

**Form 603**Corporations Law  
Section 671B**Notice of initial substantial holder**To Company  
Name/Scheme Apa Group LimitedACN/ARBN 091 344 704**1. Details of substantial holder (1)**Name Franklin Resources, Inc., and its affiliatesACN (if applicable) N/AThe holder became a substantial holder on 14 March 2025**2. Details of voting power**

The total number of votes attached to all the voting shares in the company or voting interests in the scheme that the substantial holder or an associate (2) had a relevant interest (3) in on the date the substantial holder became a substantial holder are as follows:

Class of securities (4)	Number of securities	Persons' votes (5)	Voting power (6)
Ordinary shares	65,765,607	65,362,911	5.05% (based on 1,294,951,714 shares)

**3. Details of relevant interests**

The nature of the relevant interest the substantial holder or an associate had in the following voting securities on the date the substantial holder became a substantial holder are as follows:

Holder of relevant interest	Name of relevant interest (7)	Class and number of securities
See Annexure B, item 1	See Annexure B, item 2	See Annexure B, item 3

**4. Details of present registered holders**

The persons registered as holders of the securities referred to in paragraph 3 above are as follows:

Holder of relevant interest	Registered holder of securities	Person entitled to be registered as holder (8)	Class and number of securities
-----------------------------	---------------------------------	--	--------------------------------

See Annexure B, item 1	See Annexure B, item 6	See Annexure B, item 8	See Annexure B, items 3,7 & 9
------------------------	------------------------	------------------------	-------------------------------

**5. Consideration**

The consideration paid for each relevant interest referred to in paragraph 3 above, and acquired in the four months prior to the day that the substantial holder became a substantial holder is as follows:

Holder of relevant interest	Date of acquisition	Consideration (9)		Class and number of securities
		Cash	Non-Cash	
See Annexure B, item 1	See Annexure B, item 4	See Annexure B, item 5	See Annexure B, item 5	See Annexure B, item 3

**6. Associates**

The reasons the persons named in paragraph 3 above are associates of the substantial holder are as follows:

Name and ACN (if applicable)	Nature of association
The persons referred to in paragraph 1 of Annexure A are associates of Franklin Resources, Inc. by virtue of being a related body.	

**7. Addresses**

The addresses of persons named in this form are as follows:

Name	Address
See Annexure A	See Annexure A

**Signature**

print name Thomas C. Mandia

Capacity: Assistant Secretary, Franklin Resources, Inc.

sign here

Signed by:  
  
B37A8253114D4C0

Date 18 March 2025

## Annexure A

1 Names and addresses of all associates for whom composite notice is given:

<b>Name</b>	<b>Address</b>
Benefit Street Partners L.L.C	c/o The Corporation Trust Center, 1209 Orange Street, Wilmington, New Castle County, Delaware 19801, United States
Brandywine Global Investment Management (Europe) Limited	Cannon Place, 78 Cannon Street, London, EC4N 6HL, England
Brandywine Global Investment Management, LLC	1735 Market Street / Suite 1800 / Philadelphia, PA 19103
Clarion Partners Europe Limited	Third Floor Liberation House Castle Street St Helier Jersey JE1 2LH
Clarion Partners, LLC	230 Park Avenue New York, NY 10169 United States
Clarion Partners Holdings LLC	230 Park, Floor 12, New York, NY 10169, United States
ClearBridge Investments (North America) Pty Limited	35 CLARENCE STREET SYDNEY C3 2000
ClearBridge Investments Limited	Level 13, 35 Clarence St Sydney, NSW, 2000 Australia
ClearBridge Investments, LLC	620 Eighth Avenue, New York, NY, 1001
Darby Overseas Partners, L.P.	c/o The Prentice-Hall Corporation System, Inc., 251 Little Falls Drive, Wilmington, DE, 19808, United States
ETP Holdings (Cayman) Limited	Walkers, 190 Elgin Avenue, Georgetown, Grand Cayman, KY1-9001, Cayman Islands;
Fiduciary Trust Company of Canada	200 King Street West, Suite 1500, Toronto, ON, M5H 3T4, Canada
Fiduciary Trust International, LLC	55 Old Bedford Road, Suite 302, Lincoln, MA, 01773, United States
Fiduciary International Holding, Inc.	280 Park Avenue, New York, NY, 10017, United States
Fiduciary Trust Company International	280 Park Avenue, New York, NY, 10017, United States
Franklin Advisers, Inc.	United Agent Group Inc., 4640 Admiralty Way, 5th Floor, Marina del Rey, CA, 90292, United States
Franklin Advisory Services, LLC	United Agent Group Inc., Brandywine Plaza, 1521 Concord Pike, Suite 201, Wilmington, DE, 19803, United States
Franklin Managed Options Strategies, LLC	
Franklin Mutual Advisers, LLC	United Agent Group Inc., Brandywine Plaza, 1521 Concord Pike, Suite 201, Wilmington, DE, 19803, United States
Franklin Templeton Asset Management (India) Private Limited	Indiabulls Finance Centre, Tower 2, 12th and 13th Floor, Senapati Bapat Marg, Elphinstone

