

always powering ahead

Modern Slavery Fact Sheet 2022

apa

Introduction



At APA we are Always Powering Ahead

Consistent with our purpose to strengthen communities through responsible energy, we deliver about half of the nation's gas use and connect Victoria with South Australia and Tasmania, and New South Wales with Queensland, through investments in electricity transmission assets. We also own and operate renewable power generation assets in Australia, with wind and solar projects across the country.

With Australia and the world focused on decarbonising energy supply systems, APA is well positioned to play a key role in developing and deploying the energy solutions of tomorrow.

Our modern slavery risk will change as APA and the energy market transitions to renewable energy. We will continue to assess and address modern slavery risks during this transition process as part of our commitment to deliver responsible energy.

This Fact Sheet details the processes 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 2022. An update to this Fact Sheet will be published in December 2023.

For more details, please contact the APA Modern Slavery Team.

APA Group Details	
Organisation legal name	APA Group Limited
Organisation Registering ID (ABN)	99 091 344 704
Country of Registration	Australia
Head Office Address	Level 25, 580 George Street, Sydney, NSW 2000
Contact Details	APAModernSlaveryTeam@apa.com.au

Workforce

Employment Category

Full-Time
1,815
M: 1,329 F: 486

Part-Time
76
M: 8 F: 68

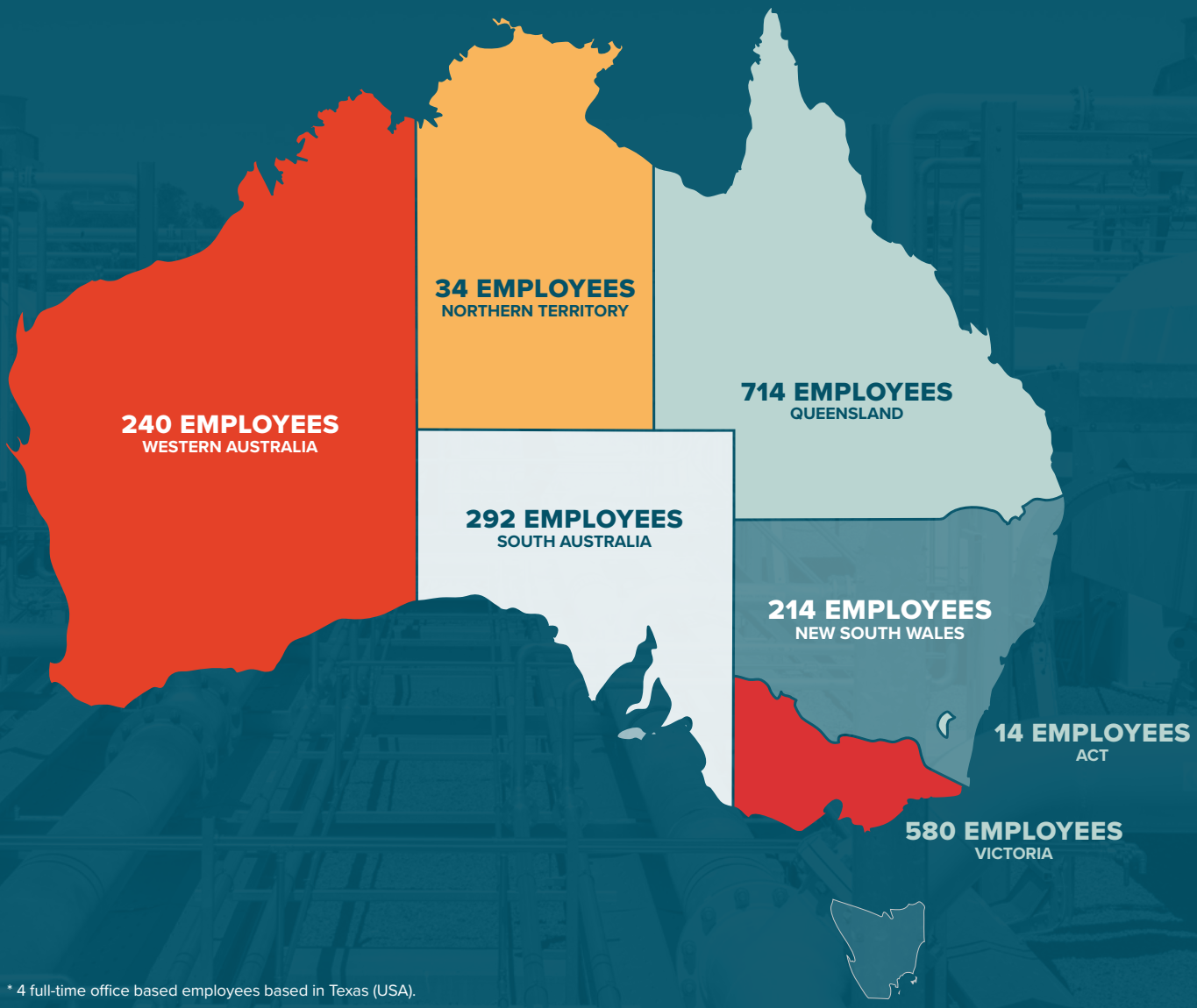
Full-Time fixed term
157
M: 133 F: 44

Part-Time fixed term
9
M: 5 F: 4

Casual
35
M: 22 F: 13

Total Employment
2,092
M: 1,477 F: 615

APA's National Site Numbers



* 4 full-time office based employees based in Texas (USA).

Policies & 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)**	The principles and business standards that support safety, anti-harassment, anti-bullying, anti-discrimination, human rights (such as modern slavery), community engagement, environmental protection, anti-corruption and data privacy and security, and prevent anti-competitive behaviour. The Code of Conduct was updated during FY22.	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. 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.
Diversity and Inclusion Policy **(Including Equal Employment Opportunity**	The current policy sets out our principles for a diverse and inclusive workplace, including guidelines on acceptable behaviour and anti-discrimination practices. This also helps us to model the same behaviour we expect from our suppliers in relation to the rights of workers.	Fair treatment awareness training is mandatory for all APA employees, and an inclusive leadership course is available for people leaders. The Diversity and Inclusion 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. In FY23 the current Diversity and Inclusion policy is being renewed.
