NORTH WEST TREATMENT HUB
GROWTH PROGRAM

Annual Sustainability Performance Report Financial Year 2024-2025

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Revisions and Distributions

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Authorised by	Matt Ross
Date	08/12/2025

Revisions

Draft issues of this document shall be identified as Revision 01, 02, 03 etc. Upon initial issue this shall be changed to a sequential number commencing at Revision A. Revision numbers shall commence at Rev. A, B etc.

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Definitions and Abbreviations

Definitions and abbreviations to be applied to this Annual Sustainability Performance Report FY2024-2025 are listed below.

Terms/ Abbreviations	Definitions
AIMT	Alliance Integrated Management Team
CRG	Community Reference Group
CSEP	Community and Stakeholder Engagement Plan
EIS	Environmental Impact Statement
EPA	Environment Protection Authority
EPL	Environmental Protection Licence
GHG	Greenhouse gas
GRI	Global Reporting Initiative
IS	Infrastructure Sustainability
ISAP	Infrastructure Sustainability Accredited Professional
ISC	Infrastructure Sustainability Council
ISQP	Independent Suitably Qualified Professional
JH / JHG	John Holland Pty Ltd / John Holland Group
KBR	Kellogg, Brown & Root
KPI	Key Performance Indicator
MCA	Multi-Criteria Analysis
NSW	New South Wales
NWHA	North West Hub Alliance
NWTH	North West Treatment Hub
NWTHGP	North West Treatment Hub Growth Program
NWTHGP SS	North West Treatment Hub Growth Program Sustainability Strategy
PPW	Project Pack Web
UN SDGs	United Nations Sustainable Development Goals
REF	Review of Environmental Factors
RHWRRF	Rouse Hill Water Resource Recovery Facility
RWRRF	Riverstone Water Resource Recovery Facility
SuMP	Sustainability Management Plan (this Plan)
SQP	Suitably Qualified Professional
SWC	Sydney Water Corporation
TC	Technical Clarification
UN SDGs	UN Sustainable Development Goals
WRP	Water Recycling Plant
WWRF	Water Resource Recovery Facility
WWTP	Wastewater Treatment Plant

Acknowledgement of Country

North West Hub Alliance (NWHA), in partnership with Sydney Water, respectfully acknowledges the Traditional Custodians across the nations where we work, live and learn.

Their lore, traditions, customs and practices nurtured and continue to nurture the waters, both saltwater and freshwater, across our operating area, contributing to wellbeing throughout the region.

We pay our deepest respect to Elders, past and present. We acknowledge their deep connections to the land and waterways on which we live, work and play. We are committed to reconciliation and partnering with Traditional Custodians, to support ensure ongoing collaboration on "Caring for Country" now, and into the future, learning from traditional and contemporary approaches, while maintaining and respecting cultural and spiritual connections.

Our vision for reconciliation across our entire area of operations is to engage in deep listening and to learn from Aboriginal peoples as the first engineers of water and natural resources in this Country and to blend their traditional knowledge with modern science to manage our waterways and protect the environment.

NWHA and Sydney Water are committed to building and maintaining meaningful and respectful relationships with Aboriginal and Torres Strait Islander people. We value the economic, social and cultural contribution, and we recognise the social and economic challenges faced by Aboriginal and Torres Strait Islander people. We understand that we have a unique opportunity to contribute to the NSW Government's strategic economic policy of "Growing NSW's First Economy" and are committed to the authentic, ongoing sustainable engagement with First Australians legal entities, organisations and community across the NWHA footprint, supporting shared input and collaboration.

Executive Summary

This Annual Sustainability Performance Report outlines the North West Hub Alliance's (NWHA) progress in delivering sustainability outcomes for the North West Treatment Hub Growth Program during FY2024–25. It demonstrates alignment with Sydney Water's Strategy 2025–2035, Carbon Zero Plan and Circular Economy Blueprint, reaffirming a shared commitment to resilient, efficient and low-carbon infrastructure that supports thriving communities across Sydney's growing north-west.

Covering the period 1 July 2024 to 30 June 2025, the report aligns with the Global Reporting Initiative (GRI) Standards 2021, including GRI 1–3 and GRI 304: Biodiversity 2016, and supports Infrastructure Sustainability (IS) v2.1 Design and As Built Rating credit Lea-1. It provides transparent, evidence-based disclosure of environmental, social and governance performance, with independent review to be undertaken in accordance with the AA1000 Assurance Standard.

During the reporting period, the Alliance achieved significant progress in embedding sustainability across governance, design and delivery. Climate and energy initiatives delivered measurable carbon reductions, including the use of over 85,000 litres of biofuels, Sense600 low-carbon steel and hydrotreated vegetable oil (HVO) fuels, contributing toward Sydney Water's net zero commitments. Waste and resource efficiency outcomes were exemplary, with 99.8% spoil reuse, 96.4% construction waste recycling and 85.8% office waste diversion, setting a new benchmark for circular economy performance in infrastructure. Boral and Aqua Options were recognised with the Sustainable Supply Chain Excellence Award for innovation in low-emission concrete and construction practices.

The Project also achieved strong outcomes in environmental protection and community engagement, maintaining zero environmental complaints, protecting biodiversity, and supporting workforce wellbeing through the delivery of SMART (Specific, Measurable, Achievable, Relevant and Time-bound) wellbeing and culture targets. Collaboration with regulators, suppliers and the community continued to drive innovation, transparency and shared value.

Through integrated governance, industry leadership and a culture of continuous improvement, the NWHA remain committed to delivering sustainable, resilient and high-performing infrastructure that safeguards Sydney's environment and enhances liveability for future generations.

1. Introduction

1.1. About this Report

The North West Treatment Hub (NWTH) Growth Program is a long-term Sydney Water initiative to deliver staged wastewater infrastructure upgrades across Sydney's north-west. The program aims to support regional population growth, promote compliance with evolving environmental standards, and contribute to a safe, efficient, and sustainable wastewater network for the community.

The program is being delivered by the North West Hub Alliance (NWHA), a partnership between Sydney Water, John Holland, KBR and Stantec. Under the current phase of works, major upgrades are underway at the Rouse Hill and Riverstone Water Resource Recovery Facilities (WRRFs) to increase treatment capacity, improve effluent quality, and enhance resource recovery.

This Annual Sustainability Performance Report for Financial Year 2024-2025 (FY2024-25) has been prepared by the NWHA to demonstrate performance against the program's approved sustainability objectives and targets.

NWHA has reported in accordance with the GRI Standards for the period 1 July 2024 to 30 June 2025. This is the first Annual Sustainability Performance Report prepared by NWHA.

The report provides transparent, evidence-based disclosures of project sustainability performance, presenting a balanced account of progress achieved and areas for ongoing improvement. Outcomes are mapped against the United Nations Sustainable Development Goals (UN SDGs) to demonstrate the program's contribution to broader sustainability priorities.

Through this process, the NWHA reaffirms its commitment to continuous improvement, transparent governance and alignment with recognised best practice in infrastructure sustainability reporting.

1.2. Project Context

Sydney Water provides water, treated wastewater, recycled water and some stormwater services to more than five million people across Greater Sydney. Operating under the *Sydney Water Act 1994*, it aims to protect public health and the environment while operating as a successful and sustainable business.

Sydney's north-west is experiencing rapid population growth, driving demand for upgraded wastewater infrastructure to maintain service reliability and environmental performance. From 1 July 2024, new Environment Protection Licence (EPL) conditions under the NSW EPA's Hawkesbury-Nepean Nutrient Framework (2019) introduce stricter nutrient load and concentration limits to reduce the risk of algal blooms and aquatic weed outbreaks. Planned upgrades are intended to support compliance with these limits and promote the ongoing protection of public and environmental health.

The NWTH Growth Program (see Figure 1) encompasses three key facilities: Castle Hill, Rouse Hill and Riverstone. Collectively, these facilities provide wastewater and recycled -water services to Sydney's rapidly developing north-west. Current projections indicate that treatment capacity across the three facilities will be exceeded by 2026, limiting the ability to accommodate future urban growth.

This Annual Sustainability Performance Report (FY2024-25) focuses on Budget 1 of the program, which includes upgrades to the Rouse Hill and Riverstone facilities (hereafter referred to as 'the Project'), as follows:

- Package 1 – Riverstone WRRF Biosolids and Liquids Upgrades; and
- Package 2 – Rouse Hill WRRF Liquid and Biosolids Amplification Works.

The Castle Hill facility and future program budgets are outside the scope of this report and are therefore excluded from its performance data and sustainability disclosures.

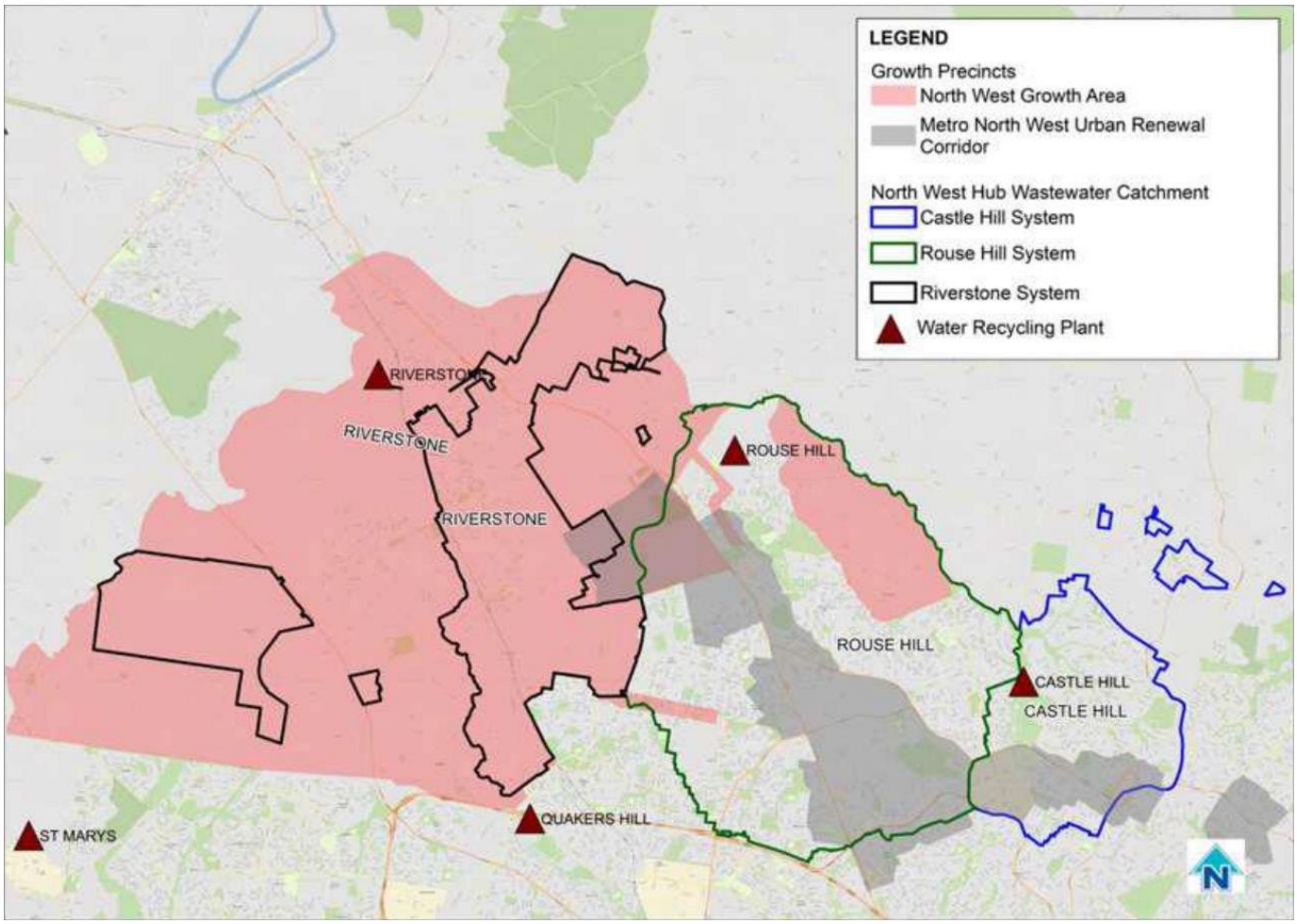


Figure 1: North West Treatment Hub services catchments

1.3. Project Objectives

Key objectives for the Project include:

- Responding to growth by increasing treatment capacity at the two facilities, while delivering the program of work in a cost-effective manner
- Protecting the environments, including the effluent receiving waterways, while meeting current and anticipated future environmental protection licence (EPL)
- Positively contributing to Sydney Water's objectives through the introduction of their Carbon Zero Plan and Circular Economy Blueprint
- Expanding the recycled water system to meet catchment needs.

1.4. Sustainability Statement

The North West Hub Alliance is true to its vision statement, 'Ahead of the flow, Sustaining tomorrow'. 'Ahead of the flow' is about continually preparing, planning, striving for excellence and being resolute, and always looking to achieve and deliver the highest quality in every task. 'Sustaining tomorrow' is about supporting future generations with increased capacity, improved environmental outcomes with the quality of water improved and a new sustainable end-product.

Sustainability is central to the NWTH Growth Program, reflecting Sydney Water's vision to deliver resilient and environmentally responsible infrastructure for Sydney's growing north-west. The Project integrates sustainability throughout design and delivery, aligning with Sydney Water's Strategy 2025-2035, Carbon Zero Plan and Circular Economy Blueprint and contributing to key UN SDGs. Guided by five core themes (leadership, climate, environment, circular economy and community), the Project applies these principles to support measurable outcomes and long-term value for Sydney's people and environment.

2. Project Details

2.1. Scope of Works

Building on the Project context detailed in Section 1.2, above, the following outlines the scope of works being delivered at the two Project sites (Riverstone WRRF and Rouse Hill WRRF).

Riverstone WRRF

Originally commissioned in 1986, Riverstone WRRF currently operates at a 14ML/d capacity. The Project scope involves increasing the site's biosolids treatment capabilities to cater for forecast growth and tightening nutrient limits. Key scope elements include:

- Installation of a new dryer and carboniser system with odour control, gas scrubbing and fire-water independence
- Augmentation of thickening, dewatering and out-loading systems to enable thermal treatment
- Electrical and control system upgrades, including new HV/LV switchrooms, Supervisory Control and Data Acquisition (SCADA) and Programmable Logic Controllers (PLC) integration for new process units
- Odour containment and treatment upgrades, integrating new emission sources into the existing odour control facility (OCF)
- Site water and services augmentation, including potable, industrial, reclaimed and fire-water systems, compressed air, and foul-water reticulation, and
- Expansion of chemical storage and dosing facilities, new inlet screens and a new de-gritter system.

Rouse Hill WRRF

The Rouse Hill WRRF, one of Sydney Water's flagship recycling plants, currently treats 26 ML/d. The Project scope involves amplifying the liquid-stream and biosolids treatment processes to support growth and improve reliability. The works include:

- Conversion of existing intermittently decanted aerated lagoons (IDALs) to four-stage nutrient-removal bioreactors and installation of a new membrane bioreactor (MBR) system with supporting blower building, switchroom and chemical dosing infrastructure
- Amplification of secondary treatment and disinfection systems to meet revised Environmental Protection Licence requirements
- Upgrades to HV/LV switchrooms and transformers, fire-rating improvements and new SCADA and PLC control systems
- Expansion of chemical storage and dosing systems, new biosolids dewatering and out-loading facilities, and a rotary drum thickener (RDT) polymer dosing facility, and
- Augmentation of UV and super-chlorination contact tank infrastructure, with associated site-water and service network upgrades.

2.2. Organisational Profile

Key NWHA organisational details are summarised in Table 1, below.

Table 1: NWHA organisational profile

Project	North West Treatment Hub
Name of Organisation	The North West Treatment Hub Project is being delivered by the North West Hub Alliance
ABN	25 164 277 614
Project Office Address	Level 11, 52 Alfred Street, Milsons Point NSW 2061 4 Money Close, Rouse Hill NSW 2155
Corporate Headquarters Address	NA
Alliance Manager	Matt Ross
Contact Details	Brooke Warrant (Environment, Sustainability & Stakeholder Engagement Manager), brooke.warren@nwha.com.au Matt Ross (Alliance Manager), matt.ross@nwha.com.au
Reporting Period	1 July 2024 to 30 June 2025
Type and Stage of Works	Upgrades to existing structures and construction of new structures. The Project is nearing completion of design and advancing construction at the Riverstone and Rouse Hill facilities See Section 2.4 for more details.

2.3. Project Timing

Design activities commenced in late 2023, with construction beginning in late-2024 and continuing through to 2029. These upgrades represent the first major delivery phase of the NWTH Growth Program and will provide the foundation for subsequent program budgets to be implemented in future years.

Table 2: Project design and construction duration

Location	Design Period	Construction Period
Riverstone WRRF	Dec 2023 – Dec 2025	Dec 2024 – Nov 2026
Rouse Hill WRRF	Dec 2023 – Sep 2025	Dec 2024 – Feb 2029

2.4. Project Status

As at the end of June 2025, the North West Hub Alliance (NWHA) is well advanced in delivering major upgrades at the Riverstone and Rouse Hill Water Resource Recovery Facilities. Design activities are largely complete across both sites, with remaining integration and constructability reviews supporting efficient delivery and risk management.

Construction is progressing strongly at Riverstone, with key milestones achieved including switchroom energisation, completion of FIFM's 2 and 3 and Factory Acceptance Testing (FAT) of the biosolids dryers. At Rouse Hill, civil and structural works continue across the bioreactor and MBR areas, supported by micro-tunnel completion, pipework installation and switchroom fit-outs. Overall, the program remains on track to meet its design, safety and quality objectives, with coordinated efforts between design, construction and commissioning teams ensuring seamless progress toward delivery.

3. Governance and Engagement

3.1. NWHA Governance Framework

The NWHA operates under a structured governance framework that establishes clear roles, accountabilities and reporting lines for program delivery and sustainability performance. The framework promotes transparent decision-making, effective risk management and alignment with Sydney Water's strategic priorities and sustainability commitments.

At the highest level, the Alliance Board provides strategic oversight of program performance and risk. The Board meets regularly to review progress against key objectives, including safety, environment, sustainability, schedule and cost, so that decisions support responsible delivery and long-term value creation.

Operational governance is provided by the Alliance Integrated Management Team (AIMT), led by the Alliance Manager. The AIMT oversees design, construction and commissioning, monitors program performance and risks, and tracks actions and decisions through formal governance records. Functional leadership for Environment, Sustainability and Stakeholder Engagement sits within the AIMT, providing strategic oversight of sustainability implementation and reporting across the program. The Sustainability Lead supports this function at the project delivery level, ensuring sustainability objectives and targets are effectively embedded within day-to-day planning and execution. A copy of the Project's organisational structure is included in **Appendix A**.

Sustainability performance is reviewed quarterly by the AIMT. These reviews assess the effectiveness of sustainability management, track continuous improvement and address emerging risks.

Independent assurance is provided through Sydney Water's internal audit and review processes, with outcomes tracked to closure through the Alliance's continuous improvement system. Issues or risks requiring escalation are raised through the AIMT to the Alliance Board to support timely resolution and accountability.

This governance approach fosters integration, transparency and accountability across all levels of the Alliance, so that sustainability considerations are embedded in both strategic and operational decision-making.

3.2. Sustainability Framework and Approach

Sustainability is integrated across all planning, design and delivery, reflecting the shared commitments of Sydney Water, John Holland, KBR and Stantec to support resilient, efficient and environmentally responsible infrastructure for Sydney's north-west. It is embedded in the Alliance's governance, management systems and culture, aiming to apply environmental, social and economic considerations are applied throughout decision-making and project delivery.

Governance and Strategic Alignment

NWHA's sustainability framework aligns Sydney Water's long-term sustainability commitments with the proven management systems of its delivery partners. This framework provides the foundation for embedding sustainability principles across design, construction and commissioning, aiming to incorporate whole-of-life environmental, social and economic outcomes into decision-making and project delivery.

The Sustainability Management Plan (SuMP) is the key governance document for sustainability on the Project. It forms part of the Project Management System and outlines the processes, accountabilities and performance requirements needed to support the Alliance's sustainability objectives. The SuMP interfaces with other governing plans (including the Project Management Plan, Environmental Management Plan and Procurement Plan) to promote a consistent approach to decision-making, monitoring and continual improvement throughout delivery.

Project ustainability objectives and themes have been adopted from the North West Treatment Hub Growth Program (NWTHGP) Sustainability Strategy, developed by Sydney Water. These objectives are structured around five interconnected themes:

- Leadership, Governance and Culture
- Energy, Climate and Resilience
- Environmental Protection
- Circular Economy
- Customer and Community

These themes align with Sydney Water's Strategy 2025-2035, Carbon Zero Plan, and Circular Economy Blueprint, as well as priority United Nations Sustainable Development Goals (UN SDGs). Together, they support the Project's contributions to Sydney Water's vision of delivering resilient, efficient and environmentally responsible infrastructure that supports thriving, liveable communities.

John Holland Sustainability Framework and Policy Commitments

The John Holland Sustainability Framework underpins the Alliance's operational approach to sustainability, providing the structure through which objectives are delivered, monitored and improved. The Framework is built around four pillars (Leadership and Strategy; Our People; Our Community and Partners; and Built and Natural Environment) and twelve Sustainability Elements that guide decision-making across design, construction, procurement and stakeholder engagement.

The Project applies the established sustainability systems of the John Holland Group (JHG) to guide delivery and performance. These systems have been adopted by the NWHA to support alignment with corporate sustainability governance and consistency across delivery partners. They include the John Holland Sustainability Framework (see Figure 2), which provides the overarching structure for integrating sustainability into project activities; the John Holland Sustainability Policy (see **Appendix B**), which defines the Alliance's commitment to ethical and responsible delivery; and the John Holland Sustainability Management System, which embeds these principles through defined processes for innovation, monitoring and continuous improvement.

