

Sustainability Management Plan

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Details of Revision Amendments

Document Control

The Project Manager is responsible for ensuring that this plan is reviewed and approved. The Project Sustainability Representative is responsible for updating this plan to reflect changes to contract and other requirements, as required.

Amendments

Any revisions or amendments must be approved by the Project Manager and/or client before being distributed / implemented.

Revision Details

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Table of Contents

1. Introduction.....	1
1.1. Purpose.....	1
1.2. Plan Structure.....	2
1.3. Project Management System.....	3
1.3.1. Certifications.....	3
1.3.2. Sustainability Assurance System.....	4
1.3.3. Interactions with other Project Plans.....	4
2. Context and Objectives.....	6
2.1. Project Scope.....	6
2.2. Policy, Objectives and Targets.....	6
2.2.1. Sustainability objectives.....	7
2.2.2. Key Targets for Sustainability.....	7
2.3. Sustainability Milestones.....	7
2.4. Project compliance requirements.....	8
2.4.1. Legislation and Regulatory Requirements.....	9
2.4.2. Sustainability Guideline and tools.....	9
3. Leadership and Collaboration.....	11
3.1. Project Leadership Sustainability Responsibilities.....	11
3.2. Project Sustainability Roles and Responsibilities.....	12
3.3. Collaboration.....	13
4. Integrating Sustainability.....	15
4.1. Assess Sustainability Risks and Opportunities.....	15
4.1.1. Sustainability Initiative and Innovation.....	16
4.2. Assess Options for High Impact / Significant Decisions.....	17
4.3. Integrating Sustainability in Design.....	17
4.4. Sustainable Procurement.....	17
4.4.1. Procurement Process.....	17
4.4.2. Human Rights and Modern Slavery.....	20
4.5. Integrating Sustainability in Construction.....	20
4.6. Training Requirements.....	21
4.6.1. Knowledge sharing.....	21
5. Sustainability Reporting and Information Management.....	23
5.1. Sustainability Data Capture.....	23
5.1.1. Resource data.....	23
5.2. Sustainability Reporting Requirements.....	24
5.2.1. Sustainability Items Reported by other Functions.....	25
6. Evaluation and improvements.....	26

6.1.	Audits and Review	26
6.2.	Inspections	27
6.3.	Sustainability Performance Review	27
6.4.	Management Plan Review and Improvement.....	27
7.	ISC Rating Strategy	28
7.1.	Roles and Responsibility.....	28
7.1.1.	Key Project Sustainability Roles and Responsibility.....	28
7.1.2.	Consultation and engagement with ISC and other stakeholders	29
7.2.	Registration and Assessment Process.....	29
7.2.1.	Establishment Period.....	31
7.3.	IS Target Score.....	31
7.4.	IS Strategy.....	31
8.	Key Sustainability Initiatives.....	33
8.1.	Climate change.....	33
8.2.	Energy Efficiency and Greenhouse Gas Emissions Strategy	33
8.2.1.	Carbon Modelling.....	33
8.2.2.	Energy	34
8.2.3.	Materials initiatives	34
8.2.4.	Waste initiatives.....	35
8.2.5.	Monitoring and Reporting.....	36
8.3.	Water Efficiency.....	36
8.4.	Environment Management Systems	36
8.5.	Heritage Management	36
8.6.	Urban Design and Landscape.....	36
8.7.	Social Sustainability	36
	Element 1: Context and objectives.....	39
	Element 2: Leadership, collaboration and support.....	40
	Element 3: Risk and opportunity assessment.....	41
	Element 4: Integrating sustainability in Design and Construction	43
	Element 5: Reporting, communication and information management.....	47
	Element 6: Evaluation and improvement.....	49
	Element 7a: Project Specific Targets - SWTC Appendix D.5.....	50
	Element 7b: Project Specific Targets - SWTC Appendix D.5, Table D5.2 Requirements.....	60
	Element 8: Environmental Mitigation Measures	65
	Element 9: Motorway Works' overarching sustainability objectives	67

Table of Tables

Table 1: Sustainability Management Plan Compliance Table	2
Table 2: Sustainability Management Plan Structure	2
Table 3: Project Plan Interfacing	4
Table 4 Sustainability Milestones	7
Table 5: External Tools and Guidelines.....	9
Table 6: Project Leadership, Functional Leads and Staff Sustainability Responsibilities	11
Table 7: Project Sustainability Key Roles, Responsibilities and Competencies.	12
Table 8: External Sustainability Key Roles, Responsibilities and Competencies	14
Table 9: Sustainability Risk and Opportunity Identification Activities	16
Table 10: Examples of sustainability knowledge sharing initiatives	21
Table 11: Sustainability data capture source.....	23
Table 12: CGU sustainability reporting requirements	24
Table 13: Sustainability Items Reported by Other Functions	25
Table 14 : CGU required sustainability audit	26
Table 15: Functional area input required for completion of ISC rating submission.....	28
Table 16 : IS Rating process	30
Table 17 : IS categories and document reference	31

Table of Figures

Figure 1: Project Management System	3
Figure 2: Environment and Sustainability organisation chart	11
Figure 3 : Energy management Hierarchy.....	33
Figure 4 : Material management hierarchy	35

Table of Annexures

Appendix A Sustainability Policy	69
Appendix B Environment Policy	71
Appendix C CPB Contractors Procurement Policy	74
Appendix D Optional Sustainability Initiatives.....	90
Appendix E IS Rating Credit Target and Score - Design	91
Appendix F IS Rating Credit Target and Score – As-built	93

Acronyms and abbreviations

Term	Expanded text
BAU	Business as Usual
CCRA	Climate Change Risk Assessment
CEMP	Construction Environmental Management Plan
CIR	Credit Interpretation Request (Managed by ISC)
CMS	CPB Contractors Management System
CoA	Condition of approval
CPB	CPB Contractors Pty Ltd
EMS	Environmental Management System
ESD	Ecologically Sustainable Development
GHG	Greenhouse gas
GRI	Global Reporting Initiative
ISAP	Infrastructure Sustainability Accredited Professional
ISC	Infrastructure Sustainability Council, previously Infrastructure Sustainability Council of Australia (ISCA)
IS Rating	Infrastructure Sustainability Rating
ISP	Independent Sustainability Professional
LCA	Life Cycle Assessment
MCA	Multi Criteria Analysis
NGER Scheme	National Greenhouse and Energy Reporting Scheme
NGER Act	National Greenhouse and Energy Reporting Act 2007
SDG	United Nations Sustainable Development Goals
SMS	CPB Contractors Sustainability Management System
SMP	Sustainability Management Plan
TC	Technical Clarification - managed by ISC

Sustainability Management Plan Requirements

The Contract Requirements for this project define that the Sustainability Management Plan must, as a minimum, address and detail the items defined in Table 1

Table 1: Sustainability Management Plan Compliance Table

Contract Document	Reference	Requirements	Where addressed
SWTC Appendix C.1	14 a)	The Sustainability Management Plan must identify how the Contractor will comply with the sustainability requirements of the Deed, the SWTC and the Environmental Documents.	This Compliance table Part B
SWTC Appendix C.1	14 b)	As a minimum, the Sustainability Management Plan must:	N/A
SWTC Appendix C.1	14 b) (i)	contain the contents specified for the Sustainability Management Plan in the SWTC, including this Appendix and Appendix D.5 (Sustainability Requirements);	This Plan
SWTC Appendix C.1	14 b) (ii)	demonstrate how the sustainability commitments and overarching sustainability objectives and targets will be achieved;	This Plan
SWTC Appendix C.1	14 b) (iii)	detail the sustainability management team structure, including key personnel, authority and roles of key personnel, lines of responsibility and communication, minimum skill levels of each role and interfaces with the overall project organisation structure;	Section 3.0
SWTC Appendix C.1	14 b) (vi)	include a sustainability policy statement and associated strategies for adaptation to climate change, resource management, workforce development and biodiversity enhancement;	Section 2.2 Appendix A
SWTC Appendix C.1	14 b) (v)	provide a description of the overall approach to the identification and assessment of sustainability opportunities;	Section 4.1
SWTC Appendix C.1	14 b) (vi)	detail the sustainability initiatives to be implemented during the performance of the Contractor's Activities and milestones for key sustainability initiatives;	Section 4.1 Section 8.0
SWTC Appendix C.1	14 b) (vii)	detail the processes and methodologies for tracking and assigning responsibility for the identification and whole-of-life assessment of potential sustainability initiatives;	Section 4.1
SWTC Appendix C.1	14 b) (viii)	detail the processes and methodologies for embedding sustainability initiatives into design, procurement and construction processes;	Section 4.0
SWTC Appendix C.1	14 b) (ix)	detail the processes and methodologies for assurance, monitoring auditing, corrective action and reporting on sustainability performance (including performance against sustainability targets);	Section 6.0
SWTC Appendix C.1	14 b) (x)	provide a description of the overall approach to the identification of opportunities to reduce carbon emissions, energy use and embodied lifecycle impacts during the Contractor's Activities and the O&M Activities;	Section 8.2
SWTC Appendix C.1	14 b) (xi)	demonstrate how the Contractor will achieve an 'As Built' Infrastructure Sustainability (IS) rating level, as a minimum score, of 65 under the Infrastructure Sustainability Council of Australia Rating Tool, for the design and construction of the Project Works and Temporary Works (including proposed contingency measures to ensure that a rating level of 'Excellent' is achieved);	Section 7.0

SWTC Appendix C.1	14 b) (xii)	detail the approach to sustainable procurement including: the processes and procedures that will be used to enhance the whole-of-life environmental, social and economic sustainability outcomes of the project through the supply chain (including Subcontractors); the processes and evaluation criteria (specifying the environmental, social and economic criteria and weightings) that will be used for the selection of Subcontractors; and the processes and procedures for assurance, monitoring, auditing, corrective action and reporting on sustainability performance of Subcontractors;	Section 4.4.1
SWTC Appendix C.1	14 b) (xiii)	provide an outline of the systems that will be used to support sustainability management;	Section 1.3
SWTC Appendix C.1	14 b) (xiv)	detail the interfaces with other Project Plans; and	Section 1.3.3
SWTC Appendix C.1	14 b) (xv)	detail optional sustainability initiatives for the Project in the form set out in Table D.5-1 of Appendix D.5 (Sustainability Requirements).	Section 4.1.1 Appendix D
SWTC Appendix C.1	14 b) (xvi)	Describe the process for the identification and detailing of all further opportunities investigated in order to exceed sustainability requirements specified in Table D.5-2 of Appendix D.5 and nominate criteria for adoption or rejection of these opportunities.	Section 4.1
SWTC Appendix C.1	14 c)	The Sustainability Management Plan must describe how the Contractor will achieve the following Motorway Works' overarching sustainability objectives: (i) demonstrate sustainability leadership and continual improvement; (ii) protect and enhance the natural environment and local heritage; (iii) contribute to liveable communities (ease congestion, connect communities, integrate land use and transport planning and facilitate urban revitalisation); (iv) optimise resource efficiency (materials, energy, water, land) and waste management; (v) increased resilience to future climate; (vi) design allows for future transport needs (transport modes, extensions, access points); (vii) sustainable procurement – whole-of-life environmental, social and economic considerations; and (viii) maximise equitable/fair training and employment opportunities.	Section 2.2 Element 9
SWTC Appendix C.1	14 d)	The Contractor must prepare an ISC IS Rating Management Plan, included as a sub-plan of the Sustainability Management Plan, that guides the achievement of the IS Design and IS As-Built Rating scores identified in Table D.5-2 contained in Appendix D.5 (Sustainability Requirements). The sub-plan must detail implementation protocols including:	Section 7.0
SWTC Appendix C.1	14 d) (i)	ISC IS assessment and registration process and timeframes;	Section 7.1
SWTC Appendix C.1	14 d) (ii)	proposed consultation and engagement with ISC and other stakeholders;	Section 3.2
SWTC Appendix C.1	14 d) (iii)	the IS rating process and requirements for the provision of documentation to ISC;	Section 7.1

