



# NRW HOLDINGS PTY LTD SUSTAINABILITY REPORT FY22



We believe in applying and supporting **sustainable business solutions and practices** that create **real and lasting value** for our **stakeholders and society**.







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# A MESSAGE FROM THE SUSTAINABILITY COMMITTEE

On behalf of the Board of Directors, I am pleased to present you with NRW's second Sustainability Report (Report) for the year ended 30 June 2022.

NRW continued its strong business and operational performance throughout FY22 despite tough economic conditions. This success is reflective of our strong corporate values and our ability to deliver safe, efficient, and sustainable business outcomes to all stakeholders.

NRW remains committed to driving this success forward whilst focusing on creating positive outcomes for our people, communities, and of course, our environment.

Last year we made a number of commitments and statements about our journey ahead. I am pleased with the progress NRW has made to further its environmental, social and governance (ESG) initiatives in FY22, and the continued commitment of the Company to improving our reporting practices.

We continued to review our company-wide approach to sustainability throughout FY22 and are expanding our remit and framework accordingly. We have taken active steps to ensure that we meet our environmental, social and governance obligations by implementing and driving several ESG initiatives this year including:

- Development of our internal sustainability strategy and work program to support sustainable value creation. The strategic plan has received Sustainability Committee endorsement and Board approval and focuses on material issues relevant to us and our stakeholders, including the identification of specific sustainability metrics and targets which we look forward to sharing with stakeholders over time.
- The appointment of Brett McIntosh – Executive General Manager – Health, Safety, Environment and Sustainability, and Tanya Eales – Executive General Manager – People & Culture. Both Brett and Tanya will be pivotal to furthering our ESG program.
- Completion of our first materiality assessment to validate our material economic, social, environmental and governance related issues relevant to our business and our stakeholders. The results of the survey validated the work done in FY21 and allowed our business to set priorities with regard to our ESG matters and identify ESG areas that will underpin our future strategic development and planning.

- Continued support to our clients including various investments and partnerships to further the objectives of a low carbon economy.
- Prioritising our workforce which we recognised as pivotal on the back of the tight labour market currently being experienced Australia wide. NRW has a renewed focus on psychosocial health initiatives to support mental health amongst the workforce and made a conscious effort to bolster training programs with a record number of Apprentices employed and the continued upskilling of employees through the NRW Training Centre.
- A continued commitment to supporting our communities as we work towards a more sustainable future, including business partnering with IronMerge, continued alignment with not-for-profit group GIVIT and involvement in various health awareness events and charitable giving throughout the year.

In addition, and in light of the recent 'Enough is Enough' inquiry into sexual harassment against women in the FIFO mining industry, NRW has taken several steps to ensure we remained focused on creating a strong workplace culture that includes zero tolerance towards sexual harassment. These steps included employee engagement to understand our workforce attitudes and experiences and have culminated in an agreed action plan which received executive support for roll out to our businesses. NRW's position is clear – sexual harassment is not tolerated anywhere, including within our workplace.

We noted in FY21 that our approach to ESG reporting may be adapted as international reporting frameworks further develop. Whilst we continue to monitor these developments, including the work of the International Sustainability Standards Board and its impact on Australian reporting guidelines, the reporting framework established in FY21 has proven a solid foundation for our current year Report, and remains unchanged.

I believe our ongoing drive and commitment to operating a sustainable business is reflected in this report and demonstrates to our stakeholders how our business values ESG matters.

I would like to thank all our stakeholders for their continued commitment to our journey.

**Fiona Murdoch**  
Chair Sustainability Committee

# SUSTAINABILITY SNAPSHOT

Aligned disclosure to the TCFD Recommendations	✓	Reporting in accordance with the GRI Standards	✓
Stakeholder Materiality Assessment Completed	61% response rate 75 surveys completed	Appointment of Brett McIntosh – Executive General Manager HSE & Sustainability	✓
Projects currently under the Infrastructure Sustainability Council's IS Rating Scheme	Four	Forrestfield Airport Link Project's Infrastructure Sustainability Council's IS Design Rating	Excellent Design v1.0 IS Rating

## ENVIRONMENT

Emissions Intensity <sup>1</sup> (Scope 1 + Scope 2) (tCO <sub>2</sub> -e/\$m AUD)	4.33 ↓	Energy Intensity <sup>1</sup> (GJ/\$m AUD)	50.5 ↓
Environmental Breaches or Fines	Nil	Published our Climate Position Statement	✓

## SOCIAL

Total Workforce as at 30 June 2022	7,261 ↗	Female Workforce Participation Rate	15.65% ↗
Apprentices Onboarded	Over 200 ↗	NRW Civil & Mining Diversity & Inclusion Survey – Employee Participation	75%

## GOVERNANCE

Cyber security review completed and findings reported to the Audit & Risk Committee	✓	Sustainability Committee Charter updated to include oversight of climate related strategy	✓
Identified actual or potential breaches of legal or regulatory frameworks	Nil	Australian Taxation Office's Justified Trust review program completed	High Assurance
Board and Committee Member attendance at meetings	100%		

(1) Intensity calculated with reference to total group revenue (\$Ms)

## OUR PRIORITY SUSTAINABLE DEVELOPMENT GOALS (SDGs)





# ABOUT THIS REPORT

## REPORT PURPOSE

This Sustainability Report (Report) discloses a summary of NRW's material sustainability topics and performance information for the financial year 1 July 2021 to 30 June 2022 (FY22). NRW adopts an annual reporting cycle in line with our audited annual financial reporting. The purpose of this Report is to demonstrate how NRW is managing its environmental, social and governance risks and opportunities to deliver sustainable shareholder returns on an annual basis.

This Report forms part of NRW's Annual Report to demonstrate the interconnectivity and interdependency of sustainability, remuneration and financial performance. It also enables the Company the ability to integrate, across the whole report, the concept of creating value for its stakeholders – including shareholders, clients, employees and the communities in which it operates.

This Report should be read in conjunction with NRW's Annual Financial Statements and other periodic announcements lodged with the Australian Securities Exchange (ASX), including the Annual Financial Statements and Corporate Governance Statement, all of which are available on the NRW website ([www.nrw.com.au](http://www.nrw.com.au)) and the ASX platform.

## REPORT COVERAGE

NRW Holdings Limited (ACN 118 300 217) is the parent entity of the NRW group of companies, and its shares are listed on the ASX (ASX Code: NWH). In this Report, unless otherwise stated, references to 'NRW', the 'Company' or 'NRW Group' refer to NRW Holdings Limited and its wholly owned subsidiaries listed on pages 74 – 75 of NRW's Annual Financial Statements for the year ended 30 June 2022 (2022 Annual Financial Statements) released to the ASX on 18 August 2022.

NRW's operations are primarily based in Australia, with an office in Canada (engaging approximately 30 employees) to support its North American operations. The Report is limited to the ESG impacts of the Australian operations only, due to the early phase of operational involvement overseas.

**NRW is predominantly a contract service provider and does not own the mining tenure or resources on which we operate. As a result, NRW generally has limited operational control over the mines on which it operates, with this responsibility generally resting with our clients (usually, the mine owners).**

## REPORT FEEDBACK

Please forward any comments or requests for further information to:

**Email:** Jasmyn Wardell-Johnson  
([jasmyn.wardell-johnson@nrw.com.au](mailto:jasmyn.wardell-johnson@nrw.com.au))  
**Post:** PO Box 592 Welshpool WA 6986

## REPORTING FRAMEWORKS

The Company has chosen to publish its sustainability information in accordance with elements of the following standards and frameworks. Over recent years there have been significant developments aimed at better quality and more consistent sustainability reporting. NRW will continue to monitor these developments and may adapt its reporting approach as needed in the future.

### UNITED NATIONS (UN) SUSTAINABLE DEVELOPMENT GOALS (SDGs)



The UN SDGs are increasingly being used to guide reporting. Throughout this Report, NRW has highlighted where it considers its activities align with, and support, the SDGs. For a more comprehensive look at how our activities align with, and support, the SDGs please see our SDG Index on the Sustainability Section of our website.

### GLOBAL REPORTING INITIATIVE STANDARDS



Last year, NRW committed to reporting in accordance with the Global Reporting Initiative (GRI) Standards as part of its Sustainability Reporting Plan. We are pleased to have delivered on this commitment and confirm that the FY22 Report that follows has been prepared in accordance with the GRI Standards. Our approach is guided by the GRI's principles for informing report content: materiality, completeness, context and stakeholder inclusiveness. Please see the GRI Reporting Index published on the Sustainability Section of our website.

### TASKFORCE FOR CLIMATE RELATED FINANCIAL DISCLOSURE RECOMMENDATIONS



NRW reports for the first time in line with the TCFD recommendations under the headings of Governance, Strategy, Risk Management, and Metrics and Targets. The Company acknowledges its climate-related disclosures are evolving, and through a phased approach will work towards increased disclosure under the TCFD Reporting Framework in the future. Please see TCFD Recommendations Reporting Index on the Sustainability Section of our website.

# SUSTAINABILITY AT NRW

NRW is committed to contributing to a sustainable future through responsible business practices that deliver economic returns for our shareholders, provide employees with a safe and inclusive workplace, create value for the communities in which we operate and respect the environment. We believe in applying and supporting sustainable business solutions and practices that create real and lasting value for our stakeholders and society. How NRW achieves this objective will evolve through active engagement in innovation, progressive industry 'best practice' and government direction and legislation.

Although NRW does not own the resources or infrastructure projects on which we operate, we are committed to supporting, and where appropriate, partnering with our clients to enhance their sustainability objectives.

These objectives include employment targets which align with community and industry expectations such as diversity, safety benchmarks, adherence to environmental standards and climate-related initiatives to reduce or limit greenhouse gas emissions whilst on site. Within the facilities that we do manage, including workshops and offices, we are committed to addressing the environmental and social impacts of these operations in a sustainable manner.

## OUR FRAMEWORK

It is NRW's mission to be the 'contractor of choice'. To fulfil our mission, NRW recognises the need to challenge ourselves to continue to improve our performance on key sustainability metrics and to invest in the area of sustainability. Ultimately, the way our business performs its work is integral to delivering products and services to standards above industry expectations. We believe this is critical to creating long-term sustainable value for our stakeholders.

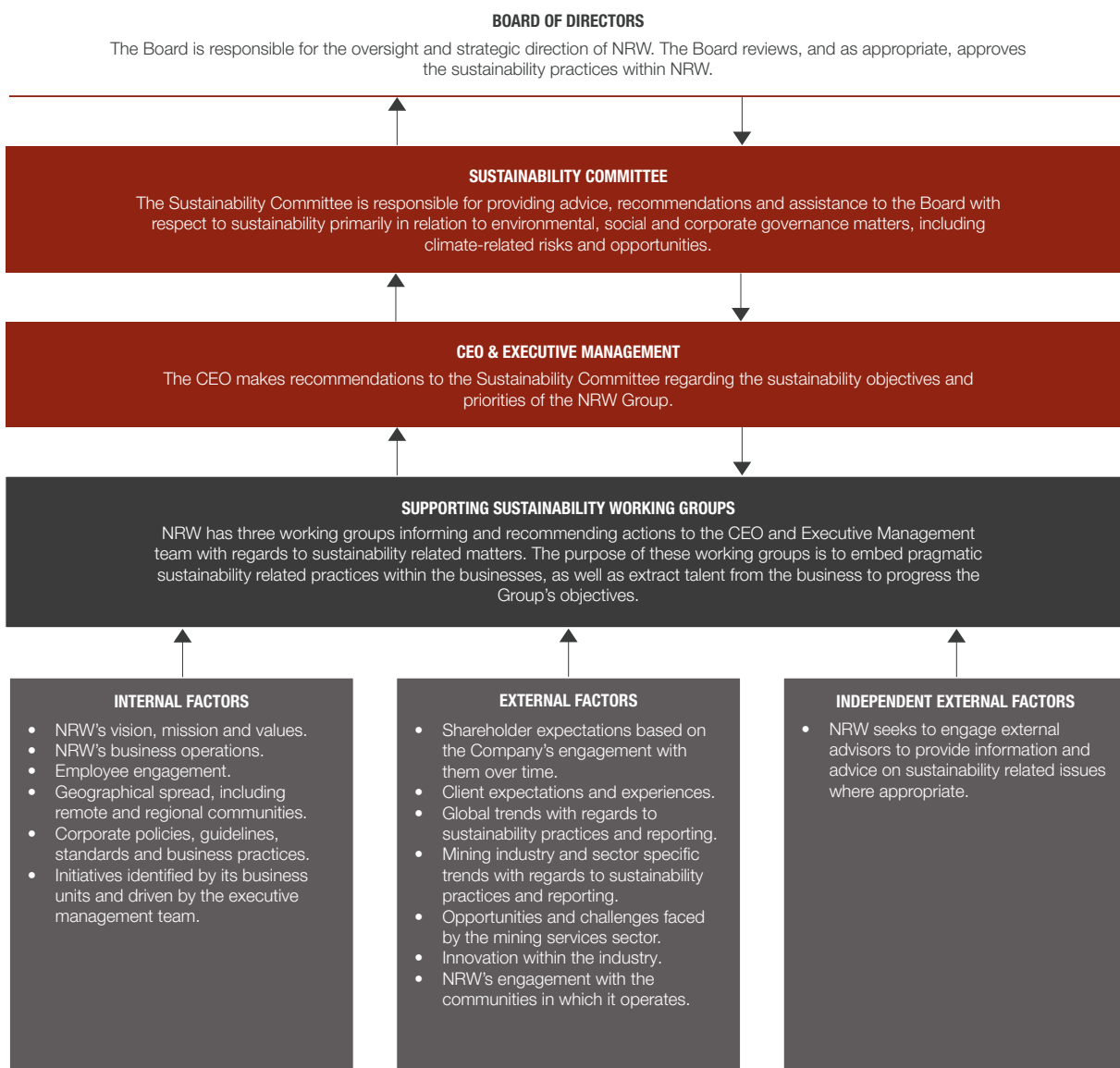


NRW recognises that **responsible environmental and social management** in the resources and infrastructure sectors plays a significant role in ensuring **sustainable outcomes** for the business and the planet.

# SUSTAINABILITY AT NRW CONTINUED

## OUR GOVERNANCE STRUCTURES

NRW's sustainability objective is central to our operation as a responsible business. NRW has set up its governance structures to ensure pragmatic sustainability practices are embedded within our organisation, starting with our Board. The Board delegates responsibility to the Sustainability Committee to review and set the objectives and targets of all ESG initiatives within the Company, and to monitor subsequent performance. The Sustainability Committee has determined the remit of directors and key executives with regards to the ESG matters for which they are accountable.



In accordance with the Charter of the Sustainability Committee, the Committee must have a minimum of three members, all of which must be Non-Executive Directors and the majority of which must be independent Directors. The Committee met three times during FY22 with all members in attendance.

The Committee comprises the following members:

<b>Fiona Murdoch</b>	Chair and Independent Non-Executive Director
<b>Peter Johnston</b>	Independent Non-Executive Director
<b>Michael Arnett</b>	Independent Non-Executive Director

Please find a copy of all available corporate governance documents referred to within the Report on the NRW website ([nrw.com.au/about-us/corporate-governance](http://nrw.com.au/about-us/corporate-governance)).