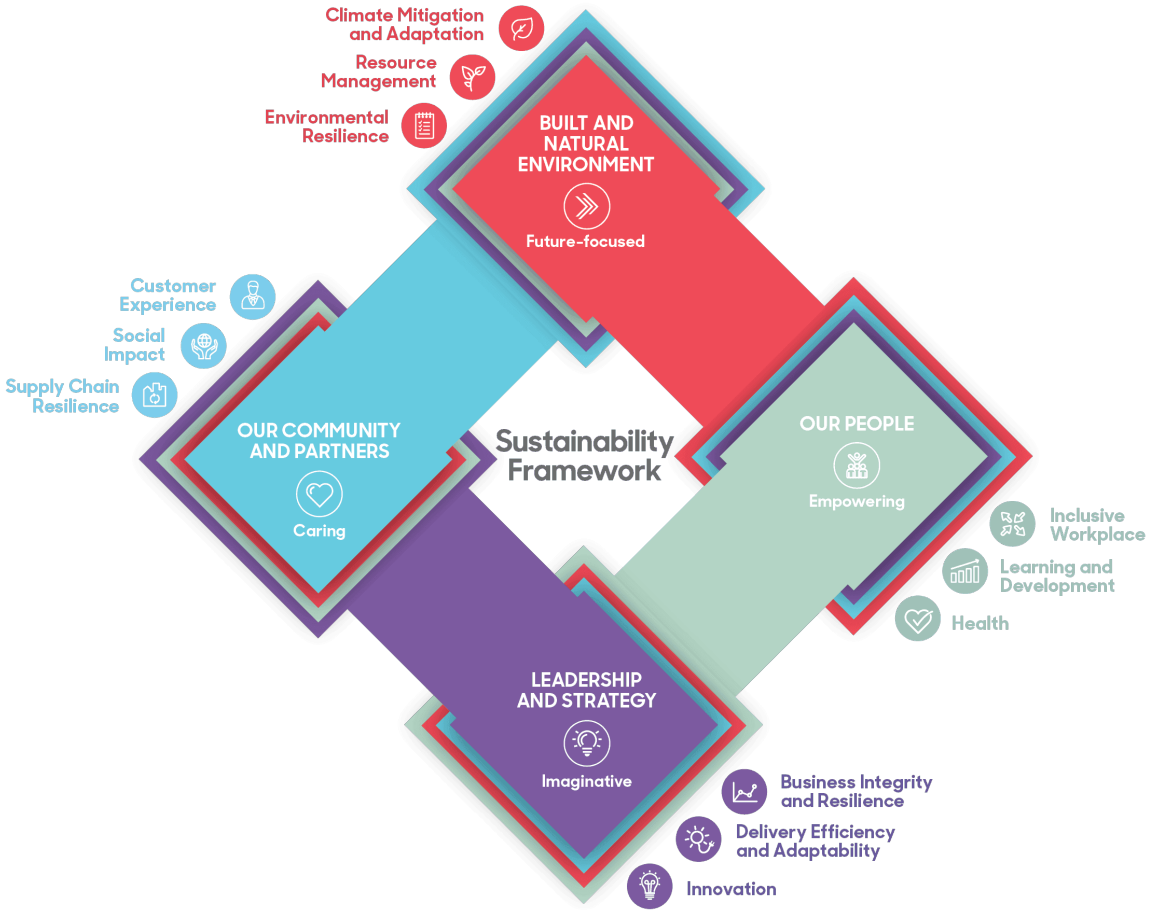


Figure 2: John Holland Sustainability Framework

This framework aims to embed sustainability into delivery by fostering innovation pathways, supporting continual improvement processes, and promoting targeted training and lessons-learned reviews. It provides a consistent methodology for achieving measurable outcomes in energy, carbon, materials efficiency, community value and workforce wellbeing.

Complementing the framework, the John Holland Sustainability Policy (**Appendix B**) articulates the Alliance's overarching commitment to responsible and ethical delivery. The policy aligns with international sustainability principles, including the UN Global Compact and the UN Guiding Principles on Business and Human Rights, and commits the Alliance to due diligence, precautionary environmental management and respect for human rights. These commitments extend across the tiers of the Alliance and its supply chain and are embedded through induction, procurement and ongoing monitoring processes.

Implementation responsibilities are clearly defined within the SuMP and through the AIMT. The AIMT, led by the Alliance Manager and supported by the Environment, Sustainability and Stakeholder Engagement Manager, provides leadership and oversight of sustainability delivery. Performance is reviewed quarterly by the AIMT and reported regularly to the Alliance Board to promote accountability and continuous improvement.

Infrastructure Sustainability Rating

The Project is pursuing a verified rating under the Infrastructure Sustainability (IS) Design and As Built Rating Scheme v2.1, administered by the Infrastructure Sustainability Council (ISC). The IS Rating Scheme provides a nationally recognised framework for benchmarking and improving sustainability performance across infrastructure projects.

The scope and boundary of the IS Rating align with the North West Treatment Hub Growth Program – Budget 1, encompassing upgrades to the Riverstone and Rouse Hill WRRFs. These two facilities are being combined into a single IS Rating submission to provide a holistic and integrated assessment of sustainability performance across the Project.

The Project is targeting outcomes equivalent to a minimum of 40 points (Silver rating) under the IS Rating Scheme, with a target score of 46.98 points and a stretch goal of 72.81 points (Gold rating). A buffer of approximately 10-15 points (~40%) has been applied above the minimum target score to account for verification uncertainty and create a robust pathway to achieving both contractual and aspirational targets.

A Materiality Assessment has been completed for the Project and verified by the ISC in March 2025, confirming alignment between the Project's material sustainability issues, key objectives, and target credits. The Project's material sustainability aspects are discussed further in Section 05, below. A Base Case proposal has also been prepared and submitted to the ISC for verification, outlining the Project's approach to demonstrating reductions in energy, water and material impacts through design and construction.

The IS Rating process provides an important external assurance mechanism for the Alliance's sustainability performance. It drives continuous improvement across areas such as energy efficiency, materials optimisation, circular economy performance, innovation and social value, aiming to deliver measurable and enduring benefits for Sydney's communities and environment.

3.3. Stakeholder Engagement

Sydney Water engaged with the community, key stakeholders and property owners during the development of the proposal and preparation of the Review of Environmental Factors (REF). The documentation was placed on public display and the community and stakeholders were invited to provide written submissions. Key matters raised include

- North West Treatment Hub: Castle Hill and Rouse Hill Water Recycling Plants Compliance Upgrade, January 2022 - Impacts of the works on water quality, traffic and access, noise and vibration, social and visual, waste management as well as overall wet weather flows and environmental performance.

- North West Treatment Hub Plant Upgrades and Sludge Transfer System (Growth Package), November 2022 - Impacts associated with noise and vibration, flora and fauna, accessibility, water quality and environmental controls during construction.
- NWTH Upgrades (Growth) – Biosolids Processing and Construction Compound, August 2024 – Community feedback noted support for the proposed works, particularly the carbonisation technology, wastewater capacity improvements and broader environmental benefits, along with impacts of the works relating to vegetation clearing and air quality impacts.

The NWHA is committed to transparent, inclusive and ongoing engagement with stakeholders and the community throughout delivery of the North West Treatment Hub Project. Engagement is guided by the Community and Stakeholder Engagement Plan (CSEP) and the publicly available Community Engagement Plan Summary (CEPS), both of which outline the objectives, approach, tools and processes used to maintain open communication and minimise disruption during design and construction.

Stakeholder Identification and Categories

Stakeholders were identified through early planning, demographic and contextual analysis of the Riverstone and Rouse Hill communities, with reference to Australian Bureau of Statistic data and local service mapping. Key stakeholder groups include:

- Directly affected residents and businesses
- Landholders
- Local councils (The Hills, Blacktown and Hawkesbury)
- Community groups
- State and federal agencies
- First Nations representatives connected to Dharug Country
- Utility and emergency service providers, and
- Suppliers and contractors.

The engagement approach considers the area's cultural diversity, population growth and the need to reach vulnerable or hard-to-reach groups.

Engagement Approach and Implementation

The Project's engagement approach is structured around clear and measurable objectives aligned with the International Association for Public Participation (IAP2) framework, ensuring stakeholders are informed, consulted and, where appropriate, involved in shaping project outcomes. Engagement tools include door knocks, written notifications, community pop-ups and quarterly newsletters, supported by the Sydney Water Talk website, project email and phone line. Key engagement milestones and activities are scheduled in the project delivery program and recorded through Consultation Manager, which tracks interactions, commitments and responses.

Feedback, Complaints and Continuous Improvement

Feedback and complaints are managed through Sydney Water's established procedures and recorded within Consultation Manager. Complaints received are triaged by the Alliance Community Team and resolved collaboratively to provide transparency and accountability. The NWHA monitors performance against engagement objectives through monthly scorecards and annual internal audits of the CSEP, with findings shared with senior management to support continuous improvement.

The Alliance continues to strengthen relationships with stakeholders through open dialogue, proactive issue resolution and culturally respectful engagement, ensuring the Program delivers enduring social value for Sydney's north-west communities.

3.4. Membership Associations

Sydney Water and its Alliance partners (John Holland, KBR and Stantec) actively participate in a range of nationally recognised sustainability and industry associations that promote best practice, collaboration and innovation across the infrastructure sector. Through these memberships, the Alliance contributes to industry-wide dialogue on sustainability, climate resilience and responsible supply chain management.

Key memberships include:

- Australian Water Association (AWA)
- Water Services Association of Australia (WSAA)
- WaterAid
- Water Research Australia (WaterRA)
- Infrastructure Sustainability Council (ISC)
- Green Building Council of Australia (GBCA)
- Materials and Embodied Carbon Leaders' Alliance (MECLA)
- Sustainable Supply Chain School
- Supply Nation
- National Association of Women in Construction (NAWIC).

These affiliations strengthen the Alliance's capability to align project delivery with evolving industry standards and sustainability benchmarks.

4. Reporting and Assurance

4.1. Reporting Approach

This Annual Sustainability Performance Report has been prepared with reference to the Global Reporting Initiative (GRI) Standards (2021), an internationally recognised framework that supports transparent, balanced and comparable sustainability disclosure. The report presents the Project's environmental, social and governance performance for the period 1 July 2024 to 30 June 2025 and applies the GRI reporting principles throughout.

A detailed GRI Content Index is provided in **Appendix C**, mapping each relevant disclosure to the corresponding section of this report to support traceability and ease of reference.

The reporting boundary aligns with the North West Treatment Hub Growth Program – Budget 1, which includes the design and construction works at the Rouse Hill and Riverstone Water Resource Recovery Facilities. The Castle Hill facility and future program budgets are excluded from this scope.

Material topics were identified through alignment with Sydney Water's corporate sustainability commitments, the Infrastructure Sustainability (IS) Rating Scheme v2.1, and stakeholder feedback gathered through Alliance engagement forums (discussed in detail in Section 5, below).

While the GRI framework includes sector-specific standards for certain industries, none currently apply to the construction or infrastructure delivery sector. Accordingly, this report references the GRI Universal and Topic Standards (2021) as the foundation for disclosure, supported by the Project's sustainability objectives and IS Rating criteria.

This reporting approach enables sustainability performance to be presented in a transparent, consistent and evidence-based manner, demonstrating alignment with recognised international frameworks and supporting continuous improvement in infrastructure sustainability.

4.2. Independent Review Process

An independent assurance process will follow completion of this Annual Sustainability Performance Report to promote transparency, objectivity and alignment with recognised sustainability reporting standards. The independent review will assess the report against the GRI Principles of Reporting and the AccountAbility AA1000 Assurance Standard, evaluating its content, quality and alignment with best practice.

The independent reviewer will provide a Statement of Satisfaction confirming the adequacy and quality of the report and outlining findings or recommendations for improvement. Feedback will be addressed by the Alliance prior to finalisation of the verified report. This process ensures the independence and integrity of the Project's sustainability reporting and supports continuous improvement in accordance with GRI expectations.

Outcomes of the independent review are detailed in Section 7, below, and a copy of the Independent Review Report included in **Appendix D**.

5. Material Sustainability Topics

5.1. Materiality Assessment

The NWHA conducted a Sustainability Materiality Assessment for the Project in alignment with the Infrastructure Sustainability (IS) Rating Scheme v2.1 and with GRI 3: Material Topics 2021. The materiality assessment is a compulsory first step in the IS rating process, designed to identify the most important (material) sustainability issues for infrastructure projects and assets. It informs the weighting of IS credits, ensuring that the IS Rating Tool focuses on the sustainability outcomes most relevant to the Project's context and risks.

The materiality assessment was initially reviewed as part of a sustainability workshop held in April 2024, attended by multidisciplinary representatives from across the Project Alliance, including sustainability, design, engineering, construction and stakeholder engagement disciplines. Feedback from this workshop was incorporated into the assessment before undergoing external verification by the ISC as part of the IS Rating process. The Materiality Assessment was verified in February 2025.

Through this process, 14 IS credits were identified as material (receiving a materiality score of 3 or 4). These material topics have been summarised into three core material topic areas, each representing a key sustainability focus for the Project:

- **Climate and Resilience** – climate risk, adaptation, energy efficiency, renewable energy, and carbon management.
- **Circular Economy** – material use, waste management, resource recovery, and sustainable procurement.
- **Environment** – water quality protection, ecological enhancement, and biodiversity.

The verified Materiality Assessment also aligns with the United Nations Sustainable Development Goals (UN SDGs), with the most material goals identified for the Project being:

- SDG 6: Clean Water and Sanitation
- SDG 7: Affordable and Clean Energy
- SDG 9: Industry, Innovation and Infrastructure
- SDG 11: Sustainable Cities and Communities
- SDG 12: Responsible Consumption and Production
- SDG 13: Climate Action
- SDG 14: Life Below Water
- SDG 15: Life on Land
- SDG 17: Partnerships for the Goals

The material UN SDGs represent positive contributions from the Project, reflecting its focus on improved environmental outcomes, resource efficiency and strengthened community and infrastructure services.

There are no UN SDGs expected to experience any material adverse impacts as a result of the Project. It is acknowledged that temporary construction-phase impacts may intersect with certain SDGs—such as SDG 11 (Sustainable Cities and Communities), SDG 12 (Responsible Consumption and Production), SDG 13 (Climate Action) and SDG 15 (Life on Land). These impacts are short-term, negligible and effectively managed through environmental management plans, construction controls and compliance with statutory requirements.

These topics and SDGs underpin the development of the Project's sustainability objectives and targets, discussed further below.

5.2. Sustainability Themes, Objectives and Targets

The Project's sustainability objectives are based on the Sydney Water NWTHGP Sustainability Strategy, which provides the foundation for the Project's sustainability framework (see Section 3.2). To support continued alignment with the updated Project scope, a review was undertaken by with Sydney Water, the AIMT to compare these objectives against the material sustainability topics (Section 5.1), IS Rating targets, Project Deed commitments, and the UN SDGs. The process reaffirmed that the existing objectives remain relevant and comprehensive, with only minor refinements made to strengthen the focus on workforce culture, innovation and wellbeing.

As part of this review, the sustainability framework was streamlined to merge overlapping themes and promote clear accountability. As a result, the Project now operates under five key sustainability themes:

1. Leadership, Governance and Culture
2. Energy, Climate and Resilience
3. Environmental Protection
4. Circular Economy
5. Customer and Community

The identified sustainability themes, objectives and targets are representative of the stakeholder-identified key matters discussed in Section 3.3, particularly the theme of Energy, Climate and Resilience, and Environmental Protection. Objectives have been endorsed by AIMT and put on public display via the Sydney Water Talk community portal for external stakeholder review. Sustainability targets are being developed to cascade from the sustainability themes. These include contractual KPI (identified with a 'KPI 2.1' number) and developed targets, informed by a cross functional sustainability workshop organised during the establishment period of the project and IS Rating materiality assessment. The sustainability objectives and targets have been shared with the with key external stakeholders including local Indigenous community – the Dharug people through public notifications and stakeholder engagement opportunities. Please note there are some KPIs which are relevant to multiple themes.

A summary of the Project's sustainability themes, objectives and targets is provided in **Appendix E**. These revised objectives were endorsed by the Alliance Integrated Management Team (AIMT) and published on the Sydney Water project website in November 2024. They address material IS rating credits and relevant UN SDGs, ensuring a cohesive and measurable sustainability approach across the Project. Performance against these objectives and targets for the reporting period is discussed in the following section (Section 6), outlining progress, outcomes and opportunities for continuous improvement.

6. Sustainability Performance Outcomes (FY2024-25)

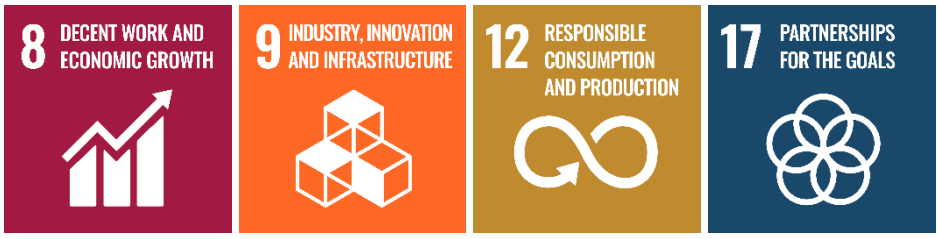
This section presents the Project's sustainability performance outcomes for the 2024–25 reporting period, assessed against the endorsed objectives and targets outlined in **Appendix E**. Performance has been evaluated in accordance with the IS Rating Scheme v2.1, Sydney Water's corporate sustainability priorities and the Project's material sustainability topics.

Throughout the reporting period, the Project continued to demonstrate meaningful progress in embedding sustainability within decision-making, design and delivery. Performance is reported across the Project's five sustainability themes (Leadership, Governance and Culture; Energy, Climate and Resilience; Environmental Protection; Circular Economy; and Customer and Community) to provide a transparent overview of progress, challenges and opportunities. These results highlight measurable outcomes such as reductions in emissions and waste, increased use of sustainable materials, improved cultural and workforce engagement and strengthened community relationships.

The following sections summarise performance highlights and results by theme, demonstrating how the Project continues to deliver tangible sustainability outcomes and drive continuous improvement across the NWTHGP.

6.1. Leadership, Governance & Culture

Table 3: Leadership, Governance Culture – Sustainability framework alignment

Framework	Material Topic(s)
IS Rating Credits	Spr-1 Sustainable Procurement Strategy Spr-2 Supplier Assessment and Selection Spr-3 Contract and Supplier Management Lea-1 Integrating Sustainability Lea-2 Risks & Opportunities Lea-3 Knowledge Sharing Ecn-1 Options Assessment and Significant Decisions Inn-1 Innovation
GRI Principles	GRI 1: Foundation 2021 GRI 201: Economic Performance 2016 GRI 308: Supplier Environmental Assessment 2016
UN SDGs	
Management Approach	Sydney Water Strategy 2025-2035 Sydney Water Environmental Policy Managing Environmental and Sustainability Requirements in Procurement (SWEMS0015) Modern Slavery Act Sustainability Management Plan Procurement Management Plan

Stakeholder Engagement	Risk & Opportunity Management Plan

Engagement	Stakeholder
Sustainability Workshop (Internal)	Sydney Water, AIMT, Discipline Leads, Comms lead, Environment Lead, Design Leads, Sustainability Lead
Supplier Engagement on Sustainability requirements (External)	Potential suppliers
Sustainability Opportunities workshop (Internal)	Sydney Water, Discipline Leads, Engineers from each discipline, Risk Manager, Sustainability Lead, Construction Leads

Objective:

Make supply chain decisions that are sustainable and socially responsible.

Target	Detail	Progress
Procure 10% of materials by cost with ISC-approved labels.	An EPD Tracking Register has been developed to record concrete, steel, and pipe products with Environmental Product Declarations (EPDs), including both confirmed products and those in development for the project. This register is integrated with the procurement register, which documents the total material value and non-material value of products used throughout the project. Together, these tools provide traceability to demonstrate that products with ISC-approved sustainability labels are being procured and costed	On track to achieve

Objective:

Promote a supportive and high performing work culture that embraces behaviours that contribute to sustainable and improved environmental outcomes and embraces innovation.

Target	Detail	Progress
Target pathway – a conservative pathway to achieve a 'Silver' rating (40 points), including Credit criteria most applicable to wastewater and Sydney Water processes, and focused to drive sustainability outcomes aligned with Sydney Water sustainability objectives.	The Project is targeting a Silver Rating (40 points) under the Infrastructure Sustainability (IS) Design and As Built Rating Scheme v2.1, consistent with Sydney Water's sustainability objectives and KPI B2.1(b). An IS Kick-off Meeting was organised in April 2024 to confirm roles, responsibilities, and expectations for the assessment process and an IS Registration and Agreement with the Infrastructure Sustainability Council (ISC) was executed on 7 May 2024. The Project is currently progressing through the Materiality Assessment, which remains subject to ISC verification. Three materiality scenarios have been developed to provide a range of indicative scores and inform planning. Based on current modelling, the Project's target score ranges between 46.98 points (Silver), A buffer of 10–15 points (~40%) above the required minimum has been applied to account for verification uncertainty, in line with best practice IS planning methodology. A six-month IS Establishment Period was implemented from 22 December 2023 to 22 June 2024 to develop and embed robust sustainability management systems, processes, and tools. The Sustainability Management Plan demonstrates a comprehensive understanding of IS Rating	On track to achieve

Target	Detail	Progress
	requirements and outlines the governance approach for achieving the targeted performance levels. To support transparent monitoring, an ISv2.1 Design Rating Tracker has been developed to record progress against each credit, metric, and target, enabling regular performance reviews and accurate calculation of credit completion percentages.	
Achieve =>5 points for Innovation Credit.	The project has committed to the following initiatives to meet the requirements of this target: • 3 points for Sense600 (Australian First) • 3 points for Stratex (Australian First) • 3 points for Carboniser (Australian First)) • 0.75 points for iSupply Emissions modelling is still under development and will provide a better understanding of the project's progress.	On track to achieve

Case Study: Utilising Sense600 on the project with HVO

The North West Treatment Hub is demonstrating sustainability and industry leadership through the integration of Sense600 low-carbon steel and Hydrotreated Vegetable Oil (HVO) biofuel, two innovative technologies that significantly reduce construction-phase carbon emissions. This initiative forms part of the Project's proposal to the ISC for recognition as an Australia-first innovation under the ISv2.1 Silver Rating pathway.

Sense600 achieves up to a 39 % reduction in embodied carbon compared with standard 500 N reinforcing steel, while HVO, produced from processed vegetable oils and animal fats, delivers over 99 % lower tailpipe emissions than conventional diesel and offers superior storage stability. The Riverstone grit vortex piles (supporting grit separation in wastewater treatment) are the first North West Hub asset to combine both materials, reducing the Project's carbon footprint by approximately 4.45 t CO_2-e, equivalent to driving an average car around 18,000 kilometres.

