

SUSTAINABILITY MANAGEMENT PLAN

DRAFT

Approvals and Reviews

Management Plan Name

Project	CopperString 2.0
Client	CuString Pty Ltd
Document Number	0643-JV-PLN-SMP-0023-B

Revision History

Rev No.	Description of Revision	By	Checked	Approved	Date
A	Draft Submission	B.Harbort	S. Nightingale	A. Terry	9 th March 2021
B	Silver Review	B.Harbort			23 rd June 2021

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Appendices

Appendix A CIMIC Group Sustainability Policy

Acronyms and abbreviations

Term	Expanded text
CEMP	Construction Environmental Management Plan
CMS	CPB Contractors Management System
CPB	CPB Contractors Pty Ltd
EMS	Environmental Management System
NGER Scheme	National Greenhouse and Energy Reporting Scheme
NGER Act	<i>National Greenhouse and Energy Reporting Act 2007</i>
NQCEH	North Queensland Clean Energy Hub
NWPN	North West Power System
SMS	CPB Contractors Sustainability Management System
SuMP	Sustainability Management Plan

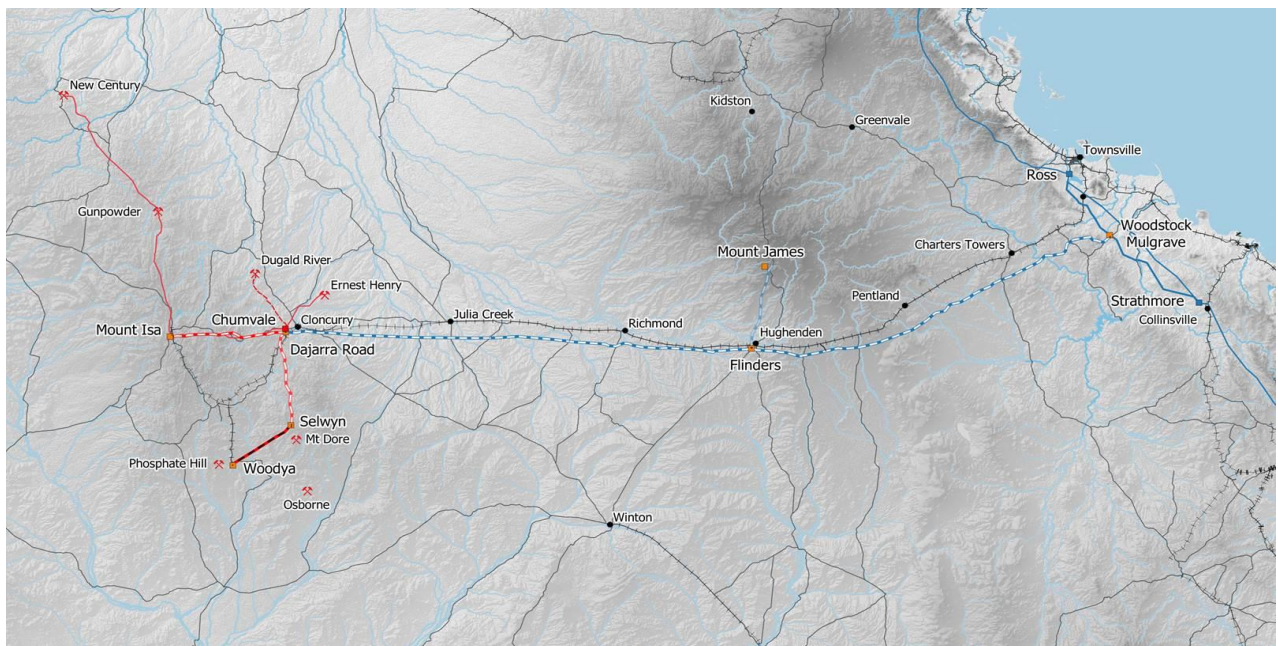
1. Introduction

The purpose of the CopperString 2.0 project is to connect the North-West Minerals Province (NWMP) of Queensland to the National Electricity Grid. This will not only allow existing loads in the Mt Isa and Cloncurry areas to be fed from the National Electricity Market NEM, but also provide access to new mining loads and opportunity for connection of renewable generation.

1.1 Project Scope

The CopperString 2.0 Project (the Project) is an extra high voltage transmission system intended to connect the North-West Power System (NWPS) near Cloncurry and Mount Isa to the Powerlink network and National Electricity Market (NEM) at Woodstock. Figure 1 below provides an overview of the Project.