SWTC Appendix C.1	14 d) (iv)	key sustainability management roles and responsibilities;	Section 7.1
SWTC Appendix C.1	14 d) (v)	the Contractor's nominated sustainability targets which must be equal to or greater than the minimum targets, if stated, listed in Table D.5-2 contained in Appendix D.5 (Sustainability Requirements); and	Section 7.3 Appendix E Appendix F
SWTC Appendix C.1	14 d) (vi)	how the Contractor will achieve the nominated sustainability targets.	Section 7.4
SWTC Appendix C.1	14 e)	The Contractor must develop and implement an Energy Efficiency and Greenhouse Gas Emissions Strategy and Management Plan, included as a sub-plan to the Sustainability Management Plan, that identifies processes and methods to:	Section 8.2
SWTC Appendix C.1	14 e) (i)	improve energy efficiency; and	Section 8.2
SWTC Appendix C.1	14 e) (ii)	reduce greenhouse gas emissions for the construction and operational stages.	Section 8.2
SWTC Appendix C.1	14 f)	Further to the requirements of the Deed and this Appendix, the Contractor must undertake the ongoing development, amendment and updating of the Sustainability Management Plan throughout the duration of the Contractor's Activities to incorporate: new elements of the Project Works, Temporary Works and O&M Activities not covered by the existing Sustainability Management Plan changes in construction sequencing or methodology; and lessons learnt, improvements/enhancements in accordance with continual improvement	Section 6.4
Conditions of Approval	Sustainability E115	A Sustainability Strategy must be prepared to achieve a minimum "Excellent" 'Design' and 'As built' rating under the Infrastructure Sustainability Council of Australia infrastructure rating tool.	This Plan
Conditions of Approval	Sustainability E116	The Sustainability Strategy must be made publicly available prior to the commencement of works, and must be implemented throughout construction and operation.	This Plan

PART A: OVERVIEW

1. Introduction

The M6 Motorway is part of the 40-year vision of the NSW Government for transport outcomes in NSW. M6 Stage 1 (the Project) will consist of twin road tunnels, approximately four kilometres in length, linking the New M5 Motorway at Arncliffe to President Avenue in Kogarah.

The CPB Contractors, Ghella, UGL Engineering (CGU) joint venture will deliver the Project in partnership with Transport for NSW (TfNSW).

1.1. Purpose

The purpose of this Sustainability Management Plan (M6S1-CGU-NWW-ENSB-MPL-001400) is to describe how CGU will consider and apply the principles of sustainable development during the delivery of the M6 Stage 1 Upgrade (the Project).

In doing so, this Plan addresses the relevant requirements of the Environmental Mitigation Measures, the Project Planning Approval, applicable legislation, and contractual requirements, including the Project Deed and Scope of Work and Technical Criteria (SWTC).

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

This Plan outlines CGU's approach to managing sustainability to enable the Project to:

- Fulfil the sustainability requirements
- Identify and act on the sustainability-related opportunities and risks associated with the design, construction and operation of the Project to achieve sustainability outcomes
- Create value and benefit from sustainability
- Identify actions to achieve an Excellent Infrastructure Sustainability (IS) Rating (minimum score of 65) under the 'Infrastructure Sustainability Council (ISC) v1.2 Rating for "design" and "as-built"

1.2. Plan Structure

This Plan is based on three parts which outline our approach to managing sustainability on the Project.

Table 2: Sustainability Management Plan Structure

Part A:	<p>Introduction</p> <ul style="list-style-type: none"> ▪ Purpose ▪ Project background ▪ Plan Structure ▪ Sustainability Management System ▪ Interaction with other Management Plans <p>Context and Objectives</p> <ul style="list-style-type: none"> ▪ Project Scope ▪ Policy, Objectives and Targets ▪ Milestones ▪ Project Compliance Requirements <p>Leadership, Collaboration and Support</p> <ul style="list-style-type: none"> ▪ Project Leadership and collaboration ▪ Sustainability Leadership <p>Embedding sustainability</p> <ul style="list-style-type: none"> ▪ Risk and Opportunity Assessment ▪ Assessment options for high impact ▪ Integrating Sustainability in Design and Construction ▪ Sustainable Procurement ▪ Training Requirements <p>Sustainability Reporting and Information Management</p> <ul style="list-style-type: none"> ▪ Project document control ▪ Sustainability data capture ▪ Sustainability reporting requirement <p>Evaluation and Improvement</p> <ul style="list-style-type: none"> ▪ Audit and Review ▪ Inspections ▪ Sustainability Performance Review ▪ Management Plan Review and Improvement <p>ISC Rating Strategy</p> <ul style="list-style-type: none"> ▪ Registration and assessment process ▪ Role and responsibility ▪ IS target scores <p>Key Sustainability initiatives</p> <ul style="list-style-type: none"> ▪ Climate change consideration ▪ Energy Efficiency and Greenhouse Gas Emissions strategy ▪ Water Efficiency ▪ Environment Management Systems ▪ Heritage Management ▪ Social Sustainability
Part B	<p>Summary of the Sustainability Management Elements</p> <ul style="list-style-type: none"> ▪ Expectations

Part C	<ul style="list-style-type: none"> ▪ Actions ▪ Responsibilities ▪ Deliverables
Part C	<p>Appendices</p> <ul style="list-style-type: none"> ▪ Sustainability Policy ▪ Environment Policy ▪ CPB Contractors Procurement Policy ▪ Optional sustainability Initiatives ▪ IS Rating Credit Target and Score – Design ▪ IS Rating Credit Target and Score – As-built

1.3. Project Management System

The Project Management System (PMS) for the Project is based on the requirements of the CPB Contractors management system and has been specifically tailored to ensure compliance with TfNSW's contract requirements.

The Way We Operate guides the way the overall project will be managed to meet client and other stakeholder requirements.

The Project Management Plan (M6S1-CGU-NWW-PMP-MPL-000300) will be implemented to ensure a consistent approach to project delivery. The management system comprises the following components:

- A policy is a statement of strategic intent and commitment and defines the minimum mandatory requirements that CGU expects all levels of the organisation to comply with
- The Project Management Plan outlines how the Project will be managed and it is supported by a suite of functional management plans
- Procedures and work instructions specify how to undertake and control specific activities. They also list accountable roles and the tools and knowledge to be used. Where appropriate and approved by the respective business unit functional manager, project specific procedures may be produced to reflect specific project circumstances
- Tools are preformatted documents such as forms and templates that are required to be completed as part of a procedure
- Knowledge documents are reference material to provide context, additional information or guidance to a policy or procedure
- Business applications are the software tools used to manage our business and support our operations.

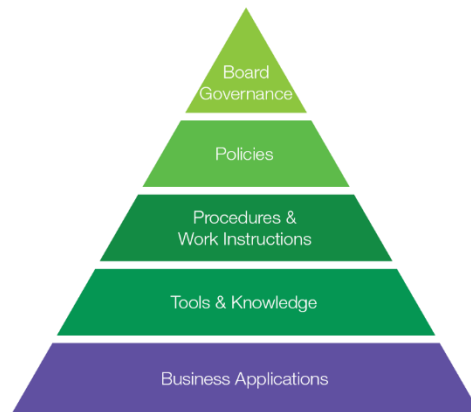


Figure 1: Project Management System

The Sustainability Management Plan has been developed as a functional management plan integrated into the PMS.

1.3.1. Certifications

This Sustainability Management Plan has been developed to be supported by a suite of CPB Contractors Management System governance components that form the Sustainability Management System. This aims to foster an integrated approach to sustainability across functions and ensure third party certifications are maintained. The CPB Contractors Management System has been developed to ensure compliance with the following external certifications:

- ISO 9001:2015 Quality Management

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

1.3.2. Sustainability Assurance System

The Sustainability Management Plan forms the basis of the Project Sustainability Assurance Framework. The assurance framework, which will ensure that any data reported is supported by robust systems, incorporates the following:

- Sustainability Procedures and Policies;
- Sustainability Requirements and Initiatives;
- Objectives/Targets;
- Structure, Responsibility and Resources;
- Corrective and Preventive Action;
- Training and Awareness;
- Document control; and
- Strategies for continuous improvement.

An excel-based Sustainability Management Tool assists the management of implementing the Project’s sustainability requirements and targeted IS Rating credits. It includes IS scorecards, a compliance matrix, evidence tracking, progress updates, and reporting dashboards. The management tool enables CGU to track compliance with the Project sustainability policy, objectives and targets, and the Project Company’s appointed sustainability targets and the IS rating tool.

1.3.3. Interactions with other Project Plans

This SMP is part of an integrated set of Project Plans. The table below outlines key sustainability items/content addressed within other relevant Plans.

Table 3: Project Plan Interfacing

Management Plan	Sustainability items/content addressed
Construction Environmental Management Plan	Sets out governance, monitoring, reporting, auditing and corrective action processes applicable to sustainability
Design Management Plan	Sets out the design management process including detailing the value engineering process, which will be utilised to ensure that all requirements, including sustainability requirements, are embedded in the design
Risk Management Plan	Sets out the risk management approach and procedures to be applied to the M6 Stage 1 delivery.
Quality Plan	Outlines reporting and auditing requirements for the M6 Stage 1.
Communications Strategy	Sets out the framework for community and stakeholder liaison and engagement for the M6 Stage 1
Procurement Plan	Details how CGU will manage procurement and tender processes during the M6 Stage 1.
Waste Management CEMP Sub-plan	Sets out the waste management and reuse strategy to be adopted for the M6 Stage 1
Spoil Management Plan	Annexure C of the Construction Management Plan, this sets out the spoil management and reuse strategy to be adopted for the M6 Stage 1

Contamination CEMP Sub-plan	Details strategies to be applied to manage contamination during the M6 Stage 1.
Groundwater CEMP Sub-plan	Details strategies to be applied to minimise water usage and manage groundwater resources during the M6 Stage 1.
Soil and Surface Water CEMP Sub-plan	Details strategies to be applied to minimise water usage, manage soil and surface water and maximise water reuse during the M6 Stage 1.
Hydrology and Flooding Report	Documents flood modelling has been undertaken to develop the design of the temporary and permanent works
Heritage Management Sub-plan	Details management strategies to minimise impacts on Aboriginal and historic heritage items and archaeology
Flora and Fauna CEMP Sub-plan	Details management strategies to minimise impacts on flora and fauna
Green and Golden Bell Frog Plan of Management	Details management, mitigation measures and monitoring to limit impacts on Green and Golden Bell Frogs habitat during construction and re-instatement of habitat
Noise and Vibration CEMP Sub-plan	Details assessment protocols and management strategies for minimising construction noise and vibration including ground borne vibration
Air Quality and Odour CEMP Sub-plan	Details management strategies to minimise dust and emissions from plant and equipment during construction
Urban Design and Landscape Plan	Describes how CGU will minimise and manage impacts on visual amenity and applies Crime Prevention Through Environmental Design principles
Workforce Development Management and Industry Participation Plan	Detail workforce development and social procurement targets and management systems and measure to be implemented across the M6 Stage 1 Worksite
Project Emergency Response Plan	Provide guidance and direction on how CPB Ghella UGL Joint Venture (CGU) will respond to an imminent threat or actual incident that poses significant or Material Harm to the safety or health of persons, property, the environment, the local community or adjacent traffic operations
Occupational Health, Hygiene and Wellness Management Plan	Outline the process to manage occupational health, hygiene and wellness risks and associated exposure monitoring

2. Context and Objectives

2.1. Project Scope

The M6 Stage1 Project is described in detail in Section 6 of the EIS and the Project Management Plan.