# SUSTAINABILITY AT NRW CONTINUED

## OUR APPROACH

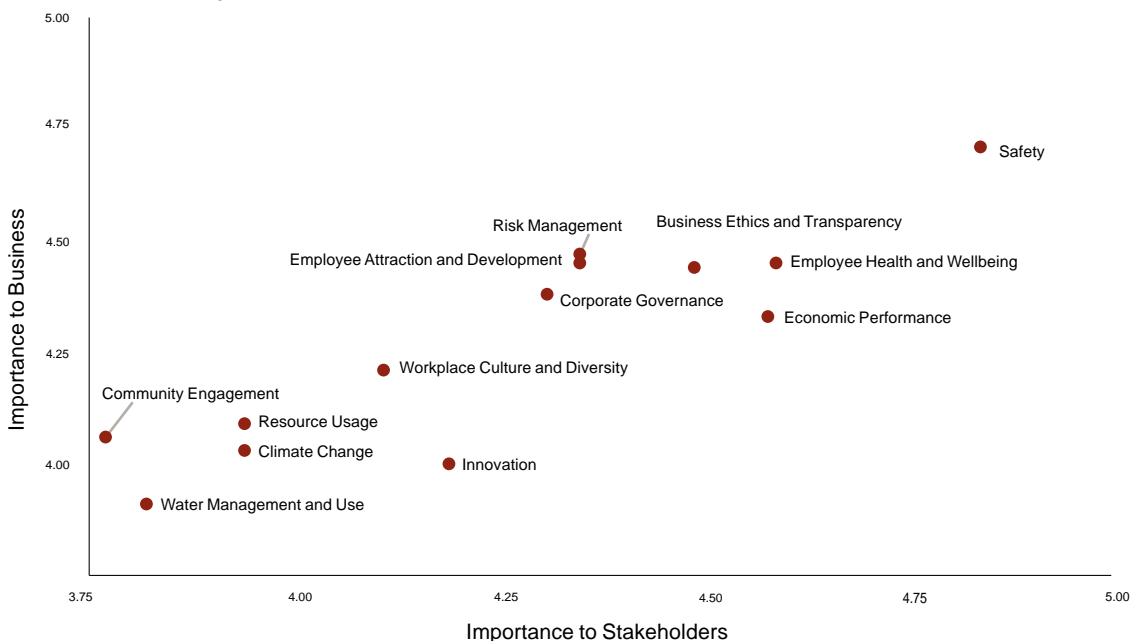
NRW is committed to reporting our sustainability performance annually and consistently improving our data and information collection processes to ensure better quality insights. As part of this commitment, NRW undertook a series of exercises to ascertain the topics that are most material to our business.

NRW applies GRI Reporting principles for informing report content by undertaking a thorough review process to understand our material sustainability topics. We did this by undertaking a materiality assessment which sought external validation of our material topics from stakeholders to ensure internal assessments are sufficiently reflective of stakeholder views with regards to ESG matters. In recognition of our operating model, the materiality exercises were conducted at the level of each of our operating businesses and results were aggregated to reflect areas most topical to the Group.

We received a total of 75 responses (a 61% response rate) from our materiality assessment, covering a broad range of stakeholders (internal and external), across all our business units. We are satisfied that the cohort surveyed was sufficiently representative of our stakeholder group, and therefore the results are representative of stakeholder sentiment. Our approach to the materiality assessment is shown below.

<p><b>Identification</b></p> 	<p>A list of potential material topics was compiled using a comprehensive range of inputs including our understanding of material risks and stakeholder expectations, peer (desktop) reviews, and global and industry trends. Whilst some topics were provided to ensure consistent prioritisation of potential core areas, the surveys allowed for open-ended responses to allow a full range of potential sustainability-related topics to be uncovered. In addition to topic prioritisation, NRW also sought stakeholder feedback on potential ESG risks and opportunities that may affect NRW's operations.</p>
<p><b>Prioritisation</b></p> 	<p>The materiality exercises were informed through consultation with a wide range of internal and external stakeholders, including operations, executives, suppliers, investors, clients and limited community groups. A representative sample of each of these groups of stakeholders was identified and contacted to complete a survey, providing quantitative data on the relative priority of the material topics. Material topics were then prioritised using two key dimensions: importance to the business (internal stakeholders), and important to our stakeholders (external stakeholders).</p>
<p><b>Validation</b></p> 	<p>Senior leaders within the Company reviewed and validated the outcomes of the exercises, and their input has helped define the material issues outlined in this Report. While the material topics are substantially similar to those identified in the prior year, some of the topics have been updated based on stakeholder feedback and our continuing alignment with the GRI Standards.</p>
<p><b>Action</b></p> 	<p>In undertaking the materiality exercises in FY22 NRW can now better understand the context to inform sustainability actions within the Company moving forward. The outcomes, which validated the initial work undertaken in FY21, will be used to guide the Company in refining and prioritising the identified material topics and will inform the future long-term action plan to achieve our sustainability objective.</p>

NRW is committed to undertaking a stakeholder materiality assessment every second year, or when the business or operating environment has materially changed and a new stakeholder assessment is warranted. The results of the assessment are shown below, noting participants were asked on a scale of 1 – 5 to rate the importance of NRW's material topics, 5 being 'material'.



# SUSTAINABILITY AT NRW CONTINUED

## STAKEHOLDER ENGAGEMENT

Across our businesses and at the Group level, a wide range of stakeholders is consulted with. NRW's business operations directly impact a wide range of stakeholders. Therefore, what is important to our stakeholders is important to the Company. This is how NRW engaged with its stakeholders during FY22.

### Shareholders



*NRW is focused on creating sustainable long-term value creation for its shareholders. Shareholders consist of institutional and retail investors.*

#### Areas of Interest

- Financial performance
- Business strategy
- Business ethics
- Governance and risk management

#### Method of Engagement

- Annual General Meeting
- Investor calls and presentations
- Distribution of price-sensitive information to shareholders via the ASX
- Responses to regular investor, analyst and media enquiries

### Clients



*NRW is committed to supporting its clients through successful project delivery. Clients range from large listed organisations, government departments to medium sized private entities.*

#### Areas of Interest

- Health, safety and wellbeing practices
- Project delivery, including product/service quality and pricing
- ESG practices
- Supply chain management
- Innovation

#### Method of Engagement

- Delivery of contract products and services
- Early Contractor Involvement opportunities
- Tendering opportunities and submissions which include provision of company safety, environmental and social performance
- Business networking events to develop long-lasting relationships

### People



*NRW values the health, safety and wellbeing of its workforce above all else, and strives to provide a workplace culture that recognises and values diversity and inclusiveness. NRW's workforce is large and diverse, engaging 7,000 people Australia wide.*

#### Areas of Interest

- Health, safety and wellbeing practices
- Diversity and inclusiveness
- Training and development
- Remuneration practices
- Innovation

#### Method of Engagement

- Active communication through the NRW intranet, newsletters and toolbox meetings (for site and workshop employees)
- Important alerts via email and notice-board signage
- Training and development opportunities where these opportunities provide meaningful personal and professional development (for example through the NRW Training Centre)

### Communities



*NRW's long-term success depends on the wellbeing and development of the communities in which it operates. NRW maintains head offices in Perth and Brisbane, as well as other offices in local and regional areas across Australia.*

#### Areas of Interest

- Level of community engagement
- The direct economic impacts of the business on the community
- Environmental impact of business operations

#### Method of Engagement

- Targeted recruitment of a local workforce where the required skills and expertise are available
- Prioritisation of spend with local vendors, particularly in remote and regional areas of operation
- Adoption of First Nations People participation plans
- In-kind and financial contributions to support community initiatives

### Other Stakeholder Groups



*This includes suppliers, contracting partners, government agencies and other regulatory bodies.*

#### Areas of Interest

- Supplier terms and conditions
- Governance and risk management
- Climate related disclosure
- Regulatory compliance

#### Method of Engagement

- Supplier pre-qualification process
- Joint venture board and committee meetings
- Responding to requests from government agencies and other regulatory bodies

# SUSTAINABILITY AT NRW CONTINUED

## MATERIAL TOPICS

The topics identified below represent the material topics assessed as relevant to the NRW Group through our stakeholder consultation process. These material topics have been mapped to the SDGs to highlight how NRW's activities can support sustainable development. The Report that follows provides further information about each material issue and how NRW, as a business, manages them in line with its sustainability objective.

Material Topic	Definition	Page
<b>Environment</b>		
Climate Change	Considering and responding to climate related risks and opportunities, including managing NRW's contribution to climate change by reducing greenhouse gas emissions, where possible, from energy use.	16
Resource Use	Reducing the amount of inputs and outputs consumed by our operations through avoidance, reuse and recycling.	20
Water Management and Use	Managing the sustainable use of water through reducing and recycling water use from operations.	20
Innovation	Becoming a market leader through investing in technical innovation.	21
<b>Social</b>		
Safety	Maintaining a high safety standard and culture throughout the organisation and being accountable for safety performance.	26
Health and Wellbeing	Supporting the mental and physical wellbeing of our people at all times.	27
Employee Attraction and Development	Attracting and retaining a skilled workforce by establishing NRW as an employer of choice within the industries and sectors in which it operates and providing its workforce access to training and education to facilitate personal and professional development opportunities.	28
Workplace Culture, Diversity and Inclusiveness	Embedding a strong corporate culture underpinned by NRW's values and creating a diverse and inclusive workplace where employees have a positive attitude and feel valued.	30
Community Engagement	Supporting the communities in which NRW operates through partnerships, sponsorships, donations, training and employment opportunities.	32
<b>Economic</b>		
Economic Performance <sup>1</sup>	Demonstrating economic strength, strong operational efficiency and financial performance in line with expectations.	
<b>Governance</b>		
Corporate Governance	Adopting good corporate governance practices and remaining in compliance with its obligations to industry, government and other regulators.	38
Business Ethics and Transparency	Expecting all employees to act lawfully, ethically and responsibly at all times. This includes engaging with suppliers and contractors to mitigate the risks of, for example, modern slavery within supply chains.	40
Risk Management	Implementing risk management practices across the organisation to identify, assess and manage risks, including non-financial risks, that can materially impact the business's sustainability outcomes.	42

(1) NRW assesses and manages financial and operational risk within the business's broader risk management processes, commentary on which is included within the Annual Financial Statements.



NRW understands that **responsible environmental management** in the resources and infrastructure sectors plays a significant role in ensuring its **long-term viability**.







# ENVIRONMENT



# ENVIRONMENT

## OUR OPERATING ENVIRONMENT AND INDUSTRY TRENDS

NRW's mining division operates within the capital and carbon-intensive mining services sector. The Company understands that the industry in which it operates, and therefore its work has an impact on the climate. Climate change is a rapidly evolving challenge for organisations in all sectors. As the impact of climate change starts to become apparent, there are increasing calls for emissions cuts, and in response the political, legal, regulatory investment and business environments are evolving at an increasing pace. Organisations in all sectors now must navigate evolving reporting requirements, increasing stakeholder expectations, and the transition to a low-carbon economy, creating both risks and opportunities alike.

NRW recognises that all sectors will be exposed to the transition to a low-carbon economy. Whilst proposed low-carbon pathways share a common focus of driving reduced GHG emissions, sectors with high intensity GHG emissions, such as mining and mining services, are facing increased pressure from stakeholders to find solutions in the short to medium term time frames. In acknowledging this shift, NRW is committed to partnering with leading organisations to further the development of low-carbon solutions that are relevant and practical to our business's operations.

In addition to Climate Change considerations, Australia's mining and mining services sector is committed to the protection and restoration of our unique environment and national heritage values. In addition to strict regulatory requirements, currently under review by the Australian Government in response to the "State of the Environment Report" released in July 2022, the industry is evolving to undertaking a range of voluntary conservation activities and partnering with local communities and First Nations people to support enduring environmental outcomes. The programs, supported by the mining services sector, extend well beyond the mine to surrounding regional areas. NRW acknowledges that mining and infrastructure projects can generate a large amount of waste, can require large amounts of water and without appropriate mitigating controls, can have the ability to impact water quality offsite and within the broader environment. NRW is committed to a partnership approach, where we work with our clients and stakeholders to make these conservation activities a reality.





# ENVIRONMENT CONTINUED

## OUR STRATEGY AND MANAGEMENT APPROACH

The effective management of our environmental aspects and impacts is fundamental to NRW's approach to the delivery of our services. NRW is committed to managing our obligations to the environment in a responsible manner and to mitigating the impact of our activities on the natural environment.

We do this by continually striving to improve the sustainability of our operations by developing and implementing environmental systems, strategies and plans to minimise harm to the environment, meeting our environmental compliance obligations, and engaging, where required, environmental professionals to monitor compliance with these obligations and encourage positive behaviour and high-quality outcomes.

We recognise that our approach to the environment impacts NRW's reputation, business value and ultimately shareholder returns. Our environmental approach and commitments are outlined in the following documents:

- Group Sustainability Policy
- Group Climate Position Statement
- Business-specific Environmental Policies
- Business-specific Corporate Social Responsibility Policies

These policies are critical to ensuring our employees and broader stakeholder groups are engaged with and aware of NRW's environmental commitments.




We place significant emphasis on ensuring effective controls are implemented through our business and continuous improvement through lessons learned to sustain the natural environment. We do this through NRW's environmental management systems (accredited to AS/NZ ISO 14001:2015) which provide the foundation for consistent delivery of the highest level of environmental management across projects. These systems ensure a consistent approach to identifying and controlling environmental hazards and risks and monitoring our environmental performance across the entire organisation.

Every project NRW undertakes involves careful environmental planning from project inception to the operational stages to identify environmental obligations and to set management procedures.

However, NRW has relatively low 'operational control' over a substantial amount of our emissions and project-specific environmental plans which include water management and resource use. Instead, these are controlled by our clients, the owners of the mining tenure and accompanying resources. Generally, NRW's operations are under the direction and control of our clients, including a requirement to work in accordance with the site policies, health and safety practices and environmental management plan.

Within the facilities that we do manage, including workshops and offices, we are committed to addressing the environmental impacts of these operations in a sustainable manner.

## ENVIRONMENTAL-RELATED MATERIAL TOPICS AND PRIORITY SDGs

Material Topic	Priority SDG	Priority SDG Indicator
Climate Change	SDG 13 – Climate Action	 Sub-goal 13.1: strengthen resilience and adaptive capacity to climate-related hazards and natural disasters in all countries
Resource Use		
Water Management and Use		
Innovation	SDG 8 – Decent Work and Economic Growth	 Sub-goal 8.2: achieve higher levels of economic productivity through technological upgrading and innovation, including through a focus on high-value added and labour-intensive sectors
	SDG 9 – Industry, Innovation, and Infrastructure	 Sub-goal 9.1: develop quality, reliable, sustainable and resilient infrastructure, to support economic development and human well-being

# ENVIRONMENT CONTINUED

## CLIMATE CHANGE

### MANAGING CARBON EMISSIONS

Responding to the challenges presented by climate change, including the physical and transitional risks associated with moving to a low-carbon economy, is critical to our ability to operate sustainably. NRW is committed to reducing our impact on the climate and providing transparent reporting in regard to our climate related disclosures.