Figure 1: CopperString 2.0 Project – Proposed Transmission Lines



CopperString 2.0 will connect into the existing Powerlink 275kV lines at Mulgrave (77 kms south of Townsville) and extend some 1100km to Mt Isa via Hughenden and Cloncurry.

At Woodstock, Powerlink will provide a 275kV switching station (Mulgrave) that will cut into the existing double circuit 275kV lines between Ross and Strathmore. The Mulgrave switching station will be located adjacent to the CopperString 2.0 275/330kV substation (Woodstock).

A double circuit 330kV line (approximately 330km) will then run west to the Hughenden area where a new 330kV switching station (Flinders) will provide reactive power support for the system and a connection point for the Mount James substation approximately 80km North. The Mount James substation services the renewable generation area around Kennedy enabling zone development.

The 330kV double circuit line (approximately 400kms) will then extend to Cloncurry where a new 330/220kV substation (Dajarra Rd) will be constructed. This substation will again provide reactive power support to the system as well as allow connection at 220kV to the following:

- The existing Energy Queensland 220kV system at Cloncurry;
- A new 220kV southern spur to Mount Dore and Woodya; and
- A new 220kV line connecting Mt Isa.

The new 220kV line to Mt Isa (approximately 100kms) will complete the connection to the NWMP where a new 220/132kV substation (Mt Isa) will provide connection to the existing system.

The southern spur will consist of a new 220kV line (approximately 110kms) to a new 220/132kV substation (Selwyn). A further double circuit 132kV will run from Selwyn and connect in to Woodya (50kms). Woodya is a new 132kV switching substation servicing the Phosphate Hill area and other local loads.

Selwyn 220/132kV substation will provide 132kV feeds for loads in the Mt Dore area.

Refer to drawing 3200-0643-DP1-DWG-001 "CopperString 2.0 Overall System Single Line Diagram Initial Arrangement" for further details.

2. Plan Structure

This Plan is broken into different elements which outline our approach to managing sustainability on the Project.

Figure 2 Sustainability Management Plan Structure

<p>Introduction</p> <ul style="list-style-type: none"> ■ Purpose ■ Sustainability Management System ■ Interaction with other Management Plans
<p>Sustainability Management Elements</p> <ul style="list-style-type: none"> ■ Context and Objectives ■ Leadership, Collaboration and Support ■ Risk and Opportunity Assessment ■ Sustainable Procurement ■ Reporting, Communication and Information Management ■ Evaluation and Improvement
<p>Appendices</p> <ul style="list-style-type: none"> ■ Sustainability Policy

2.1 Purpose

For UGL and CPB JV, sustainability is about ensuring the long-term success of our projects, people, communities and ecosystems by integrating environmental, social, economic and governance factors into our decision making. UGL and CPB JV are committed to pursuing sustainability initiatives which aim to achieve net positive environmental, social, economic and community benefits and are consistent with technical design and construction requirements.

This Plan outlines UGL and CPB JV approach to managing sustainability to enable the Project to:

- Fulfill any contractual sustainability requirements should they exist
- Identify and act on the sustainability related opportunities and risks associated with the design, construction and operation of the Project to achieve sustainability outcomes
- Reduce environmental and social impacts where reasonable and feasible and consider the asset's resilience to climate change
- Create value and benefit from sustainability

2.2 UGL and CPB JV Contractors Sustainability Management System

This Sustainability Management Plan and other Project Plans are supported by a suite of UGL and CPB JV Contractors Management System (CMS) governance components that form the Sustainability Management System (SMS) which aims to foster an integrated approach to sustainability across functions and ensure third party certifications are maintained.

2.2.1 Improvement & Certifications

The UGL and CPB Contractors Management System has been developed to ensure compliance with the following external certifications:

- ISO 9001:2015 Quality Management
- ISO 14001:2015 Environment Management
- AS/NZS 4801:2001 Occupational Health & Safety
- OHSAS 18001:2007 Occupational Health & Safety
- Office of Federal Safety Commission (OFSC)

2.3 Interaction with other Management Plans

This Sustainability Management Plan should be read in conjunction with the Project Construction Environmental Management plan '0643-JV-PLN-CEM-0003 Construction Enviro Mgmt Plan'.