	(West), Mumbai, Mumbai City, Maharashtra-MH, 400013, India
Franklin Templeton Asset Management (Malaysia) Sdn. Bhd.	Suite 31-02, 31st Floor, Menara Keck Seng, 203 Jalan Bukit Bintang, Kuala Lumpur, 55100, Malaysia
Franklin Templeton Asset Management Mexico, S.A. De C.V., Sociedad Operadora De Fondos De Inversión	Avenida Paseo de la Reforma 342, Colonia Juarez, Mexico City, CP. 06600, Mexico
Franklin Templeton Australia Limited	Level 47, 120 Collins Street, Melbourne VIC 3000
Franklin Templeton (Australia) Holdings Pty Ltd.	Level 48, 120 Collins Street, Melbourne, VIC 3000, Australia
Franklin Templeton Capital Holdings Private Limited;	United Agent Group Inc., Brandywine Plaza, 1521 Concord Pike, Suite 201, Wilmington, DE, 19803, United States;
Franklin Templeton Fund Adviser, LLC	620 Eighth Avenue 47th Floor New York, NY 10018 United States
Franklin Templeton Fund Management Limited	Cannon Place, 78 Cannon Street, London, EC4N 6HL, England
Franklin Templeton GSC Asset Management Sdn. Bhd.	Suite 31-02, 31st Floor, Menara Keck Seng, 203 Jalan Bukit Bintang, 55100, Kuala Lumpur, Malaysia
Franklin Templeton Global Investors Limited	Cannon Place, 78 Cannon Street, London, EC4N 6HL, England
Franklin Templeton Holding Limited	Ocorian Corporate Services Limited, 6th Floor, Tower A, 1 Cyber City, Ebene, Mauritius
Franklin Templeton Institutional, LLC	United Agent Group Inc., Brandywine Plaza, 1521 Concord Pike, Suite 201, Wilmington, DE, 19803, United States
Franklin Templeton International Services S.à.r.l.	8A, rue Albert Borschette, L-1246, Luxembourg
Franklin Templeton Investimentos (Brasil) Ltda.	Avenida Brigadeiro Faria Lima 3311, 5th Floor, Itaim Bibi, Sao Paulo, 04538-133, Brazil
Franklin Templeton Investment Advisors Korea Co., Ltd	3rd Floor, CCMM Building, 101 Yeouigongwon-ro, Yeongdeungpo-gu, Seoul, 07241, Republic of Korea
Franklin Templeton Investment Management Limited	Cannon Place, 78 Cannon Street, London, EC4N 6HL, England
Franklin Templeton Investment Trust Management Limited	5 Morrison Street, Edinburgh, EH3 8BH, Scotland
Franklin Templeton Investments (Asia) Limited	17th Floor, Chater House, 8 Connaught Road Central, Hong Kong
Franklin Templeton Investments (ME) Limited	The Gate, East Wing, Level 2, Dubai International Financial Centre, P.O. Box 506613, Dubai, U.A.E.
Franklin Templeton Investments Corp.	200 King Street West, Suite 1500, Toronto, ON, M5H 3T4, Canada
Franklin Templeton Japan Co., Ltd.	Shin Marunouchi Building 1 chome 1 Marunouchi Chiyoda-Ku Japan
Franklin Templeton Luxembourg S.A.	8A, rue Albert Borschette, L-1246, Luxembourg

