

OUR PRINCIPLES

Respect for human rights is a foundational value of APA Corporation (APA). We are committed to earning and maintaining the trust of our employees and neighbors by creating a safe and healthy environment for all and reinforcing that environment with strong policies and effective training. This is a shared requirement of our global workforce, including contractors, and we expect all partners across our value chain to support it. We believe our organization should have a positive impact on communities in which we operate, including by taking opportunities to advance and respect human rights in those communities.

Our Code of Conduct (Code) is the cornerstone of our comprehensive approach to human rights. It sets company standards for anti-discrimination, anti-harassment, workplace safety and health, and fair employment practices (including prohibitions on forced labor). Each employee is trained on our Code annually.

APA's approach to human rights parallels that laid out by John Ruggie in both his 2008 report and the subsequent U.N. Framework and Guiding Principles of 2011, which acknowledge the duty of governments to protect human rights and the responsibility of corporations to respect them. Our Code and our training program both guide and support our compliance with legal requirements and our own standards.

We regularly assess areas of risk to human rights in our operations, through both supply chain and internal audit engagement and make improvements as appropriate. The board of directors and the Corporate Responsibility, Governance, and Nominating Committee regularly monitor whether we are meeting our conduct standards.

Additional information regarding the monitoring and update processes can be found in APA's Monitoring of Human Rights Principles, available on the [Governance](#) section of our website.

Expectations of contractors and community partners

Like others in our industry, APA relies on contractors to support many aspects of our operations, from exploration and production to well closure and remediation activities. We engage with our contractors to promote alignment with APA's [Core Values](#), Environmental, Health and Safety (EH&S) requirements, and operational excellence. Our contractor-facing [website](#) outlines the EH&S expectations of our contractors, with documents available for download.

All contractors providing U.S.-based services are required to attest to APA's Supplier Code of Conduct. APA takes a companywide integrated approach to identify, mitigate, and manage risks in our operations, including potential human rights risks across our supply chain. APA evaluates its supply chains by screening contractors prior to engagement and through targeted judgmental audits, as deemed necessary, thereafter. In order to become an approved vendor, each contractor must comply with our comprehensive screening to ensure that our business associates maintain the same standard we expect of ourselves.

Labor practices

APA is fully committed to equal employment opportunity. No employee or applicant for employment will be discriminated against because of race, color, religion, sex, familial status, marital status, age, sexual orientation, genetic information, gender identity, creed, national origin, otherwise qualified disability, or veteran status. As a global leader, we benefit from the diversity of ideas and viewpoints that come from employees across all our operating regions. We believe in an inclusive culture that encourages employees to bring their unique perspectives and backgrounds to work every day and to know that their voices are valued and respected.

APA has a zero-tolerance policy for workplace harassment, including any offensive treatment or behavior, which, to a reasonable person, creates an intimidating, hostile or abusive work environment. We are committed to being a workplace where all employees are valued and can thrive with a sense of belonging, not just as an employee, but as a person.

We believe the employment relationship should be voluntary. Terms of employment within the company as well as for our contractors, joint-venture partners and suppliers should comply with applicable laws and regulations. We do not permit the employment of children, forced labor, or human trafficking (modern slavery) in any of our operations.

Safety and security

APA devotes extensive resources to the implementation of our EH&S systems to ensure the safety and wellbeing of our valued personnel and the environments in which we operate. In areas where we require armed protection or are required to work with local military and law enforcement, we require our security providers to follow our organizational guidelines with regards to human rights.

Workplace violence, or threats of violence, are considered harassment under our Code and are not tolerated.

Community engagement

APA operates in many areas, including areas of great need. We actively engage with our communities and local governments to emphasize that we are working to leverage our operations to enhance the interests of those communities. This involvement includes supporting vital initiatives, both environmental and social, that create lasting, positive change. We understand that each community has its own values and priorities, and we listen and learn about these unique needs to enhance the ways our involvement creates long-lasting value. We focus on developing positive relationships within our communities, by treating those who live and work in them with dignity and respect and by listening to their concerns and doing what we reasonably can to address them. We consider stakeholder input in our decision-making, both in the planning phases and after we begin operations.

Reporting suspected violations or ethical concerns

APA believes that every employee and contractor has a responsibility to help maintain a safe work environment that reflects our respect for human rights and is free from discrimination and harassment. If any employee or contractor believes that someone is violating the Human Rights Principles and/or the

law, they are asked to report it immediately to their manager, Human Resources, or Compliance. The [Ethics Hotline](#), a 24/7/365 resource externally hosted and managed by a third party, is available to report concerns regarding potential violations of our Code, including any suspected violation of human rights or negative impacts to human rights. Additionally, a report may be filed [online](#) through the Ethics Hotline. Both forms of reporting are confidential, and concerns may be submitted without fear of discrimination, retaliation, or reprisal. All inquiries receive appropriately thorough, individualized investigation to determine the underlying details and develop appropriate resolutions.