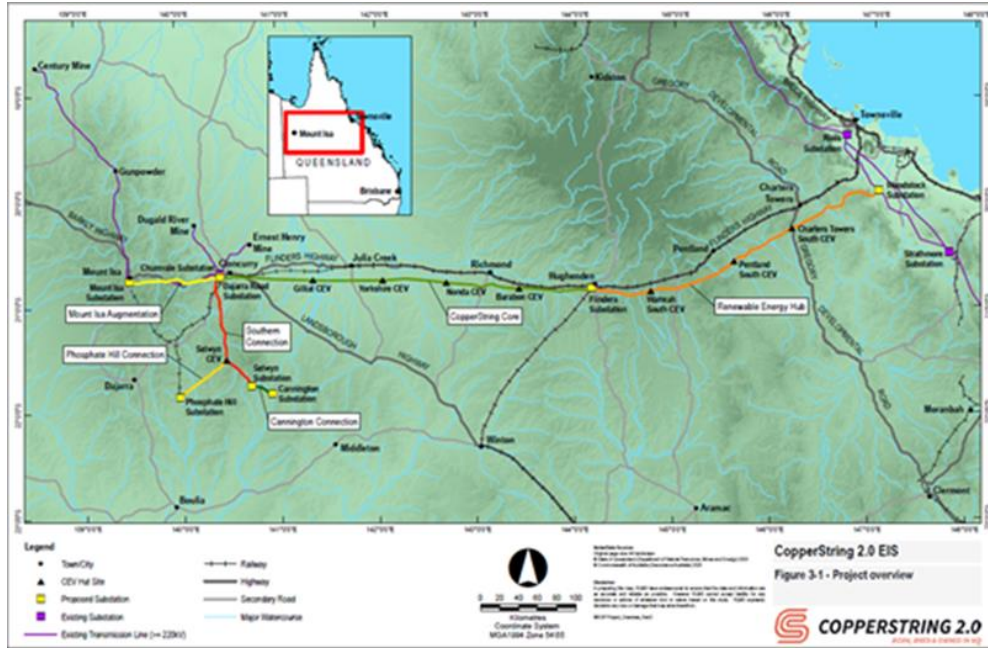
3. Sustainability Management Plan

3.1 Context & Objectives

The Context and Objectives element will identify the context, priority sustainability issues, legislation & regulatory requirements, key targets and key milestones of the project.

3.1.1 Project Background

Project Component	Description
Customer	CuString Pty Ltd
Project Type	EPC
Location	Seven substations and 1,957KM of extra high voltage overhead transmission lines east from Woodstock west to Mt Isa
Land Tenure	Leased by CuString
Historical	Pastoral, defence force and mining
Zoned	Rural
Project Working hours	Monday to Sunday 6am to 6.30pm
Project Duration	4 years
Project Commencement	ECI commencement 11th January 2021



Map 1: Overview of project area and substations

Source: CopperString 2.0 ECI

3.2 Sustainability Policy

UGL and CPB JV as Operating Companies of the CIMIC Group, operate under the CIMIC Sustainability Policy and its objectives which apply to his project. Refer to Appendix A for the full Sustainability Policy.

As a member of the CIMIC Group, UGL and CPB JV recognise the global commitment of governments and businesses to the United Nations 2030 Agenda for Sustainable Development and the Sustainable Development Goals (SDGs) in Figure 3 which outline a universal call to action to end poverty, protect the planet and ensure that all peoples enjoy peace and prosperity.

SUSTAINABLE DEVELOPMENT GOALS



Figure 3 UN Sustainable Development Goals.

Source: United Nations

3.3 Key Contract Requirements & Targets

The CopperString 2.0 project has no contractual sustainability requirements or targets.

3.4 Legislation and Regulatory Requirements

Legislation and regulations relevant to this SuMP include:

- National Greenhouse and Energy Reporting Act 2007
- Environment Protection and Biodiversity Conversation Act 1999
- Biosecurity Act 2015
- Environmental Protection Act 1994,
- Nature Conservation Act 1992
- Nature Conservation (Wildlife) Regulation 2006
- Fisheries Act 1994
- Forestry Act 1959
- Vegetation Management Act 1999
- Water Act 2000
- Environmental Protection (Waste Management) Regulation 2000

3.5 Key Stakeholders

3.5.1 Stakeholders

The anticipated sustainability related stakeholders that may be engaged with during the Project are identified in the table below.