This collaboration between the NWHA, AnewX, and other key suppliers demonstrates strong governance, early engagement, and a culture of innovation. It exemplifies how leadership and teamwork across the Alliance are translating sustainability commitments into tangible outcomes, contributing toward achieving Lea-3 (Level 3 – Knowledge Sharing) under the ISv2.1 Design and As Built rating and reinforcing the Project's reputation for sustainable construction excellence.

6.2. Energy, Climate & Resilience

Table 4: Energy, Climate & Resilience – Sustainability framework alignment

Framework	Material Topic(s)
IS Rating Credits	Ene-1 Energy Efficiency and Carbon Reductions Res-1 Climate and Natural Hazards Risks Res-2 Resilience Planning
GRI Principles	GRI 302: Energy 2016 GRI 305: Emissions 2016
UN SDGs	
Management Approach	Sydney Water Carbon Zero Plan Sydney Water Planning Guideline – Best Practice Energy Efficiency Sydney Water Design Guideline – Best Practice Energy Efficiency Sydney Water Carbon Zero Position Statements Sydney Water Carbon Zero Directional Statement Sydney Water Climate Change Adaptation Position Statement Sydney Water Resilience Policy Sydney Water Environmental Policy Carbon Zero Approach Climate Change Risk Assessment Report and the Climate Risk Register Resource Efficiency Strategy Procurement Management Plan
Stakeholder Engagement	See below

Engagement	Stakeholder
Sustainability Risks and Opportunities (Internal)	Sydney Water, AIMT, Discipline Leads, Risk Manager, Sustainability Lead
Climate and Resilience Workshop (Internal) Climate and Resilience treatment assessment (Internal)	Sydney Water, Discipline Leads, Engineers from each discipline, Risk Manager, Sustainability Lead
Climate and Resilience Stakeholder review (External)	External stakeholders, Any additional local facilities and assets, First responders, Impacted infrastructure, Community support agencies
Supplier Engagement on Sustainability requirements (External)	Potential suppliers

	Sustainability Opportunities workshop (Internal)	Sydney Water, Discipline Leads, Engineers from each discipline, Risk Manager, Sustainability Lead, Construction Leads

Objective:

Take a systems approach to address climate-related risks and other shocks and stresses through improved resistance, reliability, redundancy, response and recovery

Target	Detail	Progress
Achieve a minimum Level 1 for Res-1 and Res-2 in the ISv2.1 rating.	The Project is targeting a minimum Level 1 for Res-1 Climate and Natural Hazard Risks and Res-2 Resilience Planning credits under the IS Rating Scheme v2.1. An IS Registration and Agreement with the ISC has been executed and the Project continues to progress in line with rating requirements. A formal IS Rating Kick-off Meeting was held in April 2024 to confirm roles, responsibilities and expectations for resilience performance assessment. A series of climate change and natural hazard workshops were held with design teams, internal stakeholders, and external service providers to assess risks, shocks, stresses and infrastructure interdependencies. Internal Workshops 1 and 2 (26–27 June 2024) focused on identifying and prioritising climate and hazard risks, adaptation options and resilience treatments. An External Stakeholder Workshop (24 September 2024) engaged councils, utilities, emergency services, community groups and Sydney Water to review risk findings and proposed treatments. The outcomes informed the Project Resilience Plan, which integrates design adaptations and governance measures into operational management systems. Risk rating summary tables (Table 5 and Table 6) present the inherent and residual risk profiles. Implementation of agreed treatment measures is ongoing, with progress to be monitored and reported throughout the construction phase in accordance with the IS rating and governance requirements.	On track to achieve

Table 5: Rouse Hill WRRF climate risk rating summary

Risk Rating	Inherent Risk		Residual Risk	
	2050s	2090s	2050s	2090s
Low	11	6	15	8
Medium	16	20	13	20
High	1	2	0	0
Very High	0	0	0	0

Table 6: Riverstone WRRF climate risk rating summary

Risk Rating	Inherent Risk		Residual Risk	
	2050s	2090s	2050s	2050s
Low	10	5	14	7
Medium	21	22	17	24
High	0	4	0	0
Very High	0	0	0	0

Objectives:

Best practice energy efficient processes and assets (new and existing).

Contribute to net zero carbon for Sydney Water Operations (Scope 1 and 2 carbon emissions).

Contribute to the decarbonisation of the supply chain (scope 3 carbon emissions).

Target	Detail	Progress
Reduce construction Scope 1 and 2 carbon emissions, and embodied carbon emissions associated with materials by 10-30% when compared to a verified IS base case.	The Project is targeting a 10–30% reduction in construction Scope 1 and 2 emissions and embodied carbon, consistent with KPI B2.1(b) and Sydney Water's commitment to energy efficiency and net zero operations. The verified IS base case is under development, with the latest update completed on 31 July 2025. Energy modelling and life cycle assessment (LCA) are underway to quantify whole-of-life energy demand and emissions over 50 years, establishing reduction targets in alignment with the IS Rating Scheme v2.1. In the meantime, several carbon reduction initiatives have been implemented, including: • Use of B5 biodiesel as a minimum fuel standard • The Carboniser Initiative to optimise hydraulic loops and reduce pumping energy • Cyclone separators to eliminate nitrogen generation • Process control optimisation to improve heat dryer efficiency • Biochar application for carbon sequestration • Exploration of electric vehicles and charging infrastructure A Resource Efficiency Workshop has informed the Resource Efficiency Strategy and Action Plan (updated 12 August 2025) under ISv2.1 Rso-1 credit, while comprehensive monitoring (via monthly National Greenhouse and Energy Reporting scheme (NGER) reports, Project Pack Web (PPW) resource and waste summaries, and Power Bi system data) provides traceable evidence for IS verification once the base case is finalised.	On track to achieve
Procure 10% of materials by cost with ISC-approved labels.	An EPD Tracking Register has been developed to record concrete, steel, and pipe products with Environmental Product Declarations (EPDs), including both confirmed products and those in development for the project. This register is integrated with the procurement register, which documents the total material value and non-material value of products used throughout the project. Together, these tools provide traceability to demonstrate that sustainable, low carbon construction materials are being prioritised by the Project to support the decarbonisation of the supply chain.	On track to achieve
10% reduction in material life cycle impacts from a Base Case scenario	The Project is targeting a 10% reduction in material life cycle impacts, supporting efforts to minimise embodied carbon and optimise resource efficiency during design and construction. A Resource Efficiency Workshop identified key opportunities for material impact reduction, with findings incorporated into the Resource Efficiency Strategy and Action Plan (updated 12 August 2025) to align with ISv2.1 Rso-1 credit. These plans establish actions to minimise material use, select lower-impact alternatives, and improve construction efficiency. Material consumption and waste performance are tracked through monthly subcontractor sustainability and NGER reports, PPW resource and waste summaries, Cobra Waste Solutions data, and Power Bi system reporting with date-stamped traceability. This structured approach provides robust evidence for IS verification and continuous improvement in material efficiency.	On track to achieve

Case Study: Biodiesel and HVO

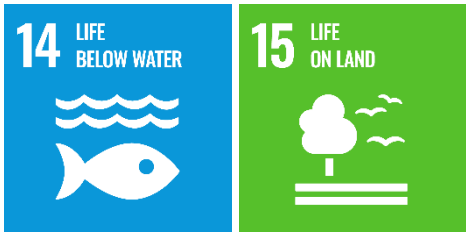
The NWHA Project has demonstrated leadership in low-carbon construction through the adoption of Biodiesel and Hydrotreated Vegetable Oil (HVO) fuels. Biodiesel, derived from renewable sources such as vegetable oils and recycled greases, was introduced as a minimum B05 blend across construction plant and equipment, with stretch targets for B20 and HVO negotiated with key subcontractors.

Between August 2024 and June 2025, the Project used over 85,000 litres of biofuels, reducing emissions by approximately 16 tCO_2-e compared with standard diesel. This initiative supports the Project's target to achieve a 10–30% reduction in Scope 1 and 2 emissions and aligns with Sydney Water's net zero objectives.

Key lessons include embedding minimum biofuel requirements in contracts, maintaining consistent follow-up with subcontractors, and addressing equipment compatibility early. The initiative highlights how strong governance and supplier engagement can translate sustainability commitments into measurable carbon reductions.

6.3. Environmental Protection

Table 7: Environmental Protection – Sustainability framework alignment

Framework	Material Topic(s)
IS Rating Credits	Env-1 - Receiving Water Quality Env-2 - Noise Env-4 - Air Quality Eco-1 - Ecological Protection and Enhancement
GRI Principles	GRI 303: Water and affluents 2018 GRI 304: Biodiversity 2016
UN SDGs	
Management Approach	Sydney Water Environmental Policy Sydney Water Biodiversity Offset Guide Flora and Fauna Assessments Project Review of Environmental Factors (REF) Construction Environmental Management Plan
Stakeholder Engagement	Community and Stakeholder Engagement Management Plan

Engagement	Stakeholder
Sustainability Risks and Opportunities (Internal)	Sydney Water, AIMT, Discipline Leads, Risk Manager, Sustainability Lead
Sustainability Risks and Opportunities (External)	External stakeholders

Objective:

Protect, restore and enhance natural and heritage assets

Target	Detail	Progress
CESP functional inspections conducted by the client. Minimise frequency of avoidable complaints	No avoidable complaints were received by the Project during the reporting period.	On track to achieve
Achieve a minimum level 1 for Eco-1 in the ISv2.1 rating	The Project is targeting a minimum Level 1 for credit 'Eco-1 Ecology' under the IS Rating Scheme, with a stretch target of Level 2 (6.75 points). A Flora and Fauna Assessment, undertaken by Biosis and summarised in Table 8, indicates that the Project will not significantly impact ecological communities or threatened species, with impacts limited to previously	On track to achieve

Target	Detail	Progress
	disturbed areas. Accordingly, neither a Species Impact Statement (SIS) nor a Biodiversity Development Assessment Report (BDAR) was required. Ecological management measures have been incorporated into the Construction Environmental Management Plan (CEMP), and a gap analysis comparing Sydney Water's Vegetation Offset Guidelines (BCT) with ISC requirements is informing a position paper to support continued alignment. The Her-1 (Heritage) credit has been scoped out, as verified through the Materiality Assessment.	

Table 8: Summary of Project biodiversity impact

Non-Certified Land				
	Direct Impact		Indirect Impact (trimming)	
Native Vegetation	1.5 ha		0.003 ha	
	Inside NWGA	**Outside NWGA**	**Inside NWGA**	**Outside NWGA**
	0.97 ha	0.53 ha	-	0.003ha
Urban Native / Exotic Vegetation	4.6 ha		-	
Existing Certified Land				
	Direct Impact		Indirect Impact (trimming)	
Native Vegetation	4.6 ha		-	
Urban Native / Exotic Vegetation	6.68 ha		-	

6.4. Circular Economy

Table 9: Circular Economy – Sustainability framework alignment

Framework	Material Topic(s)
IS Rating Credits	Rso-1 - Resource Strategy Development Rso-2 - Management of Contaminated Material Rso-4 - Resource Recovery and Management Rso-5 - Adaptability and End of Life Rso-6 - Material Life Cycle Impact Measurement & Management Rso-7 - Sustainability Labelled Products and Supply Chains
GRI Principles	GRI 301: Materials 2016 GRI 306: Waste 2020 GRI 305: Emissions 2016
UN SDGs	
Management Approach	Sydney Water Strategy 2025-2035 Procurement Management Plan Waste Management Plan
Stakeholder Engagement	**Engagement** / **Stakeholder** Sustainability Risks and Opportunities (Internal) / Sydney Water, AIMT, Discipline Leads, Risk Manager, Sustainability Lead Supplier Engagement on Sustainability requirements (External) / Potential suppliers Adaptability and End of Life Workshop (Internal) / Sydney Water, Sydney Water operators, Design Leads, Construction Lead, Someone with adaptability, disassembly or deconstruction experience

Objective:

Contribute to the decarbonisation of the supply chain (scope 3 carbon emissions)

Target	Detail	Progress

Procure 10% of materials by cost with ISC-approved labels.	An EPD Tracking Register has been developed to record concrete, steel, and pipe products with Environmental Product Declarations (EPDs), including both confirmed products and those in development for the project. This register is integrated with the procurement register, which documents the total material value and non-material value of products used throughout the project. Together, these tools provide traceability to demonstrate that products with ISC-approved sustainability labels are being procured and costed	On track to achieve

Objective:

Maximise resource value and support a circular economy by responsibly managing energy, water and materials, and minimising waste creation

Target	Detail	Progress
Achieve circular economy outcomes through delivering a Resource Efficiency Strategy and Plan in alignment ISv2.1 Rso-1. This Plan must reference the Sydney Water led and developed Biochar Reuse Strategy.	The Project is developing a Resource Efficiency Strategy and Action Plan in alignment with ISv2.1 credit Rso-1, aiming to embed circular economy outcomes throughout design and construction. The Strategy addresses key requirements of the credit and formalises initiatives to minimise resource use, optimise material selection, and reduce waste generation. In line with Sydney Water's circular economy priorities, the Plan references the Sydney Water–led Biochar Reuse Strategy, which supports the beneficial reuse of biosolids through biochar application as a soil conditioner. Biochar is estimated to sequester approximately 184 kg CO_2-e per dry tonne of biosolids, contributing to reduced lifecycle emissions and long-term carbon storage.	On track to achieve
Achieve the following waste avoidance and diversion targets: > 85% avoidance or diversion of clean/inert excavation spoil > 60% avoidance or diversion of office waste > 70% avoidance or diversion of other inert resource outputs	The project is implementing waste avoidance and diversion targets of >85% for clean/inert excavation spoil, 60% for office waste, and 70% for other inert resource outputs. These targets are addressed in the NWTH Waste Management Plan Rev03 which outlines options for waste storage, disposal, recycling, and reuse locations to ensure the targets are met. The Project has developed a Waste Register which provides a mechanism to accurately track performance against these targets. Waste avoidance and diversion targets are currently on track to be achieved, as documented in the register and supporting project monitoring systems, and summarised in Table 10 and Figure 3, below.	Currently achieving

Table 10: NWHA waste diversion performance FY2024-25

Waste Type	Fate	Total
Construction and demolition waste	Waste to Landfill	61.933 m^3
	Waste recycled	1646.098 m^3
	Waste Diversion	**96.37%**
	Target	**80%**
Office Waste	Waste to landfill	6.88 m^3
	Waste recycled	41.67 m^3
	Office Waste Diversion	**85.83%**

	Target	**70%**
Spoil	Reused on-site	0.00 m^3
	Reused/Recycled off-site	49969.88 m^3
	Disposed to landfill	100.54 m^3
	Spoil Diversion	**99.80%**
	Target	**95%**

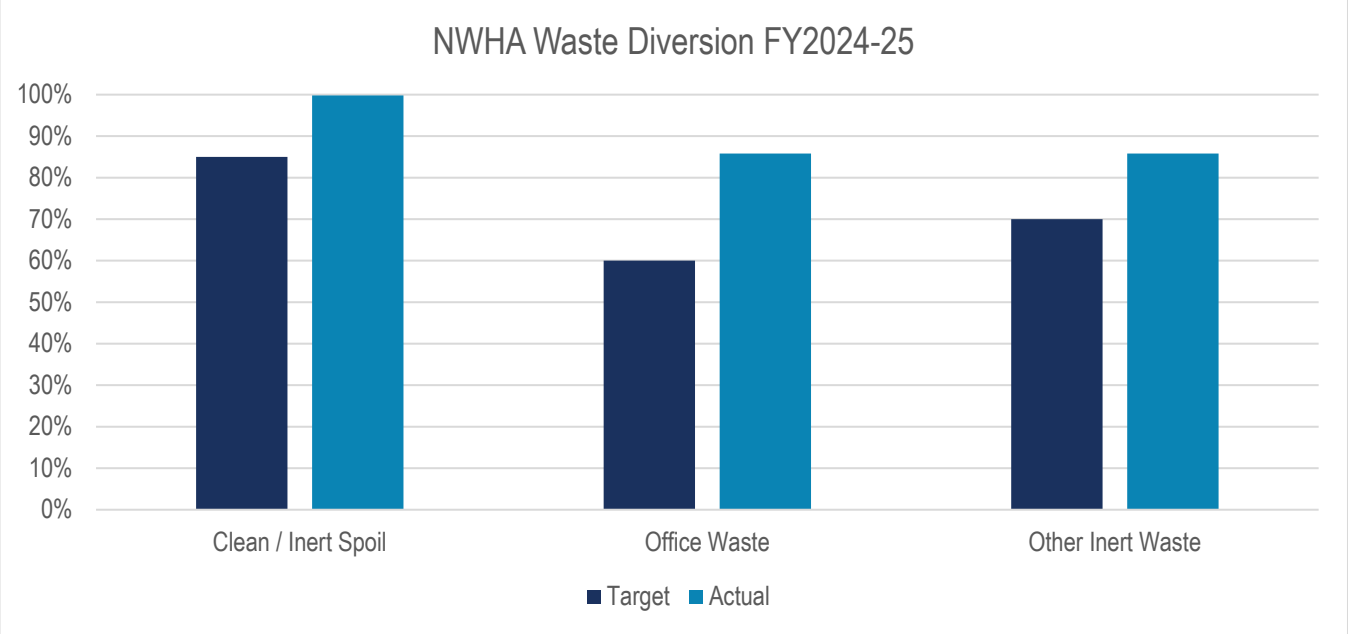


Figure 3: NWHA waste diversion performance FY2024-25

Case Study: Office Waste

To maximise waste reuse and recycling across sites, the NWHA Sustainability Team developed a comprehensive waste management system for the Milsons Point design office and the Rouse Hill and Riverstone site compounds (see Figure 4, below). A key feature of this system is the implementation of a 'Wet and Dry' waste segregation system for office waste at construction compounds.

Under this approach, wet waste (organic and biodegradable materials such as food scraps and coffee grounds) is separated from dry waste (clean recyclables such as paper, plastics, and metals). Segregation at the source prevents contamination, improving recycling recovery rates. The dry waste is further sorted into specific recycling streams off-site by the contractor, reducing bin numbers on-site and simplifying waste management for project teams.

The system was implemented through a structured process covering procurement, installation, education, and monitoring. Cobra Waste Solutions was engaged under a project-wide contract to manage office waste, supported by colour-coded bins, staff induction training, and regular site inspections. Monthly data reporting and waste tracking registers are used to monitor compliance and recycling performance.

As at the end of the reporting period, the Project is achieved an exceptional 85.83% office waste diversion rate, a result that is rare across infrastructure construction projects and demonstrates exemplary circular economy and waste management practice.

Complementary initiatives (including soft plastics and battery recycling and the Mobile Muster e-waste program) have also been implemented across NWTH sites, further enhancing circular economy outcomes and supporting the objectives of ISv2.1 credit 'Rso-4 Waste'.

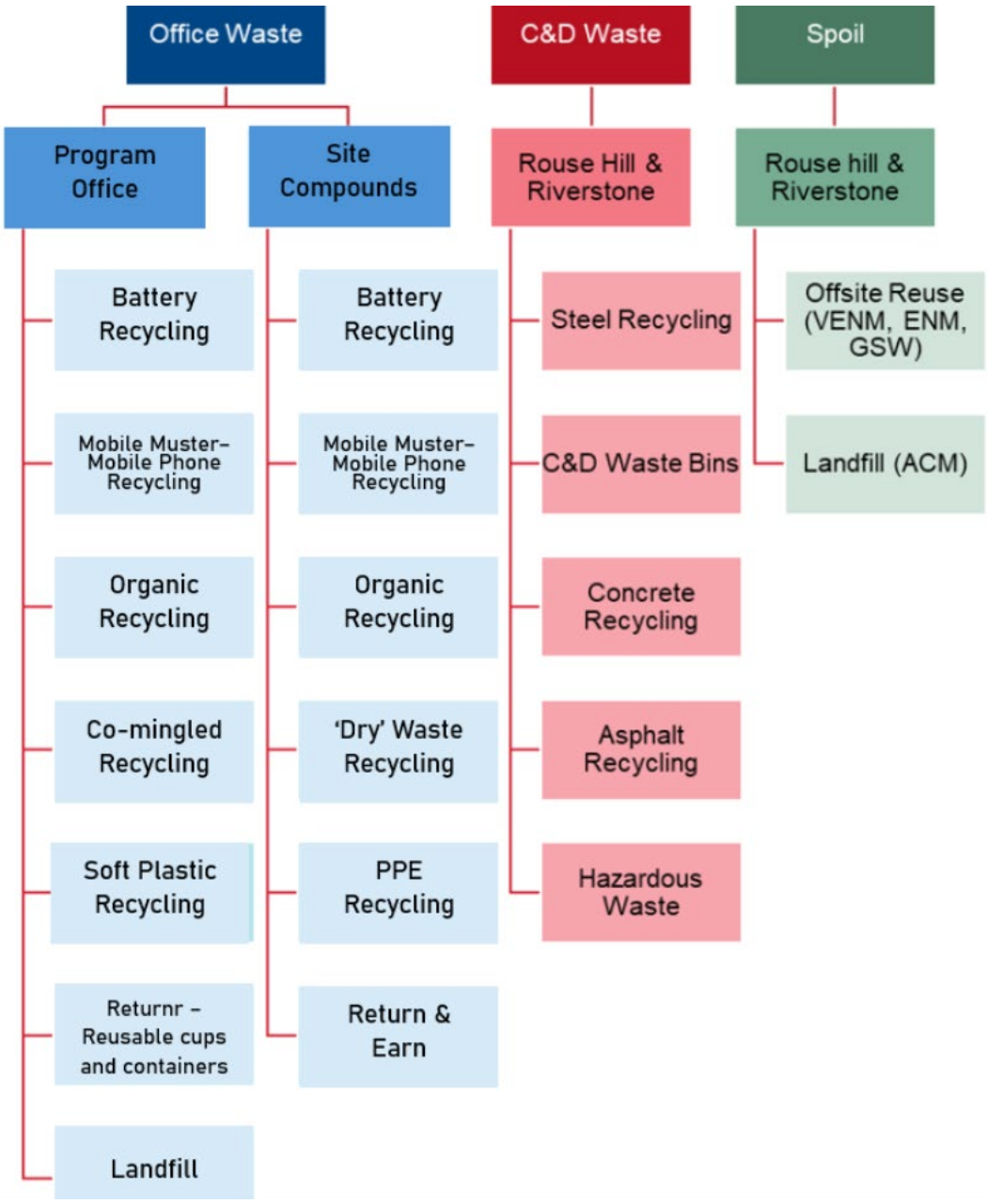


Figure 4: NWHA waste segregation process

6.5. Customer & Community

Table 11: Customer & Community – Sustainability framework alignment

Framework	Material Topic(s)
IS Rating Credits	Sta-1 Stakeholder Engagement Strategy Sta-2 Stakeholder Engagement and Impacts Leg-1 Leaving a Lasting Legacy Wfs-1 Jobs, Skills and Workforce Planning Wfs-2 Workplace Culture and Wellbeing Wfs-3 Diversity and Inclusion Wfs-4 Sustainable Site Facilities
GRI Principles	GRI 203: Indirect Economic Impacts 2016 GRI 204: Procurement Practices 2016 GRI 413: Local Communities 2016
UN SDGs	
Management Approach	Sydney Water Environmental Policy Reconciliation Action Plan 2024-2026 Sydney Water Customer Promises Modern Slavery Act Community and Stakeholder Engagement Management Plan Diversity and Inclusion Plan Learning and Development Management Plan
Stakeholder	**Engagement** / **Stakeholder** Sustainability Risks and Opportunities (Internal) / Sydney Water, AIMT, Discipline Leads, Risk Manager, Sustainability Lead Sustainability Risks and Opportunities (External) / External stakeholders

Objective:

Operate in a socially responsible manner and proactively engage and partner with stakeholders, customers and community groups to achieve positive environmental outcomes.

