

# apa



CODE OF CONDUCT

always  
powering  
ahead

# OUR CODE



**Our Code of Conduct sets out a consistent standard that we all need to follow in our daily roles.**

It also describes the outcomes we expect so we can meet the expectations of our customers, our investors, our communities and each other so we are able to deliver on our Purpose.

Our Purpose to strengthen communities through responsible energy, and we achieve this by:

- Doing the right thing, even in tough situations.
- Creating value for all our stakeholders.
- Taking a long-term view.
- Investing in future technologies and new energy.
- Innovating for a sustainable future.

Our behaviours of being Courageous, Accountable, Nimble, Collaborative and Impactful are the foundations of our culture, it's 'how we' do things.

We value our people, we get things done and do what we say. We bring out the best in our people and work together on what really matters.

Every day it is our individual responsibility through our actions and our decisions to surpass the standards expected by our customers, security holders, suppliers, contractors, regulators, our communities, and each other.

APA's Code of Conduct is more than just honouring our legal obligations - it's about always doing the right thing. We need to be proud of ourselves and our business and acknowledge that our individual conduct reflects on all of us. It's important that everyone has the courage to speak up if you think anyone at APA is not following Our Code. It is non-negotiable for all employees and there are serious consequences for not adhering to it. Our Code provides practical examples that ensures that everyone is very clear on what our expectations are.

Thank you for constantly striving to uphold these important standards and together we will achieve our vision to provide world class energy solutions.

**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 officers and employees 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.

Officers, employees and suppliers 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.

Officers, employees and suppliers 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 business 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 everyone working for, and with, APA. That includes our employees, board members, contractors, and consultants. We also 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. This policy may be updated from time to time and the amended policy 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 with, APA.

## What happens if we don't follow Our Code?

All potential breaches will be investigated, and there may be serious consequences for anyone who doesn't comply with the Code and/or company policies, procedures and standards. This can include disciplinary action, up to and including termination of employment or monetary implications.

For suppliers and contractors, your contract with us may be terminated and new contracts not awarded. Cases that involve breaking the law (such as theft, fraud or assault) will be referred to the relevant external authorities.

In severe circumstances, there may be reasons for criminal investigation and prosecution.

## 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 deal with a genuine business conduct concern. Retaliation and victimisation are treated as grounds for discipline, which could include dismissal for the person found to be taking such action. For suppliers and contractors, your contract with us may be terminated in accordance with its terms.

# OUR COMMITMENTS

Our Code is underpinned by the following commitments. These commitments outline APA's principles and standards which we expect employees, officers, suppliers and contractors to demonstrate at all times.

Our Commitment	What does this mean
<b>We maintain the safety of our assets</b>	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 and the environment. We are committed to ensuring safety-critical controls, processes and procedures are maintained and followed and we stop work immediately, assess and act on risks if there is ever a safety related concern identified.
<b>We work safely</b>	Safety is the number one priority for everything we do, and that applies to both personal safety and the safety of our assets. We come to work fit to do the job, unimpaired by alcohol, drugs or other substances. We're committed to a workplace where everyone who works with, or is touched by, APA, goes home each day without injury or illness.
<b>We foster diversity and inclusion</b>	We are committed to providing and fostering an inclusive workplace with safe, fair and positive working conditions, where everyone feels safe and supported to bring their best and true selves to work. We do not tolerate any form of discrimination, harassment or exclusionary behaviours and strive to give every employee the opportunity to realise their full potential and contribute to APA's success.
<b>We respect Human Rights</b>	We recognise our responsibility and support human rights consistent with the United Nations Universal Declaration of Human Rights and the International Labour Organisation's declaration on Fundamental Principles and Rights at Work. We also recognise the traditional rights of Aboriginal and Torres Strait Islander peoples and respect those sites, places, structures and objects that are culturally or traditionally significant. We have no tolerance for using suppliers and contractors who engage in exploitative behaviours of modern day slavery such as child labour, debt bondage, inhumane treatment of employees and forced or compulsory labour.
<b>We prevent bullying and harassment</b>	We do not tolerate harassment or bullying in the workplace. Harassment and bullying can be direct or indirect and is not tolerated on any level, and disciplinary action up to and including termination of employment may apply.
<b>We engage with our communities and respect our environment</b>	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 highly aware of our environmental footprint and seek to always minimise our impacts and contribute to long-term sustainability.
<b>We protect our company assets, data and resources and ensure the security of our systems</b>	We all have a responsibility to protect APA's physical and non-physical assets, data and resources, and to use them only for their intended purpose. We accept that employees will use APA property like computers, cars and phones for personal use, as long as it is not for private income-producing purposes or done in a way that disadvantages APA and is otherwise in accordance with relevant policies. We are all responsible for safeguarding the integrity and security of data we collect and store on APA Group information technology (IT systems, computers and handheld devices). We do not tolerate the inappropriate use of IT or data as it may expose us to risk, including virus attacks and security breaches.
<b>We do not tolerate corruption and fraud</b>	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. Stealing from the company, whether using a company credit card for small personal expenses, or siphoning money from the company's bank account, is an example of fraud.
<b>We comply with all laws and regulations including competition laws</b>	Laws and regulations are 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 carry on 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 have no tolerance for insider trading**

