

# GRI Content Index Sustainability Report 2023

Statement of use	Port Waratah Coal Services Limited has reported in accordance with the GRI Standards for the period 1 January 2023 to 31 December 2023.
GRI 1 used	GRI 1: Foundation 2021.
Applicable GRI Sector Standard(s)	GRI 12: Coal Sector 2022.

GRI	DISCLOSURE	LOCATION	COAL SECTOR STANDARD
<b>General Disclosures</b>			
<b>GRI 2: General Disclosures 2021</b>			
2-1	Organizational details	SR: Inside Front Cover, 6; AFR: 1	
2-2	Entities included in the organization's sustainability reporting	SR: Inside Front Cover, 6;	
2-3	Reporting period, frequency and contact point	SR: Inside Front Cover	
2-4	Restatements of information	No restatements of information were made in 2023.	
2-5	External assurance	SR: Inside front cover, 14, 18, AFR: 48-50	
2-6	Activities, value chain and other business relationships	SR: 6, 9, 42, 44	
2-7	Employees	SR: 32, 37	
2-8	Workers who are not employees	SR: 32. Our contractors work across a wide range of tasks for specialised projects and at peak work times. Many of our contractors possess expertise in engineering, large scale scaffolding, auditing etc., and required for a short periods of time.	
2-9	Governance structure and composition	SR: 37, 46, AFR: 5	
2-10	Nomination and selection of the highest governance body	SR: 10. Board Members are selected based upon percentage of shareholdings and possess significant qualifications and experience and broad industry knowledge as denoted in the AFR: 3-4.	
2-11	Chair of the highest governance body	The Chair is not a Senior Executive.	
2-12	Role of the highest governance body in overseeing the management of impacts	SR: 36, 46; <a href="#">Governance</a> ; The Board's Audit and Risk Committee holds four meetings a year and focuses specifically on compliance and governance to manage our operational risks and challenges.	
2-13	Delegation of responsibility for managing impacts	SR: 10, 36, 46; <a href="#">Governance Framework</a>	
2-14	Role of the highest governance body in sustainability reporting	SR: 46; <a href="#">Governance</a>	
2-15	Conflicts of interest	Board members note the following statement at the start of every Board meeting: "Given that all Directors are nominated by a shareholder or group of shareholders and that shareholders are all participants in the coal industry we all, to some extent, have a potential conflict of interest with Agenda Items included in these papers. We should note that any decisions made on these items by Port Waratah Directors will be made in the long-term interest of Port Waratah by arriving at a fair and equitable solution for our customers, and hence maintaining the reputation of Port Waratah."; <a href="#">Code of Conduct Policy Statement</a> ; Conflicts of interest are declared in matters before the Board and minuted, as appropriate.	

