engagement Guide will be progressed in FY25. 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.

These policies are supported by standards that set out performance requirements and detailed procedures. They are periodically reviewed to ensure they remain relevant and are made available on APA's website or intranet.

Modern slavery risk management controls

Category	Details
Governance framework	APA's cross-functional Modern Slavery Working Group (Working Group) supports the Executive Risk Management Committee to provide assurance to the Board, through the Risk Management Committee, that APA's approach to managing modern slavery risks is effective and compliant with APA's internal policies and standards. The Working Group met quarterly throughout FY24 and reports annually to the Executive Risk Management Committee and the Risk Management Committee on the progress of roadmap initiatives, to provide an update of modern slavery due diligence across the business and raise modern slavery risks identified through those assessments.
Supplier due diligence	**New supplier onboarding** Modern slavery checks are part of our supplier onboarding and pre-engagement risk management process. During FY24, 648 new suppliers were onboarded to APA. The onboarding process requires suppliers to declare their commitment to respect workers' fundamental human rights before they are added to our internal systems. This includes committing to: • providing a safe working environment (and appropriate worker accommodation facilities where relevant) • paying a fair wage in accordance with all relevant laws and regulations • treating workers equally without distinction based on gender, race, age or religion • ensuring workers are free from forced labour, including that workers are able to access to employee documentation and passports (if internationally sourced labour) • ensuring workers are free to join a union or other similar collective bargaining arrangement. Precedent agreements APA's precedent agreements include modern slavery clauses and obligations that were reviewed and uplifted during FY24. These commitments mitigate risk to personnel, including if they: • are paid a living wage • receive a contract in writing in a language understood by them • are of legal working age • are not subjected to discrimination on any ground (including race, national or social origin, birth, age, disability, gender, sexual orientation, religion, union membership or political opinions) • are provided accommodation arranged by the supplier, have access to hot water for bathing, adequate heating and ventilation, reasonable personal space, hygienic facilities for cooking and eating and unrestricted ability to enter and exit the accommodation facilities • are not subject to corporal punishment or mentally, physically, sexually or verbally abusive or inhumane treatment or cruel or abusive disciplinary practices in the workplace. The template clauses support our Modern Slavery Risk Management Approach, ongoing supplier due diligence, access to grievance mechanisms, and our Modern Slavery Response Procedure. This includes any necessary remediation process in circumstances where risk is identified, and/or incidents are reported.

Category	Details
Supplier due diligence continued	**Existing supplier risk management** APA suppliers, regardless of spend, are screened for inherent modern slavery risk using the Fair Supply platform using the process outlined below. **Initial screening/supply chain mapping:** The platform traces the economic inputs typically required to produce products and services sourced from tier 1 up to tier 10 suppliers. The supply chain mapping was performed by linking supply chain data from 190 countries and over 15,000 industry sectors. Data is sourced from: • the United Nations' (UN) System of National Accounts • UN COMTRADE databases • Eurostat databases • the Institute of Developing Economies, Japan External Trade Organization (IDE/JETRO) • numerous national agencies including the Australian Bureau of Statistics. It examines supply chains against international standards: • the UN Guiding Principles on Business and Human Rights • Walk Free Global Slavery Index • International Labour Organisation's (ILO) Global Estimates of Modern Slavery • the United States' Reports on International Child Labour and Forced Labour. Results from the screening and supply chain mapping are reviewed and suppliers with a higher inherent risk are asked to complete a self-assessment questionnaire. **Self-assessment questionnaires (SAQ):** The SAQ responses are used to assess the level of modern slavery risk in the supply chain and the maturity of suppliers' modern slavery risk management response. Questions asked are in relation to: • company information and related policies • modern slavery supplier risk screening and assessment • training and education • due diligence • grievance and remediation mechanisms • measuring effectiveness • industry collaboration. Results from the SAQ process are reviewed through an automated assessment in the first instance and, if required, further due diligence actions will be put in place for residual high-risk suppliers. Mitigation actions may include: • conducting deep dive assessments • contacting suppliers to request further information • collaborative supplier engagement • offering supplier training • supplier improvement plans • on-site auditing and worker interviews. **Supplier performance management:** Supplier performance management will be required for existing and future suppliers where we identify the need for further modern slavery due diligence, and/or opportunities for improvement. This will commence with direct supplier engagement following consideration given to the outcomes of any deep dive assessment undertaken following the SAQ. The supplier will be provided with relevant information detailing the modern slavery risk or concern and given the opportunity to respond. We would then seek to address any remaining concerns not addressed through the supplier's response upon agreeing remediation actions and timing for review and discussion with the supplier. This process may also be supported by third party social audits, particularly where deeper supply chain visibility is deemed necessary.