Table 1: External Stakeholders

Stakeholder	Level of Engagement	Role/Actions
CuString PTY LTD	Client	Adhere to UGL and CPB JV SuMP

3.6 Key Milestone Tasks and Timelines

Table 2 Key Milestone Tasks and Timelines

Key Tasks	Month / Year
Draft SuMP submitted for review	09/03/2021
Final SuMP submission and approval	13/07/2021

4. Leadership, Collaboration and Support

The Leadership, Collaboration and Support element identifies the general sustainability responsibilities for typical project leadership roles, functional leads and sustainability staff and the project training opportunities.

4.1 Project Leadership Sustainability Responsibilities

The project leadership team will promote the integration of sustainability at all functional management levels and create a culture where everyone acknowledges their role to play towards achieving the project sustainability objectives.

The table below outlines the general sustainability responsibilities for typical leadership roles, functional leads and staff. Project staff roles are further addressed in the UGL and CPB Construction Environmental Management Plan.

Table 3: Project Leadership Responsibilities

Role	Responsibilities
Project Director	<ul style="list-style-type: none"> Establish and champion sustainability culture across the project Manage accountability for sustainability responsibilities Ensure systems and adequate resources are in place to integrate sustainability across the project and its functions
Project Manager	<ul style="list-style-type: none"> Ensure that sustainability requirements, risks and opportunities are identified and incorporated into project controls and systems Report sustainability progress against commitments in this SuMP to the leadership team
Design Director / Design Leads	<ul style="list-style-type: none"> Engage with the Environmental Manager / Sustainability Manager to ensure sustainability requirements / performance specifications are integrated into the design plans/packages/specifications and communicated to relevant parties Ensure the design team achieves the sustainability objectives and direct/oversee corrective actions where appropriate
Construction Director / Construction Leads	<ul style="list-style-type: none"> Engage with the Environmental Manager / Sustainability Manager to ensure sustainability requirements / performance specifications are integrated into the construction plans/packages/specifications and communicated to workforce Ensure the subcontractors and suppliers achieve sustainability objectives in the Delivery Phase and direct/oversee corrective actions where appropriate
Health and Safety Manager	<ul style="list-style-type: none"> Provide data to the Project Environmental Manager / Sustainability Manager for sustainability reporting
Other key Functional Leads such as Stakeholder & Engagement	<ul style="list-style-type: none"> Engage with the Environmental Manager / Sustainability Manager to ensure sustainability requirements are integrated into the plans/packages/specifications and communicated to relevant parties Ensure all subcontractors and suppliers achieve sustainability objectives in the Delivery Phase and direct/oversee corrective actions where appropriate
Commercial Manager / Procurement	<ul style="list-style-type: none"> Engage with the Environmental Manager / Sustainability Manager to embed sustainability requirements in sub-contracts and supply agreements
Human Resources Manager	<ul style="list-style-type: none"> Develop and implement strategies to achieve the human resource related sustainability initiatives with regard to equality, social enterprises, diversity and training Ensure the provision of appropriate induction and training for sustainability aspects to all relevant Project personnel

All Staff	<ul style="list-style-type: none"> • Integrate consideration of environmental, social and economic impacts into decision making • Generate and support the implementation of sustainability initiatives
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4.2 Facilitate Sustainability Training Opportunities

4.2.1 Project Induction

All personnel, subcontractors and visitors will undergo an induction before commencing work on-site. The induction will address Project-specific sustainability issues, including:

- Sustainability objectives and targets
- Sustainability expectations of employees and subcontractors

Induction materials will be reviewed at least annually and amended where necessary to reflect changes to Project sustainability issues.

5. Risk and Opportunity Assessment

The Risk and Opportunity Assessment element will outline the key actions to identify sustainability related risks and opportunities including Governance, Economic, Environmental and Social impacts/benefits and the treatment actions/options available.

5.1 Sustainability Risk and Opportunity Treatments

Actions to treat Sustainability related Risks and Opportunities will be identified and address where appropriate:

- The sustainability risks and their treatment option/s
- The sustainability opportunities and their implementation option/s
- The selected treatment/implementation options and the reasons for selecting the treatment/implementation option
- Resources required to implement treatment/implementation options
- Timing and schedule
- Reporting and monitoring requirements
- Persons responsible for implementing, measurement, monitoring and reporting

5.2 Sustainability and Innovation Opportunity Register

The project manager will maintain a **Sustainability and Innovation Opportunity Register** or similar to capture ideas and initiatives that may lead to sustainable outcomes. The Sustainability and Innovation Opportunity Register will qualitatively assess individual opportunities based on Governance, Economic, Social and Environmental benefits. The Register will be used to track the status and responsibility for progressing sustainability and innovation opportunities.