2-16	Communication of critical concerns	SR: 30; <a href="#">Code of Conduct Policy Statement</a> , <a href="#">Whistleblower Policy Statement</a> and <a href="#">Whistleblower Policy Procedure</a> provide a framework for communication of critical concerns. Our Board committees (ARC and HSEC) also channel material issues/concerns through to the Board. These committees both meet a minimum of four times a year, and our Board meets bimonthly (five times per year).
2-17	Collective knowledge of the highest governance body	Our HSEC is the channel by which new developments are reported to the Board. The HSEC meets four times a year. Agendas of the ARC and HSEC include agenda items for new developments and new legislation. Directors receive training through their normal course of employment outside of Port Waratah.
2-18	Evaluation of the performance of the highest governance body	Under the direction of the Chair, our Board conducts a self-evaluation survey every three years. Survey results are reviewed by the Board and follow up actions are implemented. Board Committees are able to call on external experts for presentations and training when required.
2-19	Remuneration policies	AFR: 39. No Director has received or become entitled to receive a benefit by reason of a contract made by the company or a related body corporate. As set out in Note 24 (b) of our annual Financial Statements, there is no scheme for the payment of bonuses, options, additional retirement benefits, loans or any other form of incentive payment to Directors. The remuneration of Key Management Personnel is set out in Note 24 (a) of our annual Financial Statements. Key Management Personnel are remunerated aligned to market competitive terms and conditions. Remuneration of executive management includes bonuses identified through business and role specific performance indicators, which are also related to economic, environmental and social dimensions.
2-20	Process to determine remuneration	<p>Port Waratah's approach to determining and providing remuneration, benefits, development and career opportunities to employees are based on commitment of the following principles;</p> <ul style="list-style-type: none"> <li>• providing market-competitive remuneration to attract, motivate and retain key talent</li> <li>• ensuring financial rewards are directly linked to employee contributions, individual and business performance</li> <li>• providing a consistent and equitable approach to remuneration review processes and ensuring all reward decisions are made free from bias and support diversity</li> <li>• completing annual performance reviews to provide feedback on performance and areas for improvement</li> <li>• ensuring that remuneration is fair and reasonable, based on merit and underpinned by a transparent and consistent methodology</li> <li>• identifying and taking action to correct gender pay inequities and any other remuneration inequities.</li> </ul> <p>For employees engaged under the Enterprise Agreement, remuneration movement is negotiated, agreed and approved for the term of the agreement, and lodged with Fair Work Australia. For employees engaged under individual employment contracts, a role classification framework and remuneration matrix are used to guide and determine remuneration decisions and movement. Additionally, periodic remuneration benchmarking is conducted to compare remuneration levels within similar industries. Other factors that inform remuneration decisions include budget, internal relativity comparisons, gender pay-equity considerations, economic indicators, individual and business performance levels. Remuneration decisions follow multiple levels of review and approval, including the Leader, Human Resources and the Chief Executive Officer. The Manager Human Resources recommends and approves all remuneration offers and movements and provides continued guidance and recommendations in relation to elements of remuneration, rewards, recognition, and management of performance.</p>

2-21	Annual total compensation ratio	Omission: Entire disclosure Reason: Confidentiality constraints  Port Waratah operates in a highly competitive industry. Wages of all Port Waratah workers are market competitive. A benchmark review of market parity is conducted annually.	
2-22	Statement on sustainable development strategy	SR: 4, 5, 6	
2-23	Policy commitments	SR: 8, AFR: 7, 16, 18-22; <a href="#">Governance</a>	
2-24	Embedding policy commitments	<a href="#">Who we are</a> ; <a href="#">Governance</a> : Port Waratah's Board meets bi-monthly from March (five times per year). The ARC and HSEC both meet four times per year.	
2-25	Processes to remediate negative impacts	SR: 18-29; Engagement with stakeholders involves learning and understanding their perspective and concerns around potential negative impacts. We provide them with information on management processes and where relevant and appropriate, establish improvement measures through investment and special projects. Our Intelligent Dust Management System and Control Discharge Filtration System are examples of this. Both of these systems were developed to reduce impacts to air quality and improve the water quality of excess water released to the Hunter River and address key stakeholder concerns.	
2-26	Mechanisms for seeking advice and raising concerns	<a href="#">Whistleblower Policy Statement</a> and <a href="#">Whistleblower Policy Procedure</a>	
2-27	Compliance with laws and regulations	SR: 10, 18-19	
2-28	Membership associations	<a href="#">Partnership</a>	
2-29	Approach to stakeholder engagement	SR: 6, 8, 16, 30, 38, 44	
2-30	Collective bargaining agreements	SR: 36	
<b>GRI 3: Material Topics 2021</b>			
3-1	Process to determine material topics	SR: 6	
3-2	List of material topics	SR: 7, 8, 9	
<b>12.1 GHG Emissions: 2022</b>			
3-3	Management of material topics	SR: 28	12.1.1
302-1	Energy consumption within the organization	SR: 28; Port Waratah's total energy consumption in 2023 was 475,198 Gigajoules (MJ), using conversion from kWh (electricity) and kL (liquid fuels) to GJ using the National Greenhouse and Energy Measurement Determination. In 2023, the total fuel consumption within the organisation from non-renewable sources was 6273 GJ and the total fuel consumption, ethanol, within the organisation from renewable sources was 120GJ. Data has been quantified from electricity invoices and vehicle fleet fuel reports at Port Waratah. Omission: c.ii-c.iv, d Reason: Not applicable No energy sold nor energy used for heating, cooling or steam.	12.1.2
302-2	Energy consumption outside of the organization	Energy consumption outside of the organization is not considered material and does not offer potential for reductions that Port Waratah can undertake or influence. However Port Waratah's value chain for the purposes of energy and emissions reporting has not been fully defined and will be determined following further work under the 2023-2030 Climate Action Plan.	12.1.3
302-3	Energy intensity	SR: 28; Port Waratah's energy intensity in 2023 was 2.488 Megajoules per tonne of coal handled (MJ/t). This is energy from electricity which accounts for 99.5% of total energy consumed by Port Waratah.	12.1.4
302-4	Reduction of energy consumption	SR: 28-29. This year there was no material reduction in energy consumption as a direct result of conservation and energy efficiency initiatives in 2023.	