Target	Detail	Progress

CESP functional inspections conducted by the client. Minimise frequency of avoidable complaints	No avoidable complaints were received by the Project during the reporting period.	On track to achieve

Wellbeing and Culture SMART Target Progress – June 2025

Progress has been made across the well-being and culture initiatives during the reporting period, with actions advancing in line with the established SMART targets as outlined in Table 12, below.

Table 12: NWHA wellbeing and culture smart targets

Target	Detail	Progress
T-01	An annual employee survey conducted which includes: • Questions on performance against culture and wellbeing targets • Questions on satisfaction levels related to culture and wellbeing • Collation of psychological culture data • Participation rate of >60% of employees (see definitions)	Complete
T-02	At least one (1) partnership with or commitment to a not-for-profit organisation or local community group, selected in collaboration with employees and include employee participation.	Complete (R U OK Day 2024 & Mates in Construction)
T-03	Employee Assistance Program (EAP) service is extended to 100% of employees and families of NWHA workforce	Complete
T-04	90% of the workforce (see definitions) has access to 'take home material' related to one of the following: • fitness • mental health apps • financial stress advice/help OR investment/super advice	Complete
T-05	Maintain a minimum of two (2) Mental Health Champions for each workplace on the project.	Complete
T-06	Bi-monthly, Boardwalk and/or daily Whiteboard meetings includes a spotlight on mental health and wellbeing (such as but not specific to: an EAP availability reminder; flexible worker information; notification of leave policies or engagement opportunities etc).	Complete
T-07	100% of people managers (see definitions) to have completed Mental Health and Wellbeing awareness training – Introduction to Mental Health (which includes information on existing policies that address culture and wellbeing).	In progress
T-08	Annual review of the Wellbeing and Culture Program occurs with AIMT members, with these targets being reviewed and implementation actions developed if targets are not on track.	Complete

Case Study: Sustainable Supply Chain Excellence Award

The North West Hub Alliance (NWHA) proudly recognised Aqua Options Pty Ltd and Boral Limited with the Sustainable Supply Chain Excellence Award, celebrating their outstanding contributions to sustainability and innovation. Each award was presented alongside a thoughtfully curated hamper from Indigenous business Kakadu Plum Co, reinforcing the Alliance's commitment to supporting local and First Nations enterprises.

From the tender phase, Aqua Options demonstrated proactive sustainability leadership, working closely with the NWHA Sustainability Team to integrate low-emission practices into their delivery model. Their use of over 7,000 litres of biodiesel B20 (representing approximately 40% of total fuel use) to power construction machinery has meaningfully reduced carbon emissions and set a strong precedent for cleaner construction across project sites.

Similarly, Boral exceeded project requirements for sustainable materials. Tasked with supplying concrete mixes containing at least 40% Supplementary Cementitious Materials (SCM), Boral delivered mixes with over 50% SCM, incorporating slag and fly ash to lower embodied carbon and advance circular economy principles through the reuse of industrial by-products.

Together, these initiatives highlight the power of early engagement, innovation, and collaboration in achieving tangible environmental outcomes. They exemplify the Alliance's shared commitment to sustainable procurement and long-term infrastructure sustainability, setting a benchmark for excellence across the supply chain.

6.6. Challenges

This section, in alignment with the GRI Principle of Balance, the Project recognises the importance of transparent reporting of challenges encountered throughout the reporting period. Including these insights ensures a fair and accurate representation of sustainability performance and supports continuous improvement across all thematic areas.

Table 13: NWHA relevant Project challenges.

Challenge	Theme	Description
External Consultation	[Governance]	Within the SuMP, the Project proposed establishing a Community Reference Group (CRG) and a Stakeholder Reference Group (SRG). The inaugural task for these groups was to review and endorse the Project's sustainability objectives. However, the Project received no responses to progress this initiative, and the approach was subsequently abandoned. This created subsequent challenges for sustainability themes that rely on stakeholder participation and feedback, including, Customer and Community, Energy, Climate and Resilience and Environmental Protection. The Project will continue implementing the Community Engagement Plan to identify and manage community and stakeholder concerns.
GreenPower	Energy, Climate and Resilience	The Project had an Energy, Climate and Resilience target to achieve a 20% increase in electricity sourced from renewables (construction only). It was identified that a key challenge for the Project in meeting the target relates to the offices being located outside the project's operational control, with limited ability to influence energy sourcing or procurement settings. As the Project does not control the energy supply arrangements, it cannot directly influence or modify the electricity procurement settings to incorporate accredited renewable energy. An analysis showed that GreenPower procurement accounts for less than 1% of the Project's greenhouse gas footprint, and as such, the impact is negligible. This target will be withdrawn, with the project focusing on impactful initiatives to achieve positive outcomes related to energy, climate and resilience.

7. Independent Review Feedback

The Project has engaged Suitably Qualified Professional, Meg Wrixon of Wrixon Consulting Pty Ltd to undertake an independent review of the Project's annual sustainability performance reporting to meet the IS version 2.1 Design Criteria for the Lea-1: Integrating Sustainability credit; satisfying the DL3.2 credit criteria.

The independent review conducted on 28 November 2025. In general, the conclusion is that the reported sustainability performance in the *NWHA Annual Sustainability Performance Report FY2024/2025 (Revision 0.3)* has been prepared, in most material respects in accordance with the principles of reporting in the Global Reporting Initiative (2021). Eight (8) recommendations were noted in relation to the procedures and tests performed against the GRI reporting principles to assess the content and quality of what has been reported. The Project implemented all recommendations within the subsequently revised *NWHA Annual Sustainability Performance Report FY2024/2025 (Revision 0.4).* The auditor found that all recommendations have been appropriately closed.

Final conclusions note that the reported sustainability performance in the NWHA Annual Sustainability Performance Report FY2024/2025 (Revision 0.4) has been prepared, in all material respects, in accordance with the principles of reporting in the Global Reporting Initiative (2021).

A copy of the Independent Review Report is provided in **Appendix D**.

Appendix A NWHA Organisational Structure

NORTH WEST HUB ALLIANCE

Functional Org Chart

Client Representative

ALLIANCE BOARD
PROGRAM STRATEGIC

Senior Representatives

Alliance Board

AIMT – PROGRAM TACTICAL
PROJECT STRATEGIC

Alliance Manager

AM Support

Program Design

Technical Director & Integration

Commercial

Program Delivery

Sustainability & Environmental

Lead Process

Lead Hydraulics

Lead Civil

Lead Structural

Lead Mechanical

SCADA Controls Integration Lead

Lead Pipelines

Lead Odour Control

Lead Geotechnical & Contamination

Digital Engineering Lead

Integration Manager

Engineering Assurance

Acceptance Operation Readiness Engineer

Senior Process Engineer

Benefits Realisation

Finance

Procurement & Contracts

Systems

Controls

Change Management

Program Completions

Program Safety

Engineering Manager

Quality

Planning

Outperformance &Continuous Improvement

Environmental

Customer, Community & Stakeholder

Sustainability

Approvals

People, Culture & Diversity

HR

Workforce Planner / Training

Organisational Development

PROGRAM OPERATIONAL

Projects X2

Project Manager

Design Manager

Interface Manager

Commercial

Area Managers

Commissioning & Completions

PROJECT MANAGEMENT TEAMS X2
PROJECT TACTICAL

Design

Process Commissioning

Interface Engineer

Contracts Administration

Procurement

Controls

Quality

Engineer

Commissioning

Scheduling

Superintendent

Supervisor

Risk & Opportunity

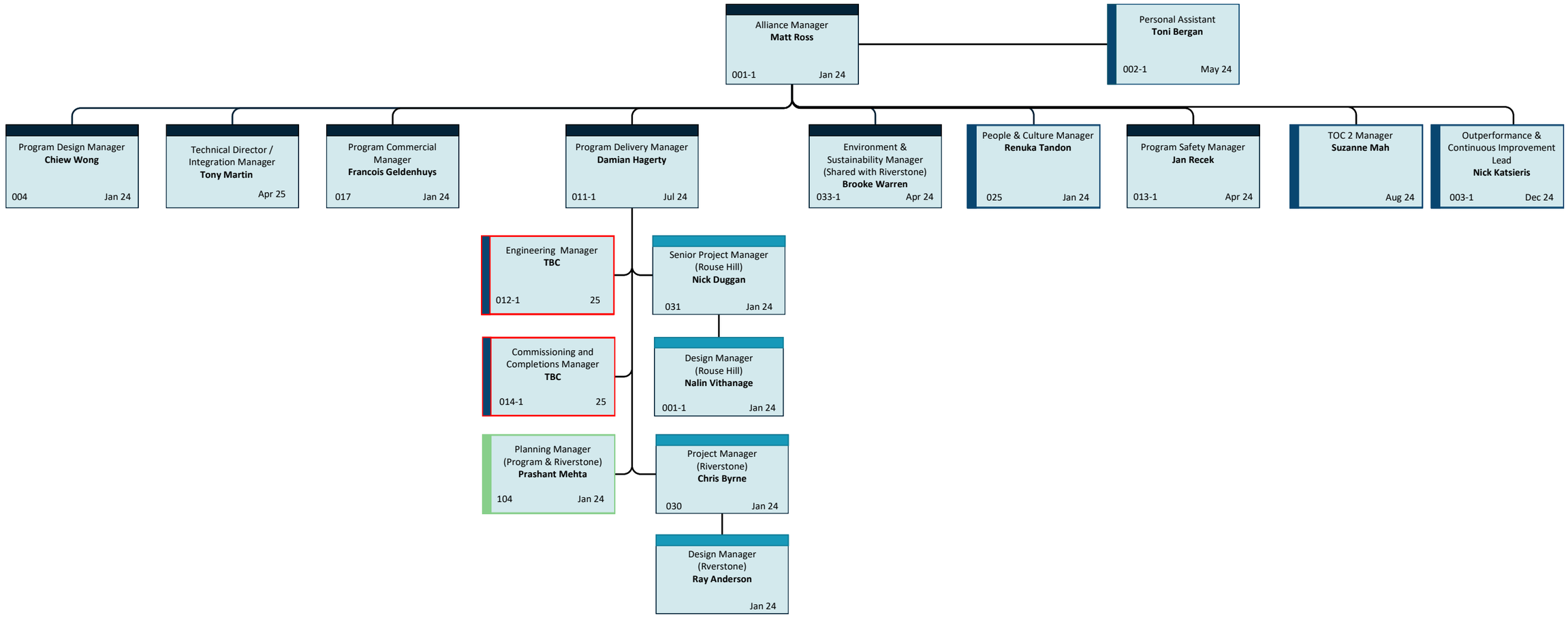
Safety

Environment

Sustainability

PROJECT TEAMS X2
PROJECT OPERACTIONAL

Leadership Team



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- PMT
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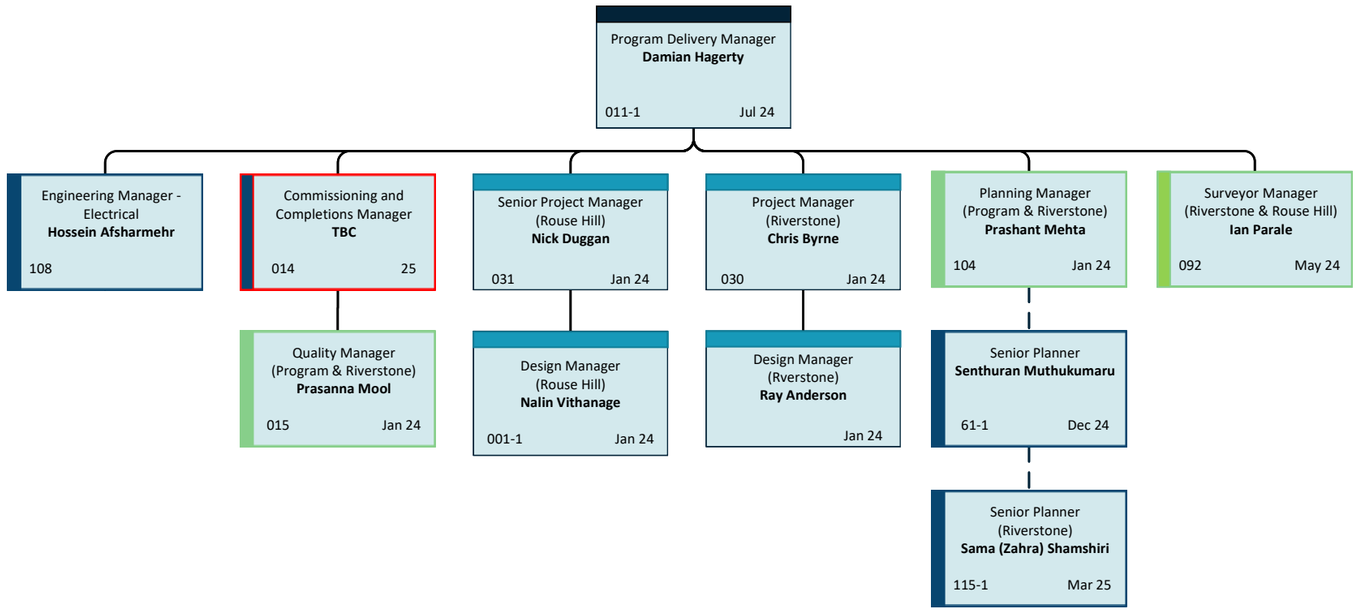
- Staff – Vacant
- Shared with ...

Delivery Program



KEY

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- PMT
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- Staff – Vacant
- Shared with ...

Riverstone WWTP

Project Manager (Riverstone)
Chris Byrne
030 Jan 24

Area Manager (EIC & Commissioning)
Daniel Fabian
072 Mar 24

Senior Project Engineer (Electrical)
Thanuja Abayaratna
074 May 24

Site Engineer (Electrical)
Honey Grais
075 Sep 24

Senior Commissioning Engineer (Riverstone)
Daiche Abe
076 Apr 25

Commissioning & Completions Engineer (Riverstone)
Max Bhandary
June 25

Design Manager (Rverstone)
Ray Anderson
066 Jan 24

Area Manager (Civil)
Chris Millar
064-1 Apr 24

Senior Project Engineer (Mechanical)
Royen Fernando
069 May 24

Project Engineer (Mechanical)
Gautam Alapakkam
070 Aug 24

Site Engineer (Mechanical)
Lars Hoerzer
071 June 25

Graduate Engineer (Mechanical)
Maxwell Jackson
Feb 26

Senior Project Engineer (Civil)
Alvaro Polisciuk
065-2 Mar 25

Project Engineer (Civil)
Dane Crocker
067 Jan 24

Project Engineer (Civil)
Ashwin Sashi
Sept 25

Site Engineer (Civil)
Salamon Dacho
066 Aug 24

Junior Engineer (Civil)
Sorour Seifi
A153 Mar 25

Graduate Engineer (Civil)
Jason McKenzie
110 Feb 24

Engineering Intern
Mujtaba Mahdawi
Nov 25

Area Manager (Mechanical)
Janice D'Souza
Dec 25

Senior Supervisor
Mark Elliott
093 Jul 25

Supervisor (Civil/Structural)
Paul Rea
094 Oct 24

Senior Supervisor (Electrical)
Stephen Muscat
096 Jan 25

Supervisor (Mechanical)
William Moroney
095 Jul 24

Commercial Manager (Riverstone)
Peter Lianos
047 Jun 24

Senior Contract Administrator (Riverstone)
Phil O'Conor
048 Sep 24

Contract Administrator (Riverstone)
Nidhi Shah
051 Oct 24

Junior Contracts Administrator (Riverstone)
Arman Ergin
052 Aug 24

Finance Officer (Riverstone)
Ally He
054 Mar 25

Commercial Intern (Riverstone)
Linda Amoor
Nov 25

Senior Estimator (Riverstone & Rouse Hill)
TBC
101 Jun 24

Senior Environmental Advisor (Riverstone and Rouse Hill)
Chetan Jayaram
049 Mar 24

Environment Coordinator (Riverstone)
Niloufar Taherinasaj
036 May 24

Sustainability Coordinator (Riverstone and Rouse Hill)
Eric Zhang
037-1 Apr 24

Planning Manager (Program & Riverstone)
Prashant Mehta
104 Jan 24

Senior Planner (Riverstone)
Sama (Zahra) Shamshiri
115-1 Mar 25

Quality Manager (Program & Riverstone)
Prasanna Mool
015 Jan 24

Senior Quality Advisor
Jack Zhang
038 Sep 24

Senior Document Controller (Riverstone)
Mopelola Kareem
039-1 Sept 25

Surveyor Manager (Riverstone & Rouse Hill)
Ian Parale
092 May 24

Senior Safety Advisor (Riverstone)
Greg Sinclair
032-1 Oct 25

Safety Coordinator
Nikita Casey
040-1 July 25

Safety Coordinator (Riverstone)
Dee Farrell
Jan 26

Community & Stakeholder Engagement Manager
Katie Xia
050 -1 Sep 24

Senior Community, Stakeholder and Government Relations Advisor
Morgan Tallack
050 Nov 25

KEY

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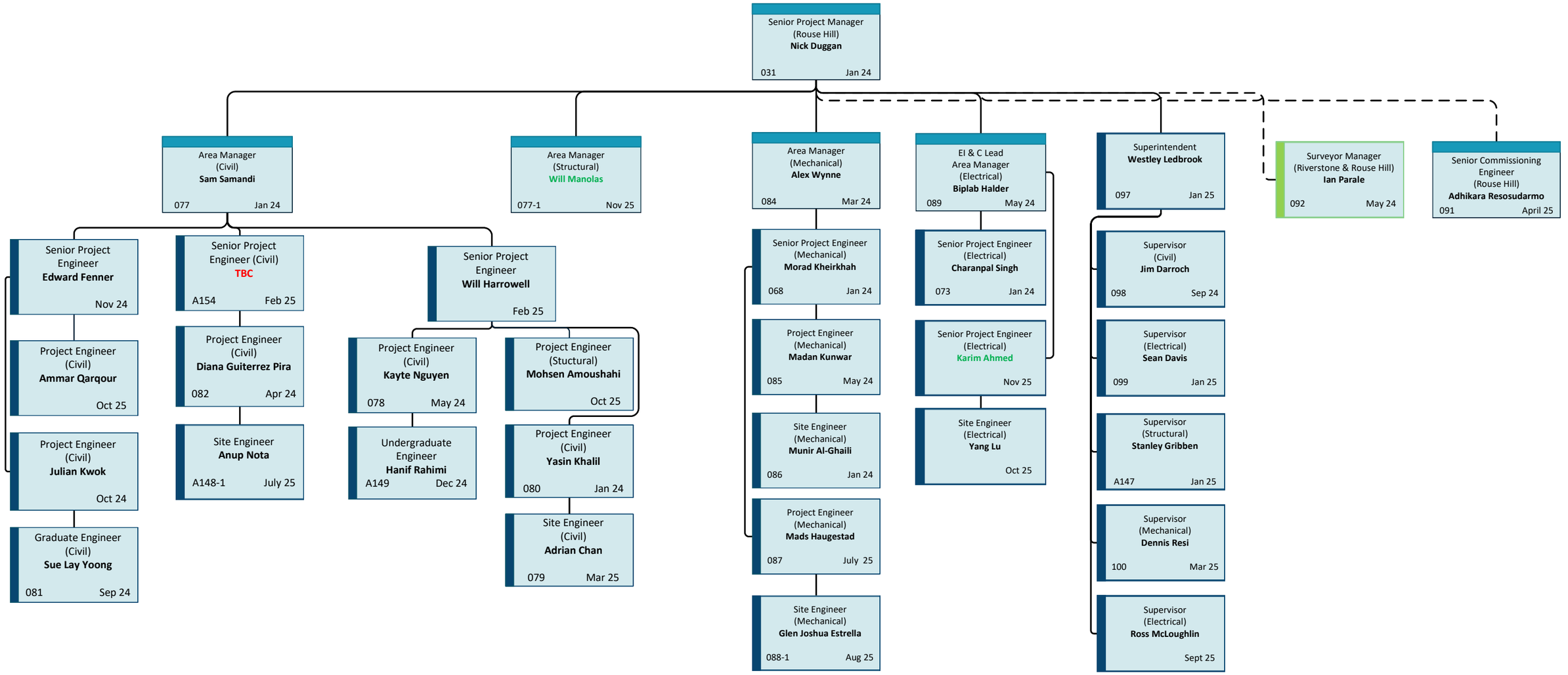
- PMT
- Staff – Commenced
- Staff – Vacant
- Shared with ...