5.3 Sustainability Risk and Opportunity Identification Activities

The table below identifies the key activities that may be undertaken throughout the Project where risks/opportunities and associated treatments will be identified/communicated/monitored.

Table 4 Sustainability Risk and Opportunity Identification Activities

Project Phase	Sustainability Activity
Commencement / Design	<ul style="list-style-type: none"> • Sustainability requirements and expectations briefing

Prior to Construction	<ul style="list-style-type: none"> Sustainable procurement including ensuring socio-economic opportunities for workforce engagement and environmentally responsible supplier/materials are all considered.
During Construction	<ul style="list-style-type: none"> Tool Box talks and project meetings
Ongoing	<ul style="list-style-type: none"> Review and monitor status of actions within Risk and Opportunity Registers throughout project

6. Sustainable Procurement

The Sustainable Procurement element outlines the project approach for transparent, competitive, compliant and sustainable procurement.

6.1 Key Procurement Targets.

No sustainability procurement targets are in place for the CopperString 2.0 project however all reasonable steps will be taken to ensure project resources are sourced from sustainable suppliers.

6.2 Supplier Engagement

Any sustainability initiatives or options identified by a supplier will be considered and added to the innovation and sustainability register.

6.3 Sustainable Procurement Actions

The CIMIC Group Procurement Policy, along with the UGLCPBJV Contractors Procurement Procedures, tools and knowledge resources form the basis of the project procurement approach in line with *ISO20400:2007 Sustainable Procurement Guidance*.

6.4 Human Rights and Modern Slavery

CIMIC Group Policies include commitments to actively avoiding human rights violations, abiding by the human rights and civil liberties included in the Universal Declaration of Human Rights, the International Labour Organisation (ILO) and the ten principles of the United Nations Global Compact.

The CIMIC Group Sustainability Policy, Code of Conduct and the Group's Dealing with Third Parties Policy requires specific due diligence to be undertaken regarding risks associated with modern slavery.

Supply chain due diligence includes screening third parties (including vendors, suppliers and business partners) against a range of risk factors which include:

- Sanctions, watch-lists, adverse litigation and Politically-Exposed-People (PEP) lists
- Adverse media (print media and social media) screening for all jurisdictions in which CIMIC operates
- Financial information including company ownership, structure, credit rating and financial strength
- Potential for modern slavery, bribery and corruption to occur in particular industries and countries

As part of prequalification and onboarding, all suppliers must also complete a Third-Party Anti-Bribery and Business Integrity Declaration in which they disclose (among other things) whether they (or any of their subcontractors or suppliers) have:

- Been subject to or received any prosecutions, regulatory notices, tendering restrictions, sanction notices, litigation or arbitration concerning allegations of fraud, bribery, ethical-business practices or corruption, modern slavery or breaches of the human rights of employees or contractors, or environmental or safety breaches or any similar or associated laws or regulations
- Used modern slavery, human trafficking or forced or child labour anywhere
- A compliance management program (i.e. policies, procedures, training, whistleblower protection) to ensure compliance with business integrity laws and regulations (i.e. bribery and corruption, fraud, modern slavery legislation and or any other associated laws or regulations)

Suppliers are also required to make certain assurances, such as that they will not use any payments which they receive from UGL and CPB JV in violation of any modern slavery, anti-bribery, anti-money laundering, trade sanctions, terrorist financing or other similar laws and regulations.

7. Reporting, Communication and Information Management

The Reporting, Communication and Information Management element outlines the actions to report project performance and the processes to manage, communicate and store project information.

7.1 Supply Chain Reporting

Key supply chain providers will be required to report periodically on sustainability performance metrics as required by UGL and CPB JV. All subcontractors on the CopperString 2.0 are required to report their NGER to UGL and CPB JV.

7.2 Project Reporting and Document Management

Project reporting and document management requirements are outlined in '0643-JV-PLN-CEM-0003 Construction Enviro Mgmt Plan'.

7.3 Knowledge sharing

Project sustainability knowledge and lessons learnt will be captured and shared in UGL and CPB JV lessons learnt sessions and documents.

8. Evaluation and Improvement

The Evaluation and Improvement element identifies the actions to review the Sustainability Management Plan, UGL and CPB JV Contractors Management System and project performance to identify continual improvement opportunities.

8.1 Management Plan Review and Improvement

This Plan will be reviewed as required by the Environmental Manager / Sustainability Manager to assess the adequacy of the Sustainability Management Plan and overall performance against Project sustainability requirements, targets and objectives. Applicable findings of the review will be incorporated into the Sustainability Management Plan and/or the UGL and CPB JV Sustainability Management System.