302-5	Reductions in energy requirements of products and services	In 2023 Port Waratah observed a 49,592MJ reduction in total energy consumption compared to Port Waratah's 2018 baseline year. The reduction was largely due to a reduction of overall tonnes handled by the business compared to 2018 performance. The methodologies used for this calculation are the National Greenhouse Energy Reporting Scheme.	
305-1	Direct (Scope 1) GHG emissions	SR: 28; Port Waratah's energy consumption and greenhouse gas emissions are reported each financial year to the Australian Federal Government through the National Greenhouse and Energy Reporting (NGER) Scheme. This scheme requires Port Waratah to report on Scope 1 emissions being the emissions released directly from our business and Scope 2 emissions being emissions released from energy purchased from an organisation. CO <sub>2</sub> , CH <sub>4</sub> and N <sub>2</sub> O are all directly quantified in calculating Scope 1 emissions for NGER reporting. HFC's, PFC's, SF <sub>6</sub> and NF <sub>3</sub> emissions are not generated in any material quantities from Port Waratah activities. Scope 1 emissions in 2023 were 433.1 tCO <sub>2</sub> -e. CH <sub>4</sub> (methane) emissions contributed 0.118 tCO <sub>2</sub> -e, or 0.03% of Scope 1 emissions. All Scope 1 emissions were from the consumption of fuel in site vehicles.	12.1.5
305-2	Energy indirect (Scope 2) GHG emissions	SR: 28; In 2023 Port Waratah's Scope 2 (market-based) emissions were 98,030 tCO <sub>2</sub> -e, which is a 21% reduction compared to our 2018 baseline. Our 2023 Scope 2 (location-based) emissions were 98,741 tCO <sub>2</sub> -e.	12.1.6
305-3	Other indirect (Scope 3) GHG emissions	Omission: Entire disclosure Reason: Information unavailable/incomplete Port Waratah is yet to determine the boundaries of its Scope 3 emissions. This is an action identified in our <a href="#">Climate Action Plan 2023-2030</a>	12.1.7
305-4	GHG emissions intensity	SR: 28; Port Waratah's 2023 emissions intensity for Scope 1 and Scope 2 (market-based) emissions was 0.516kg CO <sub>2</sub> -e per tonne of coal handled	12.1.8
305-6	Emissions of ozone-depleting substances (ODS)	Omission: Entire disclosure Reason: Not applicable Port Waratah does not produce, import or export ozone-depleting substances.	
<b>12.2 Climate adaptation, resilience, and transition: 2022</b>			
3-3	Management of material topics	SR: 27; <a href="#">Environment - Climate Climate Action Policy</a>	12.2.1
201-2	Financial implications and other risks and opportunities due to climate change	SR: 10; <a href="#">Climate Change Review and Assessment</a> Omission: a.iii, a.v, 2.3, additional sector requirements Reason: Information unavailable/incomplete Explanation: In follow up to our Climate Change Review and Assessment, in 2023 Port Waratah commenced ISSB readiness activities including a gap analysis to support ongoing understanding of financial implications of our climate-related risks and opportunities. This work is ongoing and will be delivered in alignment with future mandatory Australian reporting requirements. Additional sector requirements are not considered applicable as Port Waratah does not have reserves.	12.2.2
305-5	Reduction of GHG emissions	SR: 28; In 2023 Port Waratah achieved a 25,985 tCO <sub>2</sub> -e reduction in Scope 1 and Scope 2 (market-based) emissions compared to the 2018 baseline year. Emissions calculation utilises methodology specified in the National Greenhouse and Energy Reporting Measurement Determination.  Port Waratah's Climate Action goal is a net 50% reduction in Scope 1 and Scope 2 (market-based) emissions by 2030 relative to the 2018 baseline year. This goal was established to align with Australia's Nationally Determined Contribution (NDC) to the Paris Agreement. Goals and targets in our Climate Action Plan 2023 to 2030 are Scope 1 and 2 only. No Scope 3 emissions are reported as Port Waratah is yet to determine the boundaries of its Scope 3 emissions. This is an action identified in the <a href="#">Climate Action Plan 2023-2030</a> . See also <a href="#">Preparing for Climate Change</a> ; Our physical and direct risks are outlined in our <a href="#">Climate Change Review and Assessment</a>	12.2.3