In summary, the Project would comprise a new four-kilometre, multi-lane underground road link between the M8 Motorway and a surface intersection at President Avenue, Kogarah.

- Mainline tunnels approximately 3.0km in length, sized for three lanes of traffic and line marked for two lanes on opening of the motorway
- Entry and exit ramp tunnels approximately 1.5km in length and a tunnel portal connecting the tunnels to a surface intersection with President Avenue
- Provision of a new intersection at President Avenue including the widening and raising of President Avenue at this location
- Upgrade of the President Avenue and Princes Highway intersection to improve capacity and network integration
- Provision of a new shared cycle and pedestrian pathways
- Mainline tunnel stubs for a future connection to extend the Project to the south
- Two motorway operation complexes (MOCs) as follows:
 - ▶ Arncliffe: including mechanical and electrical fit-out of the ventilation facility built by the New M5 Motorway project, and provision of a new water treatment plant and substation
 - ▶ Rockdale (south): including a ventilation building, Disaster Recover Site (DRS), substation and power supply, deluge tanks.
- A tunnel ventilation system, including ventilation facilities located at Marsh Street, Arncliffe and West Botany Street, Rockdale, and in-tunnel ventilation systems (jet fans and ventilation ducts)
- New Utility Services, and modifications and connections to existing Utility Services
- A permanent power supply connection to the Rockdale Ventilation Facility Site MOC from Ausgrid's Canterbury Sub-Transmission Substation
- Emergency access and evacuation facilities, including pedestrian and vehicular cross, long passages, fire and safety life systems
- Ancillary infrastructure for motorway operations including operations management and control systems, permanent power supply, communications, lighting, electronic toll collection system, toll gantries and traffic control and signage (both fixed and variable signage)
- Drainage infrastructure to collect surface water and groundwater inflows for treatment
- Reinstatement of Bicentennial Park and recreation facilities
- Reinstatement and rehabilitation of construction leased areas within the Arncliffe Site
- Minor adjustments to local roads in the Project area
- Development and implementation of systems integration and operating procedures with WestConnex Motorways to ensure safe operation of the interfaces between the Project and the WestConnex Motorways.

2.2. Policy, Objectives and Targets

CGU's Sustainability and Environment Policies set out the principles for delivering the M6 Stage 1 Project to maximise environmental, social, and economic benefits while minimising impacts. This policy has been prepared with consideration to parent company policy, and Motorway Works' overarching sustainability objectives. Refer to Appendix A for the Sustainability Policy and Appendix B for the Environment Policy.

The Sustainability Policy has a strong focus on continual improvement, industry uplift, and leaving a lasting positive legacy. The Policy was established Project start up and has been endorsed by the Project Director. It will remain applicable throughout the lifecycle of the M6 Stage 1 Project. To ensure successful implementation of the Sustainability Policy, CGU has established sustainability objectives and targets that embed our Policy commitments. Objectives and targets have been set

in line with the requirements and targets of SWTC D.5 and the Sustainability Motorway Works overarching sustainability objectives (alignment shown in Part B, Element 9)

All CGU staff and workforce, including all subcontractors working on the M6 Stage 1 Project, must work under the Sustainability and Environment Policies and associated objectives and work towards achieving targets.

2.2.1. Sustainability objectives

The key sustainability objectives for the M6 Stage 1 Project are:

- Maximise efficiencies to reduce our footprint in relation to energy, water, materials, and waste
- Mitigate pollution and avoid environmental harm in accordance with environmental requirements
- Protect, promote and enhance heritage values through appropriate design, planning, and management controls
- Achieve net positive benefits for the environment and community and leave a positive legacy
- Contribute to industry uplift by building an engaged, diverse, and highly skilled workforce
- Drive sustainable procurement processes and influence subcontractors and suppliers to adopt sustainable practices and initiatives
- Demonstrate industry-leading sustainability performance by driving innovation, encouraging critical thinking and building on a culture of continual improvement

2.2.2. Key Targets for Sustainability

Sustainability targets are derived from the SWTC D.5 and in particular, the sustainability requirements listed in Table D5.2.

All targets are listed in Element 7a: Project Specific Targets - SWTC Appendix D.5, and Element 7b: Project Specific Targets - SWTC Appendix D.5, Table D5.2 Requirements.

Please note, sustainability targets related to social sustainability (workforce development and social procurement) are outlined in the Workforce Development and Industry Participation Management Plan

2.3. Sustainability Milestones

Table 4 details the key sustainability milestones

Table 4 Sustainability Milestones

Description	Category	Required timing	Date
Project Award			21 May 2021
Note and review the registration for the Project	SWTC Appendix D.5 2.2 a)	40 Business Days of the date of the Deed	21st July 2021
Submission of the Sustainability Management Plan	SWTC Appendix C.1 1.3 a)	40 Business Days of the date of the Deed	14 July 2021
Design Start Date			2 June 2021
IS Rating Strategy <ul style="list-style-type: none"> ▪ Use the IS Rating tool to calculate an updated IS Design/As-Built Rating score for the design of the Project Works and Temporary Works; 	SWTC Appendix D.5 2.2 d)	Within three months of the commencement of any design	3 September 2021

<ul style="list-style-type: none"> Identify the key steps required to achieve each IS Credit and IS Credit Level; and Nominate responsibility for the achievement of each IS Credit. 			
Substantial Detailed Design Stage Design Documentation submission			*August 2023
Verification of IS Design Rating score	SWTC Appendix D.5 2.2 f)	Within six months of the last Substantial Detailed Design Stage Design Documentation submission	*February 2024
Preliminary construction start date**			*October 2021
Construction start date**			*December 2021
<p>IS Rating Strategy</p> <p>Use the IS Rating tool to calculate an updated IS Design/As-Built Rating score for the design of the Project Works and Temporary Works;</p> <p>Identify the key steps required to achieve each IS Credit and IS Credit Level; and</p> <p>Nominate responsibility for the achievement of each IS Credit.</p>	SWTC Appendix D.5 2.2 e)	Within three months of the commencement of any construction	*January 2022
Opening Completion			*November 2025
Update the greenhouse gas assessment (for at least scope 1 and 2 emissions) for the operation of the Project based on the As-Built Project.	SWTC Appendix D.5 2.4 g)	At the Date of Opening Completion	*November 2025
Submission of As Built rating submission (round 1)	SWTC Appendix D.5 2.2 g)	One month from the Date for Opening Completion	*December 2025
Verification of IS As Built Rating score	SWTC Appendix D.5 2.2 f)	Six months from the Date for Opening Completion	*May 2026

* Indicates an indicative/target date

** Preliminary construction and Construction are defined by the Staging Report.

2.4. Project compliance requirements

Compliance requirements relating to the content of this Sustainability Management Plan are listed in Table 1. Compliance requirements relating to project sustainability performance are included in the Compliance Matrix in Part B of this Plan.

As identified under the SWTC Appendix C.1, this Plan includes

- ISC IS Rating Management Plan (Section 7.0)
- Energy Efficiency and Greenhouse Gas Emissions Strategy (Section 8.2)

2.4.1. Legislation and Regulatory Requirements

The key legislation relevant to sustainability management includes:

- Protection of the Environment Administration Act 1991 (PEA Act)
- Protection of the Environment Operations Act 1997 (POEO Act)
- National Greenhouse and Energy Reporting (NGER) Act 2007 (Cth)
- Environment Protection and Biodiversity Conservation Act 1999 (Cth)

The principles of Ecologically Sustainable Development are outlined in the Protection of the Environment Administration Act 1991 (PEA Act). Ecologically sustainable development (ESD) is the development that improves the total quality of life, both now and in the future, in a way that maintains the ecological processes on which life depends. The principles of ESD have been an integral consideration throughout the development of the Project. The PEA Act recognises that ESD requires the effective integration of economic, social and environmental considerations in decision-making processes. Refer to the Construction Environmental Management Plan for further details of the relevant legislation.

2.4.2. Sustainability Guideline and tools

Table 5 details external guidelines used for sustainability management on the M6 Stage 1 Project.

Table 5: External Tools and Guidelines

Guideline and tools	Description
Environmental Impact Statement: F6 Extension Stage 1 from New M5 Motorway at Arncliffe to President Avenue at Kogarah	The Environmental Impact Statement (EIS) is a publicly available document that provides information on a project, including its environmental impacts and mitigation measures, and is used to inform development consent decisions.
Infrastructure Sustainability Council (ISC)	
Infrastructure Council of (ISC) - Infrastructure Sustainability (IS) Rating Tool	The IS Rating Tool evaluates sustainability initiatives and impacts of infrastructure projects, and is a guide for sustainable design, procurement, construction and operation
IS Infrastructure Sustainability Technical Manual	The Technical Manual describes rating process and mandatory credit criteria and levels/targets
IS Materials Calculator IS Materials Calculator Guideline	A calculator used to determine embodied greenhouse gas emissions (CO2-e) and life cycle impact of products used in the construction of infrastructure projects. The calculation includes transport distances for the delivery of construction materials and waste composition emissions.
IS Scorecard	The IS rating tool scorecard (Excel spreadsheet) facilitates self-assessment against the IS Rating and summary of credits claimed which is submitted to ISC for independent verification.
ISC Case Study Guideline	ISC guidance document to assist in Preparation of Case Studies
ISC Business Case Preparation Guideline	ISC guidance document to assist in the preparation of Business Cases
Other	

Supply Chain Sustainability School	Various sustainable procurement related resources & tools. http://www.supplychainschool.org.au/
National Greenhouse Account Factors	The National Greenhouse Accounts (NGA) Factors provide methods that help companies and individuals estimate greenhouse gas emissions. Factors will be used to Scope 1 and Scope 2 emissions. National Greenhouse Accounts Factors (industry.gov.au)
Greenhouse Gas Assessment Workbook for Road Projects, Transport Authorities Greenhouse Group'	The Workbook outlines a process for estimating the GHG emissions for all of the major activities that were found to contribute significantly to the overall emissions arising from a road project.
US EPA air emission standards	Sets limits on certain air pollutants, including setting limits on how much can be in the air anywhere in the United States. Relevant to on-road diesel plant and equipment
Climate change adaptation for settlements and infrastructure – A risk based approach (AS 5334-2013)	Provides principles and generic guidelines on the management of the risks that settlements and infrastructure face from the impacts of climate change.

