

Exhibit A

APA Whistleblower Policy

It is the policy of APA to fully comply with all laws including federal and state antitrust laws. Compliance with the law means not only following the law but also creates an obligation on all APA employees to report to his or her supervisor or to APA Counsel, any activity of the association or association members that the employee has reason to believe may violate any law including the antitrust laws.

It is recognized that all employees are not legal experts. Employees are encouraged to seek guidance from supervisors or legal counsel whenever the employee has a legal compliance question.

In no instance will any employee be sanctioned or adversely affected from bringing any such matter to the attention of his or her supervisor, the association or the association's legal counsel even if it turns out that no violation of law or policies exist.