Rouse Hill WRP



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- Staff – Commenced
- Staff – Vacant
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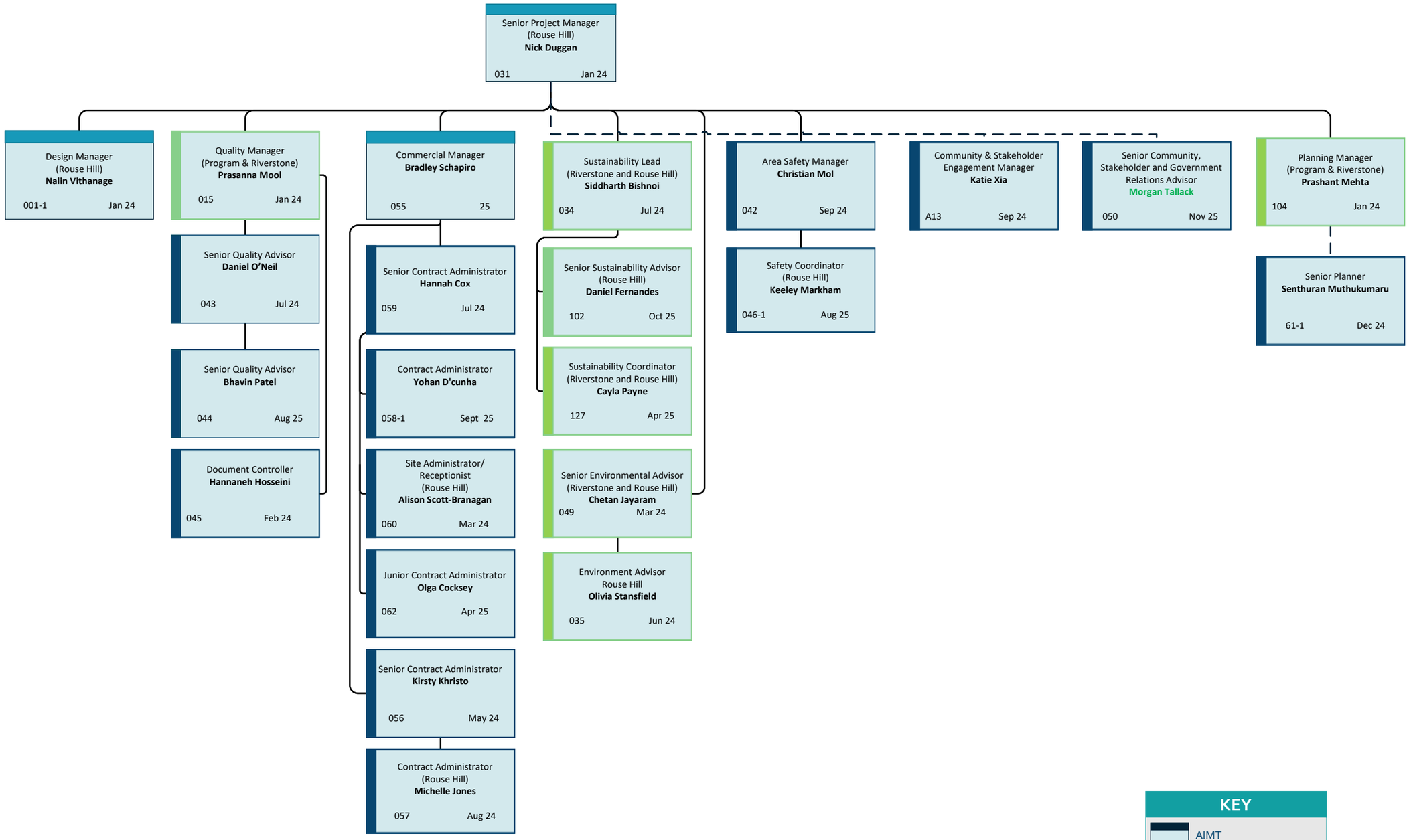
Rouse Hill WRP



KEY

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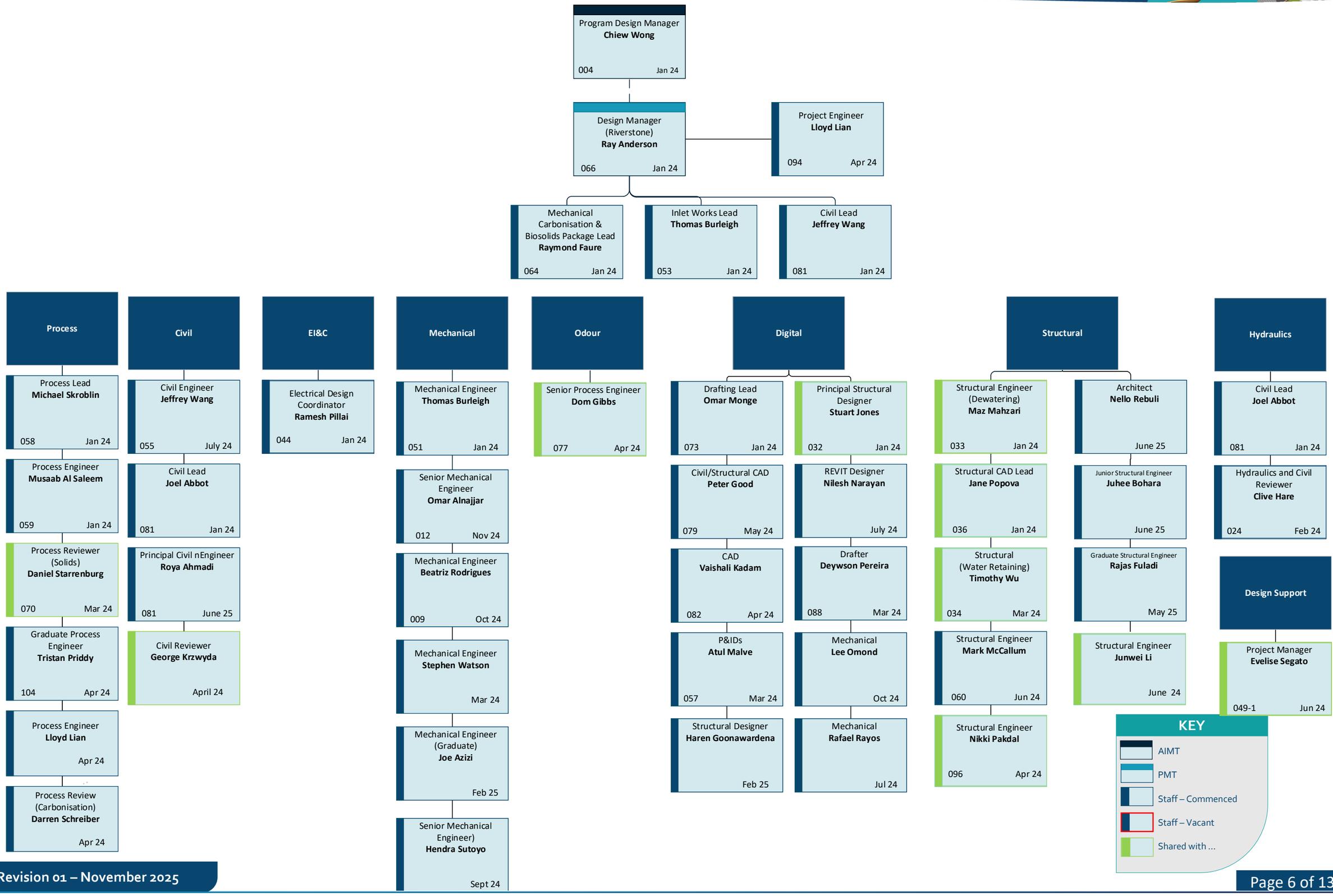
- PMT
- Staff – Commenced
- Staff – Vacant
- Shared with ...

Design - Riverstone



Design – Rouse Hill

- Program Design Manager — **Chiew Wong** — 004 — Jan 24
  - Design Manager (Rouse Hill) — **Nalin Vithanage** — 001-1 — Jan 24
    - Package Lead (Dewatering) — **Peter Horden** — 009 — Jan 24
    - BIM Lead — **Luke Gay** — 013 — Jan 24
    - Process Lead & Package Lead — **Jo Garland** — 002 — Jan 24
    - Package Lead Bioreactor and UV — **Nima Yektaparast** — 004 — Jan 24
    - Package Lead (Chemicals) — **Stephen Watson** — 012 — Jan 24
    - Civil and Hydraulics Lead — **Alvin Ting** — 007 — Feb 24
  - Project Engineer — **Katherine Ratcliffe** — Jan 24

Process Design

- Process Engineer — **Julie-Ann Lowry** — 015-1 — Feb 24
  - Process Reviewer (Solids) — **Daniel Starrenburg** — 070 — Mar 24
  - Process Reviewer (Liquids) — **Graham Gloag** — 039 — Mar 24
  - Process Engineer — **Vanessa Do** — 110 — Jun 24
  - Process Engineer / Project Engineer — **Fred Fu** — 003 — Jan 24

Civil Design

- Civil Reviewer — **Alvin Ting** — 020 — Jan 24
  - Civil Engineer — **Elham Radaei** — 017 — Mar 24
  - Civil Engineer — **Hiroshi Ueki** — 016 — Jan 24
  - Civil Reviewer — **George Krzywda** — 021 — Apr 24

Mechanical

- Mechanical Engineer — **Mark Botrell** — 008 — Feb 24
  - Mechanical Engineer — **Steve Watson** — 019 — Apr 24
  - Mechanical Engineer — **Thomas Carman** — 011 — Mar 24
  - Mechanical Engineer / Reviewer — **Graham Last** — 006 — Jan 24
  - Mechanical Engineer — **Clare Bales** — 109 — Jun 24
  - Mechanical Engineer — **Bridgette Gill** — Aug 24

Digital

- Mechanical CAD Lead — **Shim Joung** — 026 — Jan 24
  - Mechanical CAD — **Robert Bettis** — 030 — Apr 24
  - Mechanical CAD — **Gianni Isola** — Oct 24
  - Mechanical CAD — **Paul Arockiadass** — 031 — Apr 24
  - Principal Structural Designer — **Stuart Jones** — 032 — Jan 24
  - Structural CAD Lead — **Jane Popova** — 036 — Jan 24
    - Structural CAD — **George Cilesio** — 097 — May 24
- Civil CAD Lead — **Soo Weng** — 027 — Jan 24
  - Civil CAD — **Lachlan Walters** — 028 — May 24
  - P&IDs CAD — **Ashwini Adhyapak** — 056 — Apr 24
  - P&IDs CAD — **Pune Team** — Jan 24
  - Civil CAD — **Patricia Riberio** — 029 — Apr 24
  - Structural CAD — **Olcay Bingol** — 102 — Apr 24
    - Structural CAD — **David Jacques** — 099 — July 24
      - Civil Drafter — **Phoenix Lapointe** — 099 — March 24

Odour

- Odour Reviewer — **Ian Evanson** — Oct 24
  - Senior Process Engineer — **Dom Gibbs** — 077 — Apr 24

Hydraulic

- Civil &Hydraulics Reviewer — **Clive Hare** — 024 — Feb 24
  - Civil & Hydraulics Engineer — **Mohsen Ranjbarzahedani** — 018 — Feb 24
    - Hydraulics Engineer — **Elizabeth Mclyntre** — A108 — Feb 24

Structural

- Structural Lead — **Maz Mahzari** — 033 — Jan 24
  - Structural (Water Retaining) — **Timothy Wu** — 034 — Mar 24
  - Senior Structural Engineer — **Kourosh Keshvarian** — 035 — Jan 24
  - Structural Engineer — **Glenn Potger** — 095 — May 24
  - Structural Engineer — **Junwei Li** — 098 — Jun 24
- Structural Engineer — **Matthew Gauci** — 105 — May 24
  - Structural Engineer — **Jack Tidswell** — 103 — May 24
  - Structural Engineer — **Masi Hashemi** — 119 — July 24
  - Structural Reviewer — **Jaya Weerasignhe** — 072 — May 24
  - Structural Reviewer — **Kugan Kugathasan** — 101 — May 24
  - Structural Reviewer — **Omar Hilli** — Aug 24

Electrical

- Electrical Lead — **Ian Prendergast** — 022 — Jan 24

Design Support

- Project Manager — **Evelise Segato** — 049-1 — Jun 24
  - Design Project Manager — **Lauren Dragicevich** — 117 — July 24
  - Cost Control Support — **Pornima Abhyankar** — 117 — March 25

Building Services

- Building Services Engineer — **Teja Kshatri** — 46 — July 24
  - Building Services Engineer — **Matthew Earl** — 47 — July 24
  - Acoustic Engineer — **Jake Emmett** — 107-1 — Nov 24

KEY

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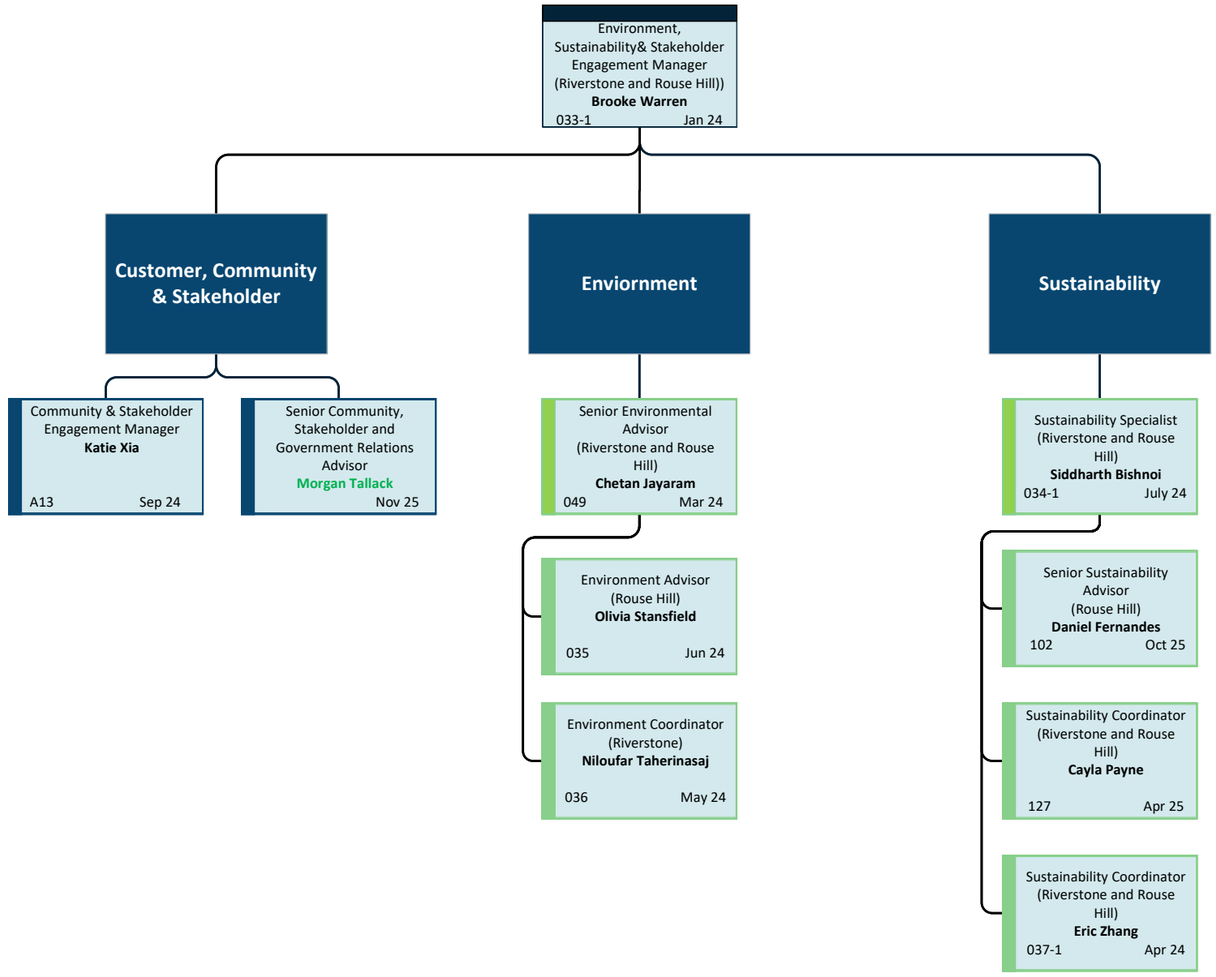
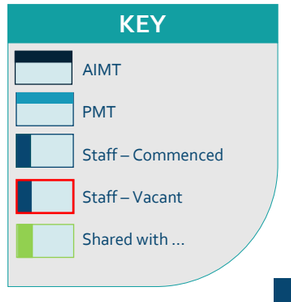
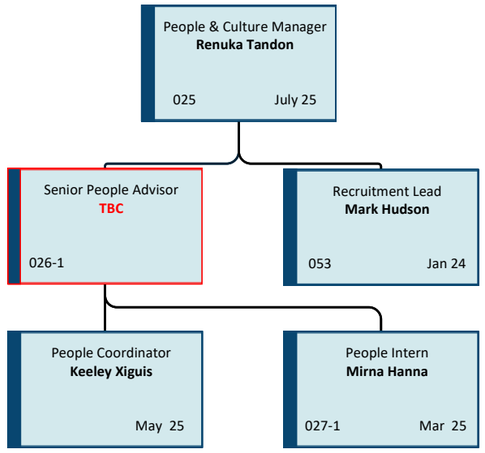
- Staff – Commenced
- Staff – Vacant
- Shared with ...

Environment / Sustainability / Stakeholder





People & Culture



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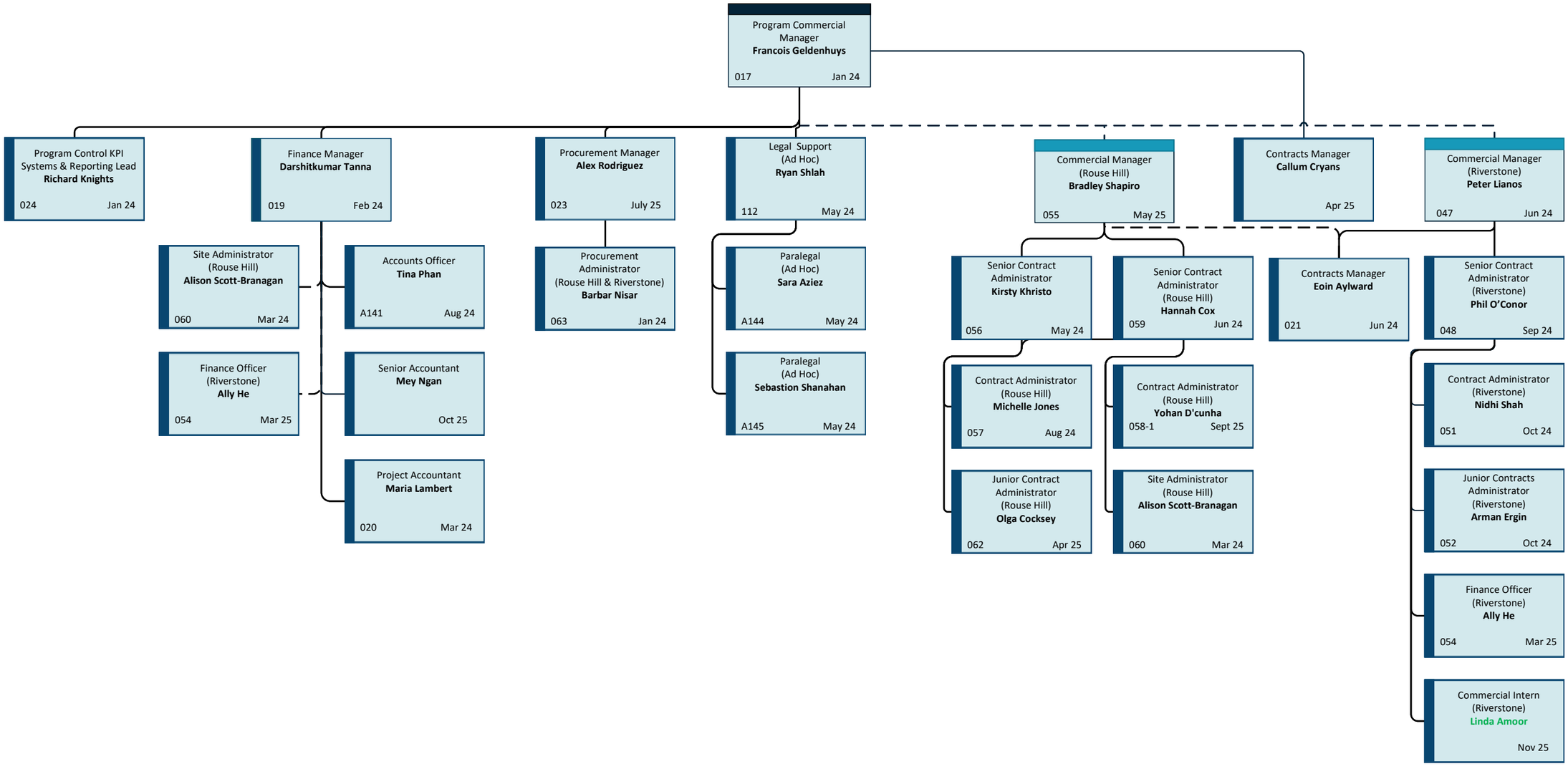
- PMT
- Staff – Commenced
- Staff – Vacant
- Shared with …