3. Leadership and Collaboration

3.1. Project Leadership Sustainability Responsibilities

The project leadership will promote the integration of sustainability at all functional management levels and create a culture where everyone acknowledges their role in achieving the project sustainability objectives. Figure 2 details the project organisation chart related to sustainability to show the team structure, authority and communication

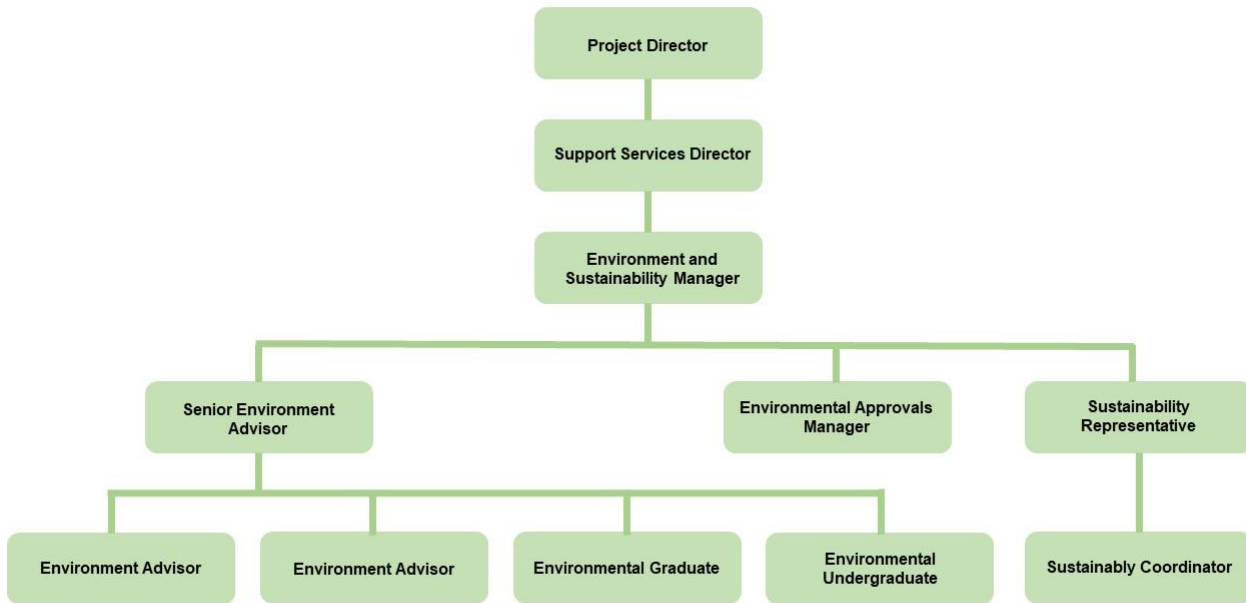


Figure 2: Environment and Sustainability organisation chart

The table below outlines the general sustainability responsibilities for leadership roles, functional leads and staff across the M6 stage 1 Project. The Sustainability Representative and sustainability support staff roles are further addressed in Section 3.2.

Table 6: Project Leadership, Functional Leads and Staff Sustainability Responsibilities

Role	Responsibilities
Project Director	<ul style="list-style-type: none"> Establish and champion sustainability culture across the project Manage accountability for sustainability responsibilities Ensure systems and adequate resources are in place to integrate sustainability across the project and its functions
Design Director / Design Manager / Design Leads	<ul style="list-style-type: none"> Engage with the Sustainability Representative to ensure sustainability requirements / performance specifications are integrated into the design plans/packages/specifications and communicated to relevant parties Integrate Sustainability Rating Scheme requirements into design management processes and provide supporting evidence is provided as required to support rating scheme certification Ensure the design team achieves the sustainability objectives and direct/oversee corrective actions where appropriate
Construction Director / Construction Leads	<ul style="list-style-type: none"> Engage with the Sustainability Representative to ensure sustainability requirements / performance specifications are integrated into the construction plans/packages/specifications and communicated to workforce

	<ul style="list-style-type: none"> Integrate Sustainability Rating Scheme requirements into construction management processes and provide supporting evidence as required to support rating scheme certification Ensure the subcontractors and suppliers achieve sustainability objectives in the Delivery Phase and direct/oversee corrective actions where appropriate
Environment and Sustainability Manager	<ul style="list-style-type: none"> Provide data to the Project Sustainability Representative for sustainability reporting Assist the Sustainability Manager in preparing the Sustainability Rating Scheme submissions
Other key Functional Leads such as Community and Stakeholder Manager	<ul style="list-style-type: none"> Engage with the Sustainability Representative to ensure sustainability requirements are integrated into the plans/packages/specifications and communicated to relevant parties Integrate Sustainability Rating Scheme requirements into design/construction management processes and provide supporting evidence as required to support rating scheme certification Ensure all subcontractors and suppliers achieve sustainability objectives in the Delivery Phase and direct/oversee corrective actions where appropriate
Commercial Legal Director / Commercial Manager	<ul style="list-style-type: none"> Engage with the Sustainability Representative to embed sustainability requirements in sub-contracts and supply agreements Establish and maintain procurement systems that support sustainable procurement objectives
Human Resources Manager	<ul style="list-style-type: none"> Develop and implement strategies to achieve the human resource related sustainability initiatives with regard to equality, social enterprises, diversity and training Ensure the provision of appropriate induction and training for sustainability aspects to all relevant Project personnel
All Staff	<ul style="list-style-type: none"> Integrate the consideration of environmental, social and economic impacts into decision making Generate and support the implementation of sustainability initiatives

3.2. Project Sustainability Roles and Responsibilities

The Sustainability Representative in conjunction with sustainability support roles, will work collaboratively to provide a proactive approach to managing sustainability. Table 7 highlights the roles, responsibilities, and minimum levels of competency for sustainability resources on the Project.

Table 7: Project Sustainability Key Roles, Responsibilities and Competencies.

Key Roles and Responsibilities	(Minimum) Competency Levels
Sustainability Representative	
Manage the development and implementation of the Sustainability Management Plan and associated sub plans	Experience in sustainable design, construction, and management
Facilitate the identification of sustainability risks and opportunities and treatment options	Experience in a similar role from at least one other project. Strong partnering, leadership, and governance skills
Work collaboratively with procurement, design, construction other functional leads to coordinate the implementation of sustainability initiatives to ensure the project's sustainability objectives, requirements and targets are achieved	Strong skills and experience in leading sustainability achievements.
Undertake technical sustainability assessments and reporting, including life cycle assessments, energy modelling, water balance, GHG assessments, climate risk assessments	Experience in design, construction, and engineering management
	Infrastructure Sustainability Accredited Professional

<p>Champion innovation, resource efficiency and Whole of Life (WOL) thinking</p> <p>Manage the Sustainability Rating Scheme requirements including collection and submission of evidence.</p> <p>Ensure sustainability management and reporting is incorporated into project processes and systems</p> <p>Monitor and report sustainability progress throughout the project delivery</p> <p>Be engaged for 100% of the time throughout the design and As Built phases project</p> <p>Work collaboratively with TfNSW Representative to facilitate ongoing reporting, knowledge sharing and continual improvement</p>	<p>Demonstrate a minimum of 50% of time implementing the SMP on the Project (Appendix D.5 Section 2.1 g)</p>
<p>Sustainability Coordinator</p>	
<p>Assist the Sustainability Representative with the implementation of identified sustainability initiatives</p> <p>Assist the Sustainability Representative to develop and collate evidence for the Sustainability Rating Scheme</p> <p>Assist the Sustainability Representative with the monitoring and reporting of sustainability metrics</p>	<p>Qualifications in sustainability, environment, engineering or similar</p> <p>Infrastructure Sustainability Accredited Professional</p>
<p>Environment and Sustainability Manager</p>	
<p>Support the effective implementation environmental and sustainability management systems, strategies, and initiatives across the project to ensure all objectives and targets are met</p> <p>Monitor and report sustainability progress throughout the project delivery</p>	<p>Experience in environment and sustainability design, construction, and management</p> <p>Strong partnering, leadership, and governance skills</p> <p>Strong skills and experience in leading sustainability achievements.</p> <p>Experience in design, construction, and engineering management</p>
<p>Support Services Director</p>	
<p>Monitor and report sustainability progress throughout the project delivery</p> <p>A member of the senior management team</p> <p>Has central responsibility for managing sustainability and responsible for achieving the IS Rating</p>	<p>Strong skills and experience in leading sustainability achievements.</p> <p>Experience in design, construction, and engineering management</p>

3.3. Collaboration

CGU will also work collaboratively with numerous external sustainability personnel and stakeholders. Table 8 lists external sustainability resources and responsibilities. Please note, tables will be updated to include relevant suitability qualified professionals, as required under targeted IS v1.2 credits

Table 8: External Sustainability Key Roles, Responsibilities and Competencies

Roles	Responsibilities	Communication
ISP/ sustainability reviewer	<ul style="list-style-type: none"> ▪ Reviews the Project's sustainability performance and makes recommendations for improvement. Acts independently and objectively, challenging conventional thinking ▪ Current member of the ISC verifier panel. ▪ Undertake sustainability reviews as required under SWTC D.5 Section 2.2 (h) 	Refer to Section 7.1.2
ISC Case Manager	<ul style="list-style-type: none"> ▪ ISC staff member assigned to the project/asset once Registration is completed. The Case Manager is the first point of the contact for the Assessor and provides support to the Assessor and other members of the project/asset management team throughout the rating process. 	
Verifiers (2)	<ul style="list-style-type: none"> ▪ Independent specialists assigned to projects/assets during the Assessment stage ▪ provide independent verification of the weightings assessment, Base case proposal and the self-assessment IS submission. 	
Technical Steering Committee	<ul style="list-style-type: none"> ▪ Sub-committee of the ISC Board ▪ Govern the rating process and are primarily responsible for certifying the achievement of a rating performance level, providing governance of tool development projects, and reviewing of TCs and CIRs. 	
Sustainability TfNSW Representative	<ul style="list-style-type: none"> ▪ Work collaboratively with the Sustainability Representative to facilitate ongoing reporting, knowledge sharing and continual improvement ▪ Arrange formal sustainability knowledge-sharing workshops at least once during each of the design and construction stages of the Project; 	Monthly meetings
Independent Certifier	<ul style="list-style-type: none"> ▪ Review the Sustainability Management Plan and provide requirements and recommendations where applicable in accordance with the SWTC 	Refer to the Communication Strategy
Environmental Representative (ER)	<ul style="list-style-type: none"> ▪ Independently oversee compliance with the Project Planning Approval and be the principal point of advice on the environmental performance of the works -Refer to the CEMP for further details 	
Acoustics Advisor (AA)	<ul style="list-style-type: none"> ▪ independently oversee construction noise and vibration planning, management and mitigation in accordance with the Project Planning Approval. 	
Parent Companies	<ul style="list-style-type: none"> ▪ Submission of NGER's data (CPB) ▪ Facilitate education and knowledge sharing between projects 	
Council and agencies	Refer to Communication Strategy	
Community Stakeholders	Refer to Communication Strategy	

4. Integrating Sustainability

By its nature, sustainability involves the integration of multiple disciplines. Consistent with the Sustainability Strategy, the sustainability requirements have been integrated with the wider Project Program, including processes, procedures and workstreams.