Anti-Bribery and Corruption Policy	Our commitment to fostering business integrity including detecting and preventing bribery, corruption and fraud, which we recognise can facilitate modern slavery. Our Anti-Bribery and Corruption Policy prohibits bribery and corruption in any form.	Training is provided annually to senior leadership and managers of employees. APA recorded zero confirmed incidents of fraud, bribery or corruption in FY22.
Health, Safety and Wellbeing Policy	The Policy sets out our commitment to provide workplaces free of injury and support the good health, wellbeing, respect and inclusion of our employees, contractors and visitors.	The Policy is implemented through our Health, Safety, Environment and Heritage Management (**HSEH**) system Safeguard which identifies and establishes controls to meet the objectives of the policy.
Risk Management policy	Our Risk Management Policy sets out APA's overall risk management principles and approach to risk management and is aligned to the international risk management standard ISO 31000.	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.

Policy	Relevance to Modern Slavery	How this policy continued to be implemented at APA during the reporting period
Compliance Policy	The Policy supports a culture of regulatory compliance and ethical decision-making and ensuring appropriate updates and reporting to our regulators.	The Compliance Management System (**CMS**) ensures APA complies with the applicable legal, regulatory, standards, codes and licence requirements, including the Modern Slavery Act 2018 (Cth). 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 chain and is supported by a model of continuous improvement.
Whistleblower Policy	The process for our people to report matters of concern and suspected wrongdoing that constitutes reportable conduct. The Whistleblower Policy provides for disclosures regarding modern slavery practices occurring in APA's supply chain.	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 requirements and procedures is available for all employees via our intranet. The approach to identifying and managing modern slavery risk is embedded within the procedures with training and communications in place focussed on the role of our employees in identifying modern slavery issues, looking out for supplier red flags and raising awareness on modern slavery across our business.



