Plan

Accommodation and Employment Strategy

ABJ-XLC-810060

Project Name: Mount Piper to Wallerawang Transmission Line Upgrade Project
Approval: SSI-70279722

Revision Number: 0
Status: Issued For Endorsement
Date: 26/10/2026

Transgrid Document number: ZINFRA-CWO-ENV-PLN-000010



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Document Approval

	Position Title	Name	Date
Approved	Project Director	Karl Littlemore	23/10/2026

Document History

Revision	Date	Author	Description of Changes
A	30/8/25	M Simpson	Initial release and first review
B	10/10/25	K Littlemore	Updated to ensure EIS items have been appropriately considered.
C	28/10/25	A Lalic	Reviewed by Senior Human Resources Business Partner
D	20/02/26	M Simpson	Updated to incorporate Transgrid comments and Conditions of Approval
E	09/05/26	K Littlemore / K Nguyen	Updated to incorporate Transgrid comments
F	24/06/2026	R Dorairaj	Updated the title of the document, made changes throughout the document aligning with the title update.
G	07/07/2026	K Littlemore	Updated to address Consultation with Council
H	28/07/2026	P Inwood, K Littlemore	Updated to address comments from the Environmental Representative
I	28/09/2026	R Vusango	Updated to demonstrate compliance of this Strategy to relevant requirements and how this will be monitored.
0	26/10/2026	K Littlemore	Issued for ER final review and endorsement

Bringing our Reconciliation Action Plan to life

"We recognise Aboriginal and Torres Strait Islander peoples as the Traditional Owners and Custodians of this land, and we pay our respects to Elders past, present and emerging."



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Definitions

Acronym / Term	Definition
AES	Accommodation and Employment Strategy
AIPP	Australian Industry Participation Plan
APP	Aboriginal Participation Plan
CEMP	Construction Environmental Management Plan
Area of Influence	The geographic area within which the Project may influence local employment, business participation, accommodation and community services, including relevant Local Government Areas, Local Aboriginal Land Council areas and Aboriginal Language Group Areas intersected by or surrounding the Project.
BESS	Battery Energy Storage System
CCS	Community Communication Strategy
CoA	Conditions of Approval
CSSI	Critical State Significant Infrastructure
DPHI	NSW Department of Planning, Housing and Infrastructure
EAP	Employee Assistance Program
EIS	Mount Piper to Wallerawang Transmission Line Upgrade Environmental Impact Statement
EP&A Act	Environmental Planning and Assessment Act
EP&A Regulation	Environmental Planning and Assessment Regulation 2021
ICN	Industry Capability Network
LALC	Local Aboriginal Land Council
LGAs	Local Government Areas
Local Worker	A worker whose usual place of residence prior to being engaged on the Project is within 50 minutes' travel time of the Project and who does not require temporary accommodation within or near the Project area while working on the Project.
Non-local worker	A worker whose usual place of residence is outside the local area and who requires temporary accommodation within or near the Project area while working on the Project.
OOHW	Out of Hours Works
OSOM	Oversize/Overmass
PAL	Purchased Additional Leave
PSSR	Power System Safety Rules
RAI	Rental Affordability Index
REMM	Revised Environmental Mitigation Measure(s)
SEARs	Secretary's Environmental Assessment Requirements
SIA	Social Impact Assessment
SSI	State Significant Infrastructure
TfNSW	Transport for NSW

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1. Introduction

1.1 Project Background

Transgrid proposes to deliver approximately eight kilometres of new 330 kilovolt transmission line and double circuit transmission structures located between the Mount Piper and Wallerawang 330 kV substations (the Project). The Project would incorporate sections of an existing, single-circuit 132 kV transmission line, where the two transmission lines would share a widened easement and transmission structures. The Project is located within the Lithgow Local Government Area (LGA), which is part of the Central West region of NSW, as illustrated in Figure 1. The Project would provide the additional capacity required to reliably transmit power to the Greater Sydney region.

In accordance with the Secretary's Environmental Assessment Requirements (SEARs) a social impact assessment (Mount Piper to Wallerawang Transmission Line Upgrade Technical Report 13 – Social Impact Assessment [GHD, August 2025]) (SIA) was conducted as part of the Infrastructure Approval process.

The SIA assessed the potential social impacts from the construction and operation of the Project, and recommended mitigation measures to minimise any impacts, as identified in Table 2. This includes implementing a Workforce Management Plan or Accommodation and Employment Strategy (AES), which is this Strategy. This Strategy also fulfills the requirements of Condition B52 of the Conditions of Approval for the Project under SSI-70279722.

1.2 Purpose and Scope

The purpose of this Accommodation and Employment Strategy (AES) is to define the strategies, controls, and processes to be implemented to minimise adverse impacts associated with the workforce on the existing community during the construction of the Mount Piper to Wallerawang Transmission Line Upgrade.

In accordance with the Conditions of approval, a copy of this Accommodation and Employment Strategy will be provided to the Planning Secretary prior to the commencement of construction and the Strategy will be implemented throughout the construction phase of the Project.

The compliance requirements relevant to this AES are summarised in the following tables. Applicable Conditions of Approval (CoA) relating to workforce and accommodation are identified in Table 1. Revised Environmental Mitigation Measures (REMMs) related to accommodation and employment are presented in Table 2.

1.3 Legislation and Regulatory Requirements

The EP&A Act and EP&A Regulation include provisions to ensure that the potential environmental impacts of a development are considered in the decision-making process prior to works proceeding. This legislation provides the framework for development assessment in NSW.

On 3 July 2024, the Mount Piper to Wallerawang Transmission Line Upgrade Project was declared Critical State Significant Infrastructure (CSSI). As a CSSI, the Project application must be accompanied by an Environmental Impact Statement (EIS) and has followed the relevant approval processes.

The Project's EIS was placed on public exhibition between 27 August and 24 September 2025 and is available on NSW Government planning portal under application SSI-70279722.

Following consideration of submissions and assessment of the Response to Submissions and Amendment Report, the NSW Department of Planning, Housing and Infrastructure (DPHI) determined the Project and granted planning approval on 16 May 2026.

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Table 1- Conditions of Approval

ID	Condition	Where Addressed	How Addressed
B52	Prior to commencing construction, the Proponent must prepare an Accommodation and Employment Strategy for the development. This strategy must:	This Strategy	This AES has been prepared for the Mount Piper to Wallerawang Transmission Line Upgrade to establish the approach for managing workforce accommodation and employment impacts during construction. It addresses accommodation availability and management, local employment and procurement opportunities, cumulative impacts and monitoring of the effectiveness of the Strategy.
B52(a)	Be prepared in consultation with relevant Council(s) and informed by consultation with local accommodation and employment service providers.	Appendix A; Sections 4 and 9.2	The AES has been informed by consultation with Lithgow City Council, Bathurst Regional Council, Blue Mountains City Council, local accommodation providers and a local employment service provider. Appendix A records the consultation undertaken and the outcomes. Feedback has informed the accommodation approach in Section 4, including consideration of accommodation availability, peak demand periods, preferred accommodation types and alternative locations.
B52(b)	Propose measures to ensure there is sufficient accommodation for the workforce associated with the development.	Sections 3, 4 and 12	Section 3 defines the anticipated workforce profile and Section 4 assesses rental and short-term accommodation availability and establishes the accommodation strategy. Measures include maximising local labour where practicable, distributing non-local workers across multiple accommodation types and locations, encouraging commercial accommodation, considering available camp-style accommodation where appropriate and monitoring workforce accommodation through the program in Section 12.
B52(c)	Consider the cumulative impacts associated with other State significant development projects in the area.	Sections 4.5 and 11	Section 11 identifies other projects that may overlap with the Project, their anticipated construction timing and workforce where known, and considers potential cumulative effects on accommodation, local labour, services, traffic and community wellbeing. Ongoing coordination with potentially concurrent projects is proposed, with the frequency of engagement increasing where construction periods overlap. Section 4.5 also considers periods of increased accommodation demand associated with community events and the Mount Piper Power Station shutdown.
B52(d)	Investigate options for prioritising the employment of local workers and use of local businesses during the construction and operation of the development, where feasible.	Sections 9 and 10	The AES identifies opportunities to maximise participation by local workers, suppliers and subcontractors. Sections 9 and 10 establish recruitment and procurement pathways, engagement with employment service providers, work packages suited to local businesses, opportunities for local personnel to fill Project roles, apprenticeship opportunities and measures to encourage workforce upskilling.
B52(e)	Include a program to monitor and review the effectiveness of the strategy over the life of the development, including regular monitoring and review during construction, upgrading and decommissioning.	Section 12	Section 12 establishes a monitoring program covering workforce numbers, accommodation use and stakeholder complaints. Workforce attendance is monitored daily and accommodation arrangements are surveyed monthly once the specified workforce threshold is reached. Action triggers initiate investigation and, where necessary, additional controls or corrective actions. Results are reported to Transgrid. The AES applies to the construction component of Zinfra's scope, with requirements for later Project phases to be addressed through the applicable Project staging and management arrangements.

Table 2 - Revised Environmental Mitigation Measures

ID	Condition	Where Addressed	How Addressed
S3	A Workforce Management Plan will be developed in consultation with Lithgow Council including local and regional health and emergency services providers, to manage potential impacts of the non-resident construction workforce.	This Strategy; Appendix A	This AES fulfils the function of the Workforce Management Plan function required by REMM S3. Consultation undertaken with Councils, local and regional health and emergency service providers is documented in Appendix A and has informed the accommodation, workforce and local employment strategies contained in the Plan.
S3	Include an accommodation strategy with measures to reduce negative impacts of the Project workforce, identify preferred workforce accommodation options and review accommodation supply and availability.	Section 4	Section 4 assesses rental and short-term accommodation availability and establishes measures to distribute accommodation demand across different types and locations. It encourages local labour and commercial accommodation where practicable, considers alternative accommodation locations and periods of constrained supply, and establishes measures to avoid undue pressure on local accommodation markets.
S3	Include strategies to promote wellbeing of the workforce.	Section 6	Section 6 establishes workforce wellbeing measures including employee benefits, community involvement, the Employee Assistance Program, MATES in Energy, early intervention support and recurring wellbeing communications and toolbox talks.
S3	Outline a code of conduct for workers and policies relating to antisocial behaviour.	Section 5.1; Appendix B	Section 5.1 establishes Project-specific expectations for professional and respectful behaviour in the community, including compliance with road rules, respect for residents and businesses and avoidance of antisocial behaviour. Appendix B contains the Group Code of Conduct, which applies to employees, contractors, consultants and suppliers.
S3	Identify health and wellbeing service needs of the temporary construction workforce, including medical, allied health and wellbeing services.	Sections 6 and 7	Sections 6 and 7 identify likely workforce health and wellbeing needs and the support available through local medical and allied health services, the Employee Assistance Program, MATES in Energy and Zinfra's early intervention arrangements.
S3	Outline information to the workforce on community services, recreation facilities, events, tourism activities and how to access health services.	Sections 7 and 8	Sections 7 and 8 identify the local services likely to be used by the workforce and establish arrangements for promoting community events, recreational opportunities and relevant local information through toolbox talks, team activities and site noticeboards.
S3	Consider cumulative accommodation impacts associated with other major projects in the area.	Sections 4.5 and 11	Section 11 assesses potentially concurrent projects, their timing and workforce demands and identifies controls for potential cumulative accommodation, workforce, service and community impacts. Section 4.5 additionally considers periods where community events and planned power station shutdowns may constrain accommodation supply.

ID	Condition	Where Addressed	How Addressed
S3	Include a program to monitor and review the effectiveness of the Plan.	Section 12	Section 12 establishes measurable monitoring of workforce numbers, workforce accommodation patterns and stakeholder complaints. Defined action triggers are used to identify when investigation and additional controls may be required, with monitoring outcomes reported to Transgrid.
S4	Options for prioritising employment of local workers during construction will be investigated. Consider recruitment, skills and training measures, including identification of skills and qualifications required and training targets. Consider how the contractor will work with regional stakeholders to upskill local residents, including Indigenous and culturally diverse communities.	Sections 9 and 10; AIPP; APP	The AES addresses S4 insofar as it relates to local workforce participation, identifying suitable local employment opportunities, recruitment pathways, apprenticeship opportunities and workforce skills and qualification requirements. Broader local industry, Indigenous participation and associated targets are addressed through the AIPP and APP.

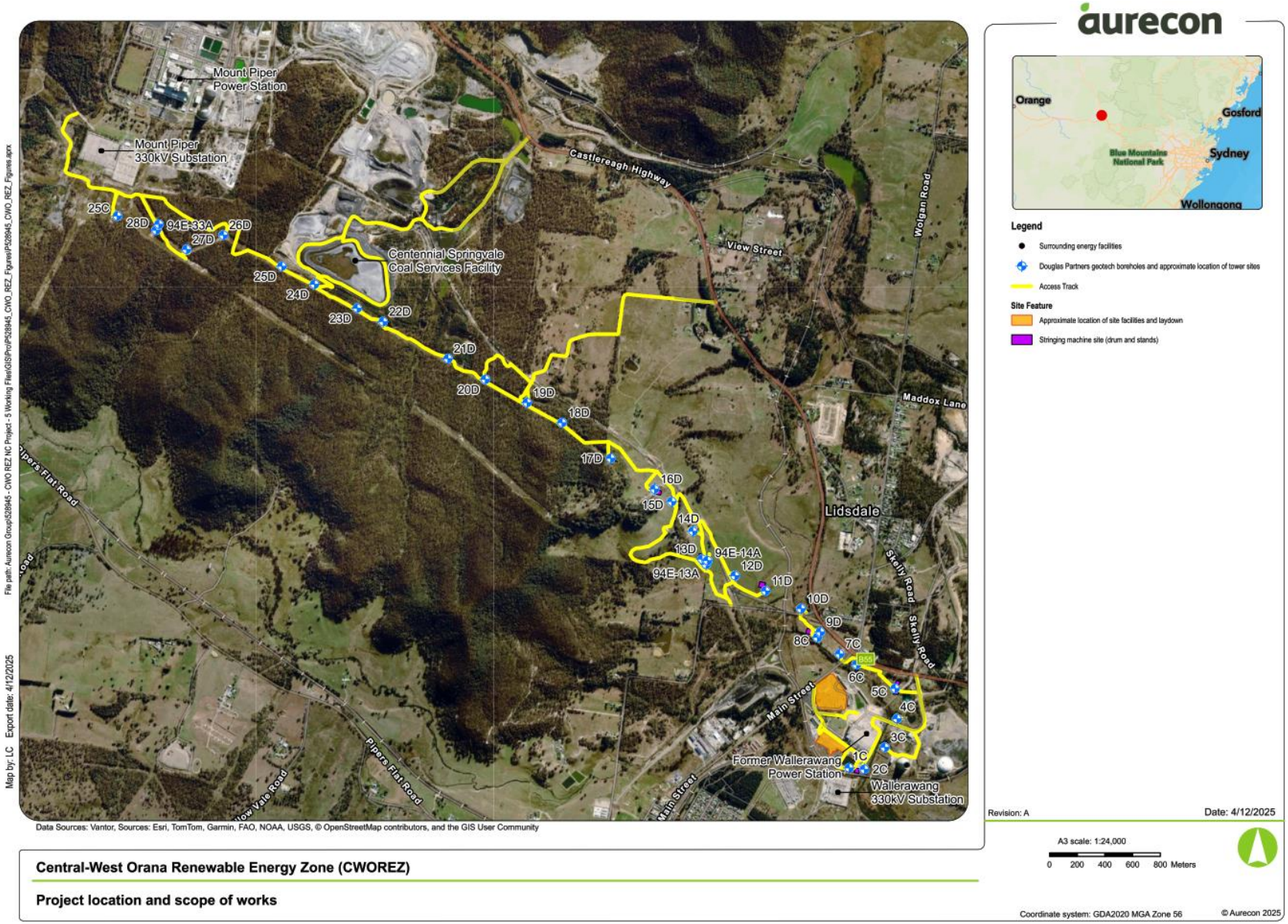


Figure 1 Project location and scope of works - Overview

1.4 Project Staging

A Staging Report has been developed in accordance with Conditions C4 to C6. Revision 2.2 of the Staging Report was endorsed by the Environmental Representative (ER) on 8 October 2026.