Franklin Templeton Private Portfolio Group, LLC	300 First Stamford Place, Stamford, CT, 06902
FTC Investor Services Inc.	200 King Street West, Suite 1500, Toronto, ON, M5H 3T4, Canada
K2 Advisors L.L.C.	c/o Corporation Service Company, 251 Little Falls Drive, Wilmington, DE, 19808, United States
K2/D&S Management Co., L.L.C.	c/o Corporation Service Company, 251 Little Falls Drive, Wilmington, DE, 19808, United States
K2 Advisors Holdings, LLC	c/o Corporation Service Company, 251 Little Falls Drive, Wilmington, DE, 19808, United States
Legg Mason Investment Funds Limited	Cannon Place, 78 Cannon Street, London, EC4N 6HL, England
Legg Mason Investments (Europe) Limited	Cannon Place, 78 Cannon Street, London, EC4N 6HL, England
Legg Mason Australia Holdings Pty Ltd;	7 Temasek Boulevard, #38-03, Suntec Tower One, Singapore, 038987;
Legg Mason Global Holdings Ltd	Walkers, 190 Elgin Avenue, Georgetown, Grand Cayman, KY1-9001, Cayman Islands
Legg Mason Global Holdings Ltd.,	Walkers, 190 Elgin Avenue, Georgetown, Grand Cayman, KY1-9001, Cayman Islands;
Legg Mason Royce Holdings, LLC.	c/o CSC-Lawyers Incorporating Service Company 7 St. Paul Street Suite 820 21202 Baltimore MD United States
Legg Mason, Inc.;	100 International Drive, Baltimore, MD 21202, United States;
LM Holdings 2 Limited;	Cannon Place, 78 Cannon Street, London, EC4N 6HL, England;
Martin Currie Fund Management Limited	Saltire Court 20 Castle Terrace Edinburgh, EH1 2ES
Martin Currie Inc.	New York Times Building, 620 Eighth Avenue, 49th Floor, New York, NY, 10018, United States
Martin Currie Investment Management Limited	Saltire Court 20 Castle Terrace Edinburgh, EH1 2ES
Martin Currie (Holdings) Limited;	Clarendon House 2 Church Street Hamilton HM11 Bermuda;
Martin Currie Limited	- Saltire Court 20 Castle Terrace Edinburgh EH1 2ES
O'Shaughnessy Asset Management, L.L.C.	6 Suburban Avenue, Stamford, CT, 06901, United States
Putnam Investment Management, LLC	100 Federal Street, Boston, MA, 02110, United States
The Putnam Advisory Company, LLC	100 Federal Street, Boston, MA, 02110, United States
Putnam Investments Limited	16 St. James's Street, London, SW1A 1ER, England
Putnam Advisory Holdings II, LLC	100 Federal Street, Boston, MA, 02110, United State
Putnam U.S. Holdings I, LLC	100 Federal Street, Boston, MA, 02110, United State

QS Batterymarch Financial Management, Inc.	100 International Drive, Baltimore, MD, 21202, United States
Royce & Associates, LP DBA Royce Investment Partners	745 Fifth Avenue New York, NY 10151
Templeton Asset Management (Poland) TFI S.A.	Rondo 1, 26th Floor, Rondo ONZ 1, Warsaw, 00-124, Poland
Templeton Asset Management Ltd.	7 Temasek Boulevard, #38-03 Suntec Tower One, Singapore, 038987
Templeton Global Advisors Limited	Box N-7759, Lyford Cay, Nassau, Bahamas
Templeton Global Holdings Ltd.	Box N-7759, Lyford Cay, Nassau, Bahamas
Templeton Hana Asset Management Co., Ltd.	3rd Floor, CCMM Building, 12 Youido-Dong, Youngdungpo-gu, Seoul, 150-968, Korea, Republic of
Templeton Investment Counsel, LLC	300 S.E. 2nd Street, Fort Lauderdale, FL 33301, United States
Templeton International, Inc.,	United Agent Group Inc., Brandywine Plaza, 1521 Concord Pike, Suite 201, Wilmington, DE, 19803, United States;
Templeton Worldwide,	United Agent Group Inc., Brandywine Plaza, 1521 Concord Pike, Suite 201, Wilmington, DE, 19803, United States;
Western Asset Management (Brazil) Holdings Limitada	Av. Presidente Juscelino Kubitschek, 1455, São Paulo - SP, 04543- 011 Brazil
Western Asset Management Company Distribuidora de Titulos e Valores Mobiliarios Limitada	Av, Presidente Juscelino Kubitschek, Sao Paulo-SP, CEP 04543-011 Brasil
Western Asset Management Company Limited	10 Exchange Square Primrose Street London, EC2A 2EN United Kingdom
Western Asset Management Company LLC	385 East Colorado Boulevard Pasadena, California 91101
Western Asset Management Company Ltd	385 East Colorado Boulevard Pasadena, California 91101
Western Asset Management Company Pte. Ltd.	1 George Street #23-01. Singapore 049145