	Additional sector disclosures	SR: 30, 31; <a href="#">Preparing for Climate Change</a> : Port Waratah is a member of the Mineral Council of Australia, NSW Mining and Business Hunter. As members of these organisations, we may from time to time provide input to ad hoc submissions related to industry matters.	12.2.4
<b>12.3 Closure and rehabilitation: 2022</b>			
3-3	Management of material topics	SR: 10, 30; AFR: 14, 34; Port Waratah maintains closure plans for all of our assets and updates these periodically. Our Stakeholder Engagement Strategy is underpinned by an approach of openness and timeliness of information.	12.3.1
402-1	Minimum notice periods regarding operational changes	<a href="#">Enterprise Agreement</a>	12.3.2
404-2	Minimum notice periods regarding operational changes	SR: 38; Omission: Additional sector recommendation. Reason: Information unavailable/incomplete Explanation: Port Waratah does not currently have a transition assistance programme, however our approach to communicating with our employees is underpinned by an approach of openness and timeliness of information.	12.3.3
	Operational sites with closure and rehabilitation plans, that have been closed and/or undergoing closure activities	SR: 10; AFR: 14, 18-21, 34; Port Waratah maintains closure plans for all of our assets and updates these periodically. No sites have been closed.	12.3.4
	Total monetary value of financial provisions made by the organization for closure and rehabilitation	AFR: 14, 18-21, 34	12.3.5
	Non-financial provisions made by the organization to manage the local community's socio-economic transition.	SR: 30-31; Port Waratah participates in the City of Newcastle's Lord Mayor's SDG Collaborative, and contributes to discussion of Newcastle's future as it transitions to a lower-carbon economy.	12.3.6
<b>12.4 Air emissions: 2022</b>			
3-3	Management of material topics	SR: 20-21; <a href="#">Air quality</a>	12.4.1
305-7	Nitrogen oxides (NOX), sulfur oxides (SOX), and other significant air emissions	Port Waratah prepares and reports air emissions annually via the Federal Government's National Pollutant Inventory (NPI). All reported emissions are available to the public on the NPI website. Emission quantities are calculated using the appropriate emission estimation technique (EET) manuals published on the NPI website. <a href="#">NPI home page</a> The quantities of NOX & SOX do not meet the reporting threshold to be included in Port Waratah's National Pollutant Inventory reporting. 2022/2023 NPI data for significant air emissions NOX = below threshold SOX = below threshold VOC's = 171kg PM10 = 71,044kg PM2.5 = 168kg	12.4.2
<b>12.5 Biodiversity: 2022</b>			
3-3	Management of material topics	SR: 25; <a href="#">Land use and biodiversity</a> : Port Waratah aims to prevent damage to biodiversity and manages natural habitats adjacent to its operations, aiming protect and enhance them. Our approach is outlined in more detail in our Biodiversity Management Plan.	12.5.1