The Staging Report identified 3 stages. These Stages have the same meaning as the terms defined in the Infrastructure Approval. The Stages are;

- Pre-Construction
- Construction
- Operation

Future stages, including upgrading and decommissioning will be addressed through future revisions of the Staging Report, as required. Following endorsement of the Staging Report, Transgrid submitted a Staging Request to the Planning Secretary for staging specific to the AES in accordance with Condition C7 which was approved by DPHI on 28 August 2026.

In accordance with the Staging Request, this Management Plan addresses the construction stage only. As such, operational management of accommodation and employment related to the Project, and operational mitigation measures and monitoring do not fall within the scope of this AES and are not addressed within the processes contained within this Strategy. Requirements applicable to the remaining stages, including operation, upgrading and decommissioning, will be addressed in a separate document prior to commencement of the relevant stage.

The Staging Report and Staging Request are subject to update where the Project staging arrangements are revised or further stages are progressed.

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2. Objectives

The following objectives guide the implementation of this AES. They establish the outcomes sought in relation to workforce management, accommodation, local employment, industry participation and community wellbeing during construction of the Mount Piper to Wallerawang Transmission Line Upgrade.

2.1 Support Economic Development in The Project Region

Prioritise the engagement of businesses located within the Project's defined Area of Influence that have the capability and capacity to undertake the relevant scope of works. This includes businesses located within the Local Government Areas (LGAs), Local Aboriginal Land Council (LALC) areas, and Aboriginal Language Group Areas intersected by the Project. Further detail is provided in the Aboriginal Participation Plan (APP), and Australian Industry Participation Plan (AIPP).

2.2 Maximise Australian and Local Industry Participation

Provide local and Australian suppliers, subcontractors, and service providers with full, fair, and reasonable opportunity to participate in relevant aspects of the Project, including procurement activities, supply chain engagement, and workforce development initiatives. Further detail is provided in the APP and AIPP.

2.3 Promote Aboriginal Business Involvement

Promote the participation of Aboriginal businesses within the broader scope of local industry engagement by aligning with the targets and commitments outlined in Zinfra's APP. This includes the ongoing inclusion of Aboriginal enterprises in procurement, subcontracting, and tendering opportunities. Further detail is provided in the APP.

2.4 Enhance Supply Chain Resilience and Capability

Support and strengthen local supply chain capability through the identification of skills gaps and the facilitation of knowledge transfer, training, and certification opportunities. These initiatives aim to enhance the long-term capability and sustainability of regional businesses and the local workforce. Further detail is provided in the APP, and AIPP.

2.5 Minimise The Impact to Local Housing and Accommodation

Minimise impacts on local housing and accommodation availability by avoiding undue pressure on the local rental and short-term accommodation markets. This includes reducing the potential for increased accommodation costs and maintaining accommodation availability for local residents, businesses, and visitors.

2.6 Ensure The Wellbeing of The Workforce

Implement measures to support and maintain a high standard of workforce wellbeing and morale throughout the duration of the Project. This includes promoting a supportive work environment where personnel are encouraged to identify signs of stress, fatigue, or mental health concerns in themselves and others, and are provided with appropriate avenues to seek assistance and support where required.

2.7 Access to Local Services

Support workforce access to local services, facilities, and amenities while minimising potential impacts on the availability and accessibility of those services for the existing community. This includes encouraging the responsible use of local health, retail, recreational, and community services, while implementing workforce management measures designed to avoid placing undue pressure on local infrastructure and service providers. Workforce arrangements, accommodation strategies, and roster structures will also be considered to assist in reducing reliance on local services where practicable.

2.8 High Standards of Behaviour

Promote and maintain high standards of behaviour by ensuring personnel act responsibly and respectfully while interacting with the local community. All personnel are expected to demonstrate professionalism, integrity, and consideration for local residents, businesses, and community members throughout the duration of the Project.

Zinfra is committed to maintaining a safe, inclusive, and respectful workplace for all employees, contractors, and stakeholders. A zero-tolerance approach is applied to bullying, harassment (including sexual harassment), discrimination, vilification, and victimisation. All personnel are expected to conduct themselves with dignity, courtesy,

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and respect, while consistently demonstrating the organisation’s values and behavioural expectations.

When engaging with local communities, personnel are expected to represent the organisation in a professional, respectful, and culturally appropriate manner. This includes maintaining clear and respectful communication, actively listening to community concerns, and supporting positive community outcomes where practicable. Building and maintaining trust through transparency, consistency, and fulfilment of commitments is considered essential. All activities are to be undertaken with consideration for safety, environmental responsibility, and social wellbeing to minimise disruption and support positive community relationships.

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3. Workforce Labour Requirements

The Project workforce will comprise skilled, unskilled and professional personnel across the following areas:

- Professional Personnel – These include Project Engineers, Project Managers, Construction Managers, Contract and Administration staff, Health-Safety and Environment Representatives, Quality Managers, Designers, Test and Commissioning Technicians
- Blue-collar employees – Electricians, Lineworkers, Trades Assistants, Store Persons etc
- Subcontractors – Civil Construction Workers, Crane Operators, Tree Clearing Arborists etc

3.1 Expected Workforce

The construction workforce is expected to peak at about 150 personnel, with an average workforce of approximately 60 to 80 personnel. The peak is expected to be early in the works when both civil foundation works and electrical works associated with the construction of transmission structures are undertaken concurrently. As the Project progresses, the civil workforce is expected to reduce.

Figure 2 shows the current anticipated Project workforce. The workforce profile is indicative and is subject to external factors including approval of the Construction Environmental Management Plan (CEMP), network outage approvals, ground conditions and weather conditions that may affect both construction activities and the ability to isolate parts of the transmission network.

From an environmental perspective, peak workforce periods may increase the risk of potential environmental impacts and increased waste generation. Appropriate mitigation measures outlined in the CEMP and Waste Management Plan should be implemented during these periods to minimise impacts, with monitoring undertaken to confirm compliance with applicable environmental requirements.

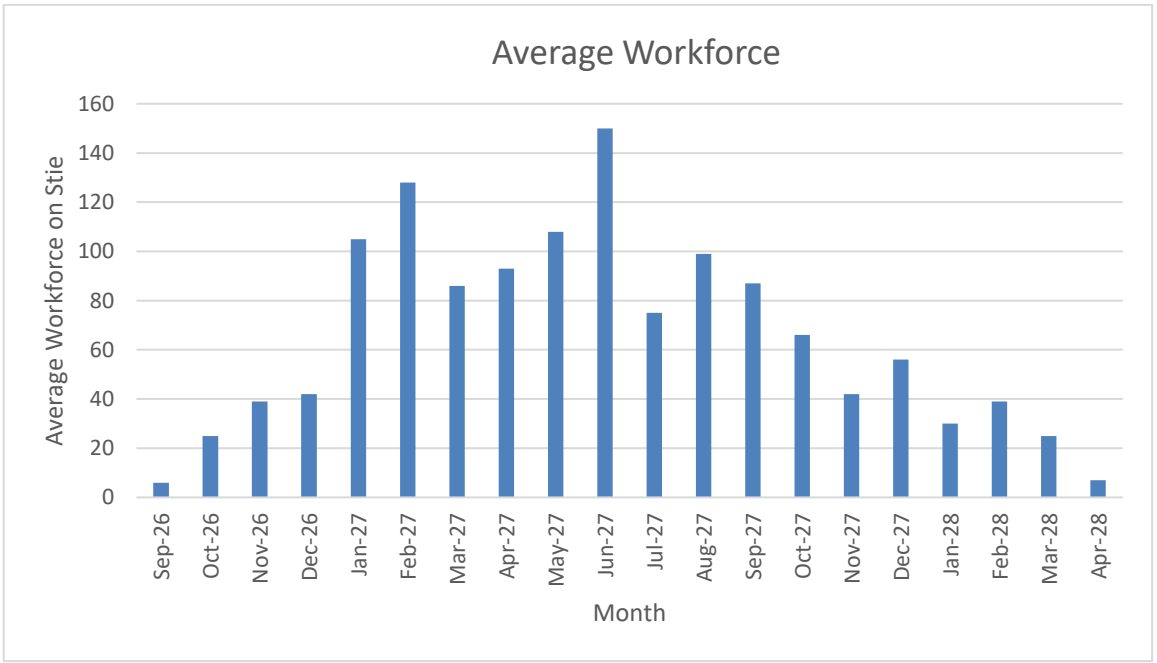


Figure 2. Average Workforce on the Project

Note: The average number of workers shown in Figure 2 is indicative and subject to change depending on factors including weather and network restrictions. The workforce profile includes both local and non-local workers.

Up to one quarter of the workforce is often made up of local persons including civil contractors for access works, arborists, ecologists, truck drivers, surveyors, store persons, cleaners, waste disposal and clerical staff.

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3.2 Roster and Working Hours

As the majority of the Project workforce will be non-local, most works will be undertaken on a roster basis. The typical roster will be a 20:8 roster over a 28-day period, comprising 17 working days, one fatigue day typically taken on a Sunday, up to two travel days comprising one day travelling to site and one day travelling home, and eight days of rest and recovery normally taken at home.

Due to the roster arrangements and the need to achieve the required construction program, it is anticipated that most weekend days falling within a roster period will be worked where the requirements of the EIS, CEMP and Infrastructure Approval (including Condition B2) can be met. Any work undertaken outside standard hours, including weekend work, will be undertaken in accordance with the Noise and Vibration Management Plan and Out of Hours Works (OOHW) Protocol and as permitted under Condition B2. This includes circumstances where activities do not result in noise-affected sensitive receivers or where works are undertaken in accordance with the approved OOHW Protocol. Where OOHW is undertaken under Condition B2, the relevant management and mitigation measures identified in the EIS and CEMP will continue to be implemented.

During the eight-day rest and recovery period, Zinfra would generally have a limited presence on site. Where circumstances such as weather, unexpected conditions or other factors require a continuous site presence, a rolling roster may be implemented. Under a rolling roster, the workforce would be divided into separate teams, with each team taking a different period of rest and recovery during the 28-day roster period, allowing Zinfra to maintain a continuous presence on site.

Normal working hours are expected to be 7 am to 5 pm Monday to Friday and 8 am to 1 pm Saturday. Out-of-hours work may also be undertaken where permitted under Condition B2 and with the relevant controls identified in the Noise and Vibration Management Plan in place.

Workdays will include a 20-minute morning break and a 30-minute lunch break. Further information on fatigue management is provided in the Fatigue Management Plan. All extended work will be undertaken in accordance with the Fatigue Management Plan and the environmental controls contained in the Noise and Vibration Management Plan to minimise impacts including noise, dust and light spill.

3.3 Likely Representation of Local Workforce

It is anticipated that up to one quarter of the workforce may comprise local personnel, including civil contractors undertaking access works, arborists performing tree clearing activities, truck drivers, surveyors, store persons, cleaners, waste management personnel, and clerical staff.

Opportunities for local workers are addressed in further detail within this Strategy, as well as in the Aboriginal Participation Plan (APP) and Australian Industry Participation Plan (AIPP).

Local personnel are typically engaged as full-time employees of local subcontractors with capabilities aligned to the Project scope or alternatively engaged on a short-term or casual basis by non-local subcontractors or Zinfra.

3.4 Composition of Non-Local Workforce

Due to the specialised nature of the works, including overhead transmission line construction, operation of large auguring equipment, and steel structure installation, a number of roles require specialised skills, qualifications, and experience developed over an extended period of time. As a result, these capabilities may not be readily available within the local workforce or achievable through training within the Project duration. Accordingly, the Project will require a significant proportion of personnel to be sourced from outside the local area.

Non-local personnel are typically full-time employees of Zinfra, based across the eastern seaboard of Australia, or employees of specialist subcontractors engaged to undertake specific components of the works. Zinfra personnel include the roles identified in Section 3, Section 10.3 and Table 3 of this Strategy.

Given the relatively short duration of the Project, together with the implementation of a 20:8 roster considered to be family-friendly within the industry, it is generally anticipated that the majority of non-local personnel will not relocate partners or families to the area during the course of the works.

It is noted that some non-local personnel may develop an appreciation for the region and the lifestyle opportunities it offers, which may result in individuals and their families choosing to relocate to the area on a longer-term basis.

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4. Accommodation Strategy

This section identifies the measures Zinfra will implement to ensure sufficient accommodation is available for the workforce associated with the development. These measures have been informed by consultation with the relevant Council(s) and local accommodation providers. The section also outlines measures to minimise potential impacts of the Project workforce on local accommodation, identifies preferred workforce accommodation options, and provides an assessment of accommodation supply and availability.

4.1 Rental Housing Availability

A summary of the findings from Technical Report 13 – Social Impact Assessment (SIA) of the EIS is provided below.

At the 2021 Census, 8,319 occupied dwellings were recorded within the Lithgow Local Government Area (LGA), representing 86.8% of the total 9,585 dwellings within the LGA. The predominant dwelling type was separate houses, accounting for 89.6% of occupied dwellings. Housing stock within the Lithgow LGA is generally characterised by larger dwellings, with 41.7% of homes comprising three bedrooms.

Home ownership within the Lithgow LGA was relatively high, with 71.4% of residents owning their home either outright or with a mortgage. Rental households represented 24.1% of all households, the majority of which were within the private rental market. Of rented households, 19.5% were rented through the State or Territory housing authority and 2.2% through a Community Housing Provider.

Rental affordability is monitored by SGS Economics through the quarterly Rental Affordability Index (RAI). The RAI data indicated that relatively few new rental bonds are lodged within the area each quarter, resulting in limited and inconsistent rental market data availability.

A review of rental listings on realestate.com.au identified 26 rental properties available within the Lithgow LGA during March 2025. A subsequent review undertaken in May 2026 identified 26 rental properties available within 30 km of the site and a further 8 properties at Blackheath.