Commercial



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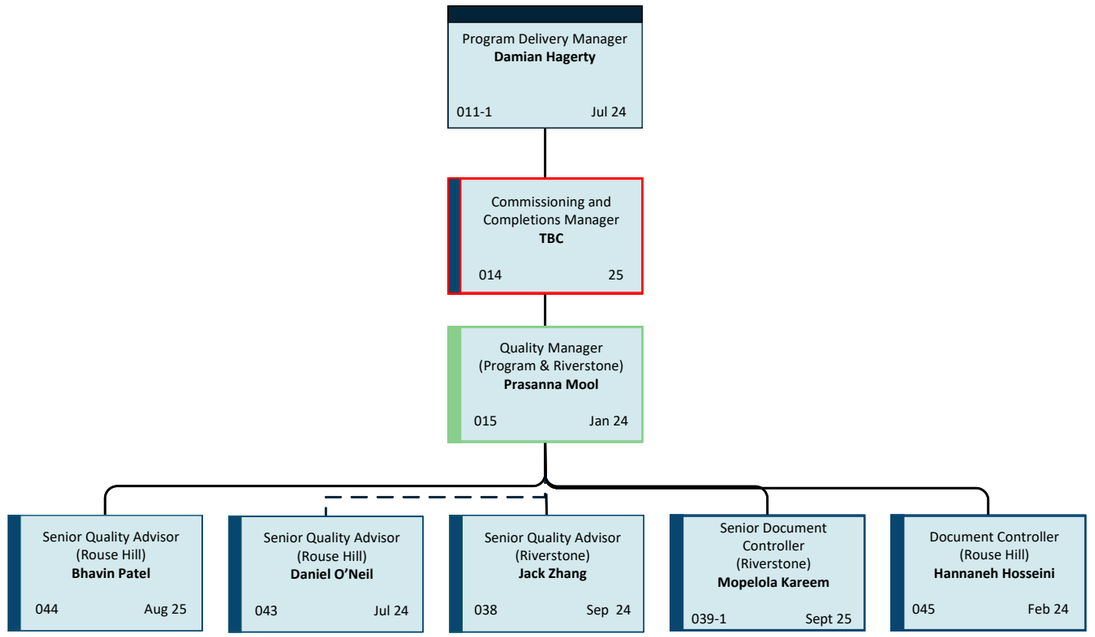
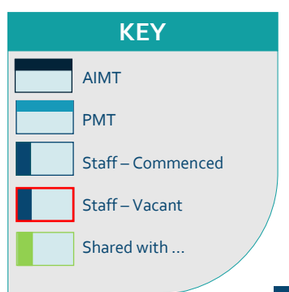
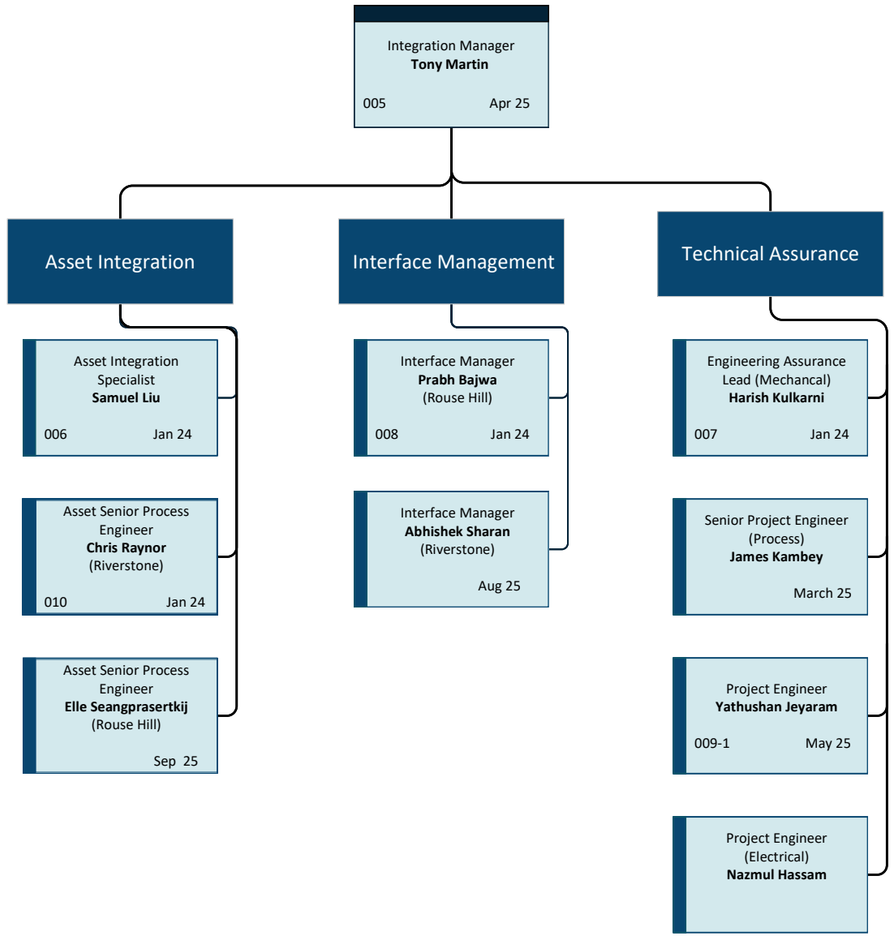
- PMT
- Staff – Commenced
- Staff – Vacant
- Shared with ...

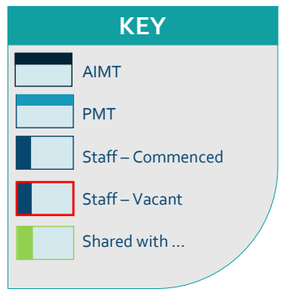
Completions / Quality



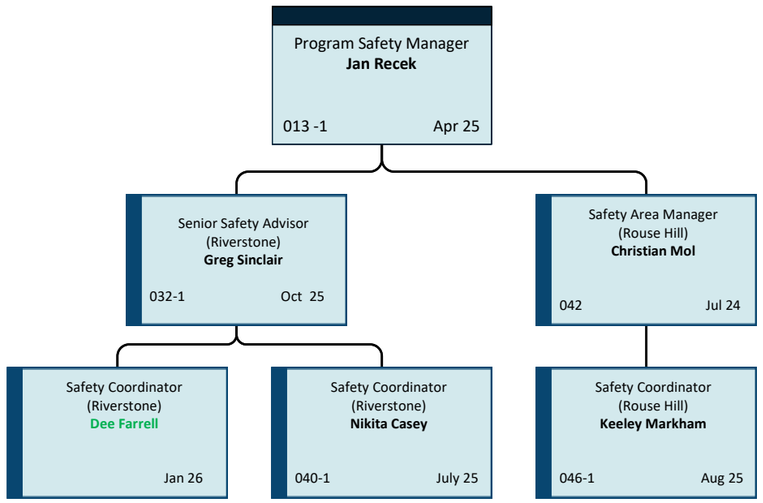


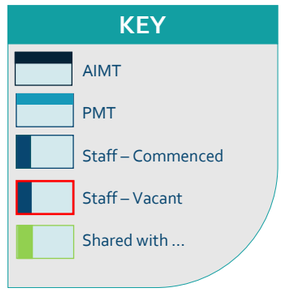
Integration





Safety


Program Safety Manager
Jan Recek
013 -1
Apr 25
Senior Safety Advisor
(Riverstone)
Greg Sinclair
032-1
Oct 25
Safety Area Manager
(Rouse Hill)
Christian Mol
042
Jul 24
Safety Coordinator
(Riverstone)
Dee Farrell
Jan 26
Safety Coordinator
(Riverstone)
Nikita Casey
040-1
July 25
Safety Coordinator
(Rouse Hill)
Keeley Markham
046-1
Aug 25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PMT
Staff – Commenced
Staff – Vacant
Shared with ...

Appendix B John Holland Sustainability Policy

JOHN HOLLAND

SUSTAINABILITY POLICY

UP FOR THE CHALLENGE OF TRANSFORMING LIVES

OUR COMMITMENT

We value the environment and communities in which we work.

Our goal across all our business activities is to drive economic growth, environmental resilience and social progress. In collaboration with our customers and stakeholders, we strive to create a positive legacy for the communities in which we work.

OUR APPROACH

John Holland's core values drive our everyday interactions and guide our approach to sustainability.

Caring

We care deeply about what we do and how it affects lives, now and for future generations, by:

- driving a strong culture that balances social, environmental and economic needs and creates positive sustainability experiences for our people, customers and stakeholders
- integrating environmentally and socially responsible sourcing into our procurement processes, and seeking opportunities to collaborate with our supply chain to drive innovation and create mutual value
- nurturing talent diversity and wellbeing across our organisation, with the aim of creating a safe and inclusive environment that fosters high performance

Empowering

We gain trust through action by:

- Empowering our people, partners and subcontractors to drive social betterment through honest, ethical behaviour
- Participating and collaborating widely to embed sustainability principles across the broader industry holding each other to account, ensuring we each understand our contributions and the role they play in supporting sustainable outcomes
- Providing information that is transparent and accurate

Imaginative

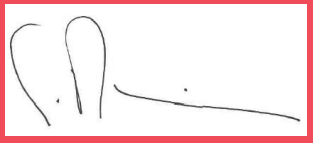
We push the boundaries by:

- Continuously learning and improving–reviewing our performance, capturing and sharing lessons learnt and celebrating our successes
- Exploring and introducing new technologies, products and approaches that support our sustainability goals
- Emphasising sustainable solutions in our decision-making at every level of the business, and through all stages of the project lifecycle

Future-focused

We're in it for the long, long term by:

- Exceeding customer requirements and positioning our business to proactively respond to changing industry expectations
- Establishing and maintaining an effective management system to reduce risk, drive sustainable outcomes and identify opportunities for improvement
- Ensuring we leave a positive legacy for people and planet by considering our footprint and relationships in everything we do
- Adapting and embracing change and championing innovation, with the aim of driving continual improvement and going beyond business as usual



Glenn Palin
Chief Executive Officer

November 2024

Appendix C GRI Content Index

Below is a summary of compliance with the GRI requirements and reporting principles set in GRI 1: Foundation 2021.

Table 14 GRI 1: Foundation 2021 Requirements Matrix

GRI Standard	Requirement Number	Disclosure Title	Section of report	Detail
GRI 1: Foundation 2021	1	Apply the reporting principles	Appendix C Table 13	Detailed in Appendix C Table 13 of this report.
	2	Report the disclosures in GRI 2: General Disclosures 2021	Appendix C Table 14	Detailed in Appendix C Table 14 of this report.
	3	Determine material topics	5.1	Detailed in Section 5.1 of this report.
	4	Report the disclosures in GRI 3: Material Topics 2021	5	Detailed in Section 5 of this report.
	5	Report disclosures from the GRI Topic Standards for each material topic	5 and Appendix C Table 14	Detailed in Appendix C Table 14 of this report.
	6	Provide reasons for omission for disclosures and requirements that the organization cannot comply with	Appendix C Table 14	Disclosures for all identified material GRI Topic Standards have been addressed in Appendix C Table 14.
	7	Publish a GRI content index	Appendix C Table 14	Detailed in Appendix C Table 14 of this report.
	8	Provide a statement of use	1.1	Detailed in Section 1.1 of this report.
	9	Notify GRI	-	To be completed following finalisation of this report.

Below is a summary of the disclosures included in this report.

Table 15 GRI Standards Compliance Matrix

GRI Standard	GRI Disclosure Number	Disclosure Title	Section of report	Detail
General Disclosures				
	2-1	Organisational Details	2.2	Detailed in Section 2.2 of this report.

GRI Standard	GRI Disclosure Number	Disclosure Title	Section of report	Detail
GRI 2: General Disclosures 2021	2-2	Entities included in the organisation's sustainability reporting	4	Detailed in Section 4 of this report.
	2-3	Reporting period, frequency and contact point	4	Detailed in Section 4 of this report.
	2-5	External Assurance	4.2	Detailed in Section 4.2 of this report.
	2-6	Activities, value chain and other business relationships	2	Detailed in Section 2 of this report.
	2-9	Governance structure and composition	3	Detailed in Section 3 of this report.
	2-12	Role of the highest governance body in overseeing the management of impacts	3.1	Detailed in Section 3.1 of this report.
	2-22	Statement on sustainable development strategy	3.2	Detailed in Section 3.2 of this report.
	2-23	Policy Commitments	3.2	Detailed in Section 3.2 of this report.
	2-24	Embedding policy commitments	3.2	Detailed in Section 3.2 of this report.
	2-25	Processes to remediate negative impacts	3	Detailed in Section 3 of this report.
	2-26	Mechanisms for seeking advice and raising concerns	3	Detailed in Section 3 of this report.
	2-28	Membership associations	3.4	Detailed in Section 3.4 of this report.
	2-29	Approach to stakeholder engagement	3.3	Detailed in Section 3.3 of this report.
Material Issues				
GRI 3: Material Topics 2021	3-1	Process to determine material topics	5	Detailed in Section 5 of this report.
	3-2	List of Material Topics	5	**Material Topics** Leadership, Governance and Culture

GRI Standard	GRI Disclosure Number	Disclosure Title	Section of report	Detail
				Energy, Climate and Resilience Environmental Protection Circular Economy Customer and the Community
Economic Disclosures				
GRI201: Economic Performance 2016	201-2	Financial implications and other risks and opportunities due to climate change	6.2	Detailed in Section 6.2 of this report. The North West Treatment Hub (NWTH) is targeting credit Res-1: Climate and Natural Hazard Risks under the Infrastructure Sustainability (IS) v2.1 Design Rating Scheme. This credit focuses on identifying, assessing and managing risks to assets arising from climate change and natural hazards. The Project is on track to achieve Level 1 for this credit, demonstrating compliance with the IS Rating requirements and alignment with best practice in climate risk management and resilience planning.
GRI203: Indirect Economic Impacts 2016	203-2	Significant indirect economic impacts	5	Environment, sustainability, and stakeholder and community risks and opportunities are assessed through the ESC Risk and Opportunity (R&O) Register, which captures both direct and indirect economic impacts across project phases. This process considers significant indirect impacts such as local employment generation, sustainable supply chain participation, and contributions to regional economic development. Risks and opportunities rated high or above are escalated to the Project R&O Register for targeted management, monitoring, and continuous improvement.
GRI 204: Procurement Practices 2016	204-1	Proportion of spending on local suppliers	6.5	Detailed in Section 6.5 of this report.
Environmental Disclosures				
GRI 304: Biodiversity 2016	304-1	Operational sites owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas	6.3	Detailed in Section 6.3 of this report.

<table>
<tr><th>GRI Standard</th><th>GRI Disclosure Number</th><th>Disclosure Title</th><th>Section of report</th><th>Detail</th></tr>
<tr><td></td><td>304-2</td><td>Significant impacts of activities, products and services on biodiversity</td><td>6.3</td><td>Detailed in Section 6.3 of this report.</td></tr>
<tr><td></td><td>304-3</td><td>Habitats protected or restored</td><td>6.3</td><td>Detailed in Section 6.3 of this report.</td></tr>
<tr><td></td><td>304-4</td><td>IUCN Red List species and national conservation list species with habitats in areas affected by operations</td><td>6.3</td><td>Detailed in Section 6.3 of this report.</td></tr>
<tr><td>GRI301: Materials 2016</td><td>301-1</td><td>Materials used by weight or volume</td><td>6.4</td><td><table><tr><th>Summary</th><th>Total</th></tr><tr><td>Aggregates – Recycled Products (m3)</td><td>11,230</td></tr><tr><td>Aggregates – Quarried Products (m3)</td><td>7,500</td></tr><tr><td>Steel (m3)</td><td>7,400</td></tr><tr><td>Asphalt (m3)</td><td>230</td></tr><tr><td>Plastics and Rubbers (m3)</td><td>80</td></tr><tr><td>Timber (m3)</td><td>30</td></tr><tr><td>Sealants (L)</td><td>89.6</td></tr><tr><td>Cables - Low Voltage Power (m)</td><td>8,500</td></tr><tr><td>Pipe (m)</td><td>800</td></tr><tr><td>Cables – Communications (m)</td><td>200</td></tr></table></td></tr>
<tr><td></td><td>301-2</td><td>Recycled input materials used</td><td>6.4</td><td><table><tr><th>Materials by Recycled %</th><th>Total</th></tr><tr><td>Aggregates - Recycled Products</td><td>79.25%</td></tr><tr><td>Aggregates – Quarried Products</td><td>0.00%</td></tr><tr><td>Asphalt</td><td>70.37%</td></tr></table></td></tr>
<tr><td>GRI302: Energy 2016</td><td>302-1</td><td>Energy consumed within the organisation</td><td>6.2</td><td><table><tr><th>Summary Total Energy used on The Project</th><th>Total</th></tr><tr><td>Electricity Usage (kWh)</td><td>186,430</td></tr></table></td></tr>
<tr><td>GRI303: Water and</td><td>303-1</td><td>Interactions with water as a shared resource</td><td>5.5</td><td>The Project interacts with water through the withdrawal, treatment, recycling, and</td></tr>
</table>

GRI Standard	GRI Disclosure Number	Disclosure Title	Section of report	Detail
affluents 2018				discharge of wastewater across the Riverstone and Rouse Hill WRRFs, reducing nutrient loads to local waterways and improving the overall quality and availability of water resources for the broader community. Water-related impacts are identified through comprehensive environmental and sustainability assessments conducted across project phases, using risk and opportunity registers, regulatory frameworks, and modelling tools to evaluate current and future impacts within the catchment. The Project addresses water-related impacts by collaborating with Sydney Water, Regulators, and local communities to enhance water reuse, protect receiving waterways, and promote responsible water stewardship across the northwest Sydney region. Water-related goals and targets are established in alignment with Sydney Water's Environmental Policy, Carbon Zero Plan, and state-level water management strategies, ensuring that project outcomes support regional sustainability objectives and respond to local water stress conditions.
GRI101: Biodiversity 2024 - English	304-1	Operational sites owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity outside protected areas	6.3	Detailed in Section 6.3 of this report.
	304-2	Significant impacts of activities, products, and services on biodiversity	6.3	Detailed in Section 6.3 of this report.
	304-3	Habitats protected or resorted	6.3	Detailed in Section 6.3 of this report.
GRI305: Emissions 2016	305-1	Direct (Scope1) GHG emissions	6.2	See Section 5.4 of this report. Emissions modelling is still under development.
	305-2	Energy indirect (Scope 2) GHG emissions	6.2	See Section 6.2 of this report. Emissions modelling is still under development.
	305-3	Other indirect (Scope 3) GHG emissions	6.2	See Section 6.2 of this report. Emissions modelling is still under development.

<table>
<tr><th>GRI Standard</th><th>GRI Disclosure Number</th><th>Disclosure Title</th><th>Section of report</th><th>Detail</th></tr>
<tr><td>GRI306: Waste 2020</td><td>306-2</td><td>Waste by type and disposal method</td><td>6.2</td><td>
<table>
<tr><th>Summary</th><th>Total (m3)</th></tr>
<tr><td>C&D Waste to Landfill</td><td>61.933</td></tr>
<tr><td>C&D Waste Recycled</td><td>1646.098</td></tr>
<tr><td>C&D Waste Diversion</td><td>96.37%</td></tr>
<tr><td>Target</td><td>80%</td></tr>
<tr><td>Office Waste to landfill</td><td>6.88</td></tr>
<tr><td>Office Waste Recycled</td><td>41.67</td></tr>
<tr><td>Office Waste Diversion</td><td>85.83%</td></tr>
<tr><td>Target</td><td>70%</td></tr>
<tr><td>Spoil Reused on-site</td><td>0.00</td></tr>
<tr><td>Spoil Reused/Recycled off-site</td><td>49969.88</td></tr>
<tr><td>Spoil Disposed</td><td>100.54</td></tr>
<tr><td>Spoil Diversion</td><td>99.80%</td></tr>
<tr><td>Target</td><td>95%</td></tr>
</table>
</td></tr>
<tr><td rowspan="2">GRI 308: Supplier Environmental Assessment 2016</td><td>308-1</td><td>New suppliers that were screened using environmental criteria</td><td>6.1</td><td>All suppliers are screened using both environmental and sustainability criteria, in line with the Project's Procurement Management Plan.</td></tr>
<tr><td>308-2</td><td>Negative environmental impacts in the supply chain and actions taken</td><td>6.1</td><td>Monitoring of supplier performance is undertaken during Project delivery. No suppliers identified as having significant actual and potential negative environmental impacts.</td></tr>
<tr><td colspan="5">Social Disclosures</td></tr>
<tr><td>GRI 413: Local Communities 2016</td><td>413-1</td><td>Operations with Local community engagement, impact assessments, and development programs</td><td>3.3</td><td>Detailed in Section 3.3 of this report.</td></tr>
</table>

Appendix D Independent Review Report

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Cindy Liles

Principal Sustainability Consultant

WolfPeak, on behalf of North West Hub Alliance

Wednesday, 3 December 2025

Dear Cindy,

Please see following the report detailing the findings from the independent review conducted on 28 November 2025 for the Annual Sustainability Performance Report – Financial Year 2024-2025 for the North West Treatment Hub (NWTH) Growth Program, delivered by the North West Hub Alliance (NWHA). The independent review report is prepared to meet the IS version 2.1 Design and As Built Criteria for the Lea-1: Integrating Sustainability credit; satisfying the DL3.2 credit criteria.

Should you have any queries, please do not hesitate to contact me directly.

Kind Regards,

Meg Wrixon

Director

Wrixon Consulting Pty Ltd

1. Introduction

The North West Treatment Hub Growth Program (herein after 'the NWTH' or 'the Project') has compiled its Annual Sustainability Performance Report 2024-2025 (herein after 'the Report'), prepared by the North West Hub Alliance (herein after 'NWHA').

The Report is prepared to showcase the sustainability targets, initiatives and processes that have been established and implemented by the NWTH. The Report focuses on the project's key sustainability areas and highlights the progress made during the reporting period 1 July 2024 to 30 June 2025. The Report content has been prepared in alignment with Global Reporting Initiative (GRI) Standards (2021). It is noted that no GRI application level has been claimed by the Project. While the GRI framework includes sector-specific standards for certain industries, no GRI Sector Standards currently apply to the construction or infrastructure delivery sector. The Report references the GRI Universal and Topic Standards (2021) as the foundation for disclosure. Outcomes are mapped against the United Nations Sustainable Development Goals (UN SDGs) to demonstrate the program's contribution to broader sustainability priorities. This is the first Annual Sustainability Performance Report to be prepared by NWHA and covers the Design phase of the Project.

The NWTH is a long-term initiative by Sydney Water to deliver staged wastewater infrastructure upgrades across Sydney's north-west. The program aims to support regional population growth, promote compliance with evolving environmental standards, and contribute to a safe, efficient, and sustainable wastewater network for the community.

The program is being delivered by the NWHA, a partnership between Sydney Water, John Holland, KBR and Stantec. Under the current phase of works, major upgrades are being undertaken at the Rouse Hill and Riverstone Water Resource Recovery Facilities (WRRFs) to increase treatment capacity, improve effluent quality, and enhance resource recovery.

The NWTH Growth Program encompasses three key facilities: Castle Hill, Rouse Hill and Riverstone. Collectively, these facilities provide wastewater and recycled-water services to Sydney's rapidly developing north-west. This Report focuses on Budget 1 of the program, which includes upgrades to the Rouse Hill and Riverstone facilities, as follows:

- Package 1 – Riverstone WRRF Biosolids and Liquids Upgrades; and
- Package 2 – Rouse Hill WRRF Liquid and Biosolids Amplification Works

The Castle Hill facility and future program budgets outside the scope of this report.

1.1 Scope of report

The Project has engaged Suitably Qualified Professional, Meg Wrixon of Wrixon Consulting Pty Ltd to undertake an independent review of the Project's annual sustainability performance reporting to meet the IS version 2.1 Design Criteria for the Lea-1: Integrating Sustainability credit; satisfying the DL3.2 credit criteria:

- The project's sustainability performance reporting must be independently reviewed by a suitably qualified professional.
- The reviewer must consider the principles of sustainability reporting (GRI or IIR – see Additional Guidance) in their assessment of the report and indicate they are satisfied with the content and quality of what is being reported, including reporting of contribution to the SDGs.
- The independent reviewer needs to be independent from the project itself but can be a suitably qualified professional from the proponent (client) organisation or a third party.
- The project must show that feedback raised in the review has been addressed.