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, iPhones and other 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 our Social Media Policy including 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 are straight with our customers**

Without our customers, we don't have a business. We are committed to building long-term relationships with them that are based on trust and respect. Transparency is key to this trust.

**We respect our suppliers and contractors**

Suppliers and contractors are an integral part of our high-quality service delivery. We are committed to engaging with them in ways that build mutual trust and respect over the long-term.

**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.

**We procure goods and services ethically and responsibly**

We are committed to ensuring that the goods and services we source are procured ethically and responsibly, without harm or exploitation to people or the environment, and require our suppliers and contractors to do likewise.

**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 are committed to continuous disclosure**

We are committed to always presenting a true and fair view of the financial 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 the trust and confidence of 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 tolerate inappropriate political affiliations**

We respect the democratic political process and the roles and contributions of all political parties. While we do participate in political forums as part of our comprehensive stakeholder engagement program, we do not make any direct donations, either in cash or in-kind, to any political party, representative or candidate on behalf of APA.

**We manage gifts and hospitality appropriately**

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 gifts and other benefits set out in APA's Anti-Bribery & Corruption Policy and Standard.



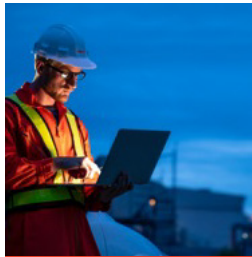
# OUR BEHAVIOURS

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 of our stakeholders.



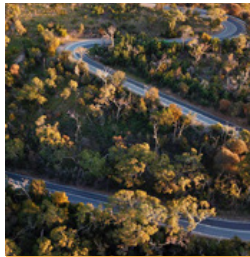
## Courageous

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 world class solutions.



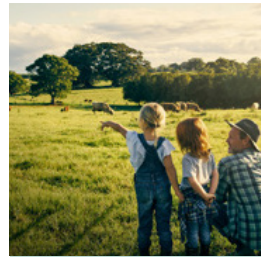
## Nimble

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?
- Will my actions meet other people's standards and expectations?
- 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 my friends?

**If you have answered no to any of the above questions, or you are unsure, then you should seek advice and support. Speak to:**

- Your Group Executive, people leader or a trusted colleague.
- Your HR Business Partner or someone from the People Safety & Culture team.
- APA's Disclosure Officer (General Manager Risk, Compliance and Insurance) or Group Legal team within Governance & External Affairs.
- In the case of suppliers and contractors, the APA contract manager.

## 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. This can be done in a number of ways:

In Person	Whistle blower Line
<ul style="list-style-type: none"> <li>– Speak to the individual directly about your concern if you feel comfortable in doing so.</li> <li>– Speak to your Group Executive or people leader directly if you feel comfortable in doing so.</li> <li>– If you do not feel comfortable discussing with your leader, you may choose to discuss with another leader, or a member of either the People, Safety &amp; Culture team or APA's Disclosure Officer (General Manager Risk, Compliance and Insurance).</li> <li>– In the case of suppliers and contracts, speak to the APA contract manager.</li> </ul>	<p>Our Whistleblower line is an independent service which operates external to APA. The Whistleblower service is available to everyone for whom Our Code applies. It is also available to suppliers, contractors and to any other third party who wants to report a concern or issue about the behaviour of APA or its people.</p> <p>This line is available if you wish to remain anonymous.</p> <ul style="list-style-type: none"> <li>– phone: 1300 304 550</li> <li>– email: <a href="mailto:apa@stopline.com.au">apa@stopline.com.au</a></li> <li>– online: <a href="http://apa.stoplinereport.com">apa.stoplinereport.com</a></li> <li>– post: c/o The Stopline, P.O.Box 403, Diamond Creek, Victoria 3089</li> </ul>

### What happens when a concern is raised?

APA takes any concern 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 the APA Disclosure Officer or go straight to providing a written statement to the STOPline – you will be protected.