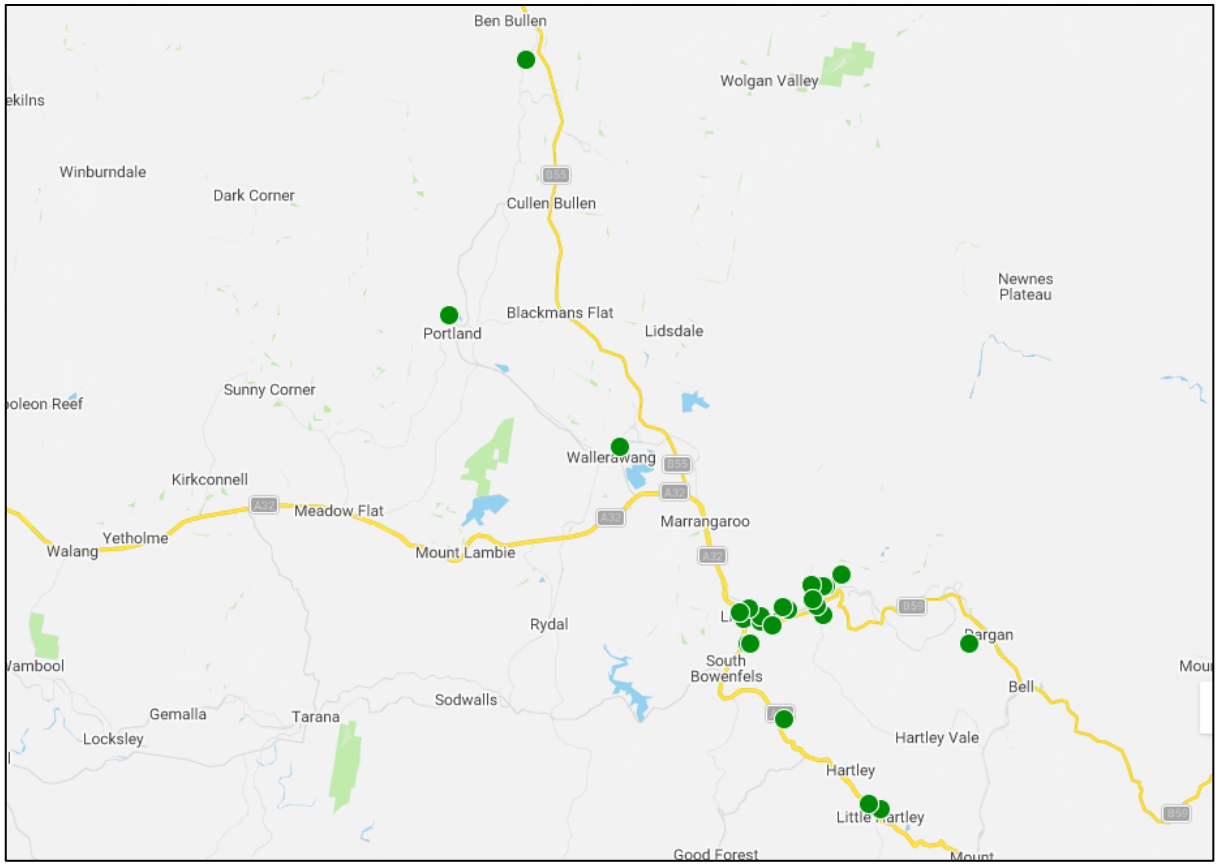


Figure 3. Location of nearby rental properties

4.2 Short Term Accommodation Availability

A summary of the findings presented in the SIA is provided below.

As of May 2025, there were over 20 hotels, motels, serviced apartments, and campgrounds around Lithgow, as well as approximately 140 properties available as short-term rental accommodation as listed on Airbnb.

Based on a review of the online accommodation reservation service TripAdvisor in May 2025, it is estimated there are approximately 530 hotel, motel, hostel, holiday park and serviced apartment rooms in Lithgow LGA. All accommodation providers in the LGA are within a one-hour drive of the Project footprint.

Extending the review to other LGAs within a one-hour drive of the Project footprint, such as localities within Bathurst, Blue Mountains, Hawkesbury and Oberon local government areas, an estimated total of 3,103 hotel, motel, hostel, holiday park and serviced apartment rooms are located within a one-hour drive of the Project footprint. When extending to Airbnb listings, there is a total of 4,637 rooms or properties with a one-hour drive.

The Project preference is for personnel to stay within 30 km of the site or, where accommodation is outside this area, within approximately 50 minutes' travel time. This extends from Ben Bullen to the north, Bathurst to the west and Blackheath to the south. A review undertaken in May 2026 of accommodation availability for September 2026 identified 321 Airbnb homes within this area. While the number of rooms could not be determined, more than 30 hotels, motels, hostels and caravan parks were also identified. Airbnb accommodation may also transition to longer-term accommodation subject to agreement with individual landlords.

To further assess short-term accommodation capacity, Zinfra consulted with a representative sample of accommodation providers across Wallerawang, Lithgow, Bathurst and Blackheath in July 2026. Consultation sought information regarding total room capacity, typical occupancy where available, and anticipated availability during November 2026. The consultation identified constrained availability within Wallerawang and Lithgow during this period, primarily associated with the planned Mount Piper Power Station shutdown, while accommodation providers in Bathurst and Blackheath generally indicated greater availability. Details of this consultation are provided in Appendix A.

While the consultation represents a snapshot in time and accommodation availability will fluctuate throughout construction, the findings indicate that accommodation demand associated with the Project can be distributed across a broader range of locations and accommodation types where availability within the immediate Project area is constrained. This supports the accommodation approach outlined in Section 4.3, including the use of Lithgow, Wallerawang, Portland, Bathurst and Blackheath, subject to the travel and fatigue management requirements identified in this Strategy.

The Project's average workforce is anticipated to be approximately 60 to 80 personnel, with a peak workforce of approximately 150 personnel. Up to approximately 25% of the workforce is anticipated to comprise local personnel who would not require temporary accommodation. Accommodation demand will also vary throughout construction depending on workforce composition and individual accommodation arrangements. Accommodation availability and workforce accommodation patterns will therefore continue to be monitored in accordance with Section 12.

4.3 Accommodation Strategy

It is acknowledged that an influx of non-local personnel could adversely affect local rental prices and the availability of accommodation in the area for others, in particular, tourist accommodation. The Project team will implement strategies to avoid placing undue pressure on any single accommodation type and work with council and third parties to minimise these impacts.

Where practical, Zinfra will use local personnel to undertake activities including vegetation clearing and management, access works, surveying, ecological and geotechnical services, clerical services and transport. This approach is preferred as it reduces demand for workforce accommodation. However, local service providers may already be fully utilised by long-term or repeat local clients and may therefore have limited capacity to support short-term construction works.

The type of accommodation used by the workforce will vary depending on factors including the duration personnel are engaged on the Project. Although the Project extends for more than 12 months, many trades and personnel will only be required for part of this period. Zinfra provides direct employees with a set payment for nights away from

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home. Indicatively, up to 15% of Zinfra personnel have their own caravans, while other personnel may use longer-term caravan park or residential accommodation. Crews may share accommodation to minimise individual costs. Specialist subcontractors are generally expected to be on site for shorter periods and are therefore more likely to use lower-cost motel-style accommodation. This strategy allows the workers to select a wide variety of accommodation and lessens the impact on local availability.

Where Councils identify preferences regarding workforce accommodation types or locations, Zinfra will consider this feedback and encourage the workforce to use those locations where practicable. Blue Mountains City Council did not identify a preference for accommodation type but was supportive of workers staying within the LGA where required.

Camp-style accommodation may also be considered where suitable existing facilities are available. Due to the relatively short-term nature of the works and uncertainty regarding construction commencement dates, construction of a Project accommodation camp is not considered viable and is not included in the Project approvals. Zinfra may, however, lease suitable camp-style accommodation provided by others in the same manner as other commercial accommodation, subject to its location and availability.

The avoidance of reliance of a single type of accommodation has proven to be successful in the past. Zinfra recently completed a project in Goulburn with a very similar sized workforce, and with the same accommodation strategy. No complaints were received from Council or any other person or business with regards to accommodation, or any impact of our workforce.

The use of varied accommodation, and non-centralised housing, has the added benefit of keeping as much traffic off the road network as possible, limiting the potential for road accidents and wear and tear of the roadway infrastructure, and limiting cumulative noise and vibration impacts on nearby communities. Accommodation would therefore be sourced in the following localities: Lithgow, Wallerawang, Portland, Bathurst and Katoomba.

Where possible, the use of local subcontractors and service providers will be maximised to alleviate any adverse impact on the supply of local accommodation options.

Under the terms of the industrial agreement in place Zinfra pay a set fee to the workers which enables them to source their own accommodation. To encourage the use of existing commercial accommodation where practicable, Zinfra will provide employees with information on preferred accommodation types, locations and larger locally available accommodation providers during the resource allocation and mobilisation process, prior to their mobilisation to site. This information will also be reinforced during the Project induction.

For non-local subcontractors, Zinfra will communicate the Project's preference for the use of existing commercial accommodation where practicable through subcontractor mobilisation and kick-off processes. Subcontractors will also be encouraged to consider the availability of accommodation within the nominated locations and to avoid undue concentration of workers within any single accommodation type or location.

4.4 Accommodation Locations

Zinfra’s industrial agreement requires the workforce to reside within 30 km of the Project site to manage fatigue and reduce the amount of travel a person needs to perform on a daily basis. Where it can be demonstrated that the travel time is 50 minutes or less, personnel may stay in other locations, including Blackheath and Bathurst. The Project induction will identify the towns and villages falling within this area, as illustrated in Figure 4. These include Ben Bullen, Cullen Bullen, Portland, Yetholme, Tarana, Rydal, Mount Victoria, Marrangaroo, Sunny Corner, Lithgow and Wallerawang. Personnel may reside outside of these areas where travel time is less than 50 minutes and with the approval of their line manager, extending the available accommodation area to include Blackheath and Bathurst.

4.5 Interaction with Events

Key community events and festivals in the area may attract visitors from outside the region and increase demand for short-term accommodation. The Project is anticipated to have a minor impact on the availability of accommodation for tourism because:

- the number of Project personnel requiring accommodation is low compared with the number of available accommodation places;
- local companies will be prioritised where practicable, reducing the number of non-local personnel requiring

accommodation;

- personnel may select from a range of accommodation types, distributing workforce demand across different accommodation options; and
- personnel may reside within approximately 50 minutes of the Project site, enabling accommodation to be distributed across Lithgow and surrounding locations with greater accommodation availability, including Blackheath and Bathurst.

Key community events include:

- February
    - Rydal Agricultural Show, Rydal
    - Seven Valleys Wild Food Festival
- March
    - Lithgow Show, Lithgow
- April
    - Ironfest, Portland
- September
    - Daffodils and Art at Rydal, Rydal
- October
    - Lithgow Halloween, Lithgow

Mount Piper Power Station has scheduled shutdowns during spring and/or autumn, which can reduce accommodation availability in the area. These shutdowns attract a substantially larger workforce than the Project and may require Project personnel to travel further than the preferred 50-minute travel time. Personnel will be asked during induction to identify where local accommodation cannot be obtained. Where longer travel is required, the Fatigue Management Plan will be applied. This may include shorter working days, rotation of drivers or consideration of the tasks undertaken by affected personnel.

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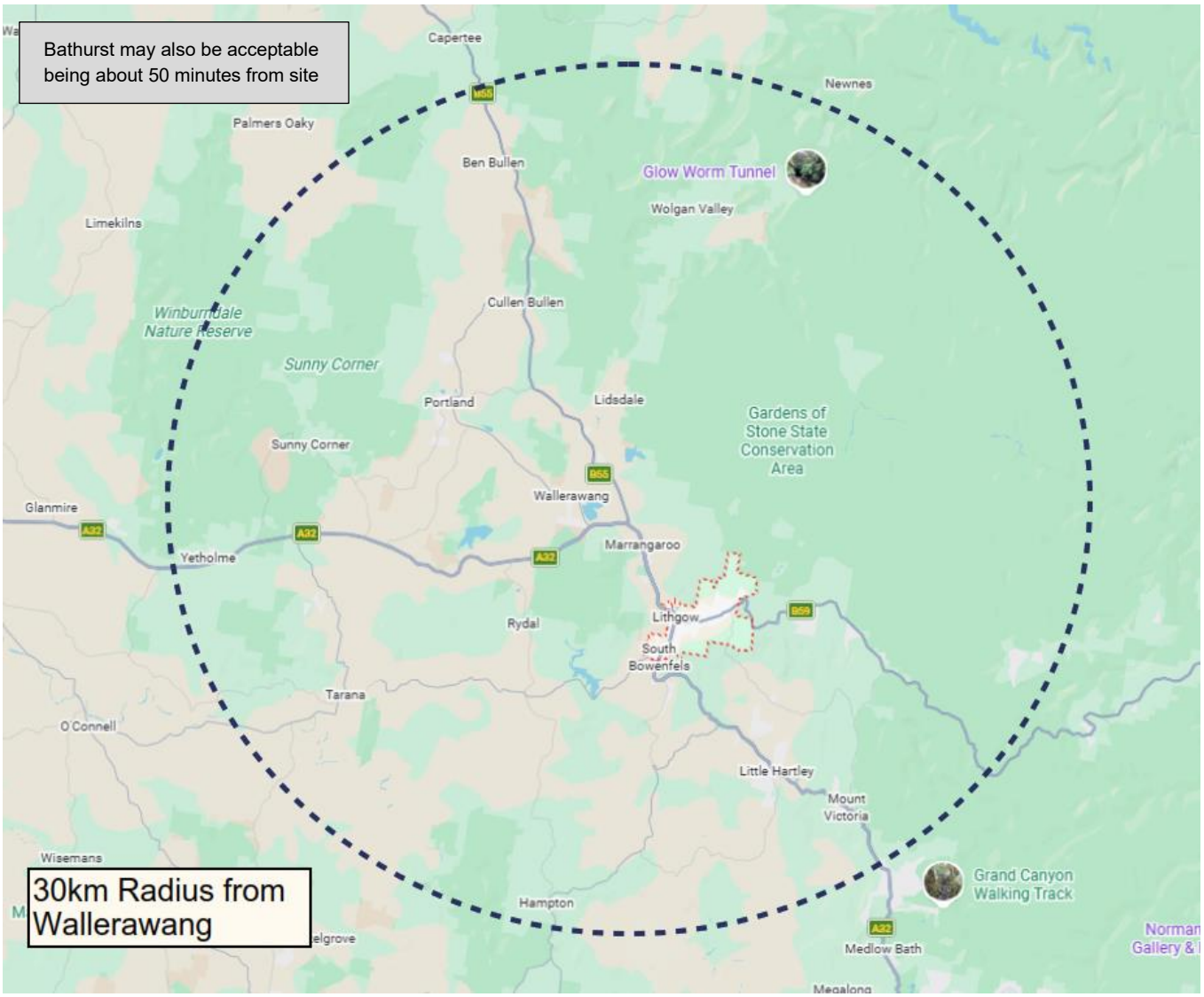


Figure 4. Approximate range for accommodation

5. Other Impacts on the Local Services and Community

5.1 Expectations of Conduct

Zinfra maintains high standards regarding the conduct and behaviour expected of its workforce, including employees, subcontractors, consultants, suppliers, and other personnel engaged on the Project. All personnel are expected to act professionally, ethically, and responsibly in the performance of their duties and while representing the Project.

At a fundamental level, all personnel are expected to act appropriately and in accordance with the Group Code of Conduct, which establishes the behavioural standards and expectations applicable across all business activities. The Code of Conduct is intended to guide personnel in making informed and ethical decisions in the course of their day-to-day work activities.

