



Margin Loans and Pledges by Directors and Officers

OUR POLICY

No Margin Accounts or Pledges

This Policy prohibits Apache's directors and Section 16 officers from holding any Apache securities in a margin account or pledging any Apache securities as collateral for a loan. Securities held in a margin account may be sold by the broker without the customer's consent if the customer fails to meet a margin call. Similarly, securities pledged as collateral for a loan may be sold in foreclosure if the borrower defaults. A margin or foreclosure sale might occur at a time when the pledgor is aware of material, nonpublic information or otherwise is not permitted to trade in Apache securities.