304-1	Operational sites owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas	SR: 25	12.5.2
304-2	Significant impacts of activities, products and services on biodiversity	SR: 25	12.5.3
304-3	Habitats protected or restored	SR: 25	12.5.4
304-4	IUCN Red List species and national conservation list species with habitats in areas affected by operations	SR: 25	12.5.5
<b>12.6 Waste: 2022</b>			
3-3	Management of material topics	SR: 27; <a href="#">Footprint: Operating to an international standard</a>	12.6.1
306-1	Waste generation and significant waste-related impacts	SR: 27	12.6.2
306-2	Management of significant waste-related impacts	SR: 27, 43	12.6.3
306-3	Waste generated	SR: 27; Port Waratah does not have waste from overburden, rock waste nor tailings.	12.6.4
306-4	Waste diverted from disposal	SR: 26-27; Hazardous: Oil, Oily water and grease: other recovery options; Liquid waste: other recovery options; and Solid hazardous wastes: recycling and other recovery options. Non-hazardous: Comingled, Paper and cardboard: recycling and other recovery options; Metals: recycling; Timber/Greenwaste: other recovery options; and Other: recycling and other recovery options. Port Waratah does not have waste from overburden, rock waste nor tailings. Note total weight diverted from landfill includes wastewater pumpout.	12.6.5
306-5	Waste directed to disposal	SR: 27; Port Waratah does not incinerate waste for landfill. Port Waratah does not have waste from overburden, rock waste nor tailings.	12.6.6
<b>12.7 Water and effluents: 2022</b>			
3-3	Management of material topics	SR: 22-23; <a href="#">Water: Kooragang Operation Water Management Plan</a>	12.7.1
303-1	Interactions with water as a shared resource	SR: 22-24; <a href="#">Kooragang Operation Water Management Plan</a> . Port Waratah does not have any sites impacted by acid mine drainage.	12.7.2
303-2	Management of water discharge-related impacts	SR: 25; <a href="#">Water</a>	12.7.3
303-3	Water withdrawal	SR: 23-24	12.7.4
303-4	Water discharge	SR: 19, 23-24; Port Waratah's total discharge of routine released water to the Hunter River (estuarine water) in 2023 was 319.3 ML. The total discharge as overflow was zero; Port Waratah's total discharge volume in 2023 was 319.3 ML.	12.7.5
303-5	Water consumption	SR: 24-25	12.7.6
<b>12.8 Economic impacts</b>			
3-3	Management of material topics	SR: 8-9, 32-35, 44; AFR: 6-8; MSS: 10	12.8.1
201-1	Direct economic value generated and distributed	SR: 32-35; AFR: 9; Port Waratah reports operates in Newcastle only and therefore reports economic value generated and distributed by spend with local suppliers and community partnerships rather than by project.	12.8.2
202-2	Proportion of senior management hired from the local community	SR: 37	12.8.3
203-1	Infrastructure investments and services supported	SR: 11, 32-35; <a href="#">Community partnerships</a>	12.8.4
203-2	Significant indirect economic impacts	SR: 32-34; <a href="#">Storylines</a>	12.8.5