The Code of Conduct applies to all personnel, including employees, directors, officers, contractors, consultants, and suppliers, irrespective of role or location. This includes conduct outside normal working hours where such conduct may relate to, impact, or reflect upon the Group or the Project.

The Code of Conduct is communicated to all personnel through the Project-specific induction process undertaken prior to mobilisation to site. Completion of the Project induction is mandatory for all personnel engaged on the Project and ensures awareness and understanding of the behavioural expectations and obligations applicable to the workforce.

In addition to the Group Code of Conduct, all project personnel are expected to interact with members of the community in a respectful and courteous manner and to conduct themselves in a way that maintains positive community relationships. Personnel are expected to comply with all applicable road rules while travelling to and from the site, drive safely and responsibly, respect local residents and businesses, use designated parking and access arrangements, and avoid behaviour that may be perceived as antisocial or that could adversely affect the amenity of the local community. These expectations will be communicated through the Project induction and reinforced throughout the Project via toolbox talks and other project communications.

Zinfra adopts a zero-tolerance approach to non-compliance with the Code of Conduct. Where concerns are raised regarding behaviour inconsistent with the Code, appropriate disciplinary action will be undertaken in accordance with applicable policies and procedures.

The Group’s approach to managing non-compliance is proportionate and responsive to the circumstances of each matter, while maintaining the standards and expectations established under the Code of Conduct.

Refer to Appendix B for a copy of the Code of Conduct.

It is noted that instances of non-compliance with the Code of Conduct are extremely rare amongst Zinfra personnel, subcontractors, consultants, and suppliers.

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6. Strategies To Promote Wellbeing

6.1 Zinfra's Commitment and Potential Impacts Due To Wellbeing

Zinfra is committed to providing a healthy and supportive work environment to protect employee mental wellbeing and avoid psychological or physical harm. Zinfra adopts an integrated approach which seeks to:

- Prevent harm from unhelpful work practices by understanding the hazards
- Intervene Early (Early Intervention) to identify vulnerable individuals, which are supported by known escalation pathways for assistance
- Promote the positive aspects of work, with evidence informed programs; and
- Support Recovery of individuals to recover from illness, cope with challenges and thrive in the workplace

This Strategy identifies the actions and initiatives used to support this approach. Work can positively contribute to mental wellbeing by providing meaning, purpose, connection, growth and a sense of achievement, while also having the potential to adversely affect mental wellbeing.

6.2 Employee Benefits

At Zinfra, we're committed to creating a workplace that supports your wellbeing, fosters flexibility, and empowers you to thrive—both professionally and personally.

We offer a wide range of employee benefits designed to promote a healthy work-life balance and enhance overall job satisfaction. These include:

- Paid annual and personal leave
- Universal Reproductive Health Leave – an industry-leading initiative providing an additional five days per year to support reproductive health needs, on top of standard personal leave entitlements
- Purchased Additional Leave (PAL) – giving you the option to buy extra annual leave when you need more time off
- Free, confidential Employee Assistance Program (EAP)
- Annual free flu vaccinations
- Discounts on health insurance and optical services

Access to the Fitness Passport, which unlocks entry to over 1,300 gyms and pools across Australia. We've also embraced a collaborative approach to remote working, removing geographic boundaries and enabling greater flexibility in how and where we work. Our teams have adapted exceptionally well, leading to stronger collaboration, improved outcomes, and increased employee satisfaction.

As we continue to evolve, our goal remains clear: to build a great place to work—where curiosity is encouraged; trust is foundational, and everyone can do their best work.

Note these benefits are reviewed and updated on a regular basis. The link is below: https://www.zinfra.com.au/our-approach/employee-benefits

6.3 Encouragement To Become Involved in the Regions

During the rostered period, there is an allowance for a fatigue day in the middle of the working roster. The employees will be encouraged during the day and the evenings to become involved in local events.

Zinfra also regularly gives to local charities. As an example, during the course of the Project the funds generated from scrap steel may be donated to causes local to the area. Local charities such as Can Assist Lithgow and Lithgow Community Projects have been identified as suitable recipients of donations sourced from the Project. Typically, donations would be made at the end of overhead stringing works and on completion of earthing activities on the Project.

Zinfra also encourages our personnel to champion community causes, for example encouraging involvement and

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initiatives in charities such as Movember and R U OK day, which highlights the issues around suicide prevention and mental health awareness. Participation may be through organised morning teas or team BBQ's where profits are donated to the respective charities.

Outcomes from community initiatives will be communicated by the Project Team through project newsletters, team and client meetings and posts on Zinfra and Transgrid intranet sites.

6.4 Employee Assistance Program

Zinfra has an Employee Assistance Program (EAP) – Acacia. This assistance program provides free and confidential assistance to personnel and their families. This service provides a wide range of options to suit the individual's needs; these include counselling services, and Critical Incident Response. The service being open to Zinfra employees, the employees' immediate families, and our subcontractors. The service is 24 hours and offered free of charge to the individual. This service is completely confidential.

6.5 MATES in Energy

Zinfra also engages with MATES in Energy. MATES provides suicide prevention through community development programs on sites, and by supporting workers in need through case management and a 24/7 help line. Information about MATES will be provided to workers through toolbox talks. Literature and flyers will also be placed on site noticeboards.

MATES representatives attend site at least once per year and encourage open and honest conversation around the difficult topic of suicide and how this can be managed within the industry and on the work site.

Zinfra's workers are also encouraged to be MATES in Energy Connectors. These Connectors undergo training to recognise when their team members need assistance, how to reach out and connect to them, and where they or team members can go for additional support. This training is not intended to provide comprehensive psychological expertise or replace professional support. It provides workers with an additional point of contact where assistance or further support may be required.

6.6 Early Intervention for Physical Issues

Zinfra understands there are times when minor issues can occur either at home or through prolonged use, e.g. minor muscle strains. Where these are caused by an incident at work, these are managed through the normal incident process, including treatment appropriate for the individual. Where however issues occur that are not through an incident at work, without treatment they can develop into a workplace injury. Zinfra offers a free physiotherapy service to our employees to use in these instances. In order to access the service personnel must first seek approval from the Construction Manager, who is required to confirm the issue is not a result of an incident. The physiotherapist also sends a report back to Zinfra providing information on the issue, and the treatment plan.

6.7 Other Strategies

Regular toolbox talks are also held where relevant safety, social, and wellbeing topics are discussed in an open and honest forum. Local social events will also be highlighted such as sporting events, campouts, musical events, fishing tournaments, etc.

It is planned that each month a toolbox will involve a section and discussion on wellbeing including the services that are available to people, reminders of what the signs of poor mental health can look like, and local events.

The notice boards will also be updated with this information to ensure personnel are regularly reminded and have the ability to take down phone numbers of the services in private.

The sites are also encouraged to hold BBQs to celebrate the successes on a project. Whilst these are normally planned for outside of critical outage periods, they are often used to celebrate the first or last concrete pours or completion of the last outage on a project. These are likely to occur on a quarterly basis.

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7. Local Services Required by the Workforce

While engaged on the Project, personnel are likely to require access to a range of local services and facilities, including accommodation providers, medical centres, dental services, chiropractic and physiotherapy services, gyms and sporting facilities, tourism and recreational providers, retail stores, cafes, restaurants, bars, and cinemas.

7.1 Medical, Dentistry, Chiropractic, Physiotherapy

Medical and dental services can be limited in regional areas. Due to the family-friendly roster arrangements, most non-local personnel are anticipated to travel without their families, reducing reliance on local medical and allied health services. Personnel travelling alone are generally more likely to retain and use established medical practitioners in their home location, particularly for non-urgent treatment.

There may nevertheless be circumstances where non-local personnel require local health services, either by choice or as a result of an injury occurring on site. Zinfra will continue to manage work-related injuries through its established incident management and treatment processes.

7.2 Other local services

Other local services such as gyms, sporting facilities, tourism providers, shops, cafes, restaurants, bars, and cinemas are likely to be used by our non-local labour. The use of these services is predominantly positive for the local economy supporting regional business and services. In many cases the long working hours and relatively early start time of the workforce mean that peak periods are avoided for cafes, bakeries and similar, causing minimal disruption to the local population, but providing an economic benefit to the business.

Where applicable, the workforce will be reminded during toolbox talks to respect local community expectations and minimise environmental impacts, including waste generation and noise, when using these facilities.

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8. Workforce and Community Involvement

During the Project works, workers will be encouraged to attend and participate in local community events. The Lithgow City Council website https://council.lithgow.com/ regularly lists local events that are upcoming.

Some local activities include the Lithgow Comedy Festival, Jetblack 24 Hour Mountain bike race and the Downunder Cigar Box Guitar Festival.

Other helpful websites that include upcoming events include The Seven Valleys sevenvalleys.com.au and Visit NSW https://www.visitnsw.com/destinations/blue-mountains/lithgow-area/events .

Workers will be advised of relevant local events at toolbox talks, morning teas and team BBQs. Site notice boards will also be regularly populated with flyers and pamphlets to enable workers to choose which events are of interest to them.

Zinfra also encourages participation in local charities. This may be by providing resources to assist with local initiatives such as fundraising on behalf of local non for profits or offering small donations, for example from the sale of scrap steel from the Project.

Participation and good news stories from worker involvement will be communicated via posts on Zinfra intranet and to Transgrid through Project team meetings, Steerco meetings and Good Job Alert correspondence.

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9. Opportunities for Local Workers and Local Subcontractors and Suppliers on the Project

In accordance with Condition B52(d) of the development consent, Zinfra has investigated options for prioritising the employment of local workers and the use of local businesses during the construction and operation of the development, where feasible.

Although Zinfra brings in core skilled non-local workers for the execution of the works, opportunities have been identified for local workers, suppliers and subcontractors to contribute to the successful completion of the Project.

Zinfra is committed to maximising local participation and ensuring regional communities benefit from project opportunities. To attract local workers, Zinfra will use a multi-channel, community-focused recruitment approach that typically includes:

- Local job boards and employment platforms – such as Seek, LinkedIn and region-specific online job sites.
- Local newspapers and community newsletters – ensuring visibility among residents who prefer traditional media.
- Community engagement channels – including local councils, Chambers of Commerce, employment service providers**,** employment networks and community noticeboards.
- Indigenous employment partners and local training organisations – to support culturally inclusive and skills-aligned recruitment pathways.
- Zinfra's website and social media – promoting opportunities to a wider local audience and enabling easy application.
- Walk-up and information sessions – hosting or participating in job fairs, local information sessions and community briefings to support direct engagement.

This approach ensures local workers are aware of opportunities and can easily access recruitment information.

9.1 Works expected to be subcontracted to locals

To effectively execute the Project works Zinfra will be entering into subcontract agreements for larger portions of the works, these include:

- Tree clearing and management,
- Earthworks - including access track establishment and maintenance, crane pad establishment, cranes,
- Ecological inspections and advice,
- Environmental remediation.

In accordance with the Australian Industry Participation Plan (AIPP), local subcontractors will have the opportunity to participate in these works. Zinfra will use the eProcure and ICN platforms to provide relevant works package information and complete thorough evaluations of tenderers and their submissions. Subcontract opportunities will also be posted on relevant websites and through the Lithgow Mercury masthead.

9.2 Engagement with Local employment Service Providers

Due to the highly skilled nature of overhead transmission line works, above-ground activities do not typically require a significant number of unskilled personnel. Ground-level and below-ground works, including foundation and access works, generally provide greater opportunities for less-skilled personnel.

Zinfra will engage local and non-local companies to deliver foundation and access works. Where supplementary labour is required, these companies may use local employment service providers on a labour-hire basis.

The anticipated number of labour-hire personnel required for the Project is relatively low. Local businesses generally maintain workforce numbers suited to their operations, while foundation construction also requires a range of higher-skilled roles, including drill-rig operation and accurate placement of steelwork stubs within concrete.

Accordingly, anticipated engagement with local employment service providers is relatively limited. Where supplementary labour is required, local personnel will be prioritised, with personnel from outside the local area used where necessary.

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10. Works Expected to Be Supplied by Locals

Consistent with Condition B52(d) of the development consent, Zinfra will, where feasible, investigate and prioritise the use of local businesses and suppliers to support the construction of the Project. While some specialised goods and services may need to be sourced from outside the local area, the Project will seek to maximise opportunities for local procurement where this is practicable.

In support of REMM S4, Zinfra will require subcontractors delivering work packages suitable for local participation to consider opportunities for locally engaged workers, including apprentices, trainees and lower-skilled personnel. During subcontractor engagement and mobilisation, Zinfra will request that relevant subcontractors identify:

- roles that may be filled by local, Indigenous or culturally diverse workers;
- the skills and competencies required for those roles;
- any suitable on-the-job training, mentoring, supervision or skills development that can be provided;
- the person responsible for providing that support; and
- any constraints that limit the availability of these opportunities.

Identified opportunities may include supervised task experience, workplace mentoring, competency development, exposure to higher-skilled activities, support to obtain relevant tickets or licences, and participation in apprenticeship or traineeship pathways, where appropriate to the work package and Project requirements.

Zinfra will discuss identified opportunities with relevant subcontractors during mobilisation and subcontractor performance meetings. Delivery will be monitored through available training, competency, apprenticeship and subcontractor records. Where suitable opportunities have not been identified, Zinfra will discuss with the subcontractor whether additional practicable opportunities can be provided, having regard to the duration and nature of the work package, safety and supervision requirements, worker capability and the availability of suitable local candidates.

Direct opportunities provided by Zinfra will primarily occur through its apprenticeship program and where suitable Project vacancies arise. Specialist roles requiring established qualifications, competencies or transmission industry experience will continue to be undertaken by appropriately qualified and experienced personnel.The extent of these opportunities will depend on the nature and duration of individual work packages, the skills and competency requirements of the work and the availability of suitable local candidates. Specialist roles requiring established qualifications, competencies or transmission industry experience will continue to be undertaken by appropriately qualified and experienced personnel.

10.1 Internal Zinfra Roles Often Performed by Locals

As the resource profile and requirements change throughout the lifecycle of the Project, opportunities may also exist for local employees to take on roles normally performed by Zinfra permanent employees. For roles that are not specialised in the electrical transmission industry, these are often and regularly performed by locals. This includes general labourers, truck drivers, and clerical staff.

Although more specialised roles are generally undertaken by non-local personnel, local candidates may apply where suitable vacancies arise. Examples include Project Engineers, Health and Safety professionals, Environmental Professionals and Lineworkers.

All potential candidates will participate in Zinfra's standard recruitment process, which includes an assessment of role suitability based on established business procedures. Recruitment and selection across the Group are merit-based and guided by principles that promote fairness and equity. We are committed to attracting top talent while fostering a diverse and inclusive workforce. Relevant role openings will be posted on the Zinfra Careers webpage https://www.zinfra.com.au/careers/current-opportunities, job seek websites and may be advertised in the Lithgow Mercury newspaper or engagement with local employment agencies.

10.2 Zinfra's Apprenticeship Program

The skills shortage throughout Australia is well documented, as is the impending shortage of Transmission Lineworkers. A key resource for the Project is Transmission Lineworkers. Previous projects that Zinfra have

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completed have necessitated the need to source Transmission Lineworkers from overseas, and labour hire providers to bolster the resources to deliver projects.