The formal review must take into account the results of:

- Audits undertaken
- Communication, participation and consultation
- Relevant communication including complaints from external stakeholders
- The performance of the Project

- The extent to which the objectives and targets have been met
- Changes to legislation
- Actions from previous management reviews and recommendations for improvement.

Continuous improvement will be achieved through continual reporting/monitoring, measurement, evaluation and adjustment in response to the changing delivery context, generating opportunities to improve sustainability outcomes.

8.2 Audits, Inspections and Review

Audits, inspections and reviews are outlined in '0643-JV-PLN-CEM-0003 Construction Enviro Mgmt Plan'.

Appendix A CIMIC Group Sustainability Policy



SUSTAINABILITY POLICY

This Policy sets out requirements for sustainability across CIMIC Group Limited and entities it controls (**the Group**). Sustainability is the integration of environmental, social and governance factors into decision making to maximize short and long term shareholder value, seek competitive advantage, and contribute to safe and healthy employees, communities and ecosystems.

This Policy should be read in conjunction with the Group Code of Conduct, the Procurement, Environment, Health and Safety, and Diversity and Inclusion policies, and the NGER Annual Compliance Report template.

This Policy applies to all employees of the Group, and third parties engaged by the Group, including alliances and joint ventures in all jurisdictions.

Any employee of the Group found to have breached this Policy may be subject to disciplinary action.

The **objectives** of this Sustainability Policy are to:

- Focus the Group's efforts on managing sustainability risks and opportunities, enhancing business performance and supporting the long-term interests of the Group;
- Promote a culture of accountability for sustainability outcomes and improve the sustainability knowledge and skills of employees;
- Integrate consideration of environmentally and socially responsible sourcing and governance factors into the Group's operating and procurement processes, and seek opportunities to collaborate with the supply chain to drive innovation and create mutual value;
- Drive the efficient use of resources and continual innovation in the delivery of projects;
- Support the adoption and delivery of appropriate industry rating schemes and standards that drive sustainability outcomes for clients;
- Encourage initiatives and successfully deliver projects that meet client expectations, provide value for money, and leave net positive legacies for the CIMIC Group, our clients, users, the environment and communities; and
- Enhance the Group's resilience to climate change.

1. Governance

The Group will abide by the principles of the UN Global Compact and acknowledges its role in contributing to the UN Sustainable Development Goals.

The Ethics Compliance and Sustainability Committee (**ECSC**) assists the Board in fulfilling its governance and oversight responsibilities in the area of sustainability.

CIMIC will coordinate and support the Operating Companies to develop tailored sustainability strategies and implement initiatives that help to achieve the Group's commitments and objectives.

CIMIC will facilitate sustainability knowledge sharing across the Group so as to encourage innovation, mitigate risk, drive competitive advantage and create shareholder value.

Operating Companies are responsible for meeting their contractual and compliance obligations regarding the operational aspects of sustainability such as project delivery, health, safety, people development, environment, community relations, procurement, risk, governance and ethical behaviour, within the Group's governance framework.

Title: Sustainability Policy
 ID: MSID-7-64 Version: 8.0 Date Published: 28/06/2017
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2. Reporting

CIMIC will coordinate the annual publication of a Global Reporting Initiative (GRI) based Group Sustainability Report. The ECSC approves the Sustainability Report and any sustainability disclosures in the Annual Report.

CIMIC will participate in recognised sustainability surveys including the Dow Jones Sustainability Index and CDP so as to promote the Group’s reputation as an industry leader in the sustainable delivery of projects.

The Operating Companies are responsible for:

- Internal reporting of operational health, safety, environment and community related initiatives and performance information to CIMIC management and the ECSC;
- The provision of sustainability data and information to CIMIC to inform corporate sustainability reporting requirements, and to support the submission of sustainability surveys as required by CIMIC; and
- Direct external reporting to meet legislative obligations (such as the National Greenhouse and Energy Reporting Act, including the completion of an annual compliance report) where appropriate.

CIMIC will regularly review Operating Company strategies, reporting and performance to ensure they demonstrate compliance with all legislative requirements and support continuous improvement in sustainability and business performance.

Policy Information

Owner:	Executive General Manager, Sustainability, CIMIC
Approved by:	Chief Executive Officer, CIMIC
Effective date:	June 2017

Note: CIMIC Group policies may be amended from time to time.