204-1	Proportion of spending on local suppliers	SR: 33	12.8.6
<b>12.9 Local communities: 2022</b>			
3-3	3-3 Management of material topics	SR: 8, 11, 30-31, 34; <a href="#">Relationships Partnerships</a>	12.9.1
413-1	Operations with significant actual and potential negative impacts on local communities	SR: 30-31; <a href="#">Compliance</a> ; <a href="#">Relationships</a> ; <a href="#">Partnerships</a> ; <a href="#">Contact</a> ; <a href="#">Whistleblower Procedure</a>	12.9.2
413-2	Operations with significant actual and potential negative impacts on local communities	SR: 8, 18-35	12.9.3
	Number and type of grievances from local communities	SR: 30; Port Waratah received seven community enquiries in 2023. Following investigation, Port Waratah was found to be accountable for one of these enquiries. The affected community member for the enquiry was satisfied that Port Waratah's actions had resolved their concerns.	12.9.4
<b>12.11 Rights of indigenous peoples: 2022</b>			
3-3	Management of material topics	SR: 11, 34-35, 40; Port Waratah is seeking endorsement for its Reconciliation Action Plan from Reconciliation Australian and aims to publish the Plan in 2024.	12.11.1
411-1	Incidents of violations involving rights of Indigenous peoples	Omission: Entire disclosure Reason: Not applicable There were no identified incidents of violations involving rights of Indigenous peoples during the reporting period.	12.11.2
	Location of operations where Indigenous peoples are present or affected by activities of the organisation	Omission: Entire disclosure Reason: Not applicable Indigenous peoples are not present at the locations of our operations and are not affected by the activities of our organisation.	12.11.3
	Report if the organisation has been involved in a process of seeking free, prior, and informed consent (FPIC) from Indigenous peoples for any of the organization's activities.	Omission: Entire disclosure Reason: Not applicable Port Waratah has not been involved in processes seeking free, prior, and informed consent (FPIC) from Indigenous peoples for any of the organization's activities.	12.11.4
<b>12.12 Conflict and security: 2022</b>			
3-3	Management of material topics	<a href="#">Contact</a> ; <a href="#">Health and Safety</a> (The health and safety of our people is a core focus); Vessels berthing at our terminals are subject to maritime security protocols coordinated and enforced by Department of Home Affairs. Port Waratah does not have operations in areas of conflict.	12.12.1
410-1	Security personnel trained in human rights policies or procedures	<a href="#">Contact</a> ; Our contracted security provider must abide by Port Waratah and Maritime security protocols and our <a href="#">Code of Conduct Policy Statement</a> and code of ethics. They operate under the Maritime, Transport and Offshore Facilities Security Act 2003. We have a number of systems in place to provide safe access to our sites, including training for employees, contractors and visitors. Robust systems and processes provide the foundation of our management approach to health and safety and are underpinned by our certification to ISO 45001.	12.12.2
<b>12.13 Asset integrity and critical incident management: 2022</b>			
3-3	Management of material topics	SR: 5, 15, 40, 42-43; <a href="#">Hazard identification</a> and <a href="#">Incident investigation</a> . The Global Industry Standard on Tailings Management (GISTM) is not relevant for Port Waratah as it does not operate or manage any tailings facilities.	12.13.1
306-3	Significant spills	SR: 19	12.13.2
	Critical incidents	SR: 14-15	12.13.3

12.14 Occupational health and safety			
3-3	Management of material topics	SR: 8, 14-17; <a href="#">Health and Safety Policy</a> ; <a href="#">Health &amp; Safety</a> ; <a href="#">Coal Terminals Information Handbook</a>	12.14.1
403-1	Occupational health and safety management system	SR: 8, 14-17; <a href="#">Health and Safety Policy</a> ; <a href="#">Health &amp; Safety</a> ; <a href="#">Coal Terminals Information Handbook</a>	12.14.2
403-2	Hazard identification, risk assessment, and incident investigation	<a href="#">Health and Safety</a>	12.14.3
403-3	Occupational health services	SR: 14-16; <a href="#">Health and Safety Policy</a>	12.14.4
403-4	Worker participation, consultation, and communication on occupational health and safety	SR: 14-16; <a href="#">Health and Safety Policy</a>	12.14.5
403-5	Worker training on occupational health and safety	SR: 14-16	12.14.6
403-6	Promotion of worker health	SR: 14-16	12.14.7
403-7	Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	SR: 14-16	12.14.8
403-8	Workers covered by an occupational health and safety management system	SR: 14	12.14.9
403-9	Work-related injuries	SR: 15-17	12.14.10
403-10	Work-related ill health	SR: 15-17	12.14.11
12.15 Employment practices			
3-3	Management of material topics	SR: 8, 36-41	12.15.1
401-1	New employee hires and employee turnover	SR: 39, 41	12.15.2
401-2	Benefits provided to full-time employees that are not provided to temporary or part-time employees	<a href="#">Join our team</a> ; All employees are entitled to the same benefits whether full-time or part-time. Part-time employees have pro-rata entitlements dependant on their work hours	12.15.3
401-3	Parental leave	SR: 41; All entitled employees that requested parental leave were granted leave.	12.15.4
402-1	Minimum notice periods regarding operational changes	<a href="#">Enterprise Agreement</a>	12.15.5
404-1	Average hours of training per year per employee	Average hours of training per: Male leaders 18 hours, non-leaders 40 hours; Female leaders 19 hours; non-leaders 39 hours. Leaders are members of our Senior Leadership Team Level 1 and Level 2 Leader employees. Data does not include casuals and apprentices. Hours reported include face-to-face learning and e-Learning in the areas of compliance training, development and specific skill/task training.	12.15.6
404-2	Programs for upgrading employee skills and transition assistance programs	SR: 38	12.15.7
414-1	New suppliers that were screened using social criteria	SR: 32; All new suppliers are screened on social and environmental criteria.	12.15.8
414-2	Negative social impacts in the supply chain and actions taken	SR: 32; MSS: 10	12.15.9
12.17 Forced labor and modern slavery			
3-3	Management of material topics	MSS: 8	12.17.1
409-1	Operations and suppliers at significant risk for incidents of forced or compulsory labor	MSS: 8-9	12.17.2
414-1	New suppliers that were screened using social criteria	MSS: 8	12.17.3