Zinfra recognise this as an opportunity to boost the local involvement through the Zinfra Apprenticeship program. The engagement of Apprentices is a long-term commitment by both Zinfra and the employee, with the apprenticeship being a 4-year process.

The considerable apprenticeship period, the need to ensure a high level of supervision for apprentices, and the potential hazards of working on transmission lines, mean Zinfra need to stagger the intake of new apprentices.

The Project resourcing will likely support up to 2 new Apprentices to contribute to the completion of the Project. Once works are completed on the Project, Apprentices will be rotated through other relevant project works being delivered by Zinfra.

The role of an apprentice lineworker is well sought after due to the remuneration offered under the current Enterprise Bargaining Agreements. Again, potential candidates will be required to follow Zinfra's recruitment process and be assessed for role suitability in line with normal business procedures. Relevant role openings will be posted on the Zinfra Careers webpage https://www.zinfra.com.au/careers/current-opportunities, job seek websites and may be advertised in the Lithgow Mercury newspaper.

10.3 Training, Skills and Induction Requirements

The core component of the Mount Piper to Wallerawang Transmission Line Upgrade is construction of a new transmission line. Delivery of these works requires a range of skills, qualifications and experience. Representative roles and qualification requirements are identified in Table 3.

Table 3 – Roles and Qualification Requirements

Role	Qualification
Engineer	Degree in Civil or Electrical Engineering
Linesman	Certificate II or III in Transmission Line Construction
Electrician	Certificate III in Electrotechnology
Crane Operator	Appropriate verification of competencies for the cranes.
Plant Operator	Appropriate verification of competencies for the plant.

Note: This is not an exhaustive list of all roles on the Project

Additionally, workers who are required to perform tasks within the Transgrid Transmission line easement will be required to undertake specialised Transgrid training before works are undertaken. Workers will be required to undertake Transgrid Power System Safety Rules (PSSR) training. The minimum required course to work in the Transmission Easement is PSSR 6.1 Transmission Lines General. All PSSR training and records will be co-ordinated between Zinfra and Transgrid.

All dedicated workers on the Project and workers who frequently attend the Project site, i.e. Surveyors, Concrete truck drivers, will be required to complete a full Zinfra project induction. The Project induction will be completed in person as workers mobilise to the Project site. Other infrequent site workers will be assessed on a case-by-case basis and at minimum will be required to complete a Site Visitors induction on arrival at site.

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11. Cumulative Impacts

Zinfra has considered the cumulative impacts associated with other State significant development projects in the area, including potential impacts on accommodation, services, the local workforce and economy. A number of significant projects are progressing through various stages of approval within Lithgow City Council and surrounding areas, including wind farms, battery energy storage systems and hydro projects.

Potential cumulative impacts range from positive economic development outcomes to adverse impacts associated with pressure on local services, reduced accommodation availability and increased traffic.

The EIS identified other projects with the potential to contribute to cumulative economic and social impacts during delivery of the Mount Piper to Wallerawang Transmission Line Upgrade. Zinfra has contacted proponents of potentially relevant projects. This consultation identified that some projects have been delayed, with commencement now anticipated after completion of this Project, reducing the potential for cumulative impacts.

The Project Engagement Lead will maintain contact with proponents of projects that may contribute to cumulative impacts. Engagement will initially occur quarterly or as required. Where construction periods are confirmed to overlap, engagement may increase to monthly or another frequency considered appropriate. The purpose of this engagement is to identify opportunities to reduce cumulative impacts where practicable

Table 4 - Updated potential concurrent projects which could have a cumulative impact

Project	Approval Status (Sept 25) from EIS	Planned Construction (considered in EIS)	Planned Construction (updated based on consultation conducted April 2026)	Expected workforce	Cumulative impact to be considered?
Wallerawang BESS	Approved 4/8/2023. Current modification at response to submissions stages	Start late 2025	Start mid 2027 Early enabling works to commence late 2026.	Construction: peak of 100 personnel a day Operation: Around 5 permanent staff	Y
Lake Lyell Pumped Hydro Energy Storage	Prepare EIS	2027-2031	Construction not anticipated to commence before 2028.	Construction: Peak of around 600 Operation: Around 20 permanent staff	N
Ben Bullen Wind Farm	Prepare EIS	2028 onwards	2028 onwards	Construction: Peak of around 200 personnel Operation: Around 15 permanent staff	N
Mount Piper BESS	Approved	Mid 2026 onwards	Construction to begin in early 2027 – 2028.	Construction: Peak of around 177 personnel Operation: Unmanned	Y
Great Western BESS	Approved	Unknown	TBC. Likely to be concurrent with this project	Construction: Peak of around 250 personnel Operation: Unmanned	Y
Wallerawang Power Station Ash Dams	Approved	Not Stated (Minor works)	Unknown . Awaiting response from proponent	Unknown	Possible
DA226/22 Torrens 1 Subdivision	DA Exhibited. To close 13th June 2025	Unknown	Unknown	Unknown	Possible
Pinecrest BESS	Prepare EIS	Late 2026	Post 2028.	Construction: Peak of around 250 personnel Operation: Around 5 permanent staff	N
Wallerawang Railway Station Upgrade	Announced on TfNSW Website	Late 2025	work occurring from May – October 2026	Unknown	Y (Minor)

As per the EIS section 21.3

> *"These six projects include the Mount Piper Battery Energy Storage System, Wallerawang Battery Energy Storage System, Great Western Battery Energy Storage System, Pinecrest Battery Energy Storage System, the Lake Lyell Pumped Hydro Energy Storage project and the Ben Bullen Wind Farm project. These projects are expected to result in significant economic benefits (direct and indirect) to the local economy of Lithgow LGA and the rest of NSW. The Mount Piper to Wallerawang Transmission Line project would be the smallest contributor to the positive cumulative economic activity, by several orders of magnitude.*
>
> *The negative combined cumulative impacts would likely be low across most environmental issues…."*

The EIS, section 18.4.3, identified the below risks, controls and mitigations measures are added in to the CEMP.

Table 5 - Cumulative impact risks and controls

Risk Identified in EIS for cumulative works	Mitigation and Control Identified in this Strategy
Reduced availability of short-term accommodation and overall housing affordability and availability	The Mount Piper to Wallerawang Transmission works will have a relatively small workforce in comparison to the above. The Project allows the workforce to use a range of accommodation options including motel rental and house rentals. Whilst the migration of families into the area would not be discouraged, it's expected that most will be single persons reducing the accommodation requirements. For example, a 4 bedrooms house would be able to house 4 working personnel. Zinfra are however keen to explore camp-style accommodation if provided by others in lease arrangement. Whilst it's not approved by the SSI Consent for Zinfra or the Project to build such accommodation, it may be viable for Zinfra to lease these from others.
competition for local labour	Whilst there will be some opportunities for unskilled labour on the Project. The majority of the labour will be specialised and come from outside the local area.
ongoing impacted access to agricultural and employment lands	Zinfra will continue to consult with affected landowners, occupiers, and local businesses throughout the Project to minimise disruption to agricultural operations and employment activities. Access to properties and businesses will be maintained wherever practicable, with temporary access arrangements implemented where required. Traffic management measures and construction planning will seek to maintain the operation of the local road network to the greatest extent practicable, and advance notification of works and access changes will be provided to affected stakeholders.
increased intensity and duration of traffic and noise impacts, particularly for residents of Lidsdale, where multiple projects are occurring near residential areas	The working hours are typically 7 am to 5 pm with a pre-start with the crews being undertaken at 6.30 am. Although the staff often arrive a little bit earlier and leave a little later to ensure the documentation is complete to commence work at this time. This avoids the peak of the Zinfra personnel on the road at the same time as local morning peak and afternoon school times. Whilst there will be some vehicles on the road, delivering steel and materials throughout the day, the majority of the time for these vehicles is loading, unloading and driving on access tracks, it's not anticipated the vehicles from the Mount Piper to Wallerawang Transmission project would cause a noticeable increase in traffic.
increase in temporary populations and resulting impacts on community cohesion	The Project will have a relatively small peak in comparison to other projects. The Project will ensure the Code of Conduct form part of the induction for all workers. Local community events will be advertised on the notice boards in the office to encourage positive impact with the local community.
increased demand for social infrastructure and services including health care and emergency services	roster of 20:8 for the workforce means they have 8 days at home. Given the time at home, it's anticipated that many will leave non-urgent care to the Rest & Recovery break. There would be some use of local services, however, the Project will have a relatively small peak in comparison to other projects.

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Risk Identified in EIS for cumulative works	Mitigation and Control Identified in this Strategy
impacts to community values associated with natural and rural character	The Project will have a relatively small peak workforce in comparison to other projects. The Project will ensure the Code of Conduct forms part of the induction for all workers. Project personnel will be expected to minimise litter, and respect the surrounding environment and local community. Potential impacts associated with visual amenity, lighting, noise and dust will be managed through the implementation of the CEMP and its supporting management plans, with compliance monitored through routine environmental inspections and corrective actions implemented where required.
impacts to community wellbeing and social cohesion due to differing views about the Projects and impacts to community character	The Project will have a relatively small peak in comparison to other projects. The Project will ensure the Code of Conduct form part of the induction for all workers. Zinfra is developing a community engagement plan (Community Communication Strategy).
cumulative growth in renewable energy jobs and skillsets	The Project will have some need for local workers, for nonspecialised roles. On an occasional basis of these to become permanent employees of Zinfra or our Subcontractors. Zinfra also has an apprenticeship program. The Project at completion, being a transmission line, is not a permanently occupied facility. Whilst there will be some growth in the resources to maintain transmission lines, this will be spread across the state and will be of very low impact.
cumulative community benefit contributions supporting local community needs	The Project will promote local community events to the workforce through site noticeboards; toolbox talks and other Project communications to encourage participation in local events and support positive interaction with the local community. Zinfra may also support local charities and community initiatives, including through the donation of proceeds generated from the sale of scrap steel from the Project. Zinfra also often provides donations to local charities from the revenue of the scrap steel generated on projects.
The Project would be a lesser contributor to the cumulative impacts due to its smaller scale and nature, for example lower workforce requirements and low proposed traffic volumes and OSOM	The Project will minimise its contribution to cumulative impacts through the use of local workers and businesses where practicable, distribution of workforce accommodation across multiple locations and accommodation types, monitoring of workforce and accommodation demand, and coordination with other project proponents where construction periods overlap. Additional controls will be implemented where monitoring identifies that cumulative impacts may be greater than anticipated.

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12. Monitoring of The Effectiveness of the Accommodation Strategy

Zinfra and Transgrid are committed to minimising adverse impacts from the Project as much as reasonably practicable. The management measures established by this Strategy will be monitored to assess their effectiveness and identify where additional controls may be required. Monitoring outcomes will be reported in the monthly report to Transgrid.

Where an action trigger is reached, an investigation will be undertaken within two weeks by the Project Manager to confirm the accuracy of the data and determine whether further action is required. Reaching an action trigger does not necessarily constitute a non-conformance with this Strategy; rather, it provides an early indication that impacts on the local community may be greater than anticipated. Investigation outcomes, including any additional management or corrective actions, will be discussed and agreed with Transgrid.

Zinfra is also required to track learning workers, First Nations personnel and personnel from underrepresented groups. The Australian Industry Participation Plan identifies the applicable targets and tracking requirements.

12.1 Management Measures

The management measures to be implemented during construction to manage accommodation, employment, workforce and associated community impacts are summarised in Table 6. These measures consolidate the key commitments established throughout this Strategy and identify the timing, responsibility, source requirement and records that will provide evidence of implementation.

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Table 6 - Management Measures

ID	Measure	When to Implement	Responsibility	Source of Requirement	Evidence
AES1	Monitor Project workforce numbers to identify changes in workforce demand that may increase accommodation or community impacts.	Daily during construction	Project Manager / Construction Manager	CoA B52(b), B52(e); REMM S3	Daily pre-start attendance records; monthly reports
AES2	Promote the use of local workers and subcontractors where practicable to reduce reliance on non-local workforce accommodation.	Procurement, recruitment and throughout construction	Project Manager	CoA B52(d); REMM S4, S5	AIPP/APP reporting
AES3	Encourage non-local personnel to use a range of accommodation types and locations, with a preference for existing commercial accommodation where practicable, to avoid excessive demand on any single accommodation market.	Prior to mobilisation and throughout construction	Project Manager	CoA B52(b); REMM S3	Induction records
AES4	Provide personnel with information on preferred accommodation locations and the expected maximum travel time from accommodation to the Project site.	Prior to mobilisation, at induction and as required	Project Manager	CoA B52(b); REMM S3	Induction records
AES5	Monitor accommodation arrangements of the non-local workforce, including accommodation type and locality, to identify potential concentration or availability issues.	Quarterly once the Project workforce exceeds 50 personnel averaged over five working days	Project Manager	CoA B52(b), B52(e); REMM S3	Survey of Worker Accommodation; Monthly reports
AES6	Consider community events, Mount Piper Power Station shutdowns and other periods of elevated accommodation demand when reviewing workforce accommodation availability.	During workforce planning and throughout construction	Project Manager	CoA B52(b), B52(c); REMM S3	Workforce Rosters
AES7	Maintain engagement with relevant nearby projects where construction periods may overlap to identify and manage potential cumulative impacts on accommodation, labour and local services.	Quarterly initially, increasing as appropriate where construction periods overlap	Project Manager / Stakeholder and Community Team	CoA B52(c); REMM S3	Meeting minutes; emails; consultation records
AES8	Promote local employment opportunities through appropriate recruitment channels, including local employment providers, Councils, industry networks and community channels.	During recruitment and as workforce requirements change	Project Manager / People and Culture / Recruitment Team	CoA B52(d); REMM S4	Job advertisements
AES9	Provide local, regional and Indigenous businesses with opportunities to participate in relevant Project work packages	Procurement and throughout construction	Commercial and Procurement Team / Project Manager	CoA B52(d); REMM S4, S5	AIPP and APP records

ID	Measure	When to Implement	Responsibility	Source of Requirement	Evidence
	and supply opportunities, in conjunction with the AIPP and APP.				
AES10	Where practicable, require relevant subcontractors, during engagement and mobilisation, to identify suitable roles for local, Indigenous and culturally diverse workers and the practicable training, mentoring, supervision, competency development, apprenticeship or traineeship opportunities associated with those roles. Review identified opportunities during subcontractor performance meetings and follow up where suitable opportunities have not been identified.	During subcontractor engagement and mobilisation, and periodically throughout delivery of the relevant work package	Project Manager / People and Culture / Commercial and Procurement Team	REMM S4	Subcontractor mobilisation records; meeting minutes; workforce development information; training and competency records; apprenticeship or traineeship records
AES11	Communicate the Project Code of Conduct and community behaviour expectations to personnel, including respectful community interaction and avoidance of antisocial behaviour.	Prior to commencing work and reinforced throughout construction	Project Manager / Construction Manager	REMM S3	Project induction records; toolbox records
AES12	Provide workforce access to wellbeing support and communicate available wellbeing programs and services, including EAP and MATES in Energy.	Throughout construction	Project Manager / People Leaders / HSE Team	REMM S3	Toolbox records; noticeboard communications
AES13	Provide workers with information on local services, recreational opportunities and community events and encourage respectful participation in the local community.	Induction and throughout construction	Project Team / Project Engagement Lead	REMM S3, S6	Toolbox records; noticeboard communications
AES14	Record and respond to complaints associated with workforce accommodation, conduct or community impacts in accordance with the Project complaints management process.	As complaints are received	Project Manager / Project Engagement Lead	REMM S1, S2, S3; CoA B52(e)	Complaints register;
AES15	Review monitoring results against the action triggers established in this Strategy and investigate exceedances to determine whether additional management measures are required.	Monthly and when an action trigger is reached	Project Manager	CoA B52(e); REMM S3	Monitoring results; monthly reports

12.2 Roles and Responsibilities

The roles and responsibilities for implementing, monitoring and maintaining the requirements of this Strategy are identified in Table 7. All Project personnel are responsible for complying with the requirements relevant to their activities and supporting the effective implementation of the Strategy.