4.1. Assess Sustainability Risks and Opportunities

Sustainability risks and opportunities will be assessed/captured using the Project's Risk management approach, as detailed in the Risk Management Plan (M6S1-CGU-NWW-PCRM-MPL-000800).

In terms of sustainability, risk and opportunity assessment will consider direct and (where possible) indirect risks and opportunities for the full project lifecycle (design, construction and operations), including consideration of:

- Governance risks and opportunities
- Economic and financial risks and opportunities
- Environmental risks and opportunities
- Social risks and opportunities

A multidisciplinary team including the Sustainability Representative, Design Manager and Construction Manager will participate in the risk and opportunity assessment processes. The identification of treatment/implementation options for sustainability risks/opportunities will be captured via risk and opportunity documents/processes, which may include:

- Overall Project Risk and/or Opportunity Register
- Sustainability and Innovation Opportunity Register
- Work Pack Risk Registers
- Climate Change Risk Assessment
- Options Reports

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

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

Risks will be documented in the Risk Register (as described in the Risk Management Plan). Review of the sustainability risk and opportunity assessment will be undertaken throughout the Project to ensure the identification, communication and monitoring of risks/opportunities and associated treatments are relevant. The table below details key timing, milestones for risk identification and review.

Table 9: Sustainability Risk and Opportunity Identification Activities

Project Phase	Timeframe	Activity to identify risk and opportunity	Responsibility
Commencement / Design	June 2021 – August 2023	<ul style="list-style-type: none"> Sustainability requirements and expectations briefing Climate Change Risk Assessment workshop 	<ul style="list-style-type: none"> Sustainability Representative Design Manager Construction Manager
During Preliminary construction	October 2021- January 2022	<ul style="list-style-type: none"> Tool Box talks and project meetings 	<ul style="list-style-type: none"> Sustainability Representative Construction Manager
Prior to Construction	Before January 2022	<ul style="list-style-type: none"> Sustainable Procurement assessment to identify socio-economic opportunities for workforce engagement and environmentally responsible supplier/material selection 	<ul style="list-style-type: none"> Sustainability Representative Procurement Manager
During Construction	January 2022 – November 2025	<ul style="list-style-type: none"> Tool Box talks and project meetings 	<ul style="list-style-type: none"> Sustainability Representative Construction Manager
Ongoing	May 2021 – Nov 2025	<ul style="list-style-type: none"> Review and monitor status of actions within Risk and Opportunity Registers throughout the project Review and monitor status of actions within Climate Change Risk Assessment throughout project 	<ul style="list-style-type: none"> Sustainability Representative Risk Manager

** Preliminary construction and Construction are defined by the Staging Report.

4.1.1. Sustainability Initiative and Innovation

CGU will document sustainability initiatives using the Sustainability Initiative Register. The purpose of this register is to identify and document all initiatives implemented and considered during project delivery.

When initiatives are identified to exceed the sustainability requirements specified in the SWTC D.5, CGU will use a sustainability impact assessment process as detailed in the Sustainability Initiative Register. This method allows financial and non-financial aspects to be scored and weighted to produce a benefit score. Initiatives that score high or very high will be adopted. Initiatives that score below a high will be rejected.

Financial review of the whole of life costing will consider where appropriate and feasible the total costs and potential benefits of the initiative across its life cycle, including:

- Up-front and transactional costs
- Capital costs
- Holding costs
- Costs incurred during operations
- Costs incurred during the expected life of the investment to upgrade or refresh an asset
- End of life decommissioning
- Revenue streams for the infrastructure

The financial review will also consider impacts to the program and other factors as required, such as scope restriction or compliance requirements.

The non-financial review takes into consideration safety, environment, community, stakeholder, workforce, supply chain and any other consideration.

CGU will recommend initiatives to TfNSW as optional sustainability initiatives as described in SWTC D.5 Section 1 b), when;

- The benefit score was significantly impacted by M6 Stage 1 restrictions or scope;
- The benefit score was rated a medium; or
- CGU believes the initiative achieves best practice results.

CGU commits to recommending optimal sustainability initiatives using the table supplied in SWTC D.5 Section 3 (Table D.5-1), as attached to this Plan as Appendix D. This table will also be supplied within the Monthly Report to propose optimal sustainability initiatives, more information refer to Section 5.2.

4.2. Assess Options for High Impact / Significant Decisions

The Sustainability Representative will assist the project team in assessing feasible options/alternatives where appropriate for high impact/significant project-related decisions. The definition and threshold of significant decisions will change throughout project delivery. It may include decisions associated with high materiality, high cost or high impact initiatives or involve variation from EIS or reference design. The project team will define and justify high impact/significant decisions.

The options/alternatives will include a credible range of high-level options, including a defined business-as-usual (BAU) approach. The project will apply sustainability decision making criteria to assess the feasibility of options/alternatives based on the ability to reduce costs, time and risks whilst generating increased environmental and/or social benefits.

Identified sustainability opportunities will be documented as sustainability initiatives as per Section 4.1.1.

4.3. Integrating Sustainability in Design

Integrating the sustainability requirements into the design process is critical to achieving the Project's sustainability targets and creating whole life value for key stakeholders. The Project's Sustainability Representative will meet regularly with the Design Director (or delegate), and other relevant design leads to discuss and document initiatives implemented during design that relate to sustainability requirements, implications and benefits.

The Sustainability Representative will prepare a 'Sustainability Requirements Register, which will outline the project sustainability requirements for design/construction elements and packages. Relevant requirements are to be included in the Design Reports

Design Reports will be reviewed to ensure the identified initiatives have been implemented and detailed project sustainability requirements. Impacts from implemented opportunities, such as material or operational energy reductions, will be calculated as part of the IS resource credits (Energy, Water, Materials).

Identified sustainability opportunities will be documented as sustainability initiatives as per Section 4.1.1

4.4. Sustainable Procurement

CGU has adopted CPB Contractor's' procurement process and systems for the delivery of the M6 Stage 1. CGU's Procurement Policy cascades from the CIMIC Group Procurement Policy (Appendix C), which along with the CPB Contractors' Procurement Procedures, tools and knowledge resources form the basis of the project procurement approach in line with ISO20400:2007 Sustainable Procurement Guidance.

4.4.1. Procurement Process

An overview of the procurement process that will be implemented on the M6 Stage 1 Project is detailed in the Procurement Plan. The following provides an overview of how sustainability considered and incorporated into in the procurement process

Review of Procurement Schedule:

The Procurement Schedule is a live document and central to the management of the timely delivery of all goods and services for CGU.

This Procurement Schedule outlines amongst other things, details on each package to be let (including nature of work, type of agreement to be entered into and tenderer identities) and timing requirements pertaining to when the various stages of the procurement process are to be reached with respect to each package, from completion of design documentation through to executed agreements. This schedule has also been used to identify suppliers with high-impact works in regards to sustainability. This is defined as having scope/s of works likely to have an impact on the overall achievement of the sustainability targets.

The Sustainability Representative has reviewed the procurement schedule and identified the following as high impact suppliers:

- Waste haulage
- Concrete and shotcrete supply
- Demolition works
- Road base and aggregate supply
- Steel supply
- Piling and civil subcontractors

The procurement team will use the schedule to ensure that all parties in the development of specifications, work packages and tendering documentation can be effectively co-ordinated, allowing time for engagement with the supply chain. The procurement team will work closely with the Sustainability Team to ensure relative sustainability aspects are adequately managed.

Prequalification

CGU uses an initial prequalification process which ensures all subcontractors and suppliers meet the minimal requirements. This involves subcontractors and suppliers completing multidisciplinary questionnaires, which includes environment and sustainability and a review for modern slavery (see section 4.4.2). Reviews are carried out by representatives from the Commercial and Procurement Team, in consultation with the Project's Environmental and Sustainability Manager and/or Sustainability Representative as required. This is considered as the first stage of supplier evaluation to ensure suppliers can operation under systems and high standards. Suppliers are either rejected or invited to tender.

Subcontractor Pack

All contracts refer to the Subcontractor Pack which includes environment and sustainability objectives and targets in plain English. The Subcontractor Pack – Environment and Sustainability will also be included in all tender requests to set out environment and sustainability systems and targets. All suppliers must agree to the requirements.

Request for Quotation

Tenders accepted within the prequalification can be invited to tender and request for quotation submitted. The tender is provided the Subcontractor Pack and is required to comply with all elements.

Pre-Tender Questionnaire

A pre-award tender interview questionnaire will request additional information based on the responses provided in the EOI form. When suppliers are identified as high-impact suppliers, further information may also be requested from the sustainability team at this stage. When a subcontractor accepts all CGU's terms and conditions, this interview is not necessary (at the discretion of the Contracts Manager).

Tender evaluation and recommendation

Once all tender responses are received, CGU will analyse and document the details of each submission. The analysis will consider each offer from an overall technical, timeframe and commercial viewpoint, as well as from the financial aspect.

The Contracts Manager will coordinate with the respective design and construction staff to analyse and assess tenders in accordance with the Procurement Plan and Subcontractor Pack. Analysis of results will be documented in a Tender Analysis sheet and processed for tender selection.

Where a subcontract has been identified as a high-impact supplier, the second stage of environment and sustainability evaluation is utilised, which includes specific environment and sustainability consideration. This criteria is unique to the subcontract and will be detailed in the tender evaluation documentation

Supply contracts

Supply contracts include requirements to comply with the Subcontractor Pack, including Environment and Sustainability requirements. Where suppliers are identified as a high-impact subcontractor, additional environment and sustainability requirements may be incorporated into the contract, where relevant.

The Subcontractor Pack include the requirement for all subcontractors to provide reports (in the form required by CGU JV)

- (a) energy production and energy usage;
 - (b) material usage
 - (c) water usage; and
 - (d) waste production,
- in connection with their Project related activities.

Performance monitoring

Performance of subcontractor is monitored throughout their engagement on the Project. Monitoring processes are dependent on the type of subcontract, and this is detailed in the Subcontractor Pack. Sustainability monitoring and assurance processes include;

- review of sustainability reporting in accordance with sustainability objectives and targets,
- work activities inspection and,
- compliance audit with applicable Project management plans, processes and procedures.

Corrective action will be issued to the subcontractor where identified. This may include;

- inspection/audit actions,
- information requests for sustainability reports
- evidence of compliance\ certification

Where corrective actions remain unresolved, management will be escalated to the Procurement and Commercial team for management. Unresolved corrective actions or where a subcontractor fails to carry out corrective action, it will be treated as breaches in their contract and CGU may exercise their rights in respect of default.

Rewarding Sustainability Performance of Suppliers and Subcontractors

Once suppliers and subcontractors have been engaged CGU will recognise and/or reward the sustainability performance of suppliers by:

- Recognition and involvement at Subcontractor Forums
- Considering their sustainability performance in the assessment of additional tender packages for CGU

- Considering sustainability innovations identified by subcontractors or suppliers.
- Considering sustainability performance in After Action Improvement Reviews which aim to capture lessons learnt and are shared with Parent Companies to assist in improving future performance on other relevant projects.

4.4.2. Human Rights and Modern Slavery

CGU will implement CIMIC Group Policies including the commitments for actively avoiding human rights violations, abiding by the human rights and civil liberties included in the Universal Declaration of Human Rights, the International Labour Organisation (ILO) and the ten principles of the United Nations Global Compact. The CIMIC Group's Code of Conduct and the Dealing with Third Parties Policy, in addition to CGU's Sustainability Policy requires specific due diligence to be undertaken regarding risks associated with modern slavery.