Modern slavery risk management controls

Category	Details
Training and awareness raising	**Training for our staff** Providing tailored modern slavery training to key staff across our business is one of the foundations of our modern slavery response. We see training as critical to building and maintaining awareness of modern slavery across key areas of our business and to help ensure relevant staff are equipped to identify and safely report any concerns. During the reporting period, we continued our training program by delivering nine modern slavery training sessions. This included four 1.5-hour sessions and five 30-minute refresher sessions for staff who had previously completed the 1.5-hour session. We delivered these training sessions online in partnership with an expert business and human rights advisory firm. We tailored the training content to create a bespoke training program for APA. The 1.5-hour sessions included information about what modern slavery is and how it could occur in ways relevant to APA, as well as guidance about stakeholder expectations, legislation, and key human rights standards such as the UNGPs. **Strategic briefings for our Board and Executive Leadership Team (ELT)** During the reporting period, we provided strategic briefings to our Board and ELT to support them to continue to effectively oversee APA's modern slavery response. The Board briefing included information about what modern slavery is, how modern slavery relates to directors' duties, emerging trends and evolving stakeholder expectations, and practical questions Directors can ask as they engage with APA's modern slavery response. The ELT briefing included an expanded version of the Board briefing content, including a focus on the role of the ELT. **Modern slavery lunch-and-learn** To complement our targeted training for key staff, we also held a modern slavery lunch-and-learn session in June 2024. The aim of this online session was to raise awareness of modern slavery across the business through an interactive presentation. We worked closely with an expert business and human rights advisory firm to develop the training content. The session included interactive exercises exploring how modern slavery is relevant to our daily personal lives (such as through the products we purchase), as well as to the commercial procurement activities undertaken by APA. The session also included hypothetical examples of how modern slavery could occur in ways relevant to APA and an explanation of the steps APA is taking to manage these risks.
CIPS corporate ethics mark	During FY24, we successfully renewed our Chartered Institute of Procurement and Supply (CIPS) Corporate Ethics Mark, as a demonstration of our ongoing commitment to ethical procurement practices. The CIPS Corporate Code of Ethics was developed as part of CIPS' commitment to reinforcing global ethical values across all procurement and supply practices. By adopting the voluntary code, APA commits to: • ensuring consistent understanding of business ethics across the organisation at all levels; • continually enhancing 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. APA employees responsible for sourcing, supplier selection and supplier management activities completed the CIPS Ethics Test during the year.