Table 7 - Roles and Responsibilities

Role	Responsibility
Project Manager	• Hold overall responsibility for implementation of the Accommodation and Employment Strategy and ensure appropriate resources are available. • Oversee daily monitoring of Project workforce numbers and quarterly monitoring of non-local workforce accommodation arrangements once the specified workforce threshold is reached. • Promote the use of local workers and subcontractors where practicable and encourage non-local personnel to use a range of accommodation types and locations. • Provide personnel with information on preferred accommodation locations, commercial accommodation options and expected maximum travel times before mobilisation, during induction and as required. • Consider community events, Mount Piper Power Station shutdowns and other periods of elevated accommodation demand during workforce planning and throughout construction. • Maintain, with the Stakeholder and Community Team, engagement with nearby projects where construction periods may overlap. • Promote local employment opportunities and support recruitment, training, apprenticeship and workforce planning initiatives with the relevant teams. • Communicate and reinforce the Project Code of Conduct and community behaviour expectations. • Ensure workforce access to wellbeing support and relevant information on local services, recreation and community events. • Ensure complaints associated with workforce accommodation, conduct or community impacts are recorded, investigated and responded to. • Review monitoring results monthly and when an action trigger is reached, assess performance against the specified triggers and coordinate investigations and corrective actions. • Undertake investigations within two weeks of an action trigger being reached and agree any additional management or corrective actions with Transgrid. • Approve personnel staying outside the nominated accommodation area where travel time remains within the permitted limit. • Coordinate implementation of additional or amended controls and updates to the Strategy where monitoring shows that existing measures are ineffective.
Construction Manager	• Support implementation of workforce management measures during construction. • Monitor workforce numbers through daily site attendance records and escalate material changes in workforce demand to the Project Manager. • Reinforce Code of Conduct, community behaviour and workforce wellbeing requirements through site communications. • Facilitate Project inductions, pre-start meetings, toolbox talks and other workforce communications relevant to this Strategy. • Approve access to the early-intervention physiotherapy service where the issue is not the result of a work incident. • Escalate emerging workforce, accommodation, conduct, wellbeing or community issues to the Project Manager. • Support implementation of corrective actions arising from monitoring, complaints or action-trigger investigations.
Project Engagement Lead	• Manage community and stakeholder engagement relevant to workforce and accommodation impacts. • Maintain records of stakeholder feedback, consultation and complaints. • Coordinate ongoing engagement with relevant Councils, accommodation providers, employment providers, affected landowners, occupiers and local businesses where required. • Support quarterly engagement with nearby project proponents, increasing the frequency where required. • Provide workers with information on local services, recreational opportunities and community events through inductions, toolbox talks, noticeboards and other Project communications.

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Role	Responsibility
	• Record and respond to complaints associated with workforce accommodation, conduct or community impacts in accordance with the Project complaints management process. • Communicate community initiatives and worker participation through Project newsletters, meetings, intranet posts and other approved communication channels. • Provide advance notification of works or access changes to affected stakeholders where required • Maintain contact with proponents of projects that may contribute to cumulative impacts. • Engage initially on a quarterly basis or as required and increase engagement where construction periods overlap. • Identify opportunities to coordinate activities and reduce cumulative impacts on accommodation, labour, local services and the community where practicable.
Recruitment Team / People and Culture	• Support recruitment and workforce planning, including local recruitment, training and apprenticeship initiatives. • Promote employment opportunities through appropriate channels, including local employment providers, Councils, industry networks, community channels, job platforms and local media. • Apply Zinfra recruitment processes and assess candidates for role suitability in accordance with established business procedures. • Encourage local, Indigenous and culturally diverse candidates to apply for suitable roles and apprenticeship opportunities. • Support tracking of learning workers, First Nations personnel and personnel from underrepresented groups in accordance with the Australian Industry Participation Plan.
Commercial and Procurement Team / Engineers and Personnel Undertaking Procurement	• Provide local, regional and Indigenous businesses with opportunities to participate in applicable Project procurement, subcontracting and supply activities. • Implement relevant requirements of the Australian Industry Participation Plan and Aboriginal Participation Plan. • Use relevant procurement platforms and advertising channels to promote suitable work packages. • Encourage subcontractors to consider local, Indigenous and culturally diverse workers when resourcing suitable roles. • During subcontractor engagement and mobilisation, request that relevant subcontractors identify suitable local participation roles and associated on-the-job training, mentoring, supervision, competency development, apprenticeship or traineeship opportunities. • Review the opportunities identified by subcontractors and follow up where suitable opportunities have not been identified, having regard to the work package, safety and competency requirements, available supervision and the availability of suitable local candidates. • Maintain or obtain appropriate records demonstrating the opportunities identified and implemented. • Ensure procurement and subcontractor engagement processes give capable local and Australian suppliers full, fair and reasonable opportunity to participate.
Supervisors / People Leaders	• workforce wellbeing requirements. • Communicate relevant requirements through pre-starts, toolbox talks and other workforce communications. • Report workforce, accommodation, wellbeing, conduct or community issues requiring further action. • Support personnel who identify signs of stress, fatigue, mental health concerns or other wellbeing issues and direct them to appropriate assistance. • Reinforce information on EAP, MATES in Energy, local services, community events and respectful use of local facilities. • Receive and escalate concerns or suspected breaches of the Code of Conduct..
HSE Team	• Support delivery and communication of workforce wellbeing programs and services, including EAP and MATES in Energy. • Support monthly wellbeing toolbox discussions and the maintenance of wellbeing information on site noticeboards. • Support incident management and treatment processes for work-related injuries and monitor applicable environmental requirements during peak workforce periods. • Assist People Leaders and the Project Manager with wellbeing issues and implementation of relevant corrective actions.
Environmental Business Partner	• Review relevant monitoring outcomes and monthly reporting associated with implementation of the Strategy. • Participate, where required, in investigations arising from action triggers.

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Role	Responsibility
	• Review proposed corrective or additional management measures for consistency with Project approval requirements. • Support monitoring of environmental compliance during peak workforce periods and ensure issues are addressed through the applicable CEMP processes. • Advise on updates to the Strategy where monitoring identifies that existing measures are ineffective..
Project Team	• Provide workers with information on local services, recreational opportunities and community events during induction and throughout construction. • Encourage respectful participation in the local community and support community involvement initiatives. • Communicate outcomes from community initiatives through newsletters, team and client meetings and approved intranet posts. • Maintain site noticeboards with relevant local event, wellbeing and support-service information. • Support regular toolbox talks, morning teas, team activities and Project communications required by the Strategy.
Transgrid Project Team	• Receive monthly reports on monitoring outcomes. • Participate with Zinfra in discussing and agreeing investigation outcomes and additional management or corrective actions. • Coordinate with Zinfra in relation to corrective actions and revisions needed to maintain compliance with the Project approval. • Coordinate Power System Safety Rules training and associated records with Zinfra.
Subcontractors	• Comply with the Strategy, Project induction, Code of Conduct and applicable community behaviour requirements. • Use existing commercial accommodation where practicable and avoid undue concentration of workers in one accommodation type or location. • Consider accommodation availability within the nominated locations during mobilisation. • Identify roles within the subcontracted works that may be suitable for locally engaged workers, including apprentices, trainees and lower-skilled personnel. • Where practicable, identify and provide appropriate on-the-job training, mentoring, supervision or skills development for locally engaged workers, having regard to the nature and duration of the work, safety and competency requirements and available supervision. • Nominate the personnel responsible for supervising or mentoring participating workers and maintain applicable training and competency records. • Provide Zinfra with information reasonably required to monitor the implementation of local workforce development opportunities. • Participate in required workforce and accommodation monitoring or surveys and report issues to the relevant supervisor.
Workers and Project Personnel	• Comply with the Strategy, Project induction and Code of Conduct. • Behave professionally, ethically and respectfully within the local community and when representing the Project. • Comply with road rules, drive safely, respect local residents and businesses, use designated parking and access arrangements and avoid antisocial behaviour. • Participate in required workforce or accommodation monitoring and surveys. • Report accommodation, fatigue, wellbeing, conduct or community issues to a supervisor or People Leader. • Use local services and facilities responsibly and minimise waste, noise and other impacts on the community. • Identify where suitable local accommodation cannot be obtained and cooperate with any fatigue-management controls applied to longer travel. • Complete required Project, visitor and Power System Safety Rules inductions and training before undertaking applicable work. • Raise suspected or known breaches of the Code of Conduct promptly and cooperate with investigations as required.
Line Manager	• Comply with the requirements of this Strategy, the Project induction and Code of Conduct; behave respectfully within the local community; participate in required monitoring or surveys; and report accommodation, wellbeing or community issues to their supervisor.
Zinfra and Transgrid Training	• Coordinate required Power System Safety Rules training and associated records for personnel working within

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Role	Responsibility
Coordinators	the Transgrid transmission line easement. • Ensure applicable workers complete the required training before undertaking work within the easement.

12.3 Monitoring, Performance Criteria, Triggers and Corrective Actions

The performance criteria, triggers and corrective actions established to assess the effectiveness of this Strategy are identified in Table 8. An action trigger provides an early indication that Project impacts may be greater than anticipated and initiates further review; reaching a trigger does not, in itself, constitute a non-conformance with this Strategy.

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Table 8 - Monitoring, Performance Criteria, Triggers and Corrective Actions

Theme	Trigger Event	Required Response	Where Addressed
Workforce numbers	Project workforce exceeds the anticipated peak of 150 personnel.	Verify workforce attendance data and assess whether the increase is temporary or represents a sustained change in the workforce profile. Review the potential implications for accommodation availability, local services and community impacts. Where required, implement additional accommodation or workforce management measures.	Sections 3.1 and 12.1
Accommodation distribution	More than 30% of surveyed non-local personnel are using one accommodation type within one town/city.	Verify survey results and assess whether the concentration is placing or has the potential to place undue pressure on that accommodation market. Review alternative accommodation types and locations and reinforce accommodation guidance to personnel where required.	Sections 4.3, 4.4 and 12.1
Travel from accommodation	Survey results identify personnel staying outside the preferred accommodation/travel arrangements established by the Strategy.	Confirm the circumstances and assess the arrangement against the Project fatigue management requirements. Where required, review alternative accommodation, working hours, driver rotation or other appropriate fatigue controls.	Sections 4.4, 4.5 and 12.1
Accommodation availability	Consultation, monitoring or workforce feedback identifies a material reduction in available accommodation that may affect the Project workforce or local community.	Review available accommodation across the nominated accommodation locations and alternative accommodation types. Consider workforce timing, local workforce opportunities, commercial accommodation and other feasible measures to reduce pressure on constrained locations.	Sections 4.2 to 4.5
Cumulative accommodation impacts	A nearby project confirms a construction period or workforce demand that materially overlaps with the Project and may increase pressure on accommodation or local services.	Engage with the relevant project proponent to understand timing and workforce demand, reassess potential cumulative impacts and identify opportunities to coordinate or implement additional mitigation measures where practicable.	Section 11
Community complaints	Any substantiated complaint relating to workforce accommodation, worker behaviour or workforce impacts on the community.	Record and investigate the complaint in accordance with the Project complaints management process. Identify the cause, implement appropriate corrective action and communicate the outcome as required. Review whether changes to existing AES controls are necessary.	Sections 5.1 and 12; Community Communication Strategy
Worker conduct	Identified or reported behaviour inconsistent with the Project community behaviour expectations or Code of Conduct.	Investigate the matter and implement appropriate corrective or disciplinary action in accordance with applicable policies and procedures. Reinforce behavioural expectations through induction, toolbox talks or other workforce communications where appropriate.	Section 5.1; Appendix B
Local employment and procurement	Monitoring identifies that applicable subcontractors have not considered or documented suitable local workforce development opportunities, or that identified development opportunities are not being implemented.	Review the relevant work package and discuss available workforce development opportunities with the subcontractor. Where practicable, agree additional actions, responsibilities and records required to provide suitable training, mentoring, supervision or skills development for locally engaged workers. Where no suitable opportunity is available, document the reason, having regard to the work scope, duration, competency and safety requirements, available supervision and availability of suitable candidates.	Sections 9 and 10; AIPP; APP
Strategy effectiveness	Monitoring demonstrates that an existing management measure is not effectively controlling the identified accommodation,	Investigate the cause and review the relevant management measure. Develop and implement additional or amended controls in consultation with Transgrid where appropriate, and update the Strategy where required.	Sections 12.1 and 12.3

Theme	Trigger Event	Required Response	Where Addressed
	workforce or community impact.		

13. Review and Improvement

13.1 Revision of Strategies, Plans and Programs

Ongoing monitoring and review of the performance and implementation of this Strategy will be undertaken in accordance with Condition C3 of the Infrastructure Approval.

If updates to an environmental management document are required:

a. to include new information or changes to the development as a result of:
    i. a modification of Project approval; or
    ii. a change in the phase of development as notified under condition C10;
b. to update risk controls or mitigation measures in response to a change in risk level identified by the annual review of the environmental risk assessment required by condition C1(f);
c. to address the findings of an Independent Environmental Audit under condition C14;
d. to implement the findings of an incident report required by condition C16;
e. to comply with a directive by the Planning Secretary;

the relevant environmental management document(s) must be revised and submitted to the Planning Secretary for approval within three months unless otherwise agreed by the Planning Secretary.

It is noted that the review of this Strategy as detailed in the Infrastructure Approval will be undertaken by Zinfra during the construction phase and by Transgrid during the operation of the Project. The review must ensure that the Strategy remains consistent with the approved operations.

Any revision of this Strategy must be approved by the Planning Secretary, unless the revision is purely administrative in nature, in which case, with the agreement of the Planning Secretary and/or the Environmental Representative (per condition A12), a revised strategy, plan or program may be prepared without undertaking consultation with all the parties referred to under the relevant condition of this consent.

13.2 Independent Environmental Audit

As per Condition C14 of the Infrastructure Approval, an Independent Audit will be carried out for the Project

The audit will be conducted in accordance with the current Independent Audit Post Approval Requirements.

The recommendations of the Independent Environmental Audit will be implemented to the satisfaction of the Planning Secretary, as relevant to this Strategy.

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Appendix A – Consultation Summary

Condition B52(a) requires the Accommodation and Employment Strategy to be prepared in consultation with relevant Councils and informed by consultation with local accommodation and employment service providers. This Appendix summarises the consultation undertaken to inform this Strategy and the outcomes of that consultation.