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

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

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

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

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

4.5. Integrating Sustainability in Construction

Integrating the sustainability requirements into the construction process is critical to achieving the Project's sustainability targets and creating whole life value for key stakeholders. The Project's Sustainability Team will conduct meetings with the Project Manager (or delegate), and other

relevant construction leads to discuss and document initiatives implemented at key construction phases that relate to sustainability requirements, implications and benefits.

The Sustainability Team will prepare a ‘Sustainability Requirements Register, which will outline the project sustainability requirements for construction elements. This register will be reviewed as part of detailed sustainability inspection described in Section 6.2.

Impacts from implemented opportunities, such as material or operational energy reductions, will be calculated as part of the IS resource credits (Energy, Water, Materials). Identified sustainability opportunities will be documented as sustainability initiatives as per Section 4.1.1.

Section 4.4 and Section 4.6 are also relevant in detailing how sustainability is embedded into construction processes.

4.6. Training Requirements

Sustainability training requirements will be identified and documented within the Project training matrix for each role, including competency, needs and capability, further details provided in the Workforce Development Management and Industry Participation Plan

CGU will provide additional training and education on sustainability aspects for the M6 Stage 1 Project staff and workforce. This includes:

- Project induction - All personnel, subcontractors and visitors will undergo an induction before commencing work on-site. The induction will address Project-specific sustainability issues, including sustainability objectives and targets and sustainability expectations of employees and subcontractors. Induction materials will be reviewed at least annually and amended where necessary to reflect changes to Project sustainability issues.
- Project Sustainability Training - The Project will deliver (internally or externally facilitated) sustainability training to provide specific and targeted sustainability training. This will include workshops described in Section 4.1
- Sustainability toolbox talks and workshops – toolbox talks targeted around relevant sustainability initiatives and ideas generation will be rolled out across the worksites to communicate key messages, reinforce requirements, and seek feedback.
- ISC Infrastructure Sustainability Accredited Professional Training (ISAP) – Relevant project staff will be encouraged to complete ISC’s ISAP training, particularly personnel within the Environment and Sustainability Team and other relevant functional areas.

4.6.1. Knowledge sharing

CGU is committed to enhancing sustainability culture and raising awareness about sustainability principles and initiatives throughout the M6 Stage 1 Project and beyond. As such, CGU will ensure knowledge sharing is carried out regularly with the project team, parent companies, key stakeholders and the wider infrastructure industry.

The Sustainability Representative will participate in relevant forums for sharing knowledge across the industry. Where appropriate, sustainability case studies will be generated by the project for internal and external communications as appropriate.

Knowledge sharing processes are iterative and evolve as the project progresses. Key examples of knowledge sharing initiatives to be adopted by CGU are shown in Table 10.

Table 10: Examples of sustainability knowledge sharing initiatives

Audience	Knowledge Sharing Initiatives
Internal	Sustainability toolbox talks Sustainability workshops
Parent Organisation	The CPB IS Network - was developed as a forum for information sharing and to provide IS rating support. Where relevant, the project will share updates, lessons

	learnt, key achievements and challenges with the network to facilitate learning and capability building across CPB IS project teams.
TfNSW	Sustainability knowledge sharing workshop as per SWTC D.5 Section 2.1 1
Key Stakeholders	Community consultation Annual report
Wider Industry	Industry Conference and Workshops - The Environment and Sustainability Manager, Project Sustainability Representative and/or other relevant personnel may present on sustainability initiatives, and lessons learnt at relevant industry conferences Case Studies – CGU JV will work collaboratively with Industry to prepare case studies to document specific sustainability initiatives, and lessons learnt. Annual report

5. Sustainability Reporting and Information Management

5.1. Sustainability Data Capture

5.1.1. Resource data

To monitor the consumption of resources (including energy, water and materials) and the generation of waste, CGU has established and will implement a monthly monitoring program. This incorporates data collection from sources across the M6 Stage 1 Project, collation and reported as per reporting requirements (Section 5.2). Table 11 shows high material resource types data source for different resources monitored during the Project

Table 11: Sustainability data capture source

Resource Type		Source/s
Resource	Fuel	Project invoices Subcontractor monthly reports
	Energy	Project invoices Mains meter reads
	Gas	Project invoices Mains meter reads
	Other (LPG, oil, grease solvents, acetylene)	Project invoices Subcontractor monthly reports Site tracking register
Water	Potable water	Project invoices Water meter reads Subcontractor monthly reports
	Non-potable water	Water meter reads Modelled consumption estimates (where water meter reads are unavailable) Subcontractor monthly reports
	Water discharge	Water meter reads Modelled estimates (where water meter reads are unavailable)
Waste	Construction waste	Waste tracking register Subcontractor monthly reports
	Office waste	Subcontractor monthly reports
Materials	Concrete	Subcontractor monthly reports
	Steel	Subcontractor monthly reports
	Road base	Project invoices
	Other materials (timber, aggregates, glass, plastic, etc)	Site tracking registers

5.2. Sustainability Reporting Requirements

Table 12 describes the required reporting for sustainability on the M6 Stage 1 Works.

Table 12: CGU sustainability reporting requirements

Reporting Requirement	Description	Frequency
Client		
Monthly Sustainability Progress Reporting	<p>Prepared by the Sustainability Representative for the Project Director's submission to the Client, this report will include requirements detailed in SWTC C.2 Section 1.2.6, including the following:</p> <ul style="list-style-type: none"> Performance of the Contractor against the targets identified in the Sustainability Management Plan progress towards achieving the "Design" and "As Built" ISC IS rating tool. Data to support reporting on targets, and a commentary / analysis of trends including actions to be undertaken to improve performance, Key sustainability and initiatives/opportunities adopted or investigated utilising, including where relevant optimal sustainability initiatives using the table supplied in SWTC D.5 Section 3 (Table D.5-1), (Appendix D) 	Monthly
Annual Sustainability Report	The report must demonstrate and detail performance in sustainability in relation to the Sustainability Management Plan and include progress against sustainability goals and targets over the last year including annual sustainability reporting metrics in line with the NSW Government Resource Efficiency Policy (2014).	Annual (within 5 business days following 31 August each year)
Legislation		
NGERS Reporting	CGU is required to report sustainability data to CPB Contractors and CIMIC to fulfil reporting requirements under the National Greenhouse and Energy Reporting Scheme (NGERS)	Annual
Infrastructure Sustainability Council		
ISC rating submissions	As outlined in Section 4.5, CGU is required to obtain an ISC rating for the M6 Stage 1 Project for the Design and As-Built phases. Sustainability data captured by CGU will be used to support the preparation of the M6 Stage 1 Project ISC rating submissions	Refer to Table 4
Annual Report	Report to identify sustainability performance, lessons learnt and gather stakeholder feedback	Annual

5.2.1. Sustainability Items Reported by other Functions

Sustainability aspects reported by other functions are listed in Table 13:

Table 13: Sustainability Items Reported by Other Functions

Sustainability Target, Requirement/Risk/Opp	Function	Sustainability Aspects Reported	Reporting Frequency
Environment Pollution	Environment	Environmental pollution (water discharge, noise, vibration, air quality and light), including environmental incidents and complaint management	Monthly (summary)
Environment and Sustainability Inspections	Environment	Quantity and results of inspections, audits and observations	Monthly
Tree Canopy	Environment	Percentage of tree canopy cover Sustainability Requirement 22	Once (Urban Design and Landscape Plan)
Workforce development	HR	Performance against SWTC D.5 Section 3	Monthly

6. Evaluation and improvements

6.1. Audits and Review

Audits, inspections, and reviews will be undertaken where required to achieve targeted rating scheme credit requirements and evaluate project performance associated with sustainability. Table 14 highlights an indicative list of audits

Table 14 : CGU required sustainability audit

Name	Detail	Timing/ Frequency
Client Required		
Independent Sustainability Professional	<p>Assess and report on progress against the Sustainability Management Plan;</p> <p>Provide a provisional update to the interim IS Ratings submitted under sections 2.2(d)(i) and 2.2(e)(i); and</p> <p>Identify opportunities or deficiencies to be addressed to meet the IS Rating requirement nominated in sections 2.2(f) and 2.2(g).</p>	<p>Two audits in the design phase; and</p> <p>Three audits and/or a minimum frequency of one per year in the construction stage.</p> <p>Reports must be submitted to the TfNSW Representative within two weeks of the completion of the review</p>
ISC Required		
Design ISP Review (Man-3 Review)	Review of ISC Submission and Sustainability Management System	Quarterly during design, and
Construction ISP Review (Man-3 Review)	Review of ISC Submission and Sustainability Management System	Six monthly during construction
Design External Sustainability Audit (Man-4 Audit)	Review of ISC Submission and Sustainability Management System	Once during design
Construction Internal Sustainability Audit (Man-4 Audit)	Review of ISC Submission and Sustainability Management System, and or environment and sustainability aspects	3 per year
Construction External Sustainability Audit (Man-4 Audit)		Annual
Energy & Carbon Monitoring and Modelling (Ene-1 Audit)	Review of energy and carbon monitoring and modelling	Once during Design and Once during Construction
Waste Handling and Disposal to destination (Was-1 Audit)	Waste Handling Audit	6 monthly during construction

The Sustainability Representative will prepare an audit and review schedule to identify required actions, frequency and responsibilities throughout design and construction.

All persons conducting audits and reviews will be required to confirm they meet the requirements outlined within applicable project requirements or IS rating tools. This may include identification of qualifications and/or meeting the relevant thresholds of "IS suitably experienced".

6.2. Inspections

Sustainability compliance monitoring on site will be undertaken using two types of sustainability inspections, which will be carried out throughout the delivery of the M6 Stage 1 Project. This sustainability inspection regime has been developed in line with the requirements of ISC credit Man-4. These inspections are:

1. Weekly environment and sustainability inspections, which will be carried out by personnel in the CGU Environment and Sustainability Team. This process is detailed in the CEMP. The sustainability component of the inspection will focus on initiatives to reduce both environmental and social impacts and, where required, actions may be raised to address any issues identified.
2. Quarterly detailed sustainability inspections, which are predominately carried out by the Sustainability Team to assess the implementation of sustainability initiatives and compliance with sustainability requirements at the M6 Stage 1 Project.

6.3. Sustainability Performance Review

Sustainability performance will be reviewed monthly by the CGU Senior Leadership Team (SLT) and reported in the Monthly Sustainability Progress Reporting (refer to Section 5.2)

In addition, sustainability performance will be presented formally, at least annually, to the Senior Leadership Team.

CGU will investigate methods to report sustainability performance to key stakeholders during construction. This will enable stakeholder feedback. Methods of delivery may include:

- Presentations during interface meetings;
- Sustainability information included in community newsletters and notifications;
- Annual sustainability performance report prepared and published online (publicly available).

6.4. Management Plan Review and Improvement

This Plan will be reviewed annually by the Sustainability Representative to assess the adequacy of the Sustainability Management Plan and overall performance against Project sustainability requirements, targets and objectives.