12.18 Freedom of association and collective bargaining			
3-3	Management of material topics	SR: 36; <a href="#">Our people</a> Port Waratah supports the rights of all workers to be a member of a union.	12.18.1
407-1	Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk	SR: 36; <a href="#">Our people</a> Port Waratah supports the rights of all workers to be a member of a union.	12.18.2
12.19 Non-discrimination and equal opportunity			
3-3	Management of material topics	SR: 9, 12-13, 39; <a href="#">Supporting home grown talent</a> ; <a href="#">Our people</a> ; Port Waratah's CEO signed the Diversity Council of Australia's 'I stand for respect' pledge', committing to a safe, equal and inclusive workplace free of discrimination and harassment. Furthermore, anti-discrimination is highly legislated in our jurisdiction of operations (Australia) and is monitored under legal compliance within our risk management framework.	12.19.1
202-1	Ratios of standard entry level wage by gender compared to local minimum wage	Omission: Entire disclosure Reason: Not applicable. The proportion of employees that are compensated based on wages subject to minimum wage is considered immaterial.	12.19.2
202-2	Proportion of senior management hired from the local community	SR: 37, 46, AFR: 5	12.19.3
401-3	Parental leave	SR: 41; All entitled employees that requested parental leave were granted leave.	12.19.4
401-3	Average hours of training per year per employee	Male leaders 18 hours, non-leaders 40 hours; Female leaders 19 hours; non-leaders 39 hours. Data does not include casuals and apprentices. Hours reported include face-to-face learning and eLearning in the areas of compliance training, development and specific skill/task training.	12.19.5
405-1	Diversity of governance bodies and employees	SR: 37, 39; The median age of our Executive team is 45 years. In addition, 3.01 per cent of team members and 9 per cent of our Executive team speak a language other than English at home.	12.19.6
405-2	Ratio of basic salary and remuneration of women to men	SR: 39; Port Waratah's approach to remuneration is role-based and within parity.	12.19.7
406-1	Incidents of discrimination and corrective actions taken	SR: 10	12.19.8
12.20 Anti-corruption			
3-3	Management of material topics	SR: 10; <a href="#">Code of Conduct Policy Statement</a> ; <a href="#">Commercial practice</a> ; <a href="#">Capacity Framework Arrangement</a>	12.20.1
205-1	Operations assessed for risks related to corruption	Referencing local legislation and with only two locations, Port Waratah's comprehensive <a href="#">Code of Conduct Policy Statement</a> ; <a href="#">Whistleblower Policy Statement</a> and <a href="#">Whistleblower Procedure</a> outline how we identify, assess, and manage potential risks related to bribery and corruption across 100 per cent of our operations. These risks are integrated into our risk assessment and management systems as legal compliance risks.	12.20.2
205-2	Communication and training about anti-corruption policies and procedures	All employees are made aware of our anti-corruption policies during their formal induction. Ongoing training for all employees takes place formally every twoyear employment anniversary through an induction renewal training package and informally during the annual employee development days and via awareness collateral such as posters. All governance body members receive a Director's Kit, which provides business governance documentation. Communication on matters and issues arising for the Board is conducted via the ARC and HSEC. Our Risk Register also includes legal compliance and corruption. Our position on anti corruption in relation to suppliers is included in our Terms and Conditions.	12.20.3
205-3	Confirmed incidents of corruption and actions taken	SR: 10	12.20.4
	Approach to contract transparency	Omission: Entire disclosure; Director's interests excluded (AFR: 6) Reason: Confidentiality constraints	12.20.5
	Organisation's beneficial owners	AFR: 1, 24, 40	12.20.6