As stated in NRW's climate position statement, we acknowledge that climate change is one of the significant issues that will impact the long-term prosperity of the global economy and our way of life. As a business, we seek to operate across a range of commodities, including critical minerals important for the world's transition to low-carbon energy. A key challenge for us is the effective management of our carbon-related activities and the implementation of strategies to reduce our GHG emissions.

As a contractor to the civil, resources and infrastructure sectors, NRW's mine site GHG emissions typically increase or decrease proportionally in line with the contracted workload. NRW has determined its GHG emissions boundary using the definition of 'operational control' as prescribed by the National Greenhouse and Energy Reporting Act 2007 (NGER Act). The NGER Act introduced a single national framework for the reporting of Greenhouse Gas (GHG) emissions, energy use and energy consumption.

In accordance with the NGER Act, NRW is not required to include Scope 1 and Scope 2 GHG emissions on sites where it does not have 'operational control' of 'facilities'. However, we are required to report this data to the entity that does have operational control for inclusion in their NGER assessment, data which NRW provides to clients in monthly environmental reports. This concept is consistent with how NRW internally tracks, manages and reports on GHG Emissions.

NRW has areas of its business with Scope 1 and Scope 2 GHG Emissions, including a heat treatment facility, workshops, office buildings, transport-related emissions (pre-entry to site), and company vehicles. NRW does not currently exceed the legal threshold for reporting GHG Emissions under the NGER Act, however our FY22 GHG Emissions have been disclosed within the Performance Data Tables. NRW did not experience a material increase or decrease in emissions intensity in FY22 compared to FY21. The slight decrease in energy intensity during FY22 was due to our Welshpool heat treatment facility drawing less pipeline natural gas due to operational requirements.

During FY22, NRW began work to chart our Group's transition and pathway to emissions reduction through the formation of the Decarbonisation Working Group. The purpose of this group is to formulate and execute a strategy that maps the Company's pathway to a practical and appropriate level of decarbonisation for the business. Work will initially focus on reducing the Group's Scope 1 and Scope 2 emissions.

#### Carbon Reduction Initiatives

We will continually seek improvements in energy efficiency across our business to reduce the carbon intensity of our operations and minimise the impact on the environment. We are committed to doing this through a focused effort on business partnering opportunities.

#### INITIATIVES AND ACTION

##### Staggered Solar Powered System Roll Out Across the Business

NRW Group has been continually assessing our ability to roll out solar powered systems across our offices, workshops and facilities, in conjunction with and subject to landlord discussions and approvals. At this stage, we have an in-principle agreement to install a 99kWp Solar Powered System at one of our Hazelmere workshops, and another designed 99kWp solar roof installation at our Head Office.

NRW recognises the benefits of these transitional steps towards the wider adoption of renewable energy across the business. For example, DIAB Engineering's solar powered system on the Geraldton workshop produced approximately 110Mwh in the last twelve months reducing our carbon emissions by 110t.

##### NRW Civil and Mining Consider Carbon Emissions in Equipment Purchasing

A key element of NRW Civil and Mining's new equipment purchase assessment and selection criteria considers the environmental impacts of operating assets over their economic life cycles.

NRW Civil and Mining recently purchased two 600 tonne face shovels for its Karara project. These shovels incorporate the latest energy conservation technologies that are expected to reduce carbon emissions by up to 15% over the previous model. This is an estimated seven thousand tonne reduction in carbon emissions over the contract term. This upgrade and subsequent GHG Emission saving directly benefits our client, who reports on the project's GHG Emissions under the NGER framework.

##### NRW Civil and Mining Change Out of Transport Fleet

NRW has purchased two new prime movers to join the transport and logistics fleet. These new trucks have replaced ageing fleet, and more importantly have new fuel-efficient technology that has reduced fuel burn by 18% over the previous model.

# ENVIRONMENT CONTINUED

## TASKFORCE FOR CLIMATE RELATED FINANCIAL DISCLOSURE

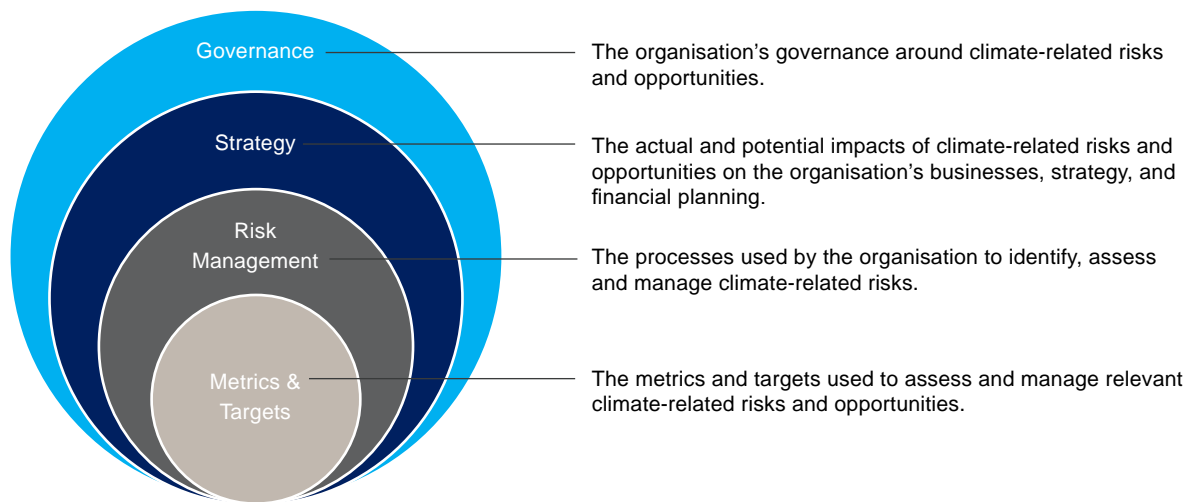
In FY21, NRW committed to adopting a phased approach to the TCFD Recommendations. In this report, NRW reports for the first time in line with the TCFD recommendations under the headings of Governance, Strategy, Risk Management, and Metrics and Targets.

The Financial Stability Board established the industry-led TCFD to develop a voluntary, consistent, climate-related financial disclosure framework for use by companies in providing information to investors, lenders, insurers and other stakeholders.

The TCFD developed four widely adoptable recommendations on climate-related financial disclosures that are applicable to organisations across all sectors.

These disclosures allow for more effective risk assessments, better-informed capital allocation decisions and better strategic planning with regards to climate. The TCFD structured its recommendations around four thematic areas that represent core elements of how organisations operate: Governance, Strategy, Risk Management and Metrics and Targets.

## CORE ELEMENTS OF RECOMMENDED CLIMATE-RELATED FINANCIAL DISCLOSURES



NRW is utilising the TCFD Recommendations as the key driver not only to improve climate-related disclosure, but for integrating climate risk management into company practices. Consequently, and as outlined in FY21, NRW is planning to adopt a phased approach to implementing the TCFD Recommendations, as shown below.

NRW's internal expertise in the area of climate related risks is developing. NRW has aligned our climate-related disclosures with the TCFD Recommendations.

By aligning to the TCFD Recommendations, NRW has a clear structure for assessing climate-related risks and opportunities, and integrating these risks and opportunities into our strategic decision making. Our actions in FY22 focused on alignment with the Governance recommendations. It is expected that actions in FY23 will address Risk Management and Strategy, with further alignment to Metrics and Targets expected in FY24 and beyond.

Identify & Plan	Update & Integrate	Adopt & Implement
<i>Define governance and management of climate-related risks.</i>	<i>Update corporate policies and integrate climate-related processes.</i>	<i>Set metrics and targets for climate-related disclosure and perform scenario analysis.</i>
<ul style="list-style-type: none"> <li>Define how climate-related risks and opportunities will be governed and managed within the business.</li> <li>Set corporate strategy and risk appetite with respect to climate-related risks.</li> <li>Identify industry best practice and relevant benchmarks, and perform a gap analysis.</li> <li>Perform a high level climate-related risk assessment.</li> </ul>	<ul style="list-style-type: none"> <li>Update corporate policies to reflect governance and management frameworks.</li> <li>Integrate climate-related risk assessments into enterprise wide risk management frameworks.</li> <li>Assess climate-related risks and opportunities against business policies and procedures.</li> </ul>	<ul style="list-style-type: none"> <li>Set metrics and targets for the business to guide and measure climate-related performance.</li> <li>Perform scenario analysis to test business resilience.</li> <li>Integrate results into strategic business planning.</li> </ul>



# ENVIRONMENT CONTINUED

## TASKFORCE FOR CLIMATE RELATED FINANCIAL DISCLOSURE

TCFD Recommendation	NRW Approach	Our Progress
<b>GOVERNANCE</b> <i>Disclose the organisation's governance around climate-related risks and opportunities.</i>		
<p>Describe the Board's oversight of climate-related risks and opportunities</p>	<p>The NRW Board is responsible for the oversight of the strategic direction across NRW. The Board has delegated responsibility for ESG matters, including climate-related topics, to the Sustainability Committee. Together, NRW's Board and Sustainability Committee oversee the governance of climate-related risks and opportunities.</p> <p>In accordance with the Sustainability Committee Charter (<a href="https://nrw.com.au/about-us/corporate-governance/">https://nrw.com.au/about-us/corporate-governance/</a>), the Committee is responsible for making recommendations to the Board regarding the Company's climate change strategy, providing oversight to ensure both physical and transitional climate-related risks and opportunities which affect the Company's ability to achieve its objectives are identified, assessed and where relevant, mitigated, and agreeing and monitoring climate-related metrics and targets. This includes oversight of a climate change strategy that maps the Company's pathway to a practical and appropriate level of decarbonisation for the business. The Committee reports to the Board periodically throughout the year on NRW's climate-related activities.</p> <p>The Sustainability Committee endorses policies that are relevant to the Company's management of climate-related risk, sustainability, and other key topics. The Sustainability Committee also oversees the management of specific climate-related risks and opportunities through regular review of global best practice, internal compliance programs and relevant sustainability frameworks.</p>	<ul style="list-style-type: none"> <li><input checked="" type="checkbox"/> Updated Committee Charter to reflect 'climate-related' risks and opportunities</li> <li><input checked="" type="checkbox"/> Three Committee meetings held during FY22 with all members in attendance</li> <li><input checked="" type="checkbox"/> On recommendation from the Committee, the Board endorsed NRW's Climate Position Statement</li> </ul>
<p>Describe management's role in assessing and managing climate-related risks and opportunities</p>	<p>The NRW executive team is responsible for the strategic and operational leadership and management of the Company, which includes the management of climate-related risks and opportunities. The Executive General Manager – Health, Safety, Environment and Sustainability (EGM – HSES) is charged with coordinating and updating the Board and Committee on management's progress and activities in this regard at each Committee Meeting.</p> <p>Supporting the EGM – HSES is the Sustainability Working Group. This Group consists of cross-functional members and contains representation from each of our business units. The Group meets monthly. Climate-related risks and opportunities and agreed actions are discussed in these forums and escalated, when required, to the Committee via the EGM - HSES.</p> <p>During FY22 NRW established a second working group to further support the EGM – HSES on more climate-specific matters. The Decarbonisation Working Group is responsible for matters and activities related specifically to decarbonisation projects to reduce NRW's carbon emissions. The working group will support the integration of climate change strategy into our businesses and be pivotal in progressing internal GHG targets across operations, ensuring that these are aligned with the Board's commitments (as and when they are established). The working group is comprised of subject matter experts and meets monthly.</p> <p>NRW's management is responsible for reviewing and monitoring, and reporting to the Board where appropriate, on matters including:</p> <ul style="list-style-type: none"> <li>• The effectiveness of the Group's policies, systems and governance structure in identifying and managing climate-related risks that are material to the Group.</li> <li>• The coordination and review of climate-related risks, strategy, and reporting.</li> <li>• The development and implementation of initiatives regarding emissions reduction.</li> <li>• The policies and systems for ensuring compliance with applicable legal and regulatory requirements associated with climate-related matters.</li> <li>• The Group's performance in relation to climate-related matters.</li> <li>• The Group's reporting regarding climate-related matters.</li> </ul>	<ul style="list-style-type: none"> <li><input checked="" type="checkbox"/> Published NRW's Climate Position Statement</li> <li><input checked="" type="checkbox"/> Establishment of the Decarbonisation Working Group</li> <li><input type="checkbox"/> Work to enhance management's role in climate-related risks will continue during FY23</li> </ul>

# ENVIRONMENT CONTINUED

TCFD Recommendation	NRW Approach	Our Progress
<b>STRATEGY</b> <i>Disclose the actual and potential impacts of climate-related risks and opportunities on the organisation's businesses, strategy and financial planning.</i>		
Describe the climate-related risks and opportunities the organisation has identified over the short, medium and long-term	Whilst NRW has not yet performed a comprehensive analysis of the potential impacts of climate change on its business, and therefore not fully identified the impacts of climate-related risks and opportunities on its business, strategy and financial planning, it does recognise that 'climate-related risks' are present and require mitigation. These risks have been disclosed in the Risk Management & Corporate Governance Statement contained in our Annual Report.	<input checked="" type="checkbox"/> Disclosure of climate-related risks and mitigating factors in our Risk Management & Corporate Governance Statement
Describe the impact of climate-related risks and opportunities on the organisation's businesses, strategy and financial planning	In addition, our existing business unit strategy process considers key external drivers over the short, medium and long term. Consideration of these key drivers is built into the strategy sessions, and includes the impacts of climate-related risks and opportunities on our business units and business unit strategy.	<input checked="" type="checkbox"/> Considered climate-related risks and opportunities over the short, medium and long term within business unit strategy sessions
Describe the resilience of the organisation's strategy, taking into consideration different climate-related scenarios, including a 2°C or lower scenario	NRW is committed to improving our disclosure of the actual and potential impacts of climate-related risks and opportunities on the organisation's business, strategy and financial planning.	<input type="checkbox"/> Work to improve NRW's identification and disclosure of actual and potential climate-related impacts is scheduled to commence during FY23
<b>RISK MANAGEMENT</b> <i>Disclose how the organisation identifies, assesses and manages climate-related risks.</i>		
Describe the organisation's processes for identifying and assessing climate-related risks	NRW's overall approach to risk management is described in the Risk Management & Corporate Governance Statement contained in our Annual Report.	<input type="checkbox"/> Work to enhance NRW's climate-related risk management processes is scheduled to commence during FY23
Describe the organisation's processes for managing climate-related risks	NRW identifies, manages and discloses climate-related risk in line with the Group risk management process, and as part of our standard business practices. The risk management process comprehensively sets out the requirement for consistent identification, assessment, escalation, management and monitoring of risks across the Company.	
Describe how processes for identifying, assessing and managing climate-related risks are integrated into the organisation's overall risk management	NRW is committed to continuously improving our risk management process in alignment to the TCFD Recommendations. NRW is looking to enhance its risk management processes for identifying, assessing and managing climate-related risks with a view to further integrate climate-related risks into our overall ERM framework. This work is due to commence during FY23.	
<b>METRICS AND TARGETS</b> <i>Disclose the metrics and targets used to assess and manage relevant climate-related risks and opportunities, where such information is material.</i>		
Disclose the metrics used by the organisation to assess climate-related risks and opportunities in line with its strategy and risk management process	NRW discloses our energy consumption, Scope 1 and Scope 2 GHG emissions and carbon intensity per million dollars (\$M's) of revenue as part of our annual sustainability reporting. We calculate our GHG emissions in line with the Australian National Greenhouse and Energy Reporting Act (2007), and as administered by NGERs.	<input checked="" type="checkbox"/> Disclosed energy consumption, Scope 1 and Scope 2 Emissions, and carbon intensity per \$M's revenue
Disclose Scope 1, Scope 2 and, if appropriate, Scope 3 GHG emissions and the related risks	NRW recognises that the setting of targets drives business decisions aligned to manage climate-related risks and opportunities, and ultimately reduce carbon emissions. NRW also recognises that the pathway towards a low-carbon economy is a shared responsibility and is committed to ensuring that our operations and businesses express targets and take actions that drive outcomes. However, NRW is still in the process of understanding the climate-related risks and opportunities for our business. Therefore, NRW has not set any climate related targets.	<input type="checkbox"/> Work to set the metrics and targets used to assess climate-related risks and opportunities is expected to commence in FY24 and beyond
Describe the targets used by the organisation to manage climate-related risks and opportunities and performance against targets		

# ENVIRONMENT CONTINUED

## RESOURCE USE

Across NRW, our teams, executives and business partners are committed to reducing our waste footprint and attaining more sustainable waste outcomes.