Updates will be made to the Plan, and where relevant, Sub-plans, when new elements of the Project Works, Temporary Works and O&M Activities not covered by the existing Sustainability Management Plan commence, or as required for changes in construction sequencing or methodology.

Updates will also take into consideration corrective actions including lessons learnt and improvement/enhancement opportunities identified as the results of:

- Audits undertaken;
- Communication, participation and consultation;
- Relevant communication including complaints from external stakeholders;
- performance of the Project;
- extent to which the objectives and targets have been met;
- Changes to legislation;
- Actions management reviews, and recommendations for improvement;
- Feedback for stakeholders.

7. ISC Rating Strategy

CGU's approach to achieving an Excellent Design and As Built Infrastructure Sustainability (IS) Rating under version 1.2 of the Infrastructure Sustainability Council (ISC) rating scheme is detailed in this Section. This Section is the ISC Rating Management Plan (as required under C1 Section 14 d). It identifies potential credits and targets that may be implemented as a pathway to the IS rating. The credits and targets may be subject to change during project delivery.

7.1. Roles and Responsibility

The Sustainability Representative will be an Infrastructure Sustainability Professional (ISP) and the principal participant on the Project team responsible for managing and delivering sustainability on the Project. The Sustainability Representative will be the IS assessor.

7.1.1. Key Project Sustainability Roles and Responsibility

The implementation of sustainability strategies on an infrastructure project requires participation by key representatives from all functional areas across the project. This is particularly true for the development of an ISC design submission, which covers multiple project aspects and requires input from personnel across the project team.

Continuing from the sustainability roles and responsibility discussed in Section 3.1, Table 15 further outlines key functional areas that the Sustainability Team may need to collaborate in regards to rating categories in the ISC IS Rating Tool version 1.2.

Table 15: Functional area input required for completion of ISC rating submission

Theme	Categories	Functional area input
Management & Governance	Management Systems	Quality Team Environment Team Senior Leadership Team
	Procurement & Purchasing	Commercial Team Procurement Manager Finance and Admin Team
	Climate Change Adaptation	Design Team Interface Team
Using Resources	Energy & Carbon	Design Team Construction Team Plant Manager Finance and Admin Team
	Water	Construction Team Plant Manager Utilities Lead Environment Team Finance and Admin Team
	Materials	Design Team Construction Team Finance and Admin Team
Emissions, Pollution & Waste	Discharges to Air, Land & Water	Environment Team Design Team Construction Team
	Land	Design Team Environment Team
	Waste	Environment Team

		Construction Team Spoil Manager
Ecology	Ecology	Environment Team
People & Place	Community Health, Wellbeing & Safety	Stakeholder and Community Relations Team Safety Team
	Heritage	Environment Team Stakeholder and Community Relations Team Design Team (Urban Design)
	Stakeholder Participation	Stakeholder and Community Relations Team Interface Team
	Urban & Landscape Design	Environment Team Design Team (Urban Design)
Innovation	Innovation	Input may be sought across the entire M6 Stage 1 project team, dependent upon the nature of innovations proposed.

7.1.2. Consultation and engagement with ISC and other stakeholders

Consultation with ISC is essential in achieving a successful IS rating. IS roles and responsibility are detailed in Section 3.2.

CGU will arrange regular IS Progress meetings with the assigned Project Case Manager. The purpose of these meetings will be to allow transparency and knowledge share between ISC and the Project. The key content of these meetings will include:

- Updates on construction progress and sustainability performance on M6 Stage 1 Project
- Requirements of technical clarification (TC) or credit interpretation requests (CIR)
- Discussion regarding the development of the weighting assessment and base case documents
- Discussion regarding technical guidance on sustainability performance and the IS rating scheme.

7.2. Registration and Assessment Process

CGU has commenced the IS assessment process for the M6 Stage 1 Project. At the date of this Plan, CGU has:

- Submitted Registration of Interest (ROI) Form to ISC for a IS Design and As-built rating under v1.2 (17/06/2021)
- Used the IS Rating tool to calculate an updated IS Design Rating score for the design of the Project Works and Temporary Works

Table 16 details the IS process and timing for achieving an IS rating and has been developed to support the milestones detailed in Section 2.3.

Table 16 : IS Rating process

Rating Deliverable	Description	Responsibility	Required timing
ISC Registration	Involves registration of interest to ISC and fee schedule and payment of a rating agreement	Assessor	At project commencement
Weightings Assessment	Highlights the materiality of rating credits in the context of the project.	Assessor/ IS verifier	Preparation and assessment throughout Design. Verification prior to Design rating submission
Base Case Proposal	Sets out the project scope and boundaries, and proposes business as usual (BAU) assumptions to be used in resource use modelling for ISC credits Ene-1, Wat-1, Wat-2, and Mat-1.	Assessor/ IS verifier	
Design Rating Round 1 (R1) Submission	Involves the self-assessment of sustainability performance during the design phase of the M6 Stage 1 Project	Assessor	Submitted at design completion
Design Rating Verification (R1)	Independent verification of sustainability performance during the design phase of the M6 Stage 1 Project The Project receives verification comments.	IS Verifiers	Typically 4-6 weeks
Design Rating Round 2 (R2) Submission	Design rating submission with updated response to resolve verification comments.	Assessor	Typically 1-2 months after round 1 verification comments
Design Rating Verification	Independent verification and certification of sustainability performance during the design phase of the M6 Stage 1 Project	IS Verifiers	Typically 4-6 weeks
As Built Rating R1 Submission	Involves the self-assessment of sustainability performance during construction of the M6 Stage 1 Project.	Assessor	At construction competition
As Built Rating Verification R1	Independent verification of sustainability performance during the as-built phase of the M6 Stage 1 Project The Project receives verification comments.	IS Verifiers	Submitted at design completion
As Built Rating R2 Submission	As-built rating submission with updated response to resolve verification comments.	Assessor	Typically 4-6 weeks

As Built Rating Verification	Independent verification and certification of sustainability performance during construction of the M6 Stage 1 Project.	IS Verifiers	Typically 1-2 months after round 1 verification comments
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7.2.1. Establishment Period

The IS guideline enables an establishment period at the start of the design or construction phases for establishing management systems. Audits/monitoring/review of these management systems therefore do not need to be undertaken during this establishment period. CGU has determined that the M6 Stage 1 establishment period will conclude when the Sustainability Management Plan has been approved by the Client.

7.3. IS Target Score

In line with the requirements of Condition E115 of the Project Planning Approval and SWTC Appendix D.5, CGU is targeting an ISC rating score of 65 for Design and As-built. This aligns with the ‘Excellent’ rating level.

Appendix E and Appendix F of this Plan details the target and stretch IS rating target levels and scores for each credit for the Design and As-built. These scores have been determined in line with the sustainability targets lists in SWTC Sustainability Requirements (D.5 Table 5-2). Note, the sustainability weighting and targets within the table are subject to change during project delivery.

7.4. IS Strategy

As part of the Sustainability Assurance System (Section 1.3), CGU has developed a tool to document and track sustainability management as it relates to ISC. This tool has been developed to satisfy SWTC requirement D.5 Section 2.2 (d) and (e). The tool identifies key steps required to achieve each targeted IS credit and IS credit level. The project team will update the tool to track and report progress at an individual IS credit level and plan delivery actions against credit criteria.

Table 17 provides a summary of key IS Categories, references in this Plan and Supporting documents that describe how CGU will achieve the sustainability targets.

Table 17 : IS categories and document reference

Theme	Categories	Plan Reference	Additional Supporting Documents
Management & Governance	Management Systems	This Plan	Quality Management Plan
	Procurement & Purchasing	Section 4.4	Procurement Management Plan
	Climate Change Adaptation	Section 8.1	Climate Change Risk Assessment Report
Using Resources	Energy & Carbon	Section 8.2	N/A
	Water	Section 8.3	Water Reuse Plan
	Materials	Section 8.2.3	N/A
Emissions, Pollution & Waste	Discharges to Air, Land & Water	Section 8.4	Construction Environmental Management Plan (CEMP)
	Land	Section 8.4	Construction Environmental Management Plan (CEMP)

	Waste	Section 8.2.4	Construction Environmental Management Plan (CEMP) Waste CEMP Sub-plan
Ecology	Ecology	Section 8.4	Construction Environmental Management Plan (CEMP)
People & Place	Community Health, Wellbeing & Safety	Section 8.7	Communications Strategy Workforce Development Management and Industry Participation Plan
	Heritage	Section 8.5	Heritage Management Subplan
	Stakeholder Participation	Section 8.7	Communications Strategy
	Urban & Landscape Design	Section 8.4	Construction Environmental Management Plan (CEMP)
Innovation	Innovation	Section 4.1	N/A

8. Key Sustainability Initiatives

8.1. Climate change

CGU will undertake a climate change risk assessment for the construction and operational stage of the Project in accordance with AS 5334-2013 (Climate change adaptation for settlements and infrastructure – A risk-based approach). The aim of the assessment will be to comprehensively identify and implement adaptation measures to address, as a minimum, ‘extreme’ and ‘high’ rated risks identified in the climate change risk assessment.

8.2. Energy Efficiency and Greenhouse Gas Emissions Strategy

In accordance with SWTC D.5 Section 2.4, this section includes the energy efficiency and greenhouse gas emissions strategy that identifies processes and methods to: (1) improve energy efficiency; and (2) reduce greenhouse gas (GHG) emissions for the construction and operational stages.

CGU has adopted an energy management hierarchy (Figure 3) in approaching energy and GHG management. This approach has been introduced early in the design development process and will be revisited at each of the key delivery phases to ensure any new opportunities to improve energy performance are investigated.

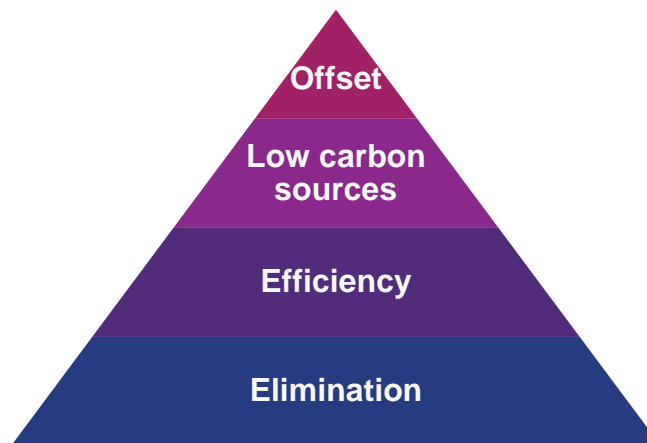


Figure 3 : Energy management Hierarchy

The options analysis will be conducted to ensure whole-of-life costs and benefits are examined. Refer to Section 4.1 for further details on the processes for the identification of opportunities.

8.2.1. Carbon Modelling

As part of the preparation of the M6 Stage 1 Project CGU will complete carbon and energy modelling to understand the carbon footprint. This will include:

- ISC IS Energy Model which capture Scope 1, 2, and 3 emissions (excluding embodied carbon associated with materials) which compares against a business-as-usual design;
- A greenhouse gas assessment as required under SWTC D.5 D Section 2.4 (e), to estimate construction and operational emission using the ‘Greenhouse Gas Assessment Workbook for Road Projects, Transport Authorities Greenhouse Group’ for at least scope 1 and 2 emissions: and
- ISC IS Material Calculator Model which captures the embodied carbon associated with materials and compares against a business-as-usual design.