Lithgow City Council

Advice	Section updated	Updates made
Council reiterated concerns regarding accommodation availability during construction, particularly: Early construction period (September–October Commencement). Peak workforce overlap with EnergyAustralia's Mt Piper turbine works and other regional projects.	Sections 4.2 - 4.5	The plan acknowledges potential accommodation shortages during peak demand periods and outlines fatigue management measures to safely manage longer travel distances where local accommodation is unavailable.
Council's preference remains for utilising existing commercial accommodation within Lithgow where available.	Section 4.3	The plan encourages the use of existing commercial accommodation where available by communicating this preference during Project induction and providing information on local accommodation options.
Project team confirmed ongoing discussions with other proponents to understand workforce accommodation demand and timing.	Section 11	The Project team will maintain regular coordination with other nearby projects to monitor construction timing and workforce accommodation demand. Engagement will increase where construction periods overlap, with the aim of identifying opportunities to minimise cumulative impacts where practicable.

Other Local Councils

Organisation	Discussion	Section updated	Outcome of Consultation
Bathurst Regional Council	Phone call briefing on the Project and Accommodation and Employment Strategy. Opportunity for questions or concerns to be shared.	n/a	No concern raised by Bathurst Regional Council
Blue Mountains City Council	Blue Mountains City Council would be supportive of workers seeking accommodation in the Blue Mountains if required. The closure of Victoria Pass and detour via Bell was raised as a potential factor for workers travelling to site.	Sections 4.3 and 4.4 Accommodation Strategy	The plan includes a reference that Blue Mountains City Council did not share a preference for accommodation type but overall were supportive of workers staying within the LGA as needed.

Employment Providers

Organisation	Discussion	Section updated	Outcome of Consultation
Giidjaa industries (local employment company)	Face to Face discussion at the chamber of commerce in Lithgow. Discussed the Project and the key elements.	N/A	Discussed that giidjaa would be happy to assist with personnel. They have a range of expertise including HV Electricians. They however don't have any lines personnel.

Accommodation Providers

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Organisation	Discussion	Section updated	Outcome of Consultation
Black Gold Motel - Wallerawang	Requested confirmation of general occupancy, and number of rooms. Requested understanding of current status for November 2026.	N/A	Currently 71 rooms, building an additional 30 room in total. Typical occupancy is 50-70%, so typically have availability. However fully booked for November.
Lithgow Van and Tourist Park - Lithgow	As above	N/A	Total of 62 beds in total. Mixture of cabins and townhouses, this includes their sites at Lithgow and Portland. However fully booked for November.
Commercial Hotel - Lithgow	As above	N/A	Total of 28 rooms and a 4 bedroom apartment. Do still have some availability (4 rooms) for November.
Gold Panner - Bathurst	As above. The discussion focused more on the availability in November	N/A	Total of 30 rooms. Currently have 30% available in November.
Comfort Inn - Bathurst	As Above	N/A	Have approximately 45 rooms in total. 15 available throughout the month of November
Littlomore Suites - Bathurst	As Above	N/A	Have a large number of rooms 50 25 rooms available and 10 apartments.
Blackheath Motor Inn - Blackheath	As Above	N/A	Have 19 rooms in total. Currently have 15 available throughout November

Local and Regional Health and Emergency Services Providers

Various local and regional health and emergency service providers were also consulted on the contents of this plan. These service providers were informed of the nature and scale of works involved with the Project, including Project timeframes, workforce numbers and roster patterns. An opportunity has been provided for these service providers to engage in future consultation should they wish.

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Appendix B – Code of Conduct

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A message from our MD

Our Group has a proud history of delivering energy services – safely and reliably to millions of Australian homes and businesses. As we work together towards achieving our Group's shared vision of '**creating sustainable energy solutions with communities'**, we hold ourselves to the highest standards of business conduct.

We meet these standards through the commitment of every team member (our employees and contractors) to conduct ourselves according to this Code of Conduct**.**

This Code and our Values guide our day-to-day actions, how we make decisions, and how we expect to be treated by our colleagues and leaders. Diversity and respect are fundamental to who we are as a business, and we are committed to enabling a workplace that's safe, inclusive and supportive and where everyone can truly belong.

I encourage you to read this Code carefully and talk about it with your peers and teams. Respect it, live it and be courageous if you have questions and concerns, or where you see actions, decisions, or interactions that do not meet the expectations set out in the Code.

Thank you for doing your part to live and uphold our Code. David Gillespie

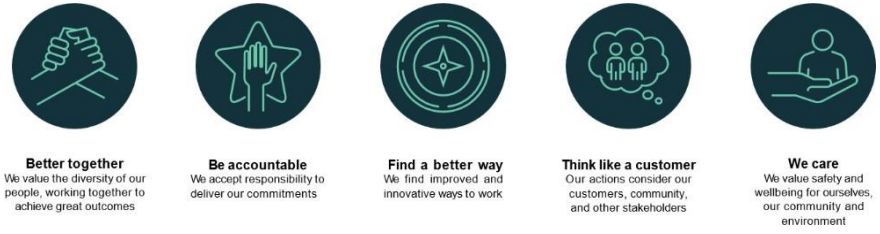
Managing Director

Our Values

It's not just about what we do, but how we do it. Our Values underpin everything we do. They define the way we think, speak and act and are a consistent guide for team members regarding what we expect. They will underpin our journey in the next one to two years to work – better and stronger together – to become a **high performing**, **sustainable**, **benchmarked efficient** business.

We want our people to love working for our Group, feel inspired to do their best every day and be recognised in the industry as the best in their field. We want our people to feel safe to express their opinions, be accountable for their actions, and treat each other with respect.

We support one another but have zero tolerance for fraudulent, corrupt or unethical behaviour.



Our Code of Conduct

The Group is committed to doing the right thing and by being consistent and ethical we will continue to strengthen the loyalty and trust that exists between each of us and our stakeholders.

What is our Code of Conduct?

We set certain standards within the Group for the way we behave as a business, and the way we expect our team members to behave in the performance of their roles and when representing the Group. At the most fundamental level we require all of our people to be simply *doing the right thing* and this Code of Conduct sets out what that means for you.

The Code of Conduct explains the standard of behaviour that is required to act in accordance with our values, comply with all relevant laws, regulations, policies and procedures and operate in accordance with our desired culture of good corporate governance.

Our Code of Conduct is to guide all of our people to make informed, ethical decisions in going about their day to day work.

How to use our Code of Conduct

Whilst we expect compliance with our policies and procedures, this Code of Conduct is the overarching document of the Group Management System. Our policies and procedures cannot anticipate every situation, so we rely on you to use good

judgement and to speak up when you have questions or concerns.

Each section within the Code of Conduct provides team members with the information about why the topic is important to us. It provides expectations of team members, where to go for support and additional resources that provide more details, such as policies and procedures, found under “other important resources”.

Who does the code apply to?

Every team member - employees, directors, officers, contractors and suppliers must adhere to the Code of Conduct, regardless of location or role (even outside of business hours where activity relates to, or reflects on the Group).

Raising conduct concerns

Questioning conduct is essential to protect the integrity of our team and business.

If you think a decision or action is not consistent with our Code of Conduct or our Values, you have the right and responsibility to see that concern raised. You will be supported all the way. You do not need to be directly affected by an issue to raise it.

Where to raise conduct concerns

Under each section of our Code of Conduct there is a section on “where to go for support” which provides the relevant contacts within the Group to assist you. If you are in any doubt, contact your people leader in the first instance who can assist you.

If you are ever unsure about what is required of you or are confused about the meaning and application of legal or other requirements, please raise your questions in person, in writing or over the phone with your leader, colleagues or General Manager.

We seek out healthier and safer ways of doing work and respect the natural and built environments in which we operate.

The Group is committed to caring for our people, the environment, and the communities in which we operate. This means that we take care when conducting our business activities so that every employee and contractor returns home safe every day and we positively contribute to the environments and communities where we work.

We understand the work we do has health, safety and environmental risk and everyone within the Group must take responsibility to actively identify and manage those risks.

What can you expect from the Group

We are committed to providing you with a safe working environment and with the resources, training and tools to enable you to do your work safely.

Health, safety and environment practices are governed by our policy, standards and procedures by which every employee and contractor must abide.

In all cases, these resources are established with the objective to meet our values and recognised legal and technical obligations, as we have no appetite for harm to our people or the environment in our business operations.

What we need from you

- Understand and follow all relevant health, safety and environment requirements;
- Stop work and report any circumstances that represent an immediate risk to health, safety or the environment;
- Identify opportunities for improvement and participate in developing and implementing health, safety and environmental solutions;
- Follow Group policies, standards and procedures;
- Use the resources and supporting systems that are in place to meet our health, safety and environment requirements;
- Consider your own physical and psychological safety and health and that of others in all that you do;
- Encourage and support team members to participate in health, safety and environment activities, and

- Report any health, safety or environment related incidents, near misses and hazards.

Where to go for support

- Your People Leader
- Health and Safety Representative (HSR)
- Health, Safety and Environmental Business Partner
- Human Resources Business Partner
- Legal Team
- Business Resilience & Compliance Team

Other important resources

- Health, Safety, Environment and Quality Policy
- Crisis and Emergency Management Framework and plans
- Group Health Safety and Environment intranet page
- Group HSEQ Manual
- Safe Work Method Statements
- Your site-based Health, Safety and Environment Management Plan

Diversity and Inclusion

We are committed to embedding inclusive practices that drive inclusion in our workplace, build a sense of belonging for all and support all team members to realise their full potential and contribute to the Group's success.

Every team member will be afforded the basic human rights of equitable access to opportunities to develop and succeed in their role irrespective of race, ethnicity, age, gender, work status, relationship status, sexual orientation, gender identity, culture, religion, family status, disability or social background.

We know that diversity of thought is good for our business, it creates opportunities for innovation, enables us to solve problems better and delivers meaningful benefits to our people, customers and the diverse communities we serve.

What can you expect from the Group

The Group's commitment to Diversity, Inclusion and Belonging means that we:

- seek to attract and retain a diverse workforce that reflects, respects and supports the diversity of our communities
- create a culture and workplace environment where our diverse workforce feels included, can realise their potential and are able to contribute fully
- facilitate equal opportunity in all

  employment, development and promotion decisions, free of bias
- provide an environment where people feel

  safe to speak up when others are excluded, or treated unfairly on the basis of their identity
- meet all legislative obligations that serve to

  protect our people and the business from harm
- must not tolerate behaviours such as illegal

  discrimination, harassment, sexual harassment, bullying, victimisation, vilification in any circumstance or from anyone in our business

In situations where relevant laws and regulations differ from the Group's values and standards, the higher requirement must be observed and People Leaders will provide clear guidance to team members regarding acceptable behaviours.

What we need from you

- Be inclusive, collaborative and supportive of every person you interact with in the course of doing your job, in accordance with our Values and this Code of Conduct
- Ensure that you have a clear understanding

  of what is required of you to perform at your best in your role and participate

actively in our performance and development processes

- Treat team members, customers and clients fairly, with respect, dignity, and without discrimination;
- Be mindful of the implications of your decisions and actions at all times and support your fellow team members in speaking up and raising concerns.

Where to go for support

- Your People Leader
- Human Resources Business Partner or Manager
- Group Employee Experience & Capability Manager
- Diversity, Inclusion and Belonging Manager
- Employee Assistance Program (external)

Other important resources

- Diversity and Inclusion Intranet Page
- Issue Resolution Intranet Page
- Workplace Behaviour Standard
- Group Leave standard
- Workplace Adjustment Guidelines
- Group Approach to Remote Working
- Acacia Employee Assistance Program

Bullying, Harassment and Sexual Harassment

The Group is committed to providing a safe and respectful work environment for team members and others interacting with the Group. We aim to provide an environment free from bullying, harassment, sexual harassment, unlawful discrimination, racial and religious vilification and victimisation.

Harassment, bullying, sexual harassment, racism and other disrespectful behaviours can cause harm. Our commitment to health, safety and wellbeing means these behaviours have no place at the Group and will not be tolerated in our workplace.

We all have the right to work in a healthy, safe, respectful and inclusive environment where we are treated with dignity and courtesy.

What can you expect from the Group

Our commitment is to provide a safe and respectful environment for employees and any other person, including our customers, contractors and visitors, who interact with our organisation.

We will take a proactive approach to:

- develop and implement initiatives to eliminate unacceptable behaviours;
- educate all team members about the behaviours expected in our workplace, how to safely and positively intervene when inappropriate behaviour is witnessed or experienced, and how to report inappropriate workplace behaviour

At all times we will be supportive and provide compassion and encouragement to any colleagues (employees or contractors) who speak up.

What we need from you

- Lead by example and role model behaviours that are consistent with our Code and Values;
- Always be aware of cultural considerations and demonstrate respect,
- Report any incidents of unacceptable conduct including bullying, harassment and sexual harassment whether directed towards you or other team members;
- If you see someone being subject to bullying, harassment or sexual harassment, step up and take action to provide support.

Where to go for support

- Your People Leader
- Human Resources Business Partner
- Employee Assistance Program (Acacia)
- Legal Team

- Workplace Behaviour Standard
- Respect@Work SharePoint Site

Other important resources

Privacy and Personal Information

We respect the privacy and the personal information of individuals.

Personal information means any information that could identify an individual, either from that information alone, or in combination with other information which is reasonably likely to come into the possession of the Group through our day to day operations.

We also collect and hold information about our team members for managing information for employment purposes.

What can you expect from the Group

We respect the personal information we hold about our team members and our customers and expect you to respect the information we hold in the same way. We manage personal information in accordance with the Company's Privacy Policy and applicable Privacy laws.

What we need from you

- Always ensure personal information of individuals is used and protected in accordance with the Privacy Policy and Procedures;
- Understand our standards and procedures

on collecting and storing personal information

Where to go for support

- Your People Leader
- The Legal Team

Other important resources

- Privacy Policy
- Privacy Procedure

Breaches of the Code of Conduct

All queries about the interpretation and application of the Code of Conduct will be treated seriously, respectfully and assessed in a timely manner.

Our People Leaders are held accountable for their own behaviour and also for the conduct of their employees. Any suspected or known breaches of the Code of Conduct should be reported to your people leader or can be raised through the Whistleblower Policy.

What can you expect from the Group

If a breach has occurred, the appropriate corrective or disciplinary action will be determined after individual circumstances and severity of the breach have been taken into account.

Examples of corrective or disciplinary action can include:

- verbal or written warnings;
- termination of employment.

Misconduct that may result in disciplinary action can include (but is not limited to):

- directly engaging in and/or either requesting or directing others to engage in conduct which would breach the Code of Conduct and/or policies or procedures;
- failure to raise known or suspected breaches;
- retaliating against another person for reporting a conduct concern;
- failure to demonstrate leadership and diligence to ensure the Code of Conduct, Our Values and the law are upheld.

Breaches which potentially constitute criminal or illegal conduct may also result in referral to appropriate authorities and/or legal recovery.

In some instances the Group has a requirement to report potential criminal breaches, outcomes of such reports are outside of the Group's control.

Breaches of fraud, bribery and anti-corruption laws are serious offences, which can result in fines, and/or imprisonment and significant reputational damage for both the Group and its employees. Any breach will be treated as serious misconduct warranting disciplinary action.