Waste generated by NRW consists primarily of general waste, sewerage and wastewater, tyres, batteries, scrap metal, oils and lubricants from company workshops. All waste is segregated into its respective waste streams on site, or at locations with appropriate recycling facilities. Waste types are generally tracked and recorded at each project site for review and, where possible, reduction.

All NRW operations are required to have waste management plans in place which address waste elimination, minimisation, storage, transportation and disposal. These waste management plans are contained within the project environmental management plan which is specific to each of the sites where NRW operates. These plans are in place to control the risks of waste impacts on the environment and local communities.

## WATER MANAGEMENT AND USE

NRW is committed to sustainable water management and use. We work with our clients to prevent contamination and wastage on each project site. This is in recognition of the potential for the offsite impacts to water quality, as well as water being a limited resource.

We recognise that water management and use is important to our stakeholders; however, it is not a significant resource use for the Company. Access to, and the monitoring of water is commonly provided by our clients. This includes site specific water management plans which are often contained within the broader project environmental management plan and are developed by our clients. These environmental management plans describe the specific requirements, procedures and measures that will be implemented for each project in the appropriate management of resources, including water. NRW adheres to all project environmental management plans whilst operating on site.


### RCR Implemented Closed System Wash Bay

CASE STUDY

RCR designed and installed a closed wash bay system at their Bunbury operations which improves the collection of contaminated water and prevents it from leeching into the water table. The wash bay is designed to contain all waste water, waste solids and hydrocarbons within the facility during the cleaning process of plant and equipment, and includes a water recycling unit. Water used during the cleaning process is independent of the mains water supply and is recycled for re-use.

The outcomes of the closed system wash bay include:

- Reduced water usage during the cleaning process.
- Improved ease of separation and removal of waste from contaminated water.
- Protection from contaminants entering the surrounding environment.



We recognise that the pathway towards a **low-carbon economy** is a **shared responsibility** and requires significant **investment and technological innovation** from all stakeholders.



# ENVIRONMENT CONTINUED

## INNOVATION

We are committed to empowering our people to seek innovative, safer and more efficient ways of working.

NRW regards the ability to adapt, innovate and leverage technology as being vital to all of our businesses' long term success. We recognise that our people need to keep up with evolving technology, industry trends, new product and service development and delivery, and evolving customer requirements in order to continue to deliver work above industry standard. We continue to support them with effective and innovative training and development opportunities that build the right skills and capabilities for future success.

In recent years the mining industry has seen a significant push towards decarbonisation through, for example, the adoption of renewable energy. NRW acknowledges that the ability to adapt, innovate and leverage technology in this space is vital to all our businesses' success. Therefore, at NRW, our innovation agenda is centered around ensuring we are equipped to transition our business, and support our clients' transition, to a low-carbon economy by focusing our actions on low-carbon initiatives. This requires NRW to work closely with our clients to understand their needs, and partner with other organisations (where required) to design and deliver against those needs.

Innovative Solutions for Our Clients		
NRW has initiatives underway to support decarbonisation through the delivery of innovative lower carbon technological solutions.		
INITIATIVES & ACTION	<p><b>RCR's Kiruna Wagon Helix Dumper</b></p> <p>RCR, in partnership with Kiruna Wagon, has the technology to offer clients a more energy-efficient solution for unloading heavy, fine-grained bulk goods. The Kiruna Wagon Helix Dumper requires less energy than its traditional car dumper alternative due to the innovative unloading station and discharge process.</p>	<p><b>Primero's Commercial Demonstration Hydrogen Plant</b></p> <p>Primero has successfully completed construction and cold commissioning of the Commercial Demonstration Hydrogen Plant for Hazer Group Limited. This production demonstration plant will be a global and Australian first in adopting a new hydrogen and graphite technology.</p>
		<p><b>RCR's In-Pit Crushing and Conveying</b></p> <p>RCR offers In-Pit Crushing &amp; Conveying units that are designed to meet the needs of modern mining practices through a combination of feeding, screening, crushing and processing functions mounted on a single self-propelled mobile platform. This award-winning innovative product design, when compared to traditional mining/haul solutions, reduces carbon emissions by 75%.</p>

NRW recognises that in order to deliver work above industry standards, we must invest in ways to improve our safety performance, and that of our clients. This has resulted in a continued focus on innovative safety measures to reduce or eliminate critical risk areas throughout our operations. NRW is proud to design, develop and commercially produce innovative safety tooling systems that are highly valued by our clients.

Action Equipment Solutions Develops Critical Risk Mitigation Solution	
CASE STUDY	<p>Action Equipment Solutions was approached by our client, following a fatality at their site, to come up with a system that eliminated the critical risk element of an equipment part change-out.</p> <p>Action Equipment Solutions developed the tooling and system of works to eliminate the critical risk area, tested it, and deployed it onto our equipment. This option is now commercially available to our clients for purchase, and significantly mitigates the safety risk associated with this process.</p> <p>Due to the commercial success of this offering, Action Equipment Solutions is investigating similar technological processes and applying this to other equipment part change-outs. Currently, a prototype has been developed and may be made available commercially in the future.</p>







NRW's long-term success depends on the **safety, wellbeing and development** of its **people** and the **communities** in which it operates.





**SOCIAL**



# SOCIAL

## OUR OPERATING ENVIRONMENT AND INDUSTRY TRENDS

A major focus of the State and Federal Governments' economic response to COVID-19 is to stimulate the economy and job creation through construction and infrastructure spending. This, coupled with strong commodity demand, has created high competition for a limited resource pool that has already been affected by border closures and travel restrictions. This has led to record low unemployment rates and critical worker shortages across the industry impacting project costs.

NRW requires an appropriately skilled workforce in order to deliver our projects safely to a high standard and meet our mission to be the "contractor of choice". NRW has not been immune to these impacts within our operations – creating an even greater focus on supplementing our existing skilled workforce with more trainees and apprentices.

In addition to workforce shortages impacting the industry, employee expectations have evolved over the past decade. The evolution of technology has allowed for more flexible work arrangements, social pressures to increase equality, diversity and inclusion (particularly in the mining and mining services sector, and in leadership roles) have intensified, and the focus on employee mental health and wellbeing is the forefront of employer's minds – particularly on the back of the COVID-19 pandemic. Creating positive social change is therefore rising to the top of many corporate agendas – driving broad executive priorities and filtering down to every project.

NRW values effective health and wellbeing programs that encourage our employees to operate at their best, leading to improved physical and mental wellbeing, increased employee engagement and ultimately employee retention – which is critical in the current limited resource labour market.

Within the mining sector, stakeholders also have heightened their focus on a wide range of corporate behaviours including those related to organisational culture. Organisational culture has been a highly publicised issue over the past 12 months following the 'Enough is Enough' inquiry into sexual harassment against women in the FIFO mining industry. The final report, which makes 24 recommendations to identify and address these issues at the employer, industry, regulatory and legislative levels, was tabled in the Western Australian Parliament in June 2022. The inquiry found that ultimately, companies are responsible for what happens in workplaces, and for setting standards of acceptable behaviour. NRW recognises the importance of an organisational culture that fosters a safe and harassment-free work environment for its people.

NRW has taken several steps to ensure we remained focused on creating a strong workplace culture that includes zero tolerance towards sexual harassment. These steps included employee engagement to understand our workforce attitudes and experiences and have culminated in an agreed action plan which received executive support for roll out to our businesses. NRW's position is clear – sexual harassment is not tolerated anywhere, including within our workplace.



# SOCIAL CONTINUED

## OUR STRATEGY AND MANAGEMENT APPROACH

The nature of NRW's operations involves high-risk activities that if not managed correctly, could result in accidents or incidents causing injury or loss of life for its workforce. NRW recognises its moral, and legal, obligation to operate in a safe manner at all times and is committed to supporting the safety of our workforce. This commitment was reinforced in the outcomes of our materiality assessment, where safety ranked as NRW's highest priority material topic for both internal and external stakeholders.



Our commitment to the health, safety and wellbeing of our people and our communities is expressed in strong safety leadership, engagement with our workforce and stakeholders, and a continual focus on identifying and managing risks. We also understand we face challenges to maintain and improve our performance, and continuously engage with our people to safeguard against complacency in the workforce. NRW recognises that it is our people who deliver our services and build trusted relationships to enhance our reputation as the contractor of choice. Therefore, supporting the wellbeing of our people, attracting, developing and retaining a skilled workforce, and promoting an inclusive and diverse workplace culture are vital to NRW maintaining a competitive advantage and underpinning our future success.

We aim to enhance our clients' assets and support the communities in which we operate. We are committed to investing in our people for the longer term by ensuring that they are provided with opportunities to develop new skills and capabilities through training and education and are surrounded by a healthy workplace culture that is collaborative and supportive. This approach is evidenced through the following policies, management systems and programs:

- Code of Conduct – Obligations to Stakeholders
- Diversity Policy
- Company Paid Parental Leave Policy
- Apprenticeship/Graduate Programs
- Internal Leadership Programs
- Employee Assistance Program

NRW's workforce levels increased through the year to 7,261 as at 30 June 2022 (FY21: 6,376) due to a number of projects coming online. We anticipate this number will increase over the coming years as new work is secured. Of this total, 2,315 (FY21: 1,593) are contractors typically engaged to perform blue-collar work on site under subcontractor agreements or are engaged through labour hire companies. The majority of NRW's workforce is employed under a collective bargaining agreement. The working conditions and terms of employment of all other employees are determined through normal labour market legislation and conditions.

## SOCIAL-RELATED MATERIAL TOPICS AND PRIORITY SDGs

Material Topic	Priority SDG	Priority SDG Indicator
<b>Safety</b>		
<b>Health and Wellbeing</b>		
Employee Attraction and Development	SDG 4 – Quality Education	 <p>Sub-goal 4.4: by 2030, substantially increase the number of youth and adults who have relevant skills, including technical and vocational skills, for employment, decent jobs and entrepreneurship</p>
Workplace Culture and Diversity	SDG 5 – Gender Equality	 <p>Sub-goal 5.1: end all forms of discrimination against all women and girls everywhere Sub-goal 5.5: ensure women's full and effective participation and equal opportunities for leadership at all levels of decision-making in political, economic and public life</p>
<b>Community Engagement</b>		

# SOCIAL CONTINUED

## SAFETY

At NRW safety is a core value and intrinsically linked to the way we work. NRW is committed to delivering safety management practices that are known, valued, understood, and implemented by our leaders, employees and contractors. NRW is constantly striving to be a leader in safety management and in the provision of a safe workplace. NRW is committed to eliminating incidents and injuries through a critical risk reduction and risk control approach. We aim to create a culture where our people are engaged in the solution to eliminate or control critical risks so that everyone goes home safe every day.

NRW strives to provide a safe workplace for all its people by maintaining a set of robust safety systems, risk controls and processes. The Occupational Health and Safety (OHS) management systems NRW currently has in place are accredited to both AS/NZS 4801:2001, ISO 45001:2018, and the Government funded Federal Safety Commission. These certifications are regularly audited by external third parties to ensure that NRW continues to deliver a high level of safety for its workforce. Across the business, rigid policies and procedures support NRW's OHS management systems, including:

- Project risk assessments - held prior to work commencing on site that look to identify all project specific risks and mitigation strategies.
- Leading and lagging indicators - continuous monitoring and analysis of indicators with regards to safety.
- Site safety meetings – including site inductions, pre-starts, return to site briefings, and toolbox meetings.
- Site safe activities – including critical risk verifications, notice boards, alerts, job hazards analysis, hazard cards and safety inspections.
- Safety training – including critical risk management, incident investigation, supervisory and systems management.

- Safety management plans - each project site has OHS issues and risks which are unique to that project. The project management team will develop a safety management plan which addresses how safety issues and risks will be managed and controlled for that particular project.

Over the course of FY22, and subsequent to the appointment of NRW's Executive General Manager – Health, Safety, Environment and Sustainability, NRW has invested and furthered the below critical safety initiatives:

- NRW researched and trialed a number of integrated software platforms to enhance the collaborative interaction between all levels of the organisation by utilising technology that drives mobility and advancement. Implementation of the preferred integrated system has commenced and is due to be fully deployed in FY23. The system builds the fundamental technology for proactive data analytics and reporting, allowing for targeted proactive HSE campaigns and strategic planning with greater accuracy and in real time.
- NRW has documented our pathway forward for Critical Risk Management. Having identified those activities that expose the workforce to critical risk, Bow Tie Risk assessments have been undertaken to bring further attention to those critical controls and framework design for safety assurance to manage these activities.
- NRW recognises that safety awareness and training are critical factors in ensuring the provision of a safe workplace, and it is our responsibility to provide our leaders, employees and contractors with access to these resources. NRW is constantly challenging our internal leadership and development programs to ensure delivery of the most current information and leadership practices with regards to safety.
- Leveraging on the success of the existing NRW Graduate Program, work is underway to further develop and extend the program, providing NRW the ability to tap into aspiring HSE professionals. The program provides Graduates exposure to real world applied practical experience across a full range of operations.

### RCR Invest in Robotic Welder Arm Technology for Safer Operations

#### CASE STUDY

RCR has procured a Robotic Welder Arm for use in their Bunbury workshop. The technology allows for precise and quick results, less waste, and greater safety. The Robotic Arm eliminates the need for the operator and other workers to be in close proximity to the welding, and in turn, eliminates the exposure to welding fumes and radiation hazards that were previously present. Prior to the Robotic Welder Arm being installed, the process of loading bulky rollers and carry-frames onto the cradles was conducted utilising manual handling and involved regular lifts to reposition and rotate the items to weld.

Not only did this increase the potential for manual handling injuries, it also presented the significant risks associated with the use of lifting devices. However, as the Robotic Arm incorporates manipulators, the items to be welded are locked, clamped, and bolted in position and the robot rotates the items as required during the welding process. This has had the impact of reducing the lifting requirements by up to 75% and eliminating the manual handling involved with the task. RCR has also designed a dedicated room for the Robotic Welder Arm and installed guarding, screens, additional ventilation units and light curtains. The safety barrier acts in the capacity of a "de-energisation switch" that automatically de-energises the Robotic Arm Welder if the barrier is breached.