Disclosures about reportable conduct when made to an eligible recipient - including an Excom member, APA Disclosure Officer or STOPline - are protected not only by law but by our Whistleblower Policy.

### 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.

It is important to note that frivolous and vexatious claims are also a breach of this Code and upon substantiation may result in disciplinary action, including termination.

All disclosures 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're encouraged 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. If you are not one of those people, you must not speak, or post on social media, as a representative of APA. If we are speaking or posting about APA and have not been authorised to do so, it must be as a private citizen.

## We will:

- Speak and present on behalf of APA only if we are authorised to do so.
- Never make any personal comments that could be interpreted as a comment or endorsement by APA unless authorised to do so.
- Never refer to APA colleagues by name or title, or release sensitive company information on social media.
- Never make any comments in relation to APA (including any of our people, customers or suppliers) that are vulgar, defamatory, harassing, hateful, threatening or discriminatory.

### Scenario: Resolving the situation

Raj's team member Lucinda posted comments on LinkedIn indicating strong political beliefs. When Raj saw these comments on LinkedIn, he thought this could be perceived as APA endorsing these comments or that these comments may have the potential to impact APA's reputation. Raj expressed to Lucinda that this could be a breach of the Code of Conduct and should be taken down. Lucinda agreed with Raj's concerns and apologised for posting this on social media. Lucinda thanked Raj for speaking up and raising his concern directly with her.







# 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 being open to new ideas

- Question decisions or activities made by suppliers, contractors or team members that could be viewed as support to a political party or representative, on behalf of APA.
- 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

- 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 in Action: We speak up when something isn't right

Carlos was a leader of the planning team, and Sandeep was one of the team's junior members. On several occasions Carlos deliberately excluded Sandeep from team meeting invites (so he would miss the meeting). He ignored his contributions in group discussions, excluded him from general social banter with the rest of the team, and was often aggressive and publicly critical about the quality of his work.

One of Carlos's colleagues in the planning leadership team, Rhonda, noticed this behaviour and raised her concerns directly with Carlos. She informed Carlos that his actions were inappropriate and did not reflect APA's Code of Conduct.

Upon reflection, Carlos recognised that his behaviour was inappropriate, did not reflect the APA way, and apologised to Sandeep for his actions. He thanked Rhonda for raising her concerns with him and appreciated her speaking up.



# ACCOUNTABLE

We spend time on what matters, we do what we say and deliver world class solutions.

## THIS MEANS WE:

### Take Ownership

- Accountable for following, complying and ensuring our activities reflect all national and international legislative and license requirements.
- 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

- Never implement activities where the detriment to the local community outweighs the broader benefit delivered to external stakeholders or solely promotes internal growth.
- Maintain a fair and equitable procurement process, ask our suppliers about their processes and base all decisions on the supplier's ability to meet our requirements as benchmarked against others.

### Being Accountable in Action: We are proactive

Robbie had an APA credit card, which she sometimes used to pay for business related meals when she travelled. On a couple of occasions she had used her APA credit card to pay for meals for her family. She reasoned that it was just a couple of times and, besides, she felt he'd really gone above and beyond for the company over recent months.

A couple of months later, Robbie's assistant was reconciling her credit card. He raised the out of office hour's expense which was one for Robbie's family dinners, and she dismissed it as nothing to worry about. Robbie's assistant felt it was not the right thing to do, so he proactively reported it to APA's Disclosure Officer. An audit of Robbie's credit card statements revealed her actions. Robbie was found to have committed fraud and to have breached of APA's Code of Conduct and faced disciplinary action.

Robbie's assistant was commended on raising this issue to APA's Disclosure Officer as Robbie made a clear breach of our Code of Conduct.