What we need from you

- To abide by the Code of Conduct at all times
- Raise and report concerns promptly
- Fully cooperate with investigations as required

Where to go for help

- Your People Leader
- Human Resources Business Partner
- Legal Team

Other important resources

- Whistleblower Policy
- Compliance with the Law Policy

- Disciplinary Procedure
- Compliance Management Framework

Official

Relationships with authorities

The Group respects the authority of governments and regulators wherever we conduct business.

The Group's ability to conduct business is directly affected by the decisions made by governments and regulators as external stakeholders.

The Group regularly shares information and opinions with external stakeholders on issues that affect our operations and our industry in general. Such exchanges are essential to enabling informed decision-making by all.

What can you expect from the Group

We work to maintain positive and constructive relationships with governments, regulators, their agencies, officials and personnel.

What we need from you

- If you provide information to an external stakeholder on behalf of the Group, you must ensure that all information is accurate and appropriate for the purpose. Errors or omissions may damage our reputation or could constitute a breach of the law;
- If you are required to make representations on behalf of the Group on matters involving government officials or regulators, you must comply with all applicable laws and regulations, and ensure all representations are in line with the Group's requirements;
- If you are unsure about whether the information you are sharing externally to the Group is appropriate to be shared, speak with your people leader.

Where to go for support

- Your People Leader
- Legal Team
- Corporate Affairs Team

Fraud and Corruption

We do our best to ensure our actions are consistent with our Values. We demand of ourselves and of each other the highest standards of individual and corporate integrity. This means we have zero tolerance towards fraud and corruption. Compliance with anti-corruption laws is essential to protect the Group's reputation and to preserve our social licence to operate.

Fraudulent and corrupt conduct in the course of business operations will not be tolerated in any form or degree. Apart from significant performance, financial and reputational impacts, such behaviour undermines engagement, our culture and may compromise welfare and safety.

Fraud means a dishonest act or omission causing actual or potential financial loss to a SGSPAA entity, customer, supplier or stakeholder:

- where deception is used at the time, immediately before or immediately following the act or omission; or
- through a deliberate falsification,

  concealment, destruction or use of falsified documentation used or intended for use for a normal business purpose; or
- through the improper use of information or position for personal financial benefit; or
- including theft of cash or assets.

Corruption means dishonest activity in which employees/contractors/3rd parties act contrary to the interests of the business and abuse their position of trust in order to achieve some personal gain or advantage for themselves or for another person or entity.

Financial misstatement, manipulation of any financial reporting or acts or omissions to avoid financial controls may constitute fraud or corrupt conduct.

What can you expect from the Group

In addition, the guiding principles below apply across the Group:

- zero tolerance towards any level of fraud and corruption;
- maintain a culture of a high level of fraud risk awareness at all times;
- compliance with establishment and

  implementation of sound internal controls to prevent and detect fraud and corruption.

What we need from you

- Ensure you understand how the requirements apply to your role, behaviour and business decisions.
- Ensure you comply with procedures and requirements in the procurement of goods and services.

- Seek approval before:
  - providing commercially sensitive information to an external person;
  - engaging a supplier who will interact with others on our behalf;
  - offering to undertake a community donation, sponsorship of an event or project.
- Maintain the integrity of our financial records by ensuring all financial transactions you make in doing your job are accurately recorded and sufficiently detailed.
- Stay vigilant for warning signs of fraud and corruption and promptly report any red flags for further investigation.

Where to go for support

- Your People Leader
- Procurement Team
- Legal Team
- Internal Audit Team
- Human Resources Business Partner
- Group Compliance Management Team

Other important resources

- Fraud Control Plan
- Whistleblower Policy
- Procurement and Contract Management Procedure

Ring-fencing

In the course of your job you may learn of information about the Group, our customers and other organisations we work with. Sharing this information with others may make us non-compliant with our electricity or gas ring-fencing obligations.

Ring-fencing is a suite of structural and operational separation requirements that apply to pipeline service providers (including JGN as well as Jemena's gas transmission pipelines[1]) and electricity distribution network service providers (such as JEN). Ring-fencing is designed to prevent the misuse of market power by monopoly businesses in a way which may affect competition in contestable parts of the market.

What can you expect from the Group

We aim to avoid a situation where our activities on our gas and electricity network businesses, or our transmission pipeline businesses, give other Group businesses (including our contestable electricity business, or gas processing businesses) an unfair advantage over their competitors. This means we must ensure:

- that entities within the Group do not disclose confidential information, or use it for other, unauthorised purposes;
- there is appropriate cost allocation between the Group's assets and businesses;
- no marketing staff of the Group's gas transportation businesses (JGN or Jemena's gas transmission pipelines[2]) are involved in a related business that produces, purchases or sells gas, and vice versa;
- no staff involved in the provision or marketing of direct control services for JEN are involved in the provision or marketing of contestable electricity services by a related electricity service provider (such as Ovida); there is no cross promotion of contestable electricity functions (such as Ovida) by Jemena Electricity Network (JEN) staff, and separate and distinct brands are used for contestable electricity functions and for JEN.

[1] DDP, Atlas lateral, and Roma North lateral have time limited transitional exemptions from the ringfencing requirements until 2 Mar 26. The NGP is currently exempt from the ringfencing provisions for a period of 15 years from its commissioning date. [2] As above.

What we need from you

Ensure you understand our electricity and gas ring-fencing obligations and know how they apply. Additionally, you must:

- do your annual gas and electricity ring-fencing compliance training;
- time write, fund and allocate costs appropriately;

- not recommend our contestable electricity works functions (such as Ovida) to JEN customers;
- not share JEN leads to contestable electricity works functions;
- be careful with sharing confidential information when interacting with other internal teams;
- protect confidential electricity and gas information, and not use it for unauthorised purposes;
- immediately report any suspected non-compliance of a ring-fencing obligation to your People Leader and the Regulatory Compliance team.

Where to go for support

- Your People Leader
- Regulatory Compliance Team via regcompliance@jemema.com.au
- Legal team

Other important Resources

- AER Electricity Distribution Ring-Fencing Guideline
- Electricity Ring-Fencing Guideline

  Compliance Manual (ELE LEG MA 0001)
- Gas Ring-Fencing training
- Compliance Management Framework
- JGN Ring-fencing Guideline Compliance Manual
- Gas Transmission and Processing Ring-

  fencing Compliance Manual (GAS-999-OM- QA-001)
- Confidential Information Manual

Conflict of interest

Always be mindful of any relationship or association which may be, or appear to be, a conflict of interest with the Group.

A conflict of interest arises when a team member's position within the Group, or their financial or other personal considerations / interests outside of work, has the potential to affect, or could have the appearance of affecting, their judgement, objectivity or independence.

Common examples of potential or perceived conflicts of interest include:

- having a personal relationship with another employee or with a third party who can influence decisions such as salary, performance rating or promotion;
- investments or personal interest, including those of close relatives, which might influence or appear to influence your judgement;
- pursuing, awarding or maintaining business opportunities for non-legitimate business purposes;
- receiving money, information, property or services or other forms of personal benefits (directly or indirectly) from suppliers or other third parties doing, or proposing to do, business with the Group;
- holding outside jobs and affiliations;
- offering or accepting gifts, hospitality and entertainment.

What can you expect from the Group

Your People Leader will follow processes to ensure any question of a potential conflict of interest raised by a team member is properly reviewed and a decision made about the right course of action.

What we need from you

- While on the job or in your personal time, nothing you do should conflict with your responsibilities to the Group or compromise the quality of your work performance, your commitment to your work, or your ability to make impartial business decisions;
- Always excuse yourself from any decision- making process if there is a possibility of your objectivity appearing compromised, for example, supplier evaluation, tendering process, suppliers performance management and commercial negotiations;
- Promptly advise your People Leader of any outside activities, financial interests or relationships that may involve you directly or indirectly either in an actual conflict of interest or the appearance of one.

Where to go for support

- Your People Leader
- Procurement Team
- Legal Team
- Human Resources Business Partner

Other important resources

- Procurement and Contract Management Procedure
- Compliance with the Law Policy
- Compliance Management Framework
- Gift Register

Procurement and Contracting

We strive to engage with our suppliers to enhance value and outcomes for mutual benefit. We are committed to the highest standards of corporate responsibility, particularly our health, safety and environmental obligations, including ethical behaviour, human rights and social responsibilities.

We have an integrated approach to commercial procurement and contract management. This means we can maximise our strategic and competitive value, build and maintain effective supplier relationships and grow our business in a managed and responsible way.

What can you expect from the Group

We will take great care to:

- promote equity, inclusion and diversity in our processes by encouraging the purchase of goods and services from businesses owned by, or that assist underrepresented groups.
- undertake honest, competitive, fair, transparent, commercially sound and planned approach when engaging with, assessing, selecting, contracting and managing our suppliers,
- ensure our business operations and dealings comply with all relevant laws and regulations and meet the contractual obligations of clients, customers and suppliers.
- apply formal governance processes - to consistently identify, assess and manage commercial and legal compliance risks.
- engage with pre-qualified suppliers who demonstrate competency and can deliver quality goods and/or services on time, safely, scope according to all contractual, legal and regulatory obligations and who comply with our Code of Conduct. Suppliers will be assessed prior to engagement and re-evaluated at regular intervals throughout the term of the relationship.

What can you expect from the Group

- We will set clear objectives and targets.
- Promote fair and effective competition tailored to the circumstances.
- Engage stakeholders, supplier groups and peers in a timely and collaborative manner.
- Ensure that everything we procure, where possible, has the lowest negative and highest positive social, environmental and economic impacts.
- Ensure supplier engagements contain clear requirements and effective change management processes across their lifecycle.

What we need from you

Ensure supplier relationships maximise value by managing and maintaining quality and safety, improving productivity and identifying opportunities for improvements and innovations.

Ensure we uphold our stance on business ethics, and maintain our zero tolerance for bribery, corruption or fraud.

Work together to identify, assess and address operations and supply chain risks including:

- Modern Slavery
- Third Party Risk
- Asset, Health, Safety, Environment & Sustainability

Provide any supplier you engage, on behalf of the Group, with access to our Code of Conduct.

Where to go for support

- Your People Leader
- Procurement Team
- Legal Team

Other important resources

- Procurement and Contract Management Policy
- Procurement and Contract Management Procedure
- Modern Slavery Statement
- Group Annual Sustainability Report
- Supply Chain Risk Management Framework

Our assets and resources

Protecting our assets

We all have an obligation to protect the Group's assets and use them for their intended purpose.

The Group's assets are both physical and non- physical, and include property, facilities, funds, equipment, information technology, sensitive information and Intellectual property (IP).

Sensitive information and IP includes:

- strategic plans
- operational data, particularly information about our critical gas and electricity assets
- research and other technical data
- business continuity information
- corporate financial data
- employee information
- customer information
- trademarks and designs
- copyright for original material, and
- confidential or 'trade secrets', including know-how and other confidential or Company owned information.

What can you expect from the Group

All assets are essential to the success of the Group and due to their commercial value, precautions are taken to protect them from theft, damage, unauthorised access, use, modification or disclosure.

What we need from you

You are responsible for appropriately using and safeguarding the Group's assets, both physical and non-physical by:

- only using the Group's assets for the purpose and in the manner intended;
- taking precautions to prevent theft, misappropriation, damage or misuse of any of the Group's assets;
- ensuring assets are not provided externally without appropriate approvals;
- never sharing any competitively sensitive 'SGSPAA-owned' information unless authorised to do so. If you are not sure what you can share, check with your People Leader;
- normalising a polite challenge culture as it relates to the wearing or carrying visible or digital ID badges at all times whilst in Group facilities;
- feeling empowered to challenge individuals you don't recognise around their authority to be onsite; and
- reporting all actual or suspected security- related incidents immediately.

You must respect both the non-physical and physical assets of others, and never

knowingly damage or misappropriate those assets.

Where to go for support

- Your People Leader
- Business Resilience & Compliance Team
- Security Monitoring Centre -24/7
- Human Resources Business Partner
- Legal Team
- IT Representative

Other important resources

- Information Security Policy
- Financial Management Policy
- Physical Security Framework
- Physical Access Control Procedures
- Crime Reporting Procedure

Technology and data security

The Group is committed to personal and corporate security by increasing team members' information security awareness and taking measures to protect our information systems.

What can you expect from the Group

We provide our team members with information technology to undertake work for the Group.

This technology must be used in a secure and responsible way and adequately protected against damage, loss, theft, alteration or unauthorised access or disclosure. Computer hardware, software and stored business information (even when located on personal devices) is, exclusively the property of the Group.

We have controls and measures in place to assist the Group and its team members with managing the risks associated with inappropriate use of information technology or data. These risks include malware and security breaches that could potentially compromise the confidentiality, integrity and availability of systems and information as well as the safety of team members and customers.

All data created and maintained by our team members and business partners must accurately reflect the underlying transactions and events. Falsifying, concealing, altering, destroying or creating misleading information is not tolerated.

Respecting all relevant laws, the Group reserves the right to monitor, report and where required block the team member use of Group information systems, electronic communications and stored information to satisfy business needs, legal or policy requirements.

What we need from you

The safeguarding of business information is the responsibility of every Group team member and includes:

- adhering to the information security policies;
- reporting actual or suspected security incidents; and
- staying up-to-date with provided information security awareness and training.

Inappropriate use of our technology and data includes:

- using it for unlawful purposes;

- disclosing or publishing the Group's data without permission;
- using the Group's information technology or data against the interest of the Group; and
- accessing or removing the Group's data or intellectual property without authorisation to do so.

If you are responsible for reporting information, whether financial or non-financial, ensure that adequate internal controls exist to support truthful, accurate, complete, consistent, timely and understandable reports.

If you have any concerns about the validity of any reporting process or record-keeping activity, or believe you are being asked to create false or misleading information,

report it immediately.

Where to go for support

- Your People Leader
- Digital Security & Risk Team
- Service Desk
- Legal Team

Other important resources

- Information Security Policy
- End User Information Security Policy
- Technical Information Security Policy

Communicating Publicly

From time-to-time, the Group may provide third parties with information or disclosures. These representations must always be clear and transparent and made by company-authorised team members only.

The Group reserves the right and responsibility to make its position known on relevant issues.

What can you expect from the Group

Any publicly available written or verbal communication that can be attributed to the Group or to one of our employees may amount to a public representation. Such acts must only be made by authorised spokespersons and in accordance with relevant policies.

Methods of communicating publicly may include:

- regulatory or policy submissions;
- interviews, speeches, articles and reports;
- information contained on the Group website and other communications channels including social media.

Failing to disclose material information or disclosing inappropriate or inconsistent information has the potential to damage our reputation.

What we need from you

- Official public statements must only be made by authorised spokespersons;
- It may be appropriate to comment on industry matters and the Group's projects via your own social media accounts. When communicating externally, our Values and the Code of Conduct apply if your words or actions are likely to be associated with the Group;
- Commenting on all media on sensitive Group issues requires prior approval from the Corporate Affairs team, examples include:
  - financial information
  - business relationship details
  - negotiations
  - disputes or deals with other parties
  - information on customers
  - shareholder information; or
  - information that discredits the Group or its customers.

If in any doubt, please contact the Corporate Affairs team for guidance.

Where to go for support

- Your People Leader
- Corporate Affairs Team
- Legal Team
- Community Partnership Steering Committee

Other Important Resources

- Media Engagement Policy