# SOCIAL CONTINUED

## HEALTH AND WELLBEING

NRW recognises the importance of psychosocial health awareness in the workplace and the benefits of effectively addressing mental health issues within its workforce. We understand that effective health and wellbeing programs encourage our employees to operate at their best, leading to improved physical and mental wellbeing, increased employee engagement and ultimately employee retention.

We provide health and wellbeing programs and benefits to our workers and their families, including employee assistance programs that provide free professional counselling services addressing personal and professional related issues and career advice and coaching. These platforms, accessible 24/7 and from any device, host a variety of content like learning modules, videos and animations, articles, blogs, podcasts, meditations, self-assessments, activities and resources toolkits – all aimed at allowing employees, or their family members, to improve their mental health and wellbeing.

Supporting our health and wellbeing programs are the following employee benefits, selected to ensure our workforce, and their families, have access to appropriate and adequate health services.

- NRW maintains a corporate partnership with a variety of insurance providers who offer our employees, and their families, access to discounted private health insurance. This enables our workforce, and their families, to have access to essential medical and health care.
- NRW provides basic Income Protection for our employees through our corporate arrangement. Under this arrangement employees are covered for accidental injury and sickness benefits payable in the event of temporary total disablement from injury or illness for a sustained period of time.
- As part of NRW's corporate arrangement with MLC Insurance and Masterkey Business Superannuation, our employees have access to a unique service that allows them, and their families, access to leading medical advice through a benefit called Best Doctors.

During FY23, NRW will conduct a review of health and wellbeing programs and benefits to ensure that our employees continue to have the appropriate support.

### Employee Health & Wellbeing Initiatives

In addition to several campaigns relating to physical health, NRW has an increasing focus on mental health and wellbeing.

INITIATIVES AND ACTION

#### Primero Develop Mental Health Strategy

Primero has designed a Mental Health Strategy and commenced deployment in FY22. The strategy initially focused on establishing and understanding current workplace practices and sentiment through employee engagement surveys and analysis.

In addition, the business is committed to performing a business system gap analysis, increasing training and development of its workforce in the area of psychosocial health and wellbeing, and furthering employee engagement strategies.

#### NRW Civil & Mining and Action Drill and Blast Support Mental Health and Breast Cancer Awareness on Site

NRW Civil & Mining is supporting breast cancer and mental health awareness on the Karara project site. The project team has elected to paint two dump truck trays blue in recognition of mental health awareness, and two dump truck trays pink for breast cancer awareness.

Action Drill & Blast is supporting the Blue Tree Initiative with a blue drill rig on the Greenbushes site. They are also promoting breast cancer awareness with a pink ute stationed at Roy Hill, and a pink bus at the Karara work site.

#### Mental Health First Aid Rolled Out at the Action Drill & Blast Business

Action Drill & Blast has rolled out mental health first aid training as part of their Performance Leadership Development Program. Delivered by clinical psychologists, the program provides an overview of mental health to increase awareness. It equips participants with tools to deal with their own mental health realities, in addition to identifying, supporting and referring others with accessing help.





# SOCIAL CONTINUED

## EMPLOYEE ATTRACTION AND DEVELOPMENT

### TRAINING AND DEVELOPMENT

To support NRW's continued growth, the Company remains committed to training and developing its people. Investing in its people not only ensures the Company has the right skills, but also provides its workforce with the opportunity for personal and professional development and aids employee retention.

During the year, we designed and ran leadership programs throughout our businesses focused on developing and supporting our people to foster high performing teams and to lead effectively.

The internal programs are aimed at newly appointed supervisors (Supervisor Toolkit Training) and senior supervisors (NRW Leadership Training) and cover off on critical areas such as creating strong team culture, conflict management, problem solving, change management and productive systems. In addition, NRW continued to increase its focus on apprenticeships, graduates and traineeships during FY22.

NRW continues to provide a number of traineeships and entry-level employment opportunities to females and Aboriginal and Torres Strait Islander People to support skills and training and create a diverse workplace. This is generally done through the NRW Training Centre with jobs available post-completion of their training at NRW.

#### NRW Training Centre

#### CASE STUDY

NRW has established a training facility to give opportunities for unskilled people to join the mining industry. This facility will allow NRW the ability to address the skills shortage experienced during FY20 and FY21 by providing training and development opportunities to the local unskilled and skilled workforce. NRW is also committed to running courses targeted at Aboriginal and Torres Strait Islander Peoples and female trainees to increase participation from these sections of the workforce.

The training facility officially opened during FY22 with 36 participants having completed training and are now mobilised to NRW sites. NRW is proud to say that 50% (18) of participants who completed the training are female, and 2 identify as Indigenous.



- ✓ More than **200 apprentices** participated in Apprenticeship Programs specialising in automotive, fabrication and mechanical works.
- ✓ **85 graduates and undergraduates** were onboarded through a graduate training program, including engineering, surveying and commercial contracts students.
- ✓ **60 staff** participating in formal training programs.
- ✓ **295 staff** were selected and completed internal Leadership & Development programs.

# SOCIAL CONTINUED

## EMPLOYEE ATTRACTION

Our people are our greatest asset and essential to our long-term success. Activity levels remain strong within the sectors NRW operates in, which continues to stretch the already limited skilled labour talent pool. This, combined with NRW's large workforce, increases the importance of providing an inclusive workplace that not only attracts, develops and retains a skilled workforce but also recognises, values and manages talent over the longer term. At NRW, we strive to be an employer of choice for our people.

NRW employs a high-performing, experienced and appropriately qualified workforce who provide a wealth of knowledge at all levels of the business. The Company is particularly pleased to have a workforce that consistently returns to NRW as more projects are secured and positions become available. Previous NRW employees are considered as first preference wherever possible, and employees are transferred from completed projects to new projects to ensure retention of a skilled workforce.

### NRW Civil & Mining Responding to the Competitive Labour Market

CASE STUDY

Given the increased demand for mining services during FY22, NRW Civil and Mining has experienced tightened labour availability and higher turnover rates. In response, NRW Civil and Mining has employed the following recruitment initiatives to attract and retain our people:

- Trade Upskill Program – we have implemented a trade upskill program for light vehicle fitters and heavy-duty fitters
- Increased Apprenticeships – we have increased capacity of our apprenticeship programs to allow for increased attrition rates across the industry
- Graduate and Undergraduate Programs – we have extended our graduate and undergraduate programs to identify and attract talent
- Operator Training Facility – a total of 36 participants were trained in the NRW Training Centre in FY22
- International Recruitment – an international focus on trade qualified maintenance employees and civil professionals is currently underway to tap into the international labour market
- Financial Incentives – the provision of sign-on bonuses offered for site-based employees





# SOCIAL CONTINUED

## WORKPLACE CULTURE, DIVERSITY AND INCLUSIVENESS

*Diversity and inclusiveness contributes to business success. NRW strives to provide a working environment that encourages respect and fairness for all participants, at all times.*

### WORKPLACE DIVERSITY

NRW recognises the benefits of having a diverse workforce and seeks to create an inclusive workplace environment where people’s diverse experiences, perspectives, and backgrounds are valued and utilised in our business. Creating an inclusive and respectful workplace is recognised as a vital part of NRW’s success and strengthening this is a focus area in FY23.

The Company has a diverse workforce in various geographic regions across Australia comprising employees from varied ethnic backgrounds, age groups, races and gender. NRW does not discriminate in its business practices including based on gender, age, ethnicity, religion or cultural background.

The Company ensures that all employees are provided with the same opportunities through open and honest communication, training and development opportunities and annual remuneration reviews.

NRW’s objective is to increase participation across a range of demographics to ensure the Company recruits and retains a skilled workforce and endorses a safe and productive working environment.

In addition to supporting greater female and First Nations People workforce participation, NRW believes it also has an opportunity to further support people with disabilities to enter or re-enter the workforce with its progress in autonomous/remote-controlled equipment operation. Work in furthering support of this demographic is continuing.

**Diversity Initiatives**

NRW continues to focus on progressing its culture, diversity and inclusion agenda to promote business success.

INITIATIVES AND ACTION	<p><b>Primero Review Internal Barriers to Equal Opportunity Employment</b></p> <p>Primero recently implemented a new recruitment system and strategy. As well as reviewing their Diversity &amp; Inclusion program, Primero took the opportunity to review their recruitment process, adverts, and interview questions to remove any potential bias or barriers to equal employment opportunities.</p> <p>Throughout this process, Primero identified opportunities to amend gendered words that may detract applications to certain positions to more neutral terms that are inclusive and representative of the wider labour market.</p> <p>In addition to amending its recruitment process, Primero is planning to run training with its hiring managers to raise awareness of unconscious bias, scheduling for roll out in FY23.</p>	<p><b>Action Drill &amp; Blast is a Proud Corporate Member of PBF Australia Ltd (Paraplegic Benefit Fund) (PBF Australia)</b></p> <p>Action Drill &amp; Blast is a corporate member of PBF Australia. As part of this corporate partnership, Action Drill &amp; Blast is able to provide PBF Membership cover for employees and their families.</p> <p>In addition to PBF Membership, Action Drill &amp; Blast has continued to engage PBF Australia to deliver information sessions across the business. These information sessions, delivered to site and leadership teams, focus on the long term physical and psychological impacts of workplace injuries and highlight the need to focus on workplace safety.</p> <p>Action Drill &amp; Blast is also committed to understanding its ability to engage with people with disabilities to work within the business. By understanding how people with disabilities can be supported and engaged in the workforce, Action Drill &amp; Blast can assess its ability to further these initiatives internally.</p>
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NRW’s female workforce participation rate is **up to 15.65%**

NRW’s Indigenous workforce participation rate has increased **up to 3.32%**

# SOCIAL CONTINUED

## WORKPLACE CULTURE

NRW recognises that the right workplace culture provides a significant competitive advantage in not only attracting and retaining a talented workforce but supporting our employees to reach their potential and to feel valued within the workplace. NRW aims to provide a work environment that promotes equal opportunity and diversity, allowing employees to reach their potential, in an environment that is free from discrimination, harassment and bullying.

NRW's stance is that any form of discrimination, bullying or harassment is completely unacceptable and has no place in any setting, including our workplace.

We are committed to providing a working environment that encourages respect and fairness at all times and believe that every person in our business is responsible for behaving in a way that is safe and respectful.

NRW maintains code of conduct policies which outline expected behaviour at all times. To supplement this, NRW is developing an updated Workplace Behaviour Policy – Harassment, Bullying and Discrimination, to clearly define NRW's position and responsibilities regarding acceptable workplace behaviour. This will be implemented in FY23.

### NRW Civil and Mining's Response to Sexual Harassment within the Mining Industry

NRW Civil and Mining is responding to findings of unacceptable workplace cultures in the resources industry following the 'Enough is Enough' inquiry into sexual harassment against women in the FIFO mining industry. NRW Civil and Mining recognises the importance of an organisational culture that fosters a safe and harassment-free work environment for its people.

With an initial focus on our remote Western Australian workforce, we undertook a Diversity & Inclusion (D&I) Survey to identify key areas of concern. Following our D&I survey, NRW Civil and Mining ran a series of focus groups to better understand the workforce's experience of our D&I culture and gain further insight into areas of concern.

The sessions were facilitated by independent consultants and included employees from different areas of the business (project, position, role, tenure). Through the survey results and a series of workshops we have developed a list of initiatives that are designed to improve our workplace diversity and culture, and ensure a safe working environment for all our employees. The information gathered from the survey and focus groups has played a central role in shaping NRW Civil and Mining's action plan, which aims to promote greater diversity in our workforce and support continued improvement in our D&I strategy. The following action item list has been endorsed by the leadership team for implementation:

- Workplace Behaviour Policy – Harassment, Bullying & Discrimination - establishes an overarching policy that defines NRW's position and responsibilities regarding workplace behaviour, what constitutes acceptable and unacceptable behaviour, and the escalation process for incidents.
- Sexual Harassment Training - to be provided to all employees and contractors to help build a common understanding of what constitutes sexual harassment and will reinforce a baseline of behaviour that is expected.
- Enhanced reporting and feedback process – ensuring an appropriate level of investigation is undertaken when complaints are raised, and that employees who raise complaints are notified that the matter has been investigated and closed out appropriately.
- Future female leaders' development – build a strong team of female leaders to support the next generation of female talent in the business.
- Gender parity pay auditing and diversity targets - ensuring equality of pay for all employees and that we are moving toward gender parity in our business.
- Diversity champions network – to complement our Equal Employment Opportunity Contact Officer program and ensures a wider network of support for employees.
- Improved awareness of the Employee Assistance Program (EAP) service, grievance reporting and whistle-blowing process - to ensure employees know where and how to raise concerns and get support.

CASE STUDY





# SOCIAL CONTINUED

## COMMUNITY ENGAGEMENT

### FIRST NATIONS PEOPLE PARTICIPATION

NRW respects the importance of the First Nations cultures and the rights of First Nations Peoples. Since inception, the Company has successfully employed and supported First Nations Peoples within its operations through training programs, employment, subcontracting and partnering opportunities. We also value the opportunity to work with our clients to provide opportunities for First Nations Peoples participation across our projects.

NRW has a proud history of partnering with First Nations businesses across Australia. Current and past joint venture partners include Ngarluma and Yindjibarndi People (represented through the Ngarluma and Yindjibarndi Foundation Limited), Eastern Guruma People (represented by Eastern Guruma Pty Ltd), Njamal and ICRG Joint Venture and Eastern Guruma and Wirilu-Murra Enterprises.

As NRW continues to diversify its business and increase its national footprint, the Company embraces the ongoing opportunities to learn from, and work with, First Nations People and their communities. NRW is focused on continuing to develop these relationships by supporting local community initiatives and harnessing community expertise and leadership.

#### Innovative Business Partnering with IronMerge and NRW

CASE STUDY

IronMerge is a Supply Nation business providing employment and procurement services to the resources and infrastructure sector. IronMerge delivers genuine opportunities to recirculate wealth within the communities of their clients and build sustainable employment pathways for Pilbara First Nations Peoples. NRW is proud to partner with IronMerge under the above arrangement.

In September 2021, IronMerge commissioned its Komatsu 30t PC290LC Excavator to work for NRW. The Komatsu machine was purchased by IronMerge and will be hired out to NRW for initial deployment on the FMG Iron Bridge project, operated by an experienced IronMerge driver.

The acquisition of the new excavator by IronMerge was made possible by NRW's commitment to engaging First Nation business leveraging a sustainable and innovative framework. IronMerge Chairman, Ian Taylor, acknowledged the support of NRW at the commissioning ceremony, "IronMerge is proud to take its relationship with NRW to the next level with the deployment of this new Komatsu excavator. It will be working on Nyamal Country, operated by IronMerge and delivering local impact".



# SOCIAL CONTINUED

## COMMUNITY INVESTMENT AND SUPPORT

Recognising our responsibility to contribute back to society, NRW strategically invests in our communities through financial and in-kind means. NRW has an established tradition of supporting the communities in which we operate. By supporting local communities NRW ensures ongoing community trust in its operations now, and in the future.