Category	Details
Stakeholder engagement and collaboration	Throughout FY24, the Modern Slavery Team engaged with a range of external stakeholders, including customers, investors, industry peers and external human rights experts. These engagement opportunities support us to monitor and learn from peers and contribute to industry wide approaches and standard setting. **Clean Energy Council (CEC)** APA is a member of the CEC Risk of Modern Slavery Working Group. The Working Group provides an opportunity for APA to meet with peers to discuss modern slavery risks facing the energy industry. The Working Group has met regularly throughout the year and we participated in each of these meetings. A key area of focus for the Working Group was to support the development of a Code of Practice (CoP) on Managing Modern Slavery Risks in Renewable Energy Value-Chains in collaboration with the NSW Anti-slavery Commissioner. APA is a member of the sub-group that was established by the CEC to draft the CoP and determine the associated mechanisms and frameworks in order to operationalise the CoP, and setting out the commitments participants would be expected to adhere to. APA is an active participant at the workshops and the CoP is currently in draft. **United Nations Global Compact (UNGC) Membership** Our ongoing membership of the UNGC continues to reinforce our commitment to uphold the 10 Principles of the United Nations in the areas of Human Rights, Labour, Environment and Anti-Corruption, including the Sustainable Development Goals. Our GRI Index and SASB Index are available in the FY24 Sustainability Data Book. **United Nations Global Compact Network Australia (UNGCNA) Modern Slavery Community of Practice (CoP)** APA continued to participate in the CoP during the reporting period. We attended two CoP meetings, which enabled us to discuss issues such as Commonwealth Government expectations of demonstrating continuous improvement in disclosure reporting, and global development of modern slavery and human rights legislation at our Modern Slavery Working Group meetings.
Stakeholder engagement and collaboration continued	**Cross-industry modern slavery practitioner group** To complement our other engagement activities, we have established an informal cross industry group to bring together practitioners working on modern slavery risks. The group includes voluntary representatives from eight companies from sectors such as arts and entertainment, energy, government, and consumer goods. We convened the first meeting of the group in March 2024, set on a quarterly cadence, held under Chatham House Rule. To date, the group has provided a forum for participants to share learnings and discuss challenges, such as: • lack of standardisation of due diligence across organisations and industry sectors • labour intensiveness of varied customer due diligence information requests • variation of governance frameworks • effectiveness of actions taken and measurable KPIs.
Grievance mechanism and remediation processes	APA takes a range of steps to prevent and mitigate modern slavery risks. However, we recognise that it is also important to be prepared to respond to actual or suspected incidents of modern slavery. During the reporting period, no complaints relating to modern slavery were received through our whistleblower mechanism or other relevant channels. However, we understand the difficulties and barriers faced by victims of modern slavery to speak up, and having not identified any incidents does not necessarily mean that APA's supply chain is free from modern slavery. We also recognise that our grievance mechanisms will only be effective if they are accessible to stakeholders who may wish to raise concerns. This is why an initiative on our FY24 roadmap included reviewing our grievance mechanisms and opportunities for potential improvement. As a first step, we reviewed and updated APA's suite of precedent agreements to provide contracted suppliers, their staff, and subcontractors with clarity on the availability of our grievance mechanisms. We will continue to progress this work in FY25. We have also communicated information about using our grievance mechanisms to our own staff through our modern slavery training program. The visual below outlines APA's grievance mechanisms and remediation process; the latter is documented in APA's Modern Slavery Response Procedure.

Modern slavery risk management controls

Our Grievance Mechanisms and Modern Slavery Response Procedure

Whistleblower Line

Our Whistleblower Line is maintained through an externally managed disclosure service as an independent, impartial and confidential means of reporting potential incidents, including any concerns related to modern slavery or broader labour rights issues. The Whistleblower Line is available to employees, contractors and other stakeholders, including suppliers and their workers. Information about the whistleblower mechanism is included in our modern slavery training. During the reporting period, no complaints relating to modern slavery were received through our whistleblower mechanism. However, we understand that modern slavery is complex to identify and that not identifying any incidents does not mean modern slavery could not occur in APA's supply chains.

Other available mechanisms to raise concerns:

- Complaints made directly to APA employees/management
- Self-reporting by a supplier (in relation to its own activities or those of a sub-supplier)
- Reports made to Modern Slavery Team
- APA's modern slavery risk management activities
- APA employees identifying modern slavery red flags on sites
- Media or civil society reporting

1. IDENTIFY →

Modern slavery report received

Reports are received through the mechanisms mentioned above

2. REVIEW →

Assessment of report

All reports will be assessed and considered by APA and a decision will be made as to what type of investigation is required

Addressing the report

APA will establish a cross-functional Incident Response Team. Reports may be addressed informally or through a formal investigation, depending on the nature of the report

3. INVESTIGATE →

Incident identified

Where an investigation identifies an instance of modern slavery, appropriate action will be taken. We will consider the most appropriate approach to engage with law enforcement and other external stakeholders

Formal investigation

Formal investigations may be confidential, will be conducted in a timely manner and will be fair and independent from any persons to whom the report relates

4. REMEDIATE

Determining our involvement under the UNGPs

The Incident Response Team will determine if APA has caused, contributed, or is directly linked to the incident in line with the UNGPs. External expert business and human rights advice will be sought to inform the assessment

Responding to the incident

We have a clear commitment to taking a victim-first approach to remediation

apa.com.au

APA
Australia's energy infrastructure partner