

## Monitoring of Human Rights Principles

## **OUR PRINCIPLES**

APA Corporation takes the same multi-level approach to implementing and monitoring its Human Rights Principles as it does the monitoring of its Code of Business Conduct and Ethics.

Implementation starts with each employee's orientation and continues through the training programs that are required for or made available to employees depending on their job responsibilities. We interpret monitoring broadly to include things such as teaching employees management listening skills to detect indirect or early signals that deserve attention, as well as more standard monitoring systems such as those built into existing human resources, legal, and internal audit functions.

A number of our corporate and outward-facing departments have responsibilities to identify important human rights issues and alert appropriate executives and managers to them who in turn report those issues to the Corporate Responsibility, Governance, and Nominating Committee. The multi-departmental and ongoing effort that culminates every year in the publication of a sustainability report plays a significant role in this process.

Our quarterly asset review system in which our senior managers travel in person (or virtually when travel is not possible or advisable) to each operating area enable us to create settings in which information critical to the monitoring of our Human Rights Principles and our Code of Business Conduct and Ethics more generally can be easily, personally, and comfortably conveyed at all levels of operations.

Finally, the Board of Directors and the Corporate Responsibility, Governance, and Nominating Committee regularly monitor whether we are meeting our conduct standards.