12.21 Payments to governments			
3-3	Management of material topics	<a href="#">Government and business relations</a> ; Port Waratah's Tax Governance Policy aligns with legal tax obligations. The Board's ARC holds four meetings a year and focuses on compliance and governance to manage our operational risks and challenges, including tax. AFR: 18-21	12.21.1
201-1	Direct economic value generated and distributed	SR: 32-34	12.21.2
201-4	Financial assistance received from government	Port Waratah did not receive any government funding in 2023.	12.21.3
207-1	Approach to tax	<p>AFR: 18-21; Our Tax Governance Policy aligns with our legal tax obligations and maintains a high level of confidence that we are paying the correct amounts of tax. Port Waratah is committed to pay the appropriate amount of tax in accordance with the relevant tax law and to conduct its tax affairs in accordance with intent and the spirit of applicable laws, engaging with tax authorities with honesty, integrity and transparency in all tax matters. This includes the following:</p> <ul style="list-style-type: none"> <li>• Complying with all applicable laws and regulations relating to tax, including meeting tax compliance obligations in a timely manner. Ensuring the appropriate tax advice is sought and considered as part of the overall commercial assessment of any significant transaction.</li> <li>• Not participating in tax evasion or facilitating the evasion of tax by a third party in any way.</li> <li>• Maintaining open and constructive relationships with all relevant revenue authorities and avoiding unnecessary and time-consuming disputes wherever possible.</li> <li>• Protecting the reputation of Port Waratah in relation to tax matters.</li> <li>• Only taking tax positions that can be clearly explained and substantiated to the Australian Tax Office.</li> <li>• Maintaining high standards of tax risk management and governance. Maintaining a "low" risk rating from all relevant revenue tax authorities.</li> </ul>	12.21.4
207-2	Tax governance, control, and risk management	Our Board of Directors and Executive Management are accountable for compliance with our tax policy and strategy. Port Waratah's Tax Risk Management and Governance Policy, which is approved by the Board, has been developed to enhance our Tax Risk Management and Governance Framework. The policy is reviewed every three years. Internal auditors are accountable for undertaking an annual review of compliance with our tax governance and control frameworks and external auditors provide assurance of our financial statements on an annual basis. See also <a href="#">Whistleblower Policy Statement</a> and <a href="#">Whistleblower Procedure</a>	12.21.5
207-3	Stakeholder engagement and management of concerns related to tax	SR: 30; <a href="#">Whistleblower Policy Statement</a> and <a href="#">Whistleblower Procedure</a>	12.21.6
207-4	Country-by-country reporting	AFR:10, 18-21; Port Waratah is an Australian resident for tax purposes. Australia is the only tax jurisdiction in which Port Waratah operates and for which audited consolidated financial statements are produced.	12.21.7
	Additional sector disclosure: Coal purchased from the state or from third parties appointed by the state to sell on their behalf	Omission: Entire disclosure Reason: Not applicable Port Waratah does not purchase coal.	12.21.8
12.22 Public policy			
3-3	Management of material topics	SR: 8-10; <a href="#">Government and business relations</a>	12.22.1
415-1	Political contributions	<a href="#">Government and business relations</a> ; Port Waratah does not support any political viewpoint or party and does not make political donations of any kind.	12.22.2

#### Topics in the applicable GRI Sector Standards determined as not material

Topic	Explanation
[Title of GRI Sector Standard]	
Child labour	Port Waratah operates in a highly regulated sector for labour.
Customer health and safety	Port Waratah is a service industry and customers do not directly interact with our infrastructure assets.
Marketing and labelling	Port Waratah does not market its services
Land and Resource Rights	Port Waratah does not conduct mining activities

AFR = 2023 Annual Financial Report;

SR = 2023 Sustainability Report;

MSS = 2023 Modern Slavery Report;

ARC = The Board Audit and Risk Committee

HSEC = The Board Health, Safety and Environment Committee.

The source is referred to first, followed by the page number. For example, SR: 4 is the 2023 Sustainability Report, page 4.