Controls

Category	Details
Modern Slavery Working Group	APA's governance framework helps to ensure material risks and opportunities, including risks relating to modern slavery, are escalated through our executive leadership team to the Board with the support of the Executive Risk Management Committee, and the Risk Management Committee. Our response to modern slavery is overseen by our cross-functional Modern Slavery Working Group, which is responsible for implementing our modern slavery roadmap. The Working Group was established in late 2019 and is made up of representatives from Procurement, Risk and Compliance, Sustainability & Community, Finance and Legal. During the reporting period, the Working Group continued to meet monthly and reported to the Executive Risk Management Committee and the Risk Management Committee annually on the progress of the planned activities from the roadmap, the progress of risk assessments, and the modern slavery risks identified through those assessments.
Training and Communication	Delivering training to raise awareness of modern slavery and help ensure our people are equipped to identify red flags and respond to potential modern slavery concerns is a key element of our modern slavery risk management approach. Face to face training is rolled out to those employees who deal directly with suppliers. Communication to raise awareness of Modern Slavery is published to all APA throughout the year.
Supplier Selection and Onboarding	During FY22 495 new suppliers were onboarded using the APA supplier onboarding process. The process ensures suppliers declare their commitment to respect workers' fundamental human rights before they are added to our systems. These commitments include: – providing a safe working environment (and appropriate accommodation facilities if being provided), – paying a fair wage in accordance with all relevant State and Commonwealth 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 considered, in accordance with APA's Procurement Policy. The precedent agreement includes modern slavery clauses and obligations that were added in FY21.
Responsible Procurement	APA's first Responsible Procurement Strategy development commenced in FY22. This was completed and approved early in FY23. The strategy is directly aligned to the priority investment areas of APA's Sustainability strategy, with key initiatives to be identified, to commence execution in the second half of FY23. The roadmap is to build and grow APA's maturity in its approach to responsible procurement.



Frameworks	Details
Risk Management Framework	APA's risk management framework complies with ISO31000:2018 and informs our risk management approach to modern slavery. We are committed to meeting our obligations of the Commonwealth Modern Slavery Act (Cth) 2018, doing what is right, and continuing to mature our approach over time. Refer to our most recent Modern Slavery Statement FY22.
Risk Management Approach	APA's modern slavery risk management approach comprises three stages: **Stage 1 -** data driven risk assessment: using annual spend data we conduct supplier screening using an external AI platform. Our products and service categories are mapped against the United Nations Standard Products and Services Codes (UNSPSC) and together with other databases utilised which provide for modern slavery analysis including social hotspots database (SHDB), supplier and country risk information. The results are analysed, and the very high-risk suppliers are shortlisted for further review. **Stage 2 –** desktop risk assessment: completed for each of the high-risk shortlisted suppliers identified in stage 1. The desktop risk assessment is used to determine whether the suppliers have the necessary controls in place to manage modern slavery risks in their supply chain. The outcomes are assessed by Procurement Managers and APA's Modern Slavery Working Group. Any suppliers deemed high risk will be shortlisted for Stage 3. **Stage 3 –** Targeted Supplier Assessments: we engage a reputable external consultancy to provide additional due diligence information for the suppliers selected for targeted assessment. Each report provides additional information across modern slavery risk indicators and research data for each of the shortlisted suppliers. Reports are reviewed by our Procurement Managers and findings are presented to the Modern Slavery Working Group. Suppliers that remain high risk will be managed via our Modern Slavery Response Plan.
Modern Slavery Response Plan	The Response Plan provides a framework for APA to appropriately manage a potential modern slavery allegation or incident involving a supplier. The Response Plan provides guidance about how we could assess whether we may have caused, contributed to, or be directly linked to modern slavery, in line with the United Nations Guiding Principles. No incidents or reports of modern slavery were received in FY22. We understand that each allegation or incident of modern slavery raised will be unique. As per the Response Plan, any future reports of modern slavery would undergo the following: – Establish a cross-functional team to manage our response, – Work to prioritise the best interests of any victims, – Consider the most appropriate approach to engage with law enforcement and other – external stakeholders, – Take other relevant steps to investigate the allegation or report, and, – Work to always ensure the safety of our employees and any victims.