Our ties to our communities are strengthened by our employees, contractors and their families who often live in our operating areas, and through our relationships with educational institutions and charities local to our operations.

NRW contributes to the social and economic prosperity of local communities through employment, education, business development and in-kind donations and community contributions. NRW seeks to identify community sponsorship opportunities and partnerships that align the interests of the local communities with NRW's values. These sponsorships and opportunities are selected based on their capacity to positively impact the local community and enhance NRW's reputation as the contractor of choice.

The NRW Group has contributed financially and in-kind support to numerous organisations throughout FY22, including:

- Donations to major charities including GIVIT, Perth Homeless Winter Appeal, Mates in Construction and Foodbank Australia.

- Sponsorship of sporting programs that aim to meet specific local community needs including the Northampton Australian Rules Football Club and the Boggabri & District Rugby League Football Club.
- In-kind support for community organisations such as the donation of scrap metal and timber to local Men's Shed and the donation of furniture to a local YMCA youth hostel.
- Support for employee efforts in fundraising activities including the Cancer 200 and MSWA Ocean Ride, the Push-Up Challenge, Movember, and World's Greatest Shave initiatives.
- Engagement with and support of relevant education programs such as an annual donation to the Greenbushes Primary School Digital Technologies Program, the facilitation of mine site excursions for the GFG Foundation Student Program, and the development of a Primero Group Scholarship with WA School of Mines to financially support students to pursue a degree in metallurgy.
- Active sourcing of goods and services from local communities, in particular Bunbury, Geraldton, Tom Price, Karratha and Kalgoorlie, to support local businesses and employment.

Community Engagement			
NRW is proud to support numerous organisations to achieve mutually beneficial partnerships for long-term societal benefits.			
INITIATIVES AND ACTION	<p><b>Golding Contractors Partners with GIVIT to Support Local and Regional Communities</b></p> <p>Golding Contractors has been a GIVIT national partner for three years. GIVIT is a national not-for-profit organisation ensuring people get what they need when they need it most – whether recovering from an emergency event, or experiencing hardship due to circumstances such as drought, domestic and family violence, homelessness, disability, and mental health.</p> <p>Golding Contractors' support in FY22 has enabled GIVIT to facilitate close to 1.9 million donations to vulnerable Queensland communities to assist people in need. In addition, Golding Contractors' financial contribution also supported the GIVIT Digital Inclusion Appeal by donating 70 refurbished laptops and 120 quality bed frames which were accessed by six charity partners across Queensland, including four Indigenous organisations.</p>	<p><b>RCR Supporting Men's Health in the South West</b></p> <p>RCR hosted a 2-hour live radio broadcast from its workshop in Picton to raise awareness of men's health and support the Prostate Cancer Foundation of Australia (PCFA). In addition to the broadcast, sponsored by local station Spirit 621 South West, RCR also promoted the following:</p> <ul style="list-style-type: none"> <li>• BBQs hosted at RCR's workplaces with guest speakers.</li> <li>• A raffle with prizes donated from local Bunbury businesses.</li> <li>• Donations from RCR and its employees, the proceeds of which were all pledged to PCFA.</li> <li>• Fully funded health checks for the local community and resources distributed including literature around men's health.</li> </ul>	<p><b>NRW Civil and Mining Provides Resources to the Metropolitan Migrant Resource Centre (MMRC)</b></p> <p>NRW Civil and Mining donated pre-owned iPhones to the MMRC in Mirrabooka. The MMRC is a not-for-profit community hub that provides critical assistance programs to predominantly refugee and migrant people who have recently relocated to Australia.</p> <p>The programs have a direct impact to help some of the most disenfranchised people in our community. The phones were presented to Rehana Khan - Migration and Partnerships Manager.</p> <p>She said, "Our resources have been stretched to the limit and the direct impact on these children is that their immediate education needs are not met and they cannot complete pieces of school work. The donation of these iPhones from NRW will assist with the participants' technology skills, in turn improving the students' progress at school, motivation levels and self-confidence. We are very grateful for the donation."</p>



Good corporate governance and **risk management practices** form the basis on which NRW delivers its **corporate strategy** and sustainability objective.







# GOVERNANCE

# GOVERNANCE

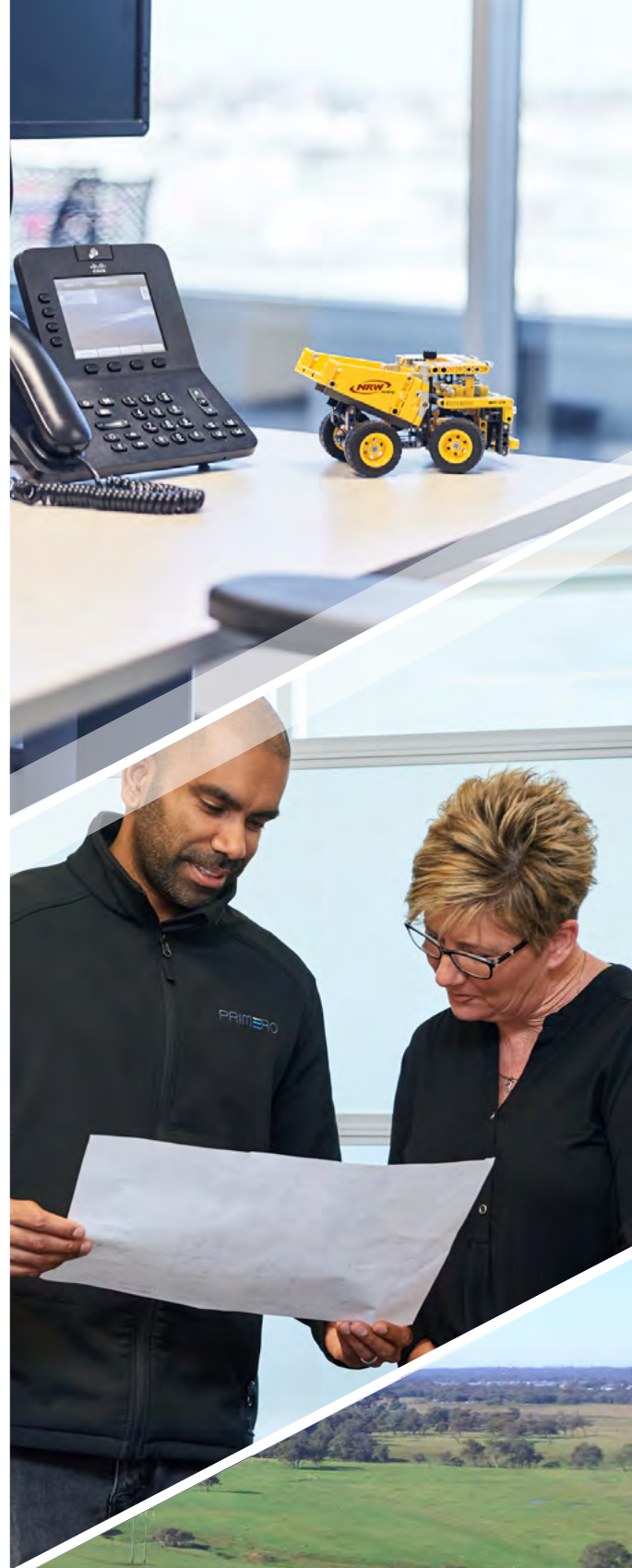
## OUR OPERATING ENVIRONMENT AND INDUSTRY TRENDS

As an Australian company operating in Australia, NRW is governed by Australian Federal and State Government legislation, which promotes fair trading and competition. This strong regulatory environment has set the foundation for a robust and stable economy with strong governance practices that must be adhered to. Despite this, there is increased investor and analyst scrutiny of company disclosures influenced by local and global events where corporate governance, ethical conduct, and risk management have often been highlighted as a failing. Companies now face an increasingly complex array of governance and risk management regulation, both mandatory and voluntary, to meet growing stakeholder expectations around open, transparent and ethical disclosure.

Companies have embraced a principles-based approach to corporate governance as an important tool to enhance board and management accountability to stakeholders. In Australia, these best practice principles are set by the ASX Corporate Governance Council (the Council). The ASX Corporate Governance Principles and Recommendations (the Principles and Recommendations) set out recommended corporate governance practices for entities listed on the ASX that, in the Council's view, are likely to achieve good governance outcomes and meet the reasonable expectations of most investors in most situations.

NRW supports and adopts high ethical standards and business transparency in line with the Council's Principles and Recommendations as we recognise this creates loyalty and trust with our stakeholders and contributes to long-term sustainable value.

NRW recognises that risks are an inherent part of our business and management of those risks is therefore critical to the Company's performance. NRW has identified a number of risk factors both specific to the Company and of a general nature which may impact the future operating and financial performance of the Group.



Main Roads WA



# GOVERNANCE CONTINUED

## OUR STRATEGY AND MANAGEMENT APPROACH

NRW believes that adopting and applying high standards of corporate governance enhances the Company's performance and creates long-term shareholder value. We are therefore committed to promoting a culture of ethical corporate behaviour which is aligned to the NRW values and ultimately evidenced through the way we work. NRW and our stakeholders place high importance on corporate governance, which was reinforced in the outcomes of our materiality assessment.

The Board is ultimately responsible for the governance, risk and compliance frameworks of the Company. The Board's approach to corporate governance is underpinned by a documented and robust Corporate Governance Framework. This framework provides the platform from which NRW's Board provides strategic direction for the responsible and sustainable growth of the company. It also drives a culture that promotes high ethical standards and personal integrity.

Under our governance framework, NRW's management is accountable to the Board, and the Board is accountable to shareholders for the operations, performance and growth of the company. The primary goal the Board has set for management is to focus on enhancing shareholder value, which includes responsibility for NRW's ESG performance.

The Charter Documents which govern our Board and Board Committees are listed below:

- Board Charter
- Audit & Risk Committee Charter
- Nomination & Remuneration Committee Charter
- Sustainability Committee Charter

NRW's corporate governance framework is affected through a suite of policies and procedures, developed over time to ensure compliance with the various legislative and regulatory requirements applicable to the NRW business. These policies include:

- Code of Conduct for Directors and Key Officers
- Code of Conduct – Obligations to Stakeholders
- Shareholder Communication Policy
- Continuous Disclosure Policy
- Securities Trading Policy
- Whistleblowing Policy
- Modern Slavery Statement

Both the Board and Committee Charter documents and NRW's corporate governance policies are published on the NRW website ([www.nrw.com.au/about-us/corporate-governance](http://www.nrw.com.au/about-us/corporate-governance)).

NRW's commitment to good corporate governance is also evidenced through the Board's endorsement of the ASX Recommendations which have been fully adopted by the Company for the year ended 30 June 2022, unless otherwise indicated. Adoption of the ASX Recommendations, and other information with regards to the Company's Corporate Governance Practices, are published in a Corporate Governance Statement. Please see the Company's Appendix 4G and accompanying Corporate Governance Statement which is released on the ASX platform annually for further information.

## GOVERNANCE-RELATED MATERIAL TOPICS AND PRIORITY SDGs

The key topics identified as material to the NRW business under the heading 'Governance' are:

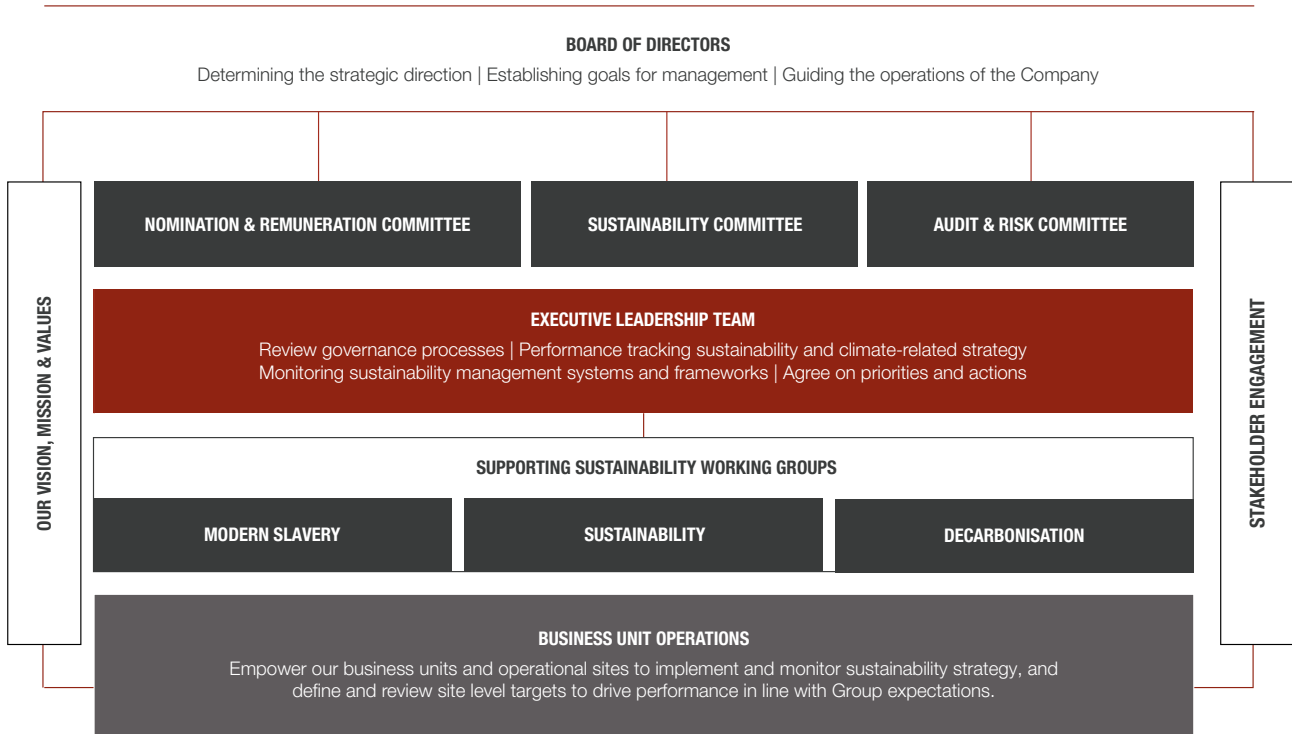
Material Topic	Priority SDG	Priority SDG Indicator
Corporate Governance		Sub-goal 16.6 Develop effective, accountable and transparent institutions at all levels
Business Ethics and Transparency	SDG 16 – Peace, Justice and Strong Institutions	Sub-goal 16.7 – Ensure responsive, inclusive, participatory and representative decision-making at all levels
Risk Management		



# GOVERNANCE CONTINUED

## CORPORATE GOVERNANCE

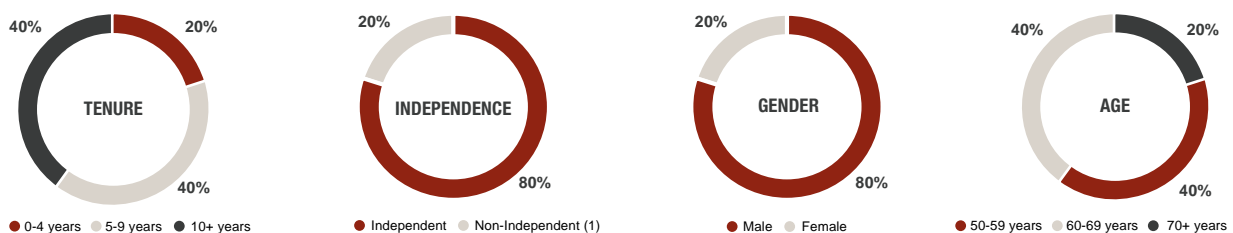
NRW's corporate governance structure consists of a Board of Directors whose role is to represent shareholders, promote and protect the interests of the Company, and to build sustainable shareholder value. The Board discharges this responsibility by having regard for the interests of all stakeholders. NRW's corporate governance structure is depicted below.



