APA Corporation

Political Contributions and Lobbying Expenditures Policy

OUR POLICY

APA Corporation believes it is in the best interest of the company and its shareholders to participate in the political process. The company is committed to transparency with political contributions and lobbying expenditures and participates in the political process in its countries of operation only in a manner consistent with applicable laws.

APA's political contribution and lobbying expenditure activities support policies and candidates that advance the interests of APA, its stockholders, and the oil and natural gas industry, irrespective of political party.

The company operates in many countries, all of which occasionally change governments, and the company needs to be able to operate effectively in these ever-changing settings. APA employs people of many different political persuasions and maintains an environment in which they all feel respected.

APA recognizes that it operates in an inherently political world. To balance this reality with the company's non-partisan status, the company has carefully delineated areas in which it feels it can appropriately channel its interactions with political entities and policymakers:

- **Policy engagement:** Political entities at all levels make the rules by which the company operates. It is therefore essential that APA work with these entities. In some cases, the company is required by law or regulation to do so, and in others, APA's participation is invited. The company supplements these required or requested communications when it believes doing so improves decision making related to its operations or the policy issues connected to them.

  These engagements also include sharing expertise. Many APA employees have expertise that can inform policy discussions on a variety of subjects. The company is therefore willing, in appropriate circumstances, to share its expertise, often pursuant to requests by shareholders, NGOs, policymakers and political entities.

  Communications that constitute lobbying are disclosed pursuant to applicable laws. APA has always been willing to answer questions that shareholders ask about any of these efforts, and the company prides itself on working openly with groups from across the political spectrum. Membership in trade associations comprises most of APA's expenditures in this area.

- **Political contributions:** On occasion, and where allowable by law, APA may consider corporate contributions for direct expenditures and/or independent expenditures in support of candidates, ballot measures, inaugurations, political party conventions and/or causes that align with the company's business objectives. Contributions using corporate funds are reviewed and approved by the Corporate Governance and Nominating (CG&N) Committee. Contributions made with company funds or resources promote the interests of the company and are made without regard for the personal preferences of company officers or executives. These contributions are fully disclosed.

  APA employees also have the opportunity to participate in the company's political action committee. The PAC is funded exclusively with personal money given voluntarily by eligible participants, and the company will never punish, reward, or take any other employment actions as a result of decisions by employees to participate or not participate in the PAC. All of these contributions are fully disclosed.

Adopted March 1, 2021
Based on the predecessor charter of Apache Corporation, revised February 7, 2019

BOARD OVERSIGHT

APA's board of directors regularly reviews the overall approach to these outward-facing decisions, as well as direct and indirect expenditures. Periodically, the CG&N Committee does a more detailed review of individual decisions and expenditures to assess the implementation of this corporate-focused rather than partisan-focused political, policy, education and charitable policy. Meetings to review the policy governing political contributions and lobbying expenditures are an official part of the CG&N Committee's annual calendar.

APA posts a disclosure of political contributions and lobbying expenditures on the company's website.