This report details the findings and recommendations for the Project, as a result of conducting a review of the Report, in line with the most recent Global Reporting Initiative (GRI) Standards (2021). The review provides feedback on the Project's sustainability performance on selected material sustainability performance indicators, as reported by the Project, and on how the Principles of the GRI Standards (the GRI Principles) have been met and details specific opportunities for improvement for this report, and future reports.

Final Conclusions have been provided in Section 7, based on the findings made from review of the Comments Register in Section 6, Close-out Report, completed on 3 December 2025.

1.2 GRI Principles Validation

The following tests and procedures were completed during the review:

Table 1: GRI Principles - Test and Procedures

Reporting Principles	Application	Procedures and tests
Accuracy	Checking reported information for accuracy and an appropriate level of detail.	Checked reported performance data against Project tracking registers and source data
Balance	Checking reporting information in an unbiased way and provide a fair representation of the organization's negative and positive impacts.	Considered reported performance in context of comparable Projects and whether positive and negative performance is reported.
Clarity	Checking reporting of information in a way that is accessible and understandable	Checked overall report presentation for accessibility and ease of understanding
Comparability	Checking reported information consistently to enable an analysis of changes in the Project's impacts over time and an analysis of these impacts relative to those of other Projects.	Confirmed intention for planned annual reviews
Completeness	Checking the Project has provided sufficient information to enable an assessment of the Project's impacts during the reporting period.	Considered scope and breadth of reported performance in context of comparable Projects Considered extent to which stakeholder input has informed sustainability objectives and targets
Sustainability context	Checking the Project has reported information about its impacts in the wider context of sustainable development.	Checked for reporting on alignment with the UN SDGs Checked for demonstration of how the project has positively or negatively contributed to achievement of the SDGs.
Timeliness	Checking the Project has reported information on a regular schedule and make it available in time for information users to make decisions.	Confirmed intention for planned annual report and reviews Confirmed completion of report promptly following reporting period.

Reporting Principles	Application	Procedures and tests
Verifiability	Checking the Project has gathered, recorded, compiled, and analysed information in such a way that the information can be examined to establish its quality.	Checked reported performance data against Project tracking registers and source data
Continuous improvement	Checking the Project has addressed feedback raised in the previous annual review.	Not Applicable for this report, as it is the first Annual Sustainability Performance Report. A 'Close-out Report' will be provided by the Project and included in the Annual Sustainability Performance Report prior to final publication.

1.3 Limitations of report

The Project has provided at their sole discretion all of the documentation that has been accessible for the review. The review has relied on the information and documentation provided. It should be noted that the range of documentation provided may not have included all of the relevant related records held. The reviewer has not had the opportunity to formally verify any of the information provided nor the opportunity to consult with any party other than Project nominated representatives during this review.

It should be noted that in the context of the Annual Sustainability Report Review Process (herein 'the Process') this review took place after the NWHA team review and approval. It is expected that following this independent review, any changes made to the report will only be in relation to responding to the identified review findings.

2. GRI Reported Performance Validation

The above procedures and tests were used to review the reported performance.

Table 2: GRI Principles – Procedures and Tests Findings

Reporting Principles	Procedures and tests	Findings
Accuracy	Checked reported performance data against Project tracking registers and source data	For reported indicators, reviewed data and tracking registered provided by the project to ensure accuracy (see Table 3), where data was available. Reported data was found to generally match source data (where available), with findings in Table 3 for data available. <u>Findings & recommendations:</u> No findings and recommendations.
Balance	Considered reported performance in context of comparable Projects and whether positive and negative performance is reported.	Project reported targets are in alignment with those typically reported on other comparable Projects. Performance against objectives and targets is summarised, with qualitative information provided in each Sustainability Theme section (Sections 5.3 to 5.7); and provided as quantitative data (where applicable, given project is in the IS Design rating phase) with performance against indicators. Each Theme provides a mapping table to show where in the Sustainability Framework the Theme is covered, as well as material IS credits linked to the Theme. The GRI Disclosures and UN SDGs are captured, demonstrating which GRI Disclosures are addressed by each Theme. Targets address whole of life of the asset (Design, Construction & Operations). Operational targets are included in 'Whole of Lifecycle' targets for emissions, circular economy and water. Roles and responsibilities for delivery, monitoring and reporting approach and frequency, are clearly defined in Appendix E; Sustainability Objectives and Targets. All targets are reported as 'On Track to Achieve' or 'Currently Achieving', though it is noted that not all targets have quantitative data available, as the project is currently in the IS Design phase. Each Sustainability Theme is presented with further detail on performance against objectives and targets and activities / initiatives implemented to achieve targets, including a strong range of case studies for each Theme (provided within Sections 5.3 to 5.7). Negative performance or challenges experienced by the project have not been reported. The Project approach to managing feedback and complaints is in accordance with Sydney Water's established procedures. A target of 'Minimise frequency of avoidable complaints' is included in 'Environmental Protection' and 'Customer and Community' Themes and detail has been provided to demonstrate that no avoidable complaints have been received during the reporting period. The 'Stakeholder Comms Chart' was reviewed as part of this independent review, demonstrating that no complaints have been received during the reporting period.

Reporting Principles	Procedures and tests	Findings
		Findings & recommendations: Finding: Negative performance or challenges experienced by the project have not been reported. Recommendation: To ensure that the GRI Principle of Balance has been achieved, it is recommended that the project adds *'Challenges'* at the end of each Sustainability Theme reporting area to transparently communicate challenges/negative impacts and provide proposed/committed actions to be taken in next reporting period.
Clarity	Checked overall report presentation for accessibility and ease of understanding	The report was to be generally accessible and easy to understand and navigate. It is understood that the final report will be located on the Project website for public access. Findings & recommendations: No findings and recommendations.
Comparability	Confirmed intention for planned annual reviews	It is confirmed that the Annual Sustainability Performance Report will continue to have annual independent reviews conducted. The reviewer report, findings, recommendations and close-out remarks will be included in Section 6. Independent Review Feedback and in Appendix D. Independent Review Report, once complete. Findings & recommendations: No findings and recommendations.
Completeness	Considered scope and breadth of reported performance in context of comparable Projects Considered extent to which stakeholder input has informed sustainability objectives and targets	3.2. Sustainability Framework and Approach – Governance and Strategic Alignment discusses how the NWHA sustainability framework aligns with the overarching Sydney Water long-term sustainability commitments and management systems, expressed through the Sydney Water Sustainability Strategy. It is stated that the NWHA Sustainability Management Plan (SuMP) is the key governance document for sustainability on the Project, forming part of the Project Management System, outlining processes, accountabilities and performance requirements. John Holland's Sustainability Framework and Sustainability Policy Commitments are adopted by NWHA to provide the structure through which objectives are delivered, monitored and improved, with four pillars: Leadership and Strategy; Our People: Our Community and Partners; and Built and Natural Environment; and twelve Sustainability Elements. A further review for the Project was undertaken that streamlined the sustainability framework and merged overlapping themes into five key sustainability themes: Leadership, Governance and Culture; Energy, Climate and Resilience; Environmental Protection; Circular Economy; and Customer and Community. Material Topics have been identified through alignment with Sydney Water's corporate sustainability commitments, the Infrastructure Sustainability (IS) Rating Scheme v2.1 Sustainability Materiality Assessment, and through stakeholder feedback gathered from Alliance engagement forums. The materiality assessment was initially

Reporting Principles	Procedures and tests	Findings
		reviewed as part of a sustainability workshop held in April 2024, attended by multidisciplinary representatives from across the Project Alliance, including sustainability, design, engineering, construction, and stakeholder engagement disciplines. Sustainability Objectives and Targets are identified however no detail is provided as to how stakeholder input has informed sustainability objectives and targets. Though it is stated that the material issues were identified as the most important in terms of significance of project context and risks, it is not clear the importance of these material issues to stakeholders, or how the validation process was undertaken with stakeholders. While internal stakeholder engagement disciplines were in attendance at the sustainability workshop, it is not clear that these disciplines were representative of external stakeholders. The Sustainability Themes (material issues) covered in the report pertain to environmental, social and economic sustainability aspects. Each Sustainability Theme is covered in Sections 5.3 to 5.7, providing context on activities and performance against objectives and targeted. Sections 5.3 to 5.7 provide no disclosure of stakeholder engagement or the management and governance approaches for the Sustainability Themes, thus not meeting GRI disclosures for stakeholder engagement and management approach. <u>Findings & recommendations:</u> <u>Finding</u>: Though it is stated that the material issues were identified as the most important in terms of significance of project context and risks, it is not clear the importance of these material issues to stakeholders, or how the validation process was undertaken with stakeholders. It is also not clear that internal stakeholder engagement disciplines were representative of external stakeholders. <u>Recommendation</u>: The Project should consider providing further detail on the validation process undertaken with stakeholders to determine the importance of identified material issues. It should also be made clear that internal stakeholder engagement disciplines were representative of external stakeholders. <u>Finding</u>: Sections 5.3 to 5.7 provide no disclosure of stakeholder engagement or the management and governance approaches for the Sustainability Themes, thus not meeting GRI disclosures for stakeholder engagement and management approach. <u>Recommendation</u>: Adding titles for 'Stakeholder Engagement' and 'Management Approach' and more in-depth disclosure overview within each section on stakeholder engagement and management approach would ensure the Report aligns better with the GRI stakeholder engagement (e.g. further detail on how the Project engages with relevant stakeholders on the Theme) and management approach (e.g. policy, roles and responsibilities, management plans, reporting) disclosure requirements for each Sustainability Theme (material issue).

Reporting Principles	Procedures and tests	Findings
Sustainability context	Checked for reporting on alignment with the UN SDGs Checked for demonstration of how the project has positively or negatively contributed to achievement of the SDGs. Checked for demonstration of nominated GRI Disclosures addressed within report.	The GRI Disclosures and UN SDGs are captured, demonstrating which GRI Principles and UN SDGs are addressed by each Theme. It is noted that the GRI Principles mapped to each Sustainability Theme have not all been addressed in Appendix C. GRI Content Index; for example, GRI 204: Procurement Practices 2016 is listed as addressed by Section 5.3. Leadership, Governance and Culture, however it is not covered in Appendix C. GRI Content Index. The Project shows how the UN SDGs are considered within the Sustainability Theme and demonstration of the Project's positive contribution to the achievement of the SDGs has been provided. Demonstration of the Project's negative contribution to the achievement of the SDGs has not been provided, as all targets are reported as 'On Track to Achieve' or 'Currently Achieving', though it is noted that not all targets have quantitative data available, as the project is currently in the IS Design phase. Findings & recommendations: Finding: It is noted that the GRI Principles mapped to each Sustainability Theme have not all been addressed in Appendix C. GRI Content Index; for example, GRI 204: Procurement Practices 2016 is listed as addressed by Section 5.3. Leadership, Governance and Culture, however it is not covered in Appendix C. GRI Content Index. Recommendation: It is recommended that a check is conducted to ensure that all GRI Principles listed in Section 5 are covered in Appendix C.
Timeliness	Confirmed intention for planned annual reviews Confirmed completion of report promptly following reporting period.	It is confirmed that the Annual Sustainability Performance Report will continue to have annual independent reviews conducted. The reviewer report, findings, recommendations and close-out remarks will be included in Section 6. Independent Review Feedback and in Appendix D. Independent Review Report, once complete. The Report was completed within a reasonable period following the end of the reporting period. The MoU relating to this review expresses the intention for further reviews to be conducted of the future annual reports for the duration of the project. Findings & recommendations: No findings and recommendations.
Verifiability	Checked reported performance data against Project tracking registers and source data	For reported indicators, reviewed data and tracking registered provided by the project to ensure accuracy (see Table 3), where data was available. Reported data was found to generally match source data (where available), with findings in Table 3 for data available. Findings & recommendations: No findings and recommendations.

Reporting Principles	Procedures and tests	Findings
Continuous improvement	Checking the Project has addressed feedback raised in the previous annual review.	Not Applicable for this report, as it is the first Annual Sustainability Performance Report. A 'Close-out Report' will be provided by the Project and included in the Annual Sustainability Performance Report prior to final publication. <u>Findings & recommendations:</u> No findings and recommendations.

3. Sustainability Performance Validation

Table 3: shows the complete review *validation and verification* findings against the reported sustainability indicators. For each indicator, the review process included: a check for alignment with the relevant tracking register, and a check of at least one example of the source data used to maintain the registers.

Table 3: Sustainability Performance Validation

Sustainability objective	KPI	SMART Target & Performance	Validation / recommendation
Promote a supportive and high-performing work culture that embraces behaviours contributing to sustainable and improved environmental outcomes and innovation.	(KPI B2.1) Target pathway – conservative pathway to achieve a 'Silver' rating (40 points), including credit criteria applicable to wastewater and Sydney Water processes.	Deliver an ISv2.1 Design and As Built rating achieving at least 40 points. On Track	Validated as on track IS Scorecard shows buffer of 10-15 points above target of 40 points. The Materiality Assessment (verified February 2025) details high materiality / high scoring credits. ISv2.1 Design Rating Tracker records progress against credits, highlighting credit criteria risk level and completion rates, with many credits near completion. Documents Reviewed: *NWTH ISv2.1 Tracking Spreadsheet (12.8.25)* *J606 NWTHGP v2.1 D&AB_MaterialityAssessment_20241121_Verified 28.02.2025*
	(KPI B2.1 d) Achieve ≥ 5 points for Innovation Credit.	Achieve ≥ 5 innovation points in the ISv2.1 Design and As Built rating. On Track	Validated as on track 9.75 innovation points targeted, 3 x Australian First innovations. Case Study on Sense600 and HVO innovations provided in Report. Documents Reviewed: *NWTH Initiatives Register (12.8.25)*
Make supply-chain decisions that are sustainable and socially responsible.	(KPI B2.1 e) Procure products with ISC-approved sustainability labels for 10 % of total materials by cost.	Procure products with ISC-approved labels for 10 % of total materials by cost by end of As Built. On Track	Validated as on track EPD tracking register developed & integrated into Procurement Register. Registers reviewed and validated that Project is tracking via registers. Sustainability label links provided in EPD Tracking Register. Documents reviewed: *EPD Tracking Register* *Procurement Register*

Sustainability objective	KPI	SMART Target & Performance	Validation / recommendation
Best-practice energy-efficient processes and assets.	(KPI B2.1 b) Reduce construction Scope 1 and 2 carbon emissions and embodied carbon by 10–30 % vs verified base case.	Achieve 10–30 % reduction in Scope 1 & 2 and embodied carbon emissions vs agreed Base Case during construction. On Track	Validated as on track IS Base Case and modelling are under development. Carbon reduction initiatives implemented. Carbon reduction initiatives have been implemented. Resource Efficiency Strategy and Action Plan is developed. Sustainability label links provided in EPD Tracking Register. Data monitoring processes are implemented via PBi and PPW reports. Documents Reviewed: *PBi Electricity Usage FY 24-25* *PBi Fuel Usage FY 24-25* *PBi Materials Usage FY 24-25* *PPW Resource Usage reports FY 24-25* *PPW Subcontractor NGER & Sustainability Reports FY 24-25* *NWHA Resource Efficiency Strategy Rev 02.1 (12.8.25)* *NWHA REAP Rev 02 (12.8.25)* *EPD Tracking Register* *Procurement Register*
Contribute to net-zero carbon for Sydney Water operations (Scope 1 & 2) and decarbonise supply chain (Scope 3).	(KPI B2.1 e) Procure 10 % of materials by cost with ISC approved labels.	Procure 10 % by end of As Built; 20 % increase in electricity from renewables (construction only). On Track	Validated as on track Project purchasing GreenPower during construction, implemented onsite renewable energy generation and other initiatives. Carbon reduction initiatives have been implemented. Resource Efficiency Strategy and Action Plan is developed

Sustainability objective	KPI	SMART Target & Performance	Validation / recommendation
	-	10 % reduction in material life-cycle impacts from Base Case. On Track	Validated as on track Data monitoring processes are implemented via PBi and PPW reports. Selecting lower-impact alternative materials. Case Study on Biodiesel and HVO initiatives provided in Report. Documents Reviewed: *PBi Electricity Usage FY 24-25* *PBi Fuel Usage FY 24-25* *PBi Materials Usage FY 24-25* *PPW Resource Usage reports FY 24-25* *PPW Subcontractor NGER & Sustainability Reports FY 24-25* *NWHA Resource Efficiency Strategy Rev 02.1 (12.8.25)* *NWHA REAP Rev 02 (12.8.25)* Finding: In Appendix E. Sustainability Objectives and Targets; Table 13: Project sustainability themes, objectives, and targets - KPI B2.1e is the incorrect KPI for the Objective and Target. Recommendation: Ensure correct KPI is displayed in Appendix E. Sustainability Objectives and Targets; Table 13: Project sustainability themes, objectives, and targets.
Take a systems approach to address climate-related risks and improve resilience.	Achieve min Level 1 for Res-1 and Res-2 in ISv2.1.	Achieve min Level 1 for Res-1 and Res-2 in Design and As Built. On Track	Validated as on track Internal & external workshops held, Climate and Natural Hazard Risk and Resilience Register; and Climate Change and Natural Hazards Risk and Resilience Report developed. Res-1 Climate Registers are developed for both Rouse Hill and Riverstone. A Res-1 Summary tab showing inherent and residual risk ratings for both sites demonstrates that there are no 'high' or 'very high' residual risks after treatment. A Resilience Register is developed for the Res-2 credit. Documents Reviewed: *Climate and Natural Hazard Risk and Resilience Register* *Climate Change and Natural Hazards Risk and Resilience Report*

Sustainability objective	KPI	SMART Target & Performance	Validation / recommendation
Protect, restore and enhance natural and heritage assets.	Achieve min Level 1 for Eco-1 in ISv2.1.	Achieve min Level 1 for Eco-1 in Design and As Built. On Track	Validated as on track Stretch target of level 2 applied. Flora and Fauna Assessment indicates no significant ecological impacts. CEMP includes management measures. Her-1 is scoped out. ISv2.1 Design Rating Tracker records progress against credits, highlighting credit criteria risk level and completion rates, with the Eco-1 credit ranked as low to medium risk (higher credit levels) and near completion. Documents Reviewed: *Flora-and-fauna-assessment-addendum* *NWTH Flora and Fauna Assessment* *Sydney Water Biodiversity Offset Guide* *NWTH ISv2.1 Tracking Spreadsheet (12.8.25)* *J606 NWTHGP v2.1 D&AB_MaterialityAssessment_20241121_Verified 28.02.2025* Finding: An incorrect target has been included in Section 5.5: Ecological Protection: 'CESP functional inspections conducted by the client. Minimise frequency of avoidable complaints.' This Target is not included in Appendix E. Sustainability Objectives and Targets; Table 13: Project sustainability themes, objectives, and targets. Recommendation: Ensure correct KPI's and targets are displayed in Section 5.5, and in Appendix E. Table 13.

Sustainability objective	KPI	SMART Target & Performance	Validation / recommendation
Maximise resource value and support a circular economy through responsible management of energy, water and materials and waste minimisation.	(KPI B2.1 a) Deliver Resource Efficiency Strategy and Plan aligned with ISv2.1 Rs0-1 referencing Sydney Water Biochar Reuse Strategy.	Deliver Resource Efficiency Strategy and Plan; Biochar reuse by June 2029. On Track	Validated as on track Circular Economy Workshop held and Resource Efficiency Strategy and Action Plan developed. Biochar reuse target included in Resource Efficiency Strategy, with responsibility handed to Sydney Water during operations. Documents Reviewed: *NWHA Resource Efficiency Strategy Rev 02.1 (12.8.25)* *NWHA REAP Rev 02 (12.8.25)* *NWTH Circular Economy Integration Workshop – invite* *NWTH Initiatives Register* Finding: A duplicate target has been included in Section 5.6: Circular Economy: 'Procure products with ISC approved sustainability labels for 10% of total materials by cost.' This Target is not included in Appendix E. Sustainability Objectives and Targets; Table 13: Project sustainability themes, objectives, and targets. Recommendation: Ensure correct KPI's and targets are displayed in Section 5.6, and in Appendix E. Table 13.

Sustainability objective	KPI	SMART Target & Performance	Validation / recommendation
	(KPI B2.1 c) Achieve waste avoidance/diversion targets > 85 % spoil, 50–60 % office waste, 70 % other inert outputs.	Achieve 85 % spoil diversion, 60 % office waste diversion, 70 % other inert wastes. Currently Achieving	Validated as on track Circular Economy Workshop held and Resource Efficiency Strategy and Action Plan developed. Data monitoring processes are implemented via PPW waste and recycling reports. Documents Reviewed: *NWHA Resource Efficiency Strategy Rev 02.1 (12.8.25)* *NWHA REAP Rev 02 (12.8.25)* *NMTH WMP Rev 03 Final* *NWHA Office Waste Diversion Strategy* *Project Wide Waste register V4 12.08.2025* *NWTH Circular Economy Integration Workshop – invite* *NWTH Initiatives Register* *PPW Waste & recycling Report FY 24-25*
Operate socially responsibly and engage stakeholders, customers and community for positive outcomes.	(KPI B5.1) CESP functional inspections conducted by client.	Minimise frequency of avoidable complaints during delivery phase. On Track	Validated as on track No avoidable complaints received during reporting period. Stakeholder Comms Chart reviewed, demonstrating no complaints received during reporting period. Documents Reviewed: *Stakeholder Comms Chart*

4. Contribution to UN SDGs

The Report shows how the UN SDGs are considered within each Sustainability Theme and demonstration of the Project's positive contribution to the achievement of the SDGs has been provided. Demonstration of the Project's negative contribution to the achievement of the SDGs has not been provided, as all targets are reported as 'On Track to Achieve' or 'Currently Achieving', though it is noted that not all targets have quantitative data available, as the project is currently in the IS Design phase. See '*Table 4 Contribution to UN SDGs'* below for further detail on UN SDG alignment.

Findings & Recommendations:

Finding: The Report shows how the UN SDGs are considered within each Sustainability Theme and demonstration of the Project's positive contribution to the achievement of the SDGs has been provided. Demonstration of the Project's negative contribution to the achievement of the SDGs has not been provided, as all targets are reported as 'On Track to Achieve' or 'Currently Achieving.