## NRW BOARD OF DIRECTORS

The Board is NRW's highest governing authority and instills a culture of accountability, integrity, transparency, and compliance. The Board is responsible for, and has the authority to determine, all matters relating to the strategic direction, policies, practices, establishing goals for management and the operation of the Company. A Board Charter has been adopted which details the functions and responsibilities of the Company's Board and management. This Charter is regularly reviewed and updated to reflect changes and developments regarding the operation of the Board. NRW Board members and their credentials are published each year in the Annual Report, along with their Committee duties.

The Board comprises five directors with diverse skills, experience, and backgrounds to support NRW in effective and robust corporate governance practices. In line with the Board Charter, a majority of directors are independent and non-executive, including the Chair. The Nomination & Remuneration Committee is tasked with reviewing the size and composition of the Board. The Directors' skills, experience and diversity, and Board size are reviewed regularly by the Nomination and Remuneration Committee to ensure it remains fit for the Group's needs and in line with best practice requirements. The Board makeup according to gender, independence, tenure and age is depicted below. The Board has set a board gender diversity target of 33.33% female representation, to be achieved by 31 December 2023.



(1) NRW has one member of the Board who is not independent, being the Managing Director and Chief Executive Officer Jules Pemberton



# GOVERNANCE CONTINUED

## NRW SUB-COMMITTEES

The Board has the following sub-committees established to assist it in carrying out its primary role of guiding NRW's strategic direction.

Committee	Oversight
<b>Audit &amp; Risk Committee (ARC)</b>	<p><b>Audit Matters</b></p> <p>The purpose of the ARC is to assist the Board in fulfilling its corporate governance and oversight responsibilities by monitoring and reviewing the integrity of financial statements, the effectiveness of internal financial controls, the independence, objectivity and competency of internal and external auditors, and the policies on risk oversight and management. In addition, the Audit &amp; Risk Committee is responsible for making recommendations to the Board in relation to the appointment of external auditors and approving the remuneration and terms of their engagement.</p>
	<p><b>Risk Matters</b></p> <p>The purpose of the ARC is to assist the Board in fulfilling its responsibilities relating to the risk management and compliance practices of the Company. The Committee is responsible for providing the Board with advice and recommendations regarding the ongoing development of enterprise-wide risk oversight and management policies that set out the roles and respective accountabilities of the Board, the Committee, management and the internal audit function. The policies should cover the areas of oversight, risk profile, risk management, compliance and control and assessment of effectiveness.</p>
<b>Nomination &amp; Remuneration Committee (N&amp;RC)</b>	<p><b>Nomination Matters</b></p> <p>The purpose of the N&amp;RC is to provide advice, recommendations and assistance to the Board with respect to identifying nominees for directorships and other key executive appointments, the composition of the Board, ensuring that effective induction and education procedures exist for new Board appointees and key executives, and ensuring that appropriate procedures exist to assess and review the performance of the Chair, executive and non-executive directors, senior management, Board committees and the Board as a whole.</p>
	<p><b>Remuneration Matters</b></p> <p>The purpose of the N&amp;RC is to provide advice, recommendations and assistance to the Board with respect to putting in place remuneration policies which are designed to attract and retain senior managers and directors with the expertise to enhance the performance and growth of the Company, and ensuring that the level and composition of remuneration packages are fair, reasonable and adequate and, in the case of executive directors and senior managers, display a clear relationship between the performance of the individual and the performance of the Company.</p>
<b>Sustainability Committee</b>	<p>The purpose of the Committee is to provide advice, recommendations, and assistance to the Board with respect to sustainability primarily in relation to environmental, social and corporate governance matters and eliminate related risks or identify related opportunities. This includes adoption of a climate change strategy that maps the Company's pathway to a practical and appropriate level of decarbonisation for the business.</p>

Sustainable development and leadership are embedded throughout NRW with focused working groups formed with a targeted range of experience and business unit representation. These working groups provide support and guidance with regards to NRW's sustainability strategies, initiatives and reporting.

Working Group	Purpose	Focus Area FY22
<b>Modern Slavery</b>	The purpose of this group is to manage the work programme to ensure compliance with modern slavery laws, ensure there is no modern slavery in the Group's operations, take steps to minimise, and ideally eradicate, modern slavery in the Group's supply chains, and raise awareness within the Group and with its suppliers regarding modern slavery.	<ul style="list-style-type: none"> <li>Continued roll-out of Modern Slavery training</li> <li>Targeted HR/Recruitment modern slavery alert</li> <li>Review and consideration of IT systems to improve identification of modern slavery practices within our supply chain</li> </ul>
<b>Sustainability</b>	The purpose of this Group is to guide ESG initiatives and practices within the business and coordinate ESG reporting, in line with NRW's sustainability objectives.	<ul style="list-style-type: none"> <li>Establishing data collection mechanisms for improved disclosure in line with GRI Standards</li> <li>Set minimum standards for Group ESG practices, formalised through the Sustainability Policy</li> <li>Increase business unit transparency with regards to ESG practices through sharing resources</li> </ul>
<b>Decarbonisation</b>	The purpose of this Group is to formulate and execute a strategy that maps the Company's pathway to a practical and appropriate level of decarbonization for the business.	<ul style="list-style-type: none"> <li>Updating risk management policies/procedures in line with TCFD Recommendations</li> <li>Establishing baseline GHG emissions</li> <li>Developing a decarbonisation roadmap</li> </ul>

# GOVERNANCE CONTINUED

## BUSINESS ETHICS AND TRANSPARENCY

*NRW believes consistent and proper business conduct creates loyalty and trust with our stakeholders and contributes to long-term sustainable value. Therefore, we are committed to promoting a culture of ethical corporate behaviour throughout our business.*

NRW endeavours to be recognised as an organisation committed to the highest ethical standards in business. NRW expects that all directors, officers and employees act lawfully, ethically and responsibly, and always strive to contribute positively to NRW's reputation and performance. We are proud of the quality of our employees and of the professional reputation and market image built by their work. The following section sets out the policies that NRW has in place to promote lawful, ethical, and responsible business practices within the organisation.

### CODE OF CONDUCT (REVISED DECEMBER 2019)

NRW's Code of Conduct (the Code) defines the Company's expectations with regards to director, officer and employee conduct, and is aligned to the Company's values. This document represents our commitment to upholding the highest standards of ethics within our business practices. This Code reflects our high standards of professional conduct and ethics in dealing with all of our stakeholders and our commitment to complying with all applicable state, national and international laws.

The Company is firmly committed to compliance with the Code and the Company's employees, consultants and suppliers (to the extent relevant) are required to comply with it. The code of conduct governs a range of aspects, including:

- Responsibilities to clients and customers, shareholders and the financial community, individuals, and the broader community
- Employment practices and participation
- Confidentiality
- Bribes & Gifts
- Agreements with competitors
- Environmental protection
- Human rights
- Drug and alcohol use
- International compliance

NRW encourages employees to speak up about any conduct that may be in violation of the Code or other policies of the Company, by reporting via the various channels set out in the Company's Whistleblowing Policy (or that of the relevant subsidiary of the Company). The Company does not permit any form of adverse treatment against any person who reports known or suspected violations of the Code or any other Company policy.

### CONTINUOUS DISCLOSURE (REVISED JANUARY 2021)

NRW recognises that transparency and disclosure are vital to enabling current and future shareholders to make informed investment decisions and exercise their rights. As such, our Board mandates timely and equal access to material information concerning the Company.

This is affected through NRW's Continuous Disclosure Policy which imposes obligations and procedures on all directors, employees and consultants of the Company to ensure the timely and balanced disclosure of all material matters. This Policy ensures the Company is able to meet its continuous disclosure obligations under the ASX Listing Rules. NRW's Disclosure Officer is the Company Secretary.

### ANTI-FRAUD, BRIBERY AND CORRUPTION (REVISED JANUARY 2022)

Fraud, bribery and corruption adversely affect the business environment by undermining legitimate business activities. NRW is committed to conducting business in accordance with the highest ethical and legal standards and avoiding bribery, corruption and fraud.

NRW is committed to:

- Ensuring efficient and effective systems, procedures and internal controls are in place to enable the prevention and detection of fraud, bribery and corruption.
- Ensuring managers identify fraud, bribery and corruption risks in their areas of business and that all systems, procedures and internal controls are properly implemented and enforced.
- Ensuring all members of staff understand that they have a duty to report any internal and external suspicions or incidents of fraud, bribery or corruption.
- Continuously reviewing our systems, procedures and internal controls through risk management processes and audit arrangements.

The Company has an Anti-fraud, Bribery and Corruption policy which sets out NRW's 'zero tolerance' towards fraud, bribery and corruption. The Company policy makes it clear that any conduct falling within the definition of fraud, bribery or corruption will thoroughly investigate and seek to take disciplinary and/or legal action against those who perpetrate, are involved in, or assist with fraudulent or other improper activities in any of our operations.



# GOVERNANCE CONTINUED

## SECURITIES TRADING POLICY (REVISED MARCH 2020)

NRW has adopted a Securities Trading Policy which details the Company's policy regarding the sale and purchase of Company securities by Directors and employees. The policy prohibits Directors and employees from buying or selling securities in the Company when they are in possession of price sensitive information which is not generally available to the market. It is contrary to the policy for Directors or employees to be engaged in short term trading of Company securities. In addition, trading in the Company's securities is not permitted by Directors and employees during closed periods which are the period from the end of the financial year or half financial year to the time of release of the annual or half year results.

## MODERN SLAVERY (PUBLISHED DECEMBER 2021)

NRW's Modern Slavery Statement outlines the steps the NRW Group has taken to trace, monitor and address modern slavery risks in our operations and supply chains.

We seek to integrate respect for human rights into the way we operate to continuously improve our business and the way we deliver work. To this end, we work to continuously improve our understanding of modern slavery risks in our operations and supply chains.

We also work to raise awareness of the issue throughout our operations and supply chains and thereby support efforts to combat it by tracing, monitoring, and addressing the risk of modern slavery practices.

NRW is committed to:

- Continuously updating and furthering our action plan for Modern Slavery based on the priorities we identify, and our aspirational actions.
- Develop and roll out Modern Slavery training that is tailored to the needs of the organisation and our employees.
- Uphold our established recruitment processes and practices which continue to uphold ethical and non-discriminatory engagement of potential employees.
- Continue to perform supply chain due diligence for modern slavery and mitigate associated risks within our supply chain.

## WHISTLEBLOWING (REVISED FEBRUARY 2020)

NRW expects and encourages the reporting of any suspected or actual unethical, illegal, corrupt, fraudulent or undesirable conduct involving our business, and prohibits any form of punishment, disciplinary or retaliatory action being taken against anyone for raising or helping to address a business conduct concern, as evidenced through our Whistleblowing Policy.

As part of this policy, NRW has committed to:

- Promoting and supporting a culture of honest and ethical behaviour, compliance and good corporate governance.
- Encouraging the reporting of any suspected or actual unethical, illegal, corrupt, fraudulent or undesirable conduct involving our business.
- Providing clear internal and external channels through which a person who becomes aware of reportable conduct may report its occurrence.
- Ensuring that employees and stakeholders who report their concerns may do so without fear of intimidation, disadvantage or reprisal.
- Investigating in a thorough and timely manner.
- Protecting whistleblowers to ensure confidentiality associated with the matters of reportable conduct.

The Whistleblowing Policy outlines the ways stakeholders can report matters they genuinely believe are in breach of the Code or are illegal (Reportable Matters). Please see our Whistleblowing Policy for guidance on what behaviour NRW considers to be a Reportable Matter.

We encourage employees to speak up about a Reportable Matter. A Reportable Matter exists if you see or have reasonable grounds to believe that we or any of our officers or employees have attempted to engage or have engaged in conduct that falls under this category. Reportable Matters can be reported through internal and external reporting channels. NRW ensures continued accessibility to our independent external whistleblowing service, which is widely communicated to employees and contractors.

### Your Call (External, Independent Whistleblowing Service)

**Website:** [www.yourcall.com.au/report](http://www.yourcall.com.au/report)

(Unique Identifier: NRW1994)

**Telephone:** 1300 790 228

**National Relay Service:** [www.relayservice.gov.au](http://www.relayservice.gov.au)

(request Your Call's hotline 1300 790 228)

### Disclosure Officer (Kim Hyman)

**Email:** [kim.hyman@nrw.com.au](mailto:kim.hyman@nrw.com.au)

**Telephone:** 08 9232 4200

### Disclosure Officer (Jasmyn Wardell-Johnson)

**Email:** [jasmyn.wardell-johnson@nrw.com.au](mailto:jasmyn.wardell-johnson@nrw.com.au)

**Telephone:** 08 9232 4200

# GOVERNANCE CONTINUED

## RISK MANAGEMENT

*Risk is an inherent part of NRW's business and management of risks is therefore critical to the Company's performance and financial strength.*

There are a number of risk factors both specific to the Company and of a general nature which may impact the future operating and financial performance of the Group. The performance of the Company is also influenced by a variety of different general economic and business conditions, including interest rates, exchange rates, access to debt and capital markets, and government policies.

In conducting its business, NRW takes informed and appropriate commercial and business risks (including non-financial risks) to achieve its objectives and deliver shareholder value.

Through an enterprise-wide approach to risk management, NRW seeks to achieve:

- Compliance with laws and regulations;
- Assurance regarding the management of significant risks;
- Decisions that pay full regard to risk considerations; and
- Efficiency and effectiveness in operations, projects and strategy.

## RISK OVERSIGHT

Risk management is overseen by the Board's Audit and Risk Committee. Consistent with its Charter, the Audit and Risk Committee is responsible for assisting the Board in fulfilling its responsibilities relating to the Company's risk management and compliance practices. This includes providing the Board with advice and recommendations regarding the ongoing development of risk oversight and management policies that set out the roles and respective accountabilities of the Board, the Committee, management and the internal audit function. The policies cover oversight, risk profile, risk management, compliance and assessment of effectiveness.

The Committee is also responsible for providing oversight of NRW's risk management and risk profile. This includes:

- Maintaining an up-to-date understanding of areas where the Company is, or may be, exposed to risk and compliance issues and seek to ensure that management is effectively managing those issues;
- Reviewing the adequacy and effectiveness of the Company's policies and procedures which relate to risk management and compliance;
- Making recommendations to the Board on the appropriate risk and risk management reporting requirements to the Board and this Committee;
- Providing advice to the Board on relevant corporate level performance indicators and targets for risk management and compliance activities;
- Undertaking an annual review of risk management policy and underlying strategies and procedures to ensure its continued application and relevance;
- If considered necessary, establishing a periodic and independent review of the implementation and effectiveness of the risk management policy to provide objective feedback to the Board as to its effectiveness;
- Receiving and considering reports on risk management and compliance programs and performance against policy and strategic targets;
- Reviewing the adequacy of the company's insurance coverage; and
- Examining any matters referred to it by the Board.