# 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 suppliers and 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

- Continuously monitor and change suppliers or contractors if we think APA has purchased unsafe or environmentally irresponsible goods or services or has used a supplier that uses exploitative or unlawful practices to produce their goods or services.
- 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 in Action: We are quick to act

Julia commenced work at a main line valve site to replace an instrument transmitter. She used her gas detector to conduct an atmospheric test for any gas releases at site. She detected a small leak on one of the fittings in the instrument tubing. Julia then reported this to her leader immediately, who advised her to isolate the transmitter and do an initial investigation of the leak. Her leader commended her on her quick response. She investigated the fitting and identified that it was non-standard. She then obtained the correct fitting (meeting the appropriate standard for this service) and re-installed it along with the new transmitter she was initially requested to install.

Following further investigation, it was found that the use of the incorrect fitting had contributed to similar leaks in the past. Julia immediately informed the procurement team to avoid any future occurrences of purchasing the incorrect fittings. The team took on the learnings, implemented new measures and replaced all of the incorrect fittings.



# 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 a culture and facilitate opportunities for everyone to develop and contribute

### 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.
- Put ourselves in our supplier's shoes and speak up if we think a supplier is being treated unfairly.

### 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 in Action: We put ourselves in each other's shoes

To improve the company's monthly cash flow, Meng suggested to one of his colleagues that his team could delay the payment of supplier invoices beyond their due date as suppliers relied on his business.

Meng's colleague, Sarah, noted that, not only would it be a breach of our Code of Conduct and our contractual obligations, this would be treating our suppliers unfairly. Meng's colleague suggested that Meng put himself in the shoes of our suppliers and reinforced that this action would undermine the trust of our supplier relationship.

Meng agreed that this would be an unethical and unfair approach to engaging with our suppliers and thanked his colleague for bringing this to his attention. Upon reflection, Meng would not like to be put in that situation, so he decided he wouldn't put others in it either.



# 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.

### 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 the feedback on issues and input on solutions.

### 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).
- Assess the environmental standards, risk controls and track records of our main contractors and suppliers before and during APA's engagement and proactively report any incidences of non-compliance to support our communities, our people and our environment.

### Think about the long-term impact

- Consider the human rights implications of all our activities, including not purchasing products or services from suppliers or contractors we know violate human rights standards.
- Ask suppliers about their manufacturing processes and supply chain procurement to assess their commitment to ethical and responsible supply. Do not use suppliers that we know supply unsafe or environmentally irresponsible goods or services, or use exploitative or unlawful practices (including modern slavery or violation of human rights standards) to produce their goods or services.
- Take a long-term approach to build relationships that are in our mutual interests.

#### Being Impactful in Action: We make safety a priority

Sven was responsible for coordinating maintenance cleaning and repairs of a compressor station. This was to be completed by the end of the day. The morning of the repair, one of the crew called to advise they were unwell and would not be in today. Sven explained the situation to his manager Jessica, she told Sven to "let's see if we can get this done today or we might be over budget".

Sven explained to Jessica that he does not think it would be safe to undertake the work give a colleague was absent. Jessica reflected on this situation and gained approval for an extension to complete the work. She thanked Sven for making the safety of himself and his colleagues a priority.



## 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 Policy
- Inclusion and Diversity Policy
- Security Trading Policy
- Conflict of Interest Policy
- Anti-bribery and Corruption Policy
- Social Media Policy
- Health, Safety and Wellbeing Policy

## RESPONSIBILITIES

Party Responsible	Responsibility
All Employees	All persons have a responsibility to comply with this Code and act in accordance with APA policies, procedures and standards. All employees have a responsibility to align with APA's 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 employees to comply with this Code by role modelling our commitments and behaviours. People Leaders should hold team members accountable by dealing with any instances where the Code is not followed, including reporting them where appropriate.
Suppliers	All suppliers that require a purchase order have a responsibility to comply with this Code and act in accordance with APA standards, commitments, and behaviours.
Contractors	All contractors that require a purchase order have a responsibility to comply with this Code and act in accordance with APA standards, commitments, and behaviours.

## GLOSSARY

Descriptor	Definition
Bullying	When someone intentionally uses words or actions against someone else (or a group) to cause distress, intimidation and risk to their wellbeing.
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.
Harassment	Behaviour that is viewed as unwelcome, humiliating or intimidating by the recipient, and may be sexual in nature, even when that is not the intention of the person doing it.