Recommendation: It should be assessed whether the Project has any negative contributions to the achievement of the SDGs and any negative contribution should be disclosed within the report.

Table 4 Contribution to UN SDGs

UN SDG	Project Reported Contribution (Theme / Objective)	Validation / recommendation
1. No poverty	The Project scope is not aligned to the contribution of this goal.	Agreed, the Project scope is not aligned to contribute to this goal.
2. Zero hunger	The Project scope is not aligned to the contribution of this goal.	Agreed, the Project scope is not aligned to contribute to this goal.
3. Good health and well-being	Theme: Customer & Community Objective: Operate in a socially responsible manner and proactively engage and partner with stakeholders, customers and community groups to achieve positive environmental outcomes.	Agreed, the Project scope is aligned to contribute to this goal.
4. Quality education	The Project scope is not aligned to the contribution of this goal.	Agreed, the Project scope is not aligned to contribute to this goal.
5. Gender equality	Theme: Customer & Community Objective: Operate in a socially responsible manner and proactively engage and partner with stakeholders, customers and community groups to achieve positive environmental outcomes.	Agreed, the Project scope is aligned to contribute to this goal.
6. Clean water and sanitation	The Project scope is not aligned to the contribution of this goal.	Agreed, the Project scope is not aligned to contribute to this goal.

UN SDG	Project Reported Contribution (Theme / Objective)	Validation / recommendation
7. Affordable and clean energy	Theme: Energy, Climate & Resilience Objectives: Best practice energy efficient processes and assets (new and existing), contribute to net zero carbon for Sydney Water Operations (Scope 1 and 2 carbon emissions). Contribute to the decarbonisation of the supply chain (scope 3 carbon emissions).	Agreed, the Project scope is aligned to contribute to this goal.
8. Decent work and economic growth	Theme: Leadership, Governance & Culture Objective: Make supply chain decisions that are sustainable and socially responsible.	Agreed, the Project scope is aligned to contribute to this goal.
9. Industry, innovation and infrastructure	Theme: Leadership, Governance & Culture Objective: Promote a supportive and high performing work culture that embraces behaviours that contribute to sustainable and improved environmental outcomes and embraces innovation.	Agreed, the Project scope is aligned to contribute to this goal.
10. Reduced inequalities	Theme: Customer & Community Objective: Operate in a socially responsible manner and proactively engage and partner with stakeholders, customers and community groups to achieve positive environmental outcomes.	Agreed, the Project scope is aligned to contribute to this goal.
11. Sustainable cities and communities	Themes: Circular Economy Objectives: Contribute to the decarbonisation of the supply chain (scope 3 carbon emissions). Maximise resource value and support a circular economy by responsibly managing energy, water and materials, and minimising waste creation. Theme: Customer & Community Objective: Operate in a socially responsible manner and proactively engage and partner with stakeholders, customers and community groups to achieve positive environmental outcomes.	Agreed, the Project scope is aligned to contribute to this goal.
12. Responsible consumption and production	Theme: Circular Economy Objectives: Contribute to the decarbonisation of the supply chain (scope 3 carbon emissions). Maximise resource value and support a circular economy by responsibly managing energy, water and materials, and minimising waste creation.	Agreed, the Project scope is aligned to contribute to this goal.

UN SDG	Project Reported Contribution (Theme / Objective)	Validation / recommendation
13. Climate action	Theme: Energy, Climate & Resilience Objectives: Take a systems approach to address climate-related risks and other shocks and stresses through improved resistance, reliability, redundancy, response and recovery.	Agreed, the Project scope is aligned to contribute to this goal.
14. Life below water	Theme: Environmental Protection Objectives: Protect, restore and enhance natural and heritage assets	Agreed, the Project scope is aligned to contribute to this goal.
15. Life on land	Theme: Environmental Protection Objectives: Protect, restore and enhance natural and heritage assets	Agreed, the Project scope is aligned to contribute to this goal.
16. Peace, justice, and strong institutions	The Project scope is not aligned to the contribution of this goal.	Agreed, the Project scope is not aligned to contribute to this goal.
17. Partnerships for the goals	Theme: Leadership, Governance & Culture Objective: Promote a supportive and high performing work culture that embraces behaviours that contribute to sustainable and improved environmental outcomes and embraces innovation.	Agreed, the Project scope is aligned to contribute to this goal.

5. Conclusions of Independent Review (28 November 2025)

Based on the procedures performed on the supplied evidence, a number of findings / recommendations / improvements have been noted within the report for the Project to consider. In general, the conclusion is that the reported sustainability performance in the *NWHA Annual Sustainability Performance Report Financial Year 2024/2025* has been prepared, in most material respects in accordance with the principles of reporting in the Global Reporting Initiative (2021). Improvements and recommendations are noted in *Table 5: Annual Review Recommendations 2024/2025* in relation to the procedures and tests performed against the GRI reporting principles to assess the content and quality of what has been reported. Improvements have been noted against the GRI Principles of Balance, Clarity, Completeness and Sustainability Context. The following recommendations are noted from the review.

Table 5: Annual Review Recommendations 2024/2025

Number	Item	Finding	Recommendation
1	GRI Principle: Balance	Negative performance or challenges experienced by the project have not been reported.	To ensure that the GRI Principle of Balance has been achieved, it is recommended that the project adds *'Challenges'* at the end of each Sustainability Theme reporting area to transparently communicate challenges/negative impacts and provide proposed/committed actions to be taken in next reporting period.
2	GRI Principle: Completeness	Though it is stated that the material issues were identified as the most important in terms of significance of project context and risks, it is not clear the importance of these material issues to stakeholders, or how the validation process was undertaken with stakeholders. It is also not clear that internal stakeholder engagement disciplines were representative of external stakeholders.	The Project should consider providing further detail on the validation process undertaken with stakeholders to determine the importance of identified material issues. It should also be made clear that internal stakeholder engagement disciplines were representative of external stakeholders.
3	GRI Principle: Completeness	Sections 5.3 to 5.7 provide no disclosure of stakeholder engagement or the management and governance approaches for the Sustainability Themes, thus not meeting GRI disclosures for stakeholder engagement and management approach.	Adding titles for 'Stakeholder Engagement' and 'Management Approach' and more in-depth disclosure overview within each section on stakeholder engagement and management approach would ensure the Report aligns better with the GRI stakeholder engagement (e.g. further detail on how the Project engages with relevant stakeholders on the Theme) and management approach (e.g. policy, roles and responsibilities, management plans, reporting) disclosure requirements for each Sustainability Theme (material issue).

Number	Item	Finding	Recommendation
4	GRI Principle: Sustainability Context	It is noted that the GRI Principles mapped to each Sustainability Theme have not all been addressed in Appendix C. GRI Content Index; for example, GRI 204: Procurement Practices 2016 is listed as addressed by Section 5.3. Leadership, Governance and Culture, however it is not covered in Appendix C. GRI Content Index.	It is recommended that a check is conducted to ensure that all GRI Principles listed in Section 5 are covered in Appendix C.
5	Sustainability Performance Validation	In Appendix E. Sustainability Objectives and Targets; Table 13: Project sustainability themes, objectives, and targets - KPI B2.1e is the incorrect KPI for the Objective and Target.	Ensure correct KPI is displayed in Appendix E. Sustainability Objectives and Targets; Table 13: Project sustainability themes, objectives, and targets.
6	Sustainability Performance Validation	An incorrect target has been included in Section 5.5: Ecological Protection: 'CESP functional inspections conducted by the client. Minimise frequency of avoidable complaints.' This Target is not included in Appendix E. Sustainability Objectives and Targets; Table 13: Project sustainability themes, objectives, and targets.	Ensure correct KPI's and targets are displayed in Section 5.5, and in Appendix E. Table 13.
7	Sustainability Performance Validation	A duplicate target has been included in Section 5.6: Circular Economy: 'Procure products with ISC approved sustainability labels for 10% of total materials by cost.' This Target is not included in Appendix E. Sustainability Objectives and Targets; Table 13: Project sustainability themes, objectives, and targets.	Ensure correct KPI's and targets are displayed in Section 5.6, and in Appendix E. Table 13.
8	Contribution to the UN SDGs	The Report shows how the UN SDGs are considered within each Sustainability Theme and demonstration of the Project's positive contribution to the achievement of the SDGs has been provided. Demonstration of the Project's negative contribution to the achievement of the SDGs has not been provided, as all targets are reported as 'On Track to Achieve' or 'Currently Achieving	It should be assessed whether the Project has any negative contributions to the achievement of the SDGs and any negative contribution should be disclosed within the report.

6. Close-out Report (3 December 2025)

Table 6: Close-out of Findings/Recommendations

Number	Item	Finding	Recommendation	Project Response	Auditor Close-out remarks
1	GRI Principle: Balance	Negative performance or challenges experienced by the project have not been reported.	To ensure that the GRI Principle of Balance has been achieved, it is recommended that the project adds *'Challenges'* at the end of each Sustainability Theme reporting area to transparently communicate challenges/negative impacts and provide proposed/committed actions to be taken in next reporting period.	Recommendation implemented. Section 6 has been included to communicate challenges	Closed out: Updated content in Section 6.6 'Challenges' addresses the finding and recommendation.
2	GRI Principle: Completeness	Though it is stated that the material issues were identified as the most important in terms of significance of project context and risks, it is not clear the importance of these material issues to stakeholders, or how the validation process was undertaken with stakeholders. It is also not clear that internal stakeholder engagement disciplines were representative of external stakeholders.	The Project should consider providing further detail on the validation process undertaken with stakeholders to determine the importance of identified material issues. It should also be made clear that internal stakeholder engagement disciplines were representative of external stakeholders.	Recommendation implemented. Information on stakeholders engaged during the REFs is included in Section 3.3. Statement included in Section 5.2 to confirm themes, objectives and targets are representative of key matters discussed in Section 3.3	Closed out: Additions made to Sections 3.3 and 5.2 address the finding and recommendation.

Number	Item	Finding	Recommendation	Project Response	Auditor Close-out remarks
3	GRI Principle: Completeness	Sections 5.3 to 5.7 provide no disclosure of stakeholder engagement or the management and governance approaches for the Sustainability Themes, thus not meeting GRI disclosures for stakeholder engagement and management approach.	Adding titles for 'Stakeholder Engagement' and 'Management Approach' and more in-depth disclosure overview within each section on stakeholder engagement and management approach would ensure the Report aligns better with the GRI stakeholder engagement (e.g. further detail on how the Project engages with relevant stakeholders on the Theme) and management approach (e.g. policy, roles and responsibilities, management plans, reporting) disclosure requirements for each Sustainability Theme (material issue).	Recommendation implemented. Tables at the beginning of each theme have been updated to include management approach and stakeholder approach	Closed out: Additions made to Section 5 address the finding and recommendation.
4	GRI Principle: Sustainability Context	It is noted that the GRI Principles mapped to each Sustainability Theme have not all been addressed in Appendix C. GRI Content Index; for example, GRI 204: Procurement Practices 2016 is listed as addressed by Section 5.3. Leadership, Governance and Culture, however it is not covered in Appendix C. GRI Content Index.	It is recommended that a check is conducted to ensure that all GRI Principles listed in Section 5 are covered in Appendix C.	Recommendation implemented. GRI Standards listed in Appendix C now match those listed in Section 5. Appendix C now details how the Project complies with each GRI disclosure. (See Appendix C for a summary of updates).	Closed out: Changes made to Appendix C and Section 5 address the finding and recommendation.

Number	Item	Finding	Recommendation	Project Response	Auditor Close-out remarks
5	Sustainability Performance Validation	In Appendix E. Sustainability Objectives and Targets; Table 13: Project sustainability themes, objectives, and targets - KPI B2.1e is the incorrect KPI for the Objective and Target.	Ensure correct KPI is displayed in Appendix E. Sustainability Objectives and Targets; Table 13: Project sustainability themes, objectives, and targets.	Recommendation implemented. KPI B2.1e is KPI for the following themes: - Leadership, Governance, and Culture - Energy, Climate & Resilience - Circular Economy This KPI is now displayed in both Section 6 and Appendix E for these 3 themes. A description of KPI and target structure is included in Section 5.2 to explain the development of KPIs/targets	Closed out: Additions made to Section 5.2, Section 6 and Appendix E address the finding and recommendation.
6	Sustainability Performance Validation	An incorrect target has been included in Section 5.5: Ecological Protection: 'CESP functional inspections conducted by the client. Minimise frequency of avoidable complaints.' This Target is not included in Appendix E. Sustainability Objectives and Targets; Table 13: Project sustainability themes, objectives, and targets.	Ensure correct KPI's and targets are displayed in Section 5.5, and in Appendix E. Table 13.	Recommendation implemented. "Community Engagement and Stakeholder Management" KPI added to Appendix E Table 13 under the Environmental Protection theme, as it is used to monitor enviro complaint.	Closed out: Addition made to Appendix E under the Environmental Protection theme address the finding and recommendation.

Number	Item	Finding	Recommendation	Project Response	Auditor Close-out remarks
7	Sustainability Performance Validation	A duplicate target has been included in Section 5.6: Circular Economy: 'Procure products with ISC approved sustainability labels for 10% of total materials by cost.' This Target is not included in Appendix E. Sustainability Objectives and Targets; Table 13: Project sustainability themes, objectives, and targets.	Ensure correct KPI's and targets are displayed in Section 5.6, and in Appendix E. Table 13.	Recommendation implemented. KPI B2.1e 'Procure products with ISC-approved sustainability labels for 10 % of total approved materials by cost' has been added to Appendix E. It is now addressed in both Section 5.6 as well as in Appendix E.	Closed out: Additions made to Section 5.6 and Appendix E address the finding and recommendation.
8	Contribution to the UN SDGs	The Report shows how the UN SDGs are considered within each Sustainability Theme and demonstration of the Project's positive contribution to the achievement of the SDGs has been provided. Demonstration of the Project's negative contribution to the achievement of the SDGs has not been provided, as all targets are reported as 'On Track to Achieve' or 'Currently Achieving'.	It should be assessed whether the Project has any negative contributions to the achievement of the SDGs and any negative contribution should be disclosed within the report.	Recommendation implemented. Paragraph added in Section 5.1 to discuss negative contributions to the achievement of the SDGs. Noting impact is short-term, negligible and effectively managed through environmental management plans	Closed out: Addition made to Section 5.1 addresses the finding and recommendation.

7. Final Conclusions of Independent Review (3 December 2025)

Following the initial independent review of the Project's Annual Sustainability Performance Report, the findings register was provided to the Project. A meeting was held with the Project team on 28 November 2025 to discuss the Project's response to findings and recommendations and a Close-out Report was provided by the Project for auditor close-out. Based on the review of the Close-out Report and review of 'NWHA_Sustainability Performance Report_FY2025_Rev 04 ', all findings / recommendations / improvements have been appropriately closed-out within the Report.

The final conclusion is that the reported sustainability performance in 'NWHA_Sustainability Performance Report_FY2025_Rev 04 ' has been prepared, in all material respects in accordance with the principles of reporting in the Global Reporting Initiative (2021), based on the Project response and Auditor close-out remarks in *Table 6: Close-out of Findings/Recommendations*, and in relation to the overall procedures and tests performed against the GRI reporting principles to assess the content and quality of what has been reported.

Appendix A. Documents Reviewed

Document Reference	Information Reviewed
NWHA_Sustainability Performance Report_FY2025_Rev 03	Annual Sustainability Performance Report Financial Year 2024-2025
NWTH ISv2.1 Tracking Spreadsheet (12.8.25)	NWTH IS Tracking Register
J606 NWTHGP v2.1 D&AB_MaterialityAssessment_20241121_Verified 28.02.2025	NWTH IS Materiality Assessment & Scorecard
NWTH Initiatives Register (12.8.25)	NWTH Sustainability Initiatives Register
EPD Tracking Register	EPD Tracking Register
Procurement Register	Procurement Register
PBi Electricity Usage FY 24-25	Power Bi Electricity Usage Report FY 24-25
PBi Fuel Usage FY 24-25	Power Bi Fuel Usage Report FY 24-25
PBi Materials Usage FY 24-25	Power Bi Materials Usage Report FY 24-25
PPW Resource Usage reports FY 24-25	Project Pack Web Resource Usage Reports FY 24-25
PPW Subcontractor NGER & Sustainability Reports FY 24-25	Project Pack Web Subcontractor NGERs & Sustainability Reports FY 24-25
NWHA Resource Efficiency Strategy Rev 02.1 (12.8.25)	NWHA Resource Efficiency Strategy
NWHA REAP Rev 02 (12.8.25)	NWHA Resource Efficiency Action Plan
Climate and Natural Hazard Risk and Resilience Register	Climate and Natural Hazard Risk and Resilience Register
Climate Change and Natural Hazards Risk and Resilience Report	Climate Change and Natural Hazards Risk and Resilience Report
NWTH Flora and Fauna Assessment	NWTH Flora and Fauna Assessment
Flora-and-fauna-assessment-addendum	NWTH Flora and Fauna Assessment Addendum
Sydney Water Biodiversity Offset Guide	Sydney Water Biodiversity Offset Guide
NWTH Circular Economy Integration Workshop – invite	Invitation: NWTH Circular Economy Integration Workshop
NWTH WMP Rev 03 Final	NWTH Waste Management Plan
NWHA Office Waste Diversion Strategy	NWHA Office Waste Diversion Strategy
Project Wide Waste register V4 12.08.2025	Project Wide Waste Register
PPW Waste & recycling Report FY 24-25	Project Pack Web Waste & Recycling Report
Stakeholder Comms Chart	Stakeholder Complaints Register

Appendix E Sustainability Objectives and Targets

Table 16: Project sustainability themes, objectives, and targets

Theme	Objective	KPI	SMART Target	Monitoring	Reporting	Responsibility
Leadership, Governance and Culture	Promote a supportive and high-performing work culture that embraces behaviours contributing to sustainable and improved environmental outcomes and innovation.	(KPI B2.1) Target pathway – conservative pathway to achieve a 'Silver' rating (40 points), including credit criteria applicable to wastewater and Sydney Water processes.	Deliver an ISv2.1 Design and As Built rating achieving at least 40 points.	IS tracker metric: On track to achieve IS target.	Monthly reporting to AIMT & Sydney Water.	Sustainability Lead
		(KPI B2.1 d) Achieve ≥ 5 points for Innovation Credit.	Achieve ≥ 5 innovation points in the ISv2.1 Design and As Built rating.	IS tracker – Innovation credit metric: On track to achieve IS target.	Monthly reporting to AIMT.	Sustainability Lead
	Make supply-chain decisions that are sustainable and socially responsible.	(KPI B2.1 e) Procure products with ISC-approved sustainability labels for 10 % of total approved materials by cost.	Procure products with ISC-approved labels for 10 % of total materials by cost by end of As Built.	IS tracker – Rso-7 credit metric: On track to achieve IS target.	Monthly reporting to AIMT.	Sustainability Lead
Energy, Climate and Resilience	Best-practice energy-efficient processes and assets.	(KPI B2.1 b) Reduce construction Scope 1 and 2 carbon emissions and embodied carbon by 10–30 % vs verified base case.	Achieve 10–30 % reduction in Scope 1 & 2 and embodied carbon emissions vs agreed Base Case during construction.	Energy bills, meters, sub-consultant reports – metric: Energy consumption vs target.	Monthly reporting to AIMT.	Sustainability Lead
	Contribute to net-zero carbon for Sydney Water operations (Scope 1 & 2) and	(KPI B2.1 e) Procure 10 % of materials by cost with ISC-approved labels.	Procure 10 % by end of As Built; 20 % increase in electricity from	Project Pack Web and energy meters; renewable energy model.	Monthly reporting to AIMT.	Sustainability Lead

Theme	Objective	KPI	SMART Target	Monitoring	Reporting	Responsibility
	decarbonise supply chain (Scope 3).		renewables (construction only).			
		—	10 % reduction in material life-cycle impacts from Base Case.	ISC Materials Calculator model or equivalent.	Once at end of Design and As Built phases.	Sustainability Lead
	Take a systems approach to address climate-related risks and improve resilience.	Achieve min Level 1 for Res-1 and Res-2 in ISv2.1.	Achieve min Level 1 for Res-1 and Res-2 in Design and As Built.	IS tracker – Res-1 & Res-2 credits metric: On track to achieve IS target.	Monthly reporting to AIMT.	Sustainability Lead
Environmental Protection	Protect, restore and enhance natural and heritage assets.	(KPI B5.1) CESP functional inspections conducted by client.	Minimise frequency of avoidable complaints during delivery phase.	Record CESP inspections and avoidable complaints.	Monthly reporting to AIMT.	Stakeholder Lead
		Achieve min Level 1 for Eco-1 in ISv2.1.	Achieve min Level 1 for Eco-1 in Design and As Built.	IS tracker – Eco-1 : On track to achieve IS target.	Monthly reporting to AIMT.	Environment Lead
Circular Economy	Contribute to the decarbonisation of the supply chain (Scope 3 carbon emissions)	(KPI B2.1 e) Procure products with ISC-approved sustainability labels for 10 % of total approved materials by cost.	Procure products with ISC-approved labels for 10 % of total materials by cost by end of As Built.	IS tracker – Rso-7 credit metric: On track to achieve IS target.	Monthly reporting to AIMT.	Sustainability Lead
	Maximise resource value and support a circular economy through responsible	(KPI B2.1 a) Deliver Resource Efficiency Strategy and Plan aligned with ISv2.1 Rso-1	Deliver Resource Efficiency Strategy and Plan; Biochar	Biochar Strategy update metric: Delivery vs schedule.	Monthly reporting to AIMT.	Sustainability Lead

Theme	Objective	KPI	SMART Target	Monitoring	Reporting	Responsibility
	management of energy, water and materials and waste minimisation.	referencing Sydney Water Biochar Reuse Strategy.	reuse by June 2029.			
		(KPI B2.1 c) Achieve waste avoidance/diversion targets > 85 % spoil, 60 % office waste, 70 % other inert outputs.	Achieve 85 % spoil diversion, 60 % office waste diversion, 70 % other inert wastes.	IS tracker – Rso-4 credit; waste audits and provider reports.	Monthly reporting to AIMT.	Sustainability Lead
Customer and Community	Operate socially responsibly and engage stakeholders, customers and community for positive outcomes.	(KPI B5.1) CESP functional inspections conducted by client.	Minimise frequency of avoidable complaints during delivery phase.	Record CESP inspections and avoidable complaints.	Monthly reporting to AIMT.	Stakeholder Lead