**ANNEXURE B****DETAILS OF ENTITLEMENTS AND RELEVANT INTERESTS**

Holder of relevant interest	Date of acquisition	Consideration (9)		Class and number of securities
		Cash (AUD)	Non-Cash	Ordinary
Franklin Advisory Services, LLC.	11/6/2024	(1,015)		148
Franklin Advisory Services, LLC.	12/2/2024	(1,661)		232
Franklin Advisory Services, LLC.	1/8/2025	(1,598)		232
Franklin Advisory Services, LLC.	1/14/2025	(1,596)		232
Franklin Advisory Services, LLC.	1/21/2025	(1,596)		232
Franklin Advisory Services, LLC.	1/28/2025	(29,870)		4,445
Franklin Advisory Services, LLC.	2/12/2025	(1,559)		232
Franklin Advisory Services, LLC.	2/20/2025	(1,522)		232
Franklin Advisory Services, LLC.	3/4/2025	(1,728)		232
Franklin Advisory Services, LLC.	3/13/2025	(1,770)		232
Franklin Templeton Australia Limited	11/4/2024	(83,402)		11,928
Franklin Templeton Australia Limited	11/15/2024	(1,216,713)		173,583
Franklin Templeton Australia Limited	11/19/2024	(68,169)		9,518
Franklin Templeton Australia Limited	11/20/2024	(25,925)		3,607
Franklin Templeton Australia Limited	12/3/2024	(79,421)		10,995
Franklin Templeton Australia Limited	12/24/2024	(146,150)		20,137
Franklin Templeton Australia Limited	1/20/2025	(17,743)		2,565
Franklin Templeton Australia Limited	2/25/2025	(101,079)		13,274
Franklin Templeton Australia Limited	3/11/2025	(687,055)		90,527
Franklin Templeton Australia Limited	3/13/2025	(98,302)		12,865
Franklin Templeton International Services S.a r.l.	12/23/2024	(1,798,877)		249,456
ClearBridge Investments Limited	12/6/2024	(192,801,338)		26,663,326
ClearBridge Investments Limited	12/9/2024	(6,275,656)		864,749
ClearBridge Investments Limited	12/10/2024	(4,459,342)		608,659
ClearBridge Investments Limited	12/11/2024	(5,515,638)		746,830
ClearBridge Investments Limited	12/12/2024	(13,337,280)		1,807,373
ClearBridge Investments Limited	12/13/2024	(10,419,173)		1,425,000
ClearBridge Investments Limited	12/16/2024	(1,669,862)		229,062
ClearBridge Investments Limited	12/17/2024	(28,830,400)		4,000,000
ClearBridge Investments Limited	1/9/2025	(232,508)		33,692
ClearBridge Investments Limited	1/24/2025	(273,295)		40,312
ClearBridge Investments Limited	1/28/2025	(933,637)		138,639
ClearBridge Investments Limited	2/10/2025	(1,509,252)		222,037
ClearBridge Investments Limited	2/14/2025	(161,255)		23,957
ClearBridge Investments Limited	2/20/2025	(2,148,302)		327,905
ClearBridge Investments Limited	2/26/2025	(1,382,629)		183,892

ClearBridge Investments Limited	3/5/2025	(704,748)		95,213
ClearBridge Investments Limited	3/13/2025	(7,780,492)		1,019,309
ClearBridge Investments Limited	3/14/2025	(7,920,466)		1,035,319

Registered Holder of Shares	Class of Shares	Number of Shares
Bank of New York	Ordinary	15,646,996
CITIBANK LIMITED, MELBOURNE	Ordinary	2,365,298
HSBC BANK AUSTRALIA LIMITED	Ordinary	363,207
JP Morgan Chase Bank, N.A.	Ordinary	43,626,560
Northern Trust	Ordinary	2,250,875
State Street	Ordinary	1,512,671

## **NOTES**

### **1. Nature of Relevant Interest:**

- Except as provided below, the relevant interest of each of FRI and the bodies corporate referred to in paragraph 1 of Annexure A was acquired by virtue of an associate of, or related body corporate each of FRI and the bodies corporate referred to in paragraph 1 of Annexure A, acquiring a relevant interest in voting shares of the company.
- The nature of the relevant interest acquired by the bodies corporate referred to in item 1 of Annexure B in relation to the voting shares referred to in item 3 of Annexure B arose by virtue of those companies having the right to dispose of the shares in the company as a result of the Investment Management Agreements.
- Particulars of any relevant agreement or other circumstances by which the relevant interest was acquired: the interests were acquired in the ordinary course of business on the stock market of a stock exchange in accordance with the rules of the stock exchange and containing no terms or conditions other than the standard terms or conditions.
- Particulars of any qualification of the power of a person to exercise, control the exercise of, or influence the exercise of, the voting powers or disposal of the shares to which the relevant interests relates: not applicable.

### **2. Consideration**

Details of any and all benefits other than money, that any person from whom a relevant interest was acquired has, or may, become entitled to receive in relation to that acquisition: not applicable.