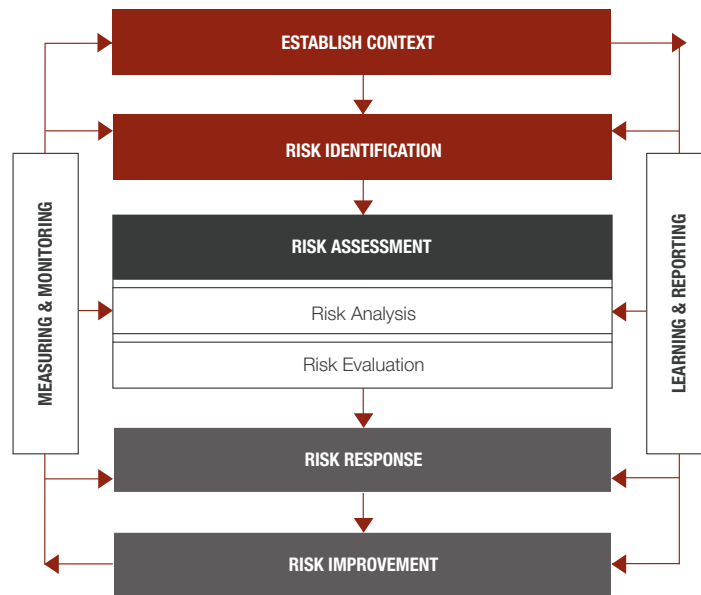


# GOVERNANCE CONTINUED

## ENTERPRISE WIDE RISK MANAGEMENT APPROACH

Our approach to Enterprise Wide Risk Management (ERM) is aligned to the requirements of the International Standard for Risk Management ISO 31000:2009, which supports NRW in managing and mitigating risks including sustainability risks and tracking our performance. NRW's Risk Management strategy is set out in the Risk Management Corporate Policy. The Risk Management Corporate Policy is reviewed annually and outlines the Board's mandate and commitment to ERM.

Supporting the Risk Management Corporate Policy is a documented Risk Management Procedure and the Risk Management Manual. This policy, procedure and manual, combined, assists the NRW Group with the identification, understanding, monitoring and management of risks and opportunities which can arise from operations, projects and strategies adopted by the Company. Supporting this is a dedicated risk and commercial function that embeds these frameworks within the business.



Understanding NRW's risks, and managing these risks appropriately, will enhance our ability to successfully deliver on objectives and provide greater certainty and confidence for shareholders, employees, customers and suppliers and the communities in which we operate.

Material risks that could adversely affect NRW are set out in the FY22 Annual Financial Statements. Consideration of all business risks, including environmental, social and governance risks, were included in this assessment of the most significant risks to the NRW Group.

### NRW's Cyber Security Strategy Development

#### CASE STUDY

NRW's data and information volumes are expanding exponentially, and threat actors are evolving to become more sophisticated are taking advantage of increasingly global connectivity, and launching more cyberattacks than ever before to potentially compromise NRW data and information volumes. In response to this, during FY22, NRW developed its Cyber Security Strategy.

The Cyber Security Strategy, endorsed by the Audit & Risk Committee, outlines NRW's approach to managing the ever-increasing threat that cyber security issues raise across the group. As the business and its entities, pivot further towards digital-enabled business models, exponentially more data and digital information is generated and shared among the businesses, customers and third parties. This results in increased cyber security threats and risks which can cause significant financial loss, reputational damage, or cause outages that damage NRW's business operations.

The Cyber Security Strategy adopted by NRW is based on the National Institute of Standards and Technology (NIST) framework and applies to all NRW's business and subsidiary entities. The NIST framework is a set of standards, guidelines, and best practices focused on managing cyber security-related risk.

Moving forward, the ability to maintain a current understanding of the cyber threat environment and relevant organisation cyber risks is going to be necessary to effectively manage the increasing number of cyber threats. NRW's Cyber Security Strategy initiatives will provide the necessary controls to govern the management of these risks whilst enabling the business to operate efficiently.

# PERFORMANCE DATA

Performance data is shown below for the period 1 July 2021 – 30 June 2022 for NRW Holdings Limited and its wholly owned subsidiaries.

Performance Metric	FY22		FY21 <sup>1</sup>			
<b>ENERGY &amp; EMISSIONS</b>						
Scope 1 (ktCO <sub>2</sub> -e) <sup>2</sup>	6.23		5.89			
Scope 2 (ktCO <sub>2</sub> -e) <sup>2</sup>	4.08		4.38			
Scope 1 and Scope 2 (ktCO <sub>2</sub> -e)	10.31		10.27			
Emissions Intensity <sup>3</sup> (Scope 1 + Scope 2) (tCO <sub>2</sub> -e/\$m AUD)	4.33		4.62			
Energy Consumption (GJ)	120,048		117,506			
Energy Intensity <sup>3</sup> (GJ/\$m AUD)	50.5		52.9			
Revenue (\$m)	2,378		2,222			
<b>ENVIRONMENT</b>						
Environmental Fines/Sanctions (\$)	Nil		Nil			
Environmental Fines/Sanctions (Number)	Nil		Nil			
Environmental cases brought through dispute resolution mechanisms	Nil		Nil			
<b>SAFETY</b>						
Occupational Injuries and Work-related Fatalities (Employees and Contractors)						
Total Recordable Injury Frequency Rate	5.64 <sup>4</sup>		6.25			
Lost Time Injury Frequency Rate	0.64		0.51			
Safety related fines or prosecutions	Nil		Nil			
Total number of work-related fatalities	0		0			
Total number of high-consequence work-related injuries	7		- <sup>6</sup>			
Total number of recordable work-related injuries	79		94			
<b>GOVERNING BODY</b>						
Total Board of Directors	5		5			
Board of Directors By Gender	<b>Male</b>	<b>Female</b>	<b>Male</b>	<b>Female</b>		
Number	4	1	4	1		
Board of Directors By Age	<b>Under 30</b>	<b>30-50</b>	<b>Over 50</b>	<b>Under 30</b>	<b>30-50</b>	<b>Over 50</b>
Number	0	0	5	0	0	5
<b>WORKFORCE<sup>5</sup></b>						
Total Workforce	7,261		6,376			
Total Employees	4,946		4,783			
Total Contractors	2,315		1,593			
Employees by Contract by Gender	<b>Male</b>	<b>Female</b>				
Permanent	3,611	684		- <sup>6</sup>		
Fixed term (temporary)	248	43		- <sup>6</sup>		
Casual (non-guaranteed hours)	313	47		- <sup>6</sup>		
Employees by Contract by Region	<b>National</b>	<b>Expats</b>				
Permanent	4,270	25		- <sup>6</sup>		
Fixed Term (temporary)	288	3		- <sup>6</sup>		
Casual (non-guaranteed hours)	359	1		- <sup>6</sup>		
Employees by Employment Type by Gender	<b>Male</b>	<b>Female</b>				
Full-time	3,842	674		- <sup>6</sup>		
Part-time	17	53		- <sup>6</sup>		
Casual	313	47		- <sup>6</sup>		



# PERFORMANCE DATA CONTINUED

Performance Metric	FY22			FY21 <sup>1</sup>
Employees by Employment Type by Region	<b>National</b>	<b>Expats</b>		
Full-time	4,489	27		-.6
Part-time	69	1		-.6
Casual (non-guaranteed hours)	359	1		-.6
Collective Bargaining Agreements (CBA)				
Percentage of employees covered by CBA	67.39%			-.6
Workplace related fines or prosecutions	Nil			Nil
Percentage of senior management hired from the local community	100%			100%
Total New Employee Hires during reporting period	2,809			-.6
Total Employee Turnover during reporting period	2,270			-.6
New Employee Hires During Reporting Period by Gender	<b>Male</b>	<b>Female</b>		
Number	2,359	450		-.6
New Employee Hires During Reporting Period by Age	<b>Under 30</b>	<b>30-50</b>	<b>Over 50</b>	
Number	678	1,347	784	-.6
New Employee Hires During Reporting Period by Region	<b>National</b>	<b>Expats</b>		
Number	2,809	0		-.6
Employee Turnover During Reporting Period by Gender	<b>Male</b>	<b>Female</b>		
Number	1,988	282		-.6
Employee Turnover During Reporting Period by Age	<b>Under 30</b>	<b>30-50</b>	<b>Over 50</b>	
Number	403	1,112	755	-.6
Employee Turnover During Reporting Period by Region	<b>National</b>	<b>Expats</b>		
Number	2,270	0		-.6
<b>EMPLOYEE DIVERSITY</b>				
Total Employees	4,946			4,782
Total Employees by Level				
Total Senior Management	178			-.6
Total Middle Management	209			-.6
Total General	4,559			-.6
Total Employees By Gender	<b>Male</b>	<b>Female</b>	<b>Male</b>	<b>Female</b>
Number	4,172	774	4,151	631
Total Employees By Age	<b>Under 30</b>	<b>30-50</b>	<b>Over 50</b>	
Number	977	2,593	1,376	-.6
Total Senior Management by Gender	<b>Male</b>	<b>Female</b>		
Number	166	12		-.6
Total Senior Management by Age	<b>Under 30</b>	<b>30-50</b>	<b>Over 50</b>	
Number	3	98	77	-.6
Total Middle Management by Gender	<b>Male</b>	<b>Female</b>		
Number	196	13		-.6
Total Middle Management by Age	<b>Under 30</b>	<b>30-50</b>	<b>Over 50</b>	
Number	3	136	70	-.6
Total General by Gender	<b>Male</b>	<b>Female</b>		
Number	3,810	749		-.6
Total General by Age	<b>Under 30</b>	<b>30-50</b>	<b>Over 50</b>	
Number	970	2,360	1,229	-.6

# PERFORMANCE DATA CONTINUED

Performance Metric	FY22		FY21 <sup>1</sup>	
<b>RATIO OF BASIC SALARY AND REMUNERATION FOR WOMEN TO MEN<sup>7</sup></b>	<b>Ratio</b>			
Senior Management	1:1.41		.6	
Middle Management	1:1.36		.6	
General	1:1.40		.6	
<b>EMPLOYEE PARENTAL LEAVE BENEFITS</b>	<b>Male</b>	<b>Female</b>	<b>Male</b>	<b>Female</b>
Employee Covered by Parental Leave Policy	3,302	694	3,560	506
Employees who took Parental Leave during the Reporting Period	15	38	13	27
Employees who returned to work post Parental Leave ending during the Reporting Period	15	9	13	12
Employees who returned to work post Parental Leave ending that were still employed 12 months after their return to work	12	4	12	9
<b>TRAINING HOURS</b>	<b>Hours</b>			
Total Training hours <sup>8</sup>	104,967		.6	
<b>Average training hours per employee<sup>9</sup></b>				
Male	21.76		.6	
Female	13.61		.6	
Senior Management	8.22		.6	
Middle Management	9.21		.6	
General	21.48		.6	
<b>ECONOMY</b>	<b>\$'000</b>		<b>\$'000</b>	
Community Donations and Contributions	431		356	
Financial Assistance Received from Government <sup>10</sup>	893		.6	
Total monetary value of financial and in-kind political contributions made	Nil		Nil	
<b>SUPPLY CHAIN</b>				
Percentage of the procurement budget spent on suppliers in Australia	99.5%		98.5%	
<b>COMPLIANCE WITH LAWS AND REGULATIONS</b>				
Instances of non-compliance with laws and regulations	Nil		Nil	
Total fines issues for non-compliance with laws and regulations	Nil		Nil	
Other sanctions (non-monetary) for non-compliance with laws and regulations	Nil		Nil	
<b>Anti-corruption</b>				
Confirmed incidents of corruption	Nil		Nil	
Confirmed incidents in which employees were dismissed or disciplined for corruption	Nil		Nil	
Confirmed incidents when contacts with business partners were terminated or not renewed due to violations related to corruption	Nil		Nil	
Public legal cases regarding corruption brought against the organisation or its employees	Nil		Nil	
<b>Anti-competitive Behaviour</b>				
Total number of legal actions for anti-competitive behaviour, anti-trust, and monopoly practices	Nil		Nil	
<b>Incidents of Discrimination and Corrective Actions Taken</b>				
Total number of incidents of discrimination	Nil		Nil	
<b>Incidents of Violations Involving Rights of Indigenous Peoples</b>				
Total number of identified incidents of violations involving the rights of indigenous peoples	Nil		Nil	

# PERFORMANCE DATA CONTINUED

Performance Metric	FY22	FY21 <sup>1</sup>
<b>Incidents of Non-compliance Concerning the Health and Safety Impacts of Products and Services</b>		
Total number of incidents of non-compliance with regulations and/or voluntary codes concerning the health and safety impacts of products and services:		
- Resulting in a fine or penalty	Nil	Nil
- Resulting in a warning	Nil	Nil
- Non-compliance with voluntary code	Nil	Nil
<b>Incidents of Non-compliance Concerning Product and Service Information and Labelling</b>		
Total number of incidents of non-compliance with regulations and/or voluntary codes concerning product and service information and labelling:		
- Resulting in a fine or penalty	Nil	Nil
- Resulting in a warning	Nil	Nil
- Non-compliance with voluntary code	Nil	Nil
<b>Incidents of Non-compliance Concerning Marketing Communications</b>		
Total number of incidents of non-compliance with regulations and/or voluntary codes concerning marketing communications, including advertising, promotion, and sponsorship:		
- Resulting in a fine or penalty	Nil	Nil
- Resulting in a warning	Nil	Nil
- Non-compliance with voluntary code	Nil	Nil
<b>Substantiated complaints concerning breaches of customer privacy and losses of customer data</b>		
Total number of substantiated complaints received concerning breaches of customer privacy, categorized by:		
- Complaints received from outside parties and substantiated by the organisation	Nil	Nil
- Complaints from regulatory bodies	Nil	Nil

(1) Includes Primero Group from February 2021

(2) Scope 1 and Scope 2 GHG Emissions are calculated in accordance with the National Greenhouse and Energy Reporting Act 2007

(3) Intensity calculated with reference to total group revenue (\$M's)

(4) FY22 Total Recordable Injury Frequency Rate has been updated since release of our FY22 Annual Financial Statements due to the lag nature of incident reporting and subsequent verification of injuries.

(5) Workforce numbers (employees and contractors) reported as total headcount as at 30 June 2022

(6) This information is not able to be sourced for the FY21 comparative period. NRW are working on updating our data capture processes to enhance reporting in the future.

(7) Basic Salary includes total fixed remuneration excluding short and long term incentives such as cash bonuses

(8) Due to data availability, total training hours only includes NRW Civil and Mining, Golding Contractors, Primero, Action Mining Services and RCR Mining Technologies

(9) Due to data availability, total training hours only includes NRW Civil and Mining, Primero, Action Mining Services and RCR Mining Technologies

(10) Financial assistant relates primarily to rebates received for hiring, training and retaining apprentices within the business as part of the Australian Apprenticeships Incentive System





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