This information will be used to drive initiatives and innovation to reduce carbon related to high impact aspects of the project. Aspects of project delivery that contribute to the greatest proportion of energy use and GHG emissions are believed to be:

- Tunnel excavation (Scope 2, electricity)
- Surface excavation and bulk excavation of temporary civil structures (Scope 1, diesel-powered plant)
- Material consumption, predominately concrete, and steel (scope 3 emissions)
- Waste transportation and disposal (Scope 3 emissions)
- road designs to minimise energy consumed by vehicles using the motorway (scope 3)

8.2.2. Energy

Carbon and energy management strategies and initiative will be developed for high consumption activities. Strategies and initiatives may include:

- The investigation of opportunities to use renewable energy or lower carbon energy during the construction;
- The procurement of offsets and GreenPower as required under SWTC D.5 Table D5-2;
- Compliance to European Union or US EPA air emissions standards for all non-road diesel plant and equipment;
- Reducing or eliminating energy use through the refinement of work activities – using prefabricated assets where possible;
- Utilisation of energy-efficient equipment – The construction methodology uses a range of energy efficient systems, including variable speed drives, power factor correction, efficient fans, pumps, compressors and energy-efficient lighting in site compound and tunnelling areas. These have been shown to deliver a ‘whole-of-life’ benefit through reduced energy use;
- The use of energy-efficient site accommodation where practicable;
- The adoption of alternative fuels, where available and practicable;
- The use of new and regularly serviced equipment and plant on site to reduce the GHG emissions associated with their operation;
- Implementation of an idling reduction policy for plant and equipment;
- Implementation of a targeted carbon and energy education program;
- The use of electrical plant and equipment; and
- Minimisation of fuel consumption by reducing material consumption and waste disposal.
- Construction site will be designed to reduce travel distances and double handling of materials to reduce fuel usage and emission generation

8.2.3. Materials initiatives

The M6 Stage 1 Project will place a significant demand on a range of resources, including both primary and secondary materials that have undergone some degree of offsite processing. This demand has the potential to create a resource depletion risk. As such CGU has a sustainability objective to maximise efficiencies to reduce our footprint in relation to energy, water, materials, and waste. To manage this risk, CGU will adopt the materials management hierarchy shown in Figure 4 during the M6 Stage 1 Project.

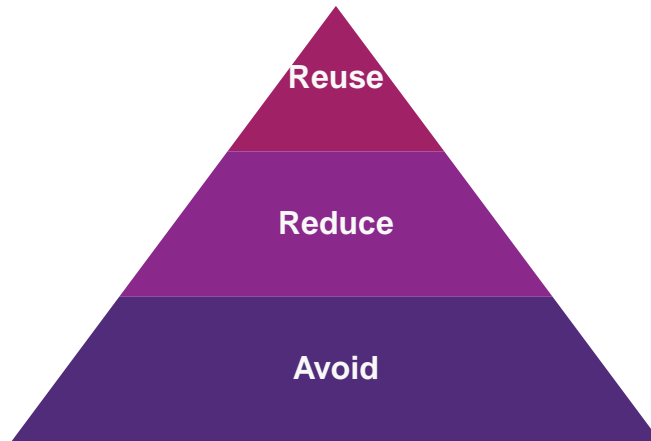


Figure 4 : Material management hierarchy

The following outlines CGU's approach to sustainably manage materials used during the delivery of the M6 Stage 1 Project where appropriate:

- Minimising the quantity of Portland cement in concrete mix designs and using supplementary cementitious material (e.g. fly ash, slag), where possible, while still meeting other Design requirements;
- Reducing steel and concrete quantities through value engineering initiatives identified during design development ;
- Reducing steel reinforcement quantities through use of steel fibre reinforcement or plastic fibre reinforcement (e.g. in shotcrete), while still meeting other Design requirements;
- Batching and production of bentonite onsite, reducing transport emissions;
- Batching and production of concrete onsite for in-tunnel CRCP works, where possible, reducing transport emissions
- Use of recycled or reused steel where possible. Sourcing reinforcing steel (rebar and mesh) from suppliers who use electric arc furnaces which adopt energy-reducing processes such as Polymer Injection Technology (PIT), to reduce the embodied energy per unit. Suppliers will need to be members of the World Steel Association (WSA) Climate Assessment Program (CAP);
- Provide for asset reuse, where appropriate. This approach removes and/or minimises the need to procure various items of equipment through reuse of existing plant and facilities;
- Implement the Forest Certification Scheme (FSC) procurement policy. Sourcing timber from FSC sources certified suppliers or, where it can be shown it is impractical to source timber using the FSC scheme, timber will be sourced from Forestry Corporation NSW managed schemes which can provide Chain of Custody using PEFC certification;
- Reuse of formwork. If materials used on site can be reused without diminished performance or easily repurposed without the need for off-site treatment or processing, they will be used as a preference.

8.2.4. Waste initiatives

Waste management is an important aspect of sustainability on the M6 Stage 1 Works. The Waste CEMP Sub-plan details CGU's management practices in relation to waste. A focus will be on minimising waste excavated and maximising recycling and reuse potential. Initiatives may include:

- Investigation of best practice approach to utilise existing asset where feasible and practicable, including removal of unnecessary work activities and option-engineering;
- Ensure the highest percentage of demolition and construction waste is reused or recycled;
- Where practicable, use post-consumer, post-industrial recycled material or waste materials, including crushed glass, recycled aggregate, tyre-derived aggregate and recycled materials for noise attenuation devices;

- Recycled hardstand materials use for temporary works, if possible, and existing hardstand areas will be maintained for use; and
- Spoil reuse opportunities will be sought and maximised, targeting 95% reuse of reusable spoil generated during delivery of the Works. This may involve seeking Resource Recovery Exemptions.

8.2.5. Monitoring and Reporting

CGU will monitor carbon and energy usage, including material and waste consumption, through environmental and sustainability inspection and monthly client reporting detailed in Section 5.2.

8.3. Water Efficiency

CGU is committed to maximising efficiencies to reduce our footprint in relation to water through the delivery of the M6 Stage 1 Project. The Water Reuse Strategy includes the findings of the water demand model, and explores water minimisation and reuse practices and opportunities.

8.4. Environment Management Systems

Environment management is a core pillar of sustainability management. CGU has committed to mitigate pollution and avoid environmental harm in accordance with environmental requirements, and achieve net positive benefits for the environment and community and leave a positive legacy.

The Construction Environment Management Plan (CEMP) is the overarching document which details the environment systems and how CGU will achieve this objective. The CEMP includes a range of documents that support the management practices and initiatives across the M6 Stage 1 Project. The CEMP and CEMP Sub-plans cover sustainability aspects such as,

- Pollution control such as discharges to air, land and water;
- Land use consideration, including conservation, remediation and flood design; and
- Ecological value, habitat connectivity and biodiversity enhancement

Also refer to the Green and Golden Bell Frog Plan of Management for information on ecological management and biodiversity enhancement related to the Green and Golden Bell Frog habitat at Arncliffe.

It is noted that biodiversity enhancement, is also detailed in the Urban and Landscape Design Plan (refer to Section □)

8.5. Heritage Management

CGU is committed to protect, promote and enhance heritage values through appropriate design, planning, and management controls. CGU approach to heritage management is detailed in the,

- Heritage Sub-plan.
- Urban and Landscape Design Plan (refer to Section □)

8.6. Urban Design and Landscape

The Project incorporates well-design and well-functioning urban places and landscaping. The design principle has a focus on water, ecology and community. Initiatives include heritage interpretation, habitat management, indigenous story-telling and planting, and public art installation. This is detailed in the Urban and Landscape Design Plan

8.7. Social Sustainability

Social sustainability is about identifying impacts (both positive and negative) which affects people and their community. For the M6 Stage 1 project, there are several methods of promoting social sustainability outcomes:

- CGU will ensure the M6 Stage 1 Project will leave a positive legacy through effective and comprehensive community engagement. This is detailed in the Communications Strategy;
- Through delivery the M6 Stage 1 Project, CGU will contribute to industry uplift by building an engaged, diverse, and highly skilled workforce. This is detailed in the Workforce Development and Industry Participation Management Plan .

PART B: SUSTAINABILITY MANAGEMENT PLAN REQUIREMENTS SUMMARY

Part B of this Plan explains how sustainability requirements and targets will be met during the M6 Stage 1 Works. Compliance with all elements of these systems and tools is required to minimise the likelihood of causing unauthorised harm and maximise the uptake of sustainability.

The Sustainability Elements are:

- Element 1: Context and Objectives
- Element 2: Leadership, Collaboration and Support
- Element 3: Risk and Opportunity Assessment
- Element 4: Integrating Sustainability in Design and Construction
- Element 5: Reporting, Communication and Information Management
- Element 6: Evaluation and Improvement
- Element 7a: Specific contract requirement from
- Element 7b: Specific contract requirement from

Element 1: Context and objectives

Expectations	Required actions (refer to Part A for all actions/details)	Responsible / Key Contributor	Deliverables
1.1 Identify project context, objectives, targets and requirements	<ul style="list-style-type: none"> ▪ Establish Sustainability Policy applicable for the project (CIMIC or other project specific) ▪ Identify project key contract requirements and targets ▪ Identify project Legislation and Regulatory Requirements ▪ Identify project key stakeholders ▪ Establish project external sustainability related resources if required ▪ Integrate sustainability elements into other functional management plans <p>Refer Section 2 and Section 1.3.3 for more details</p>	<ul style="list-style-type: none"> ▪ Sustainability Representative ▪ Project Manager/Director 	Details included in SMP Section 2 and 1.3.3
1.2 Assess sustainability materiality	<ul style="list-style-type: none"> ▪ Assess Sustainability Materiality <p>Refer Section 2 for more details.</p>	<ul style="list-style-type: none"> ▪ Sustainability Representative ▪ Project Manager ▪ Design manager ▪ Engineering Manager ▪ Construction Manager ▪ Risk Manager ▪ Stakeholder/Social Inclusion Manager ▪ Workforce Manager ▪ Environment Manager ▪ Commercial Manager 	External to SMP: <ul style="list-style-type: none"> ▪ Materiality Assessment

Element 2: Leadership, collaboration and support

Expectations	Required actions (refer to Part A for all actions/details)	Responsible / Key Contributor	Deliverables
2.1 Define sustainability roles, responsibilities and competencies	<ul style="list-style-type: none"> Define project leadership sustainability responsibilities Define sustainability team roles, responsibilities and competencies Define rating scheme associated roles and responsibilities <p>Refer Section 3 for more details.</p>	<ul style="list-style-type: none"> Project Manager/Director Sustainability Representative 	Details included in SMP Section 3.
2.2 Identify and facilitate sustainability training opportunities	<ul style="list-style-type: none"> Include sustainability training requirements in training matrix. All resources to deliver the training including personnel, equipment, funding and materials, will be allocated in the Project budget For IS Rated projects: Unless already completed, sustainability team staff will complete the [ISC Accredited] training course and exam within 6 months of project commencement or when the course is next offered Industry sustainability training courses including [ISC Accredited] training courses will be offered to functional leads and project leadership roles where appropriate 	<ul style="list-style-type: none"> Sustainability Representative HR Manager 	External to SMP: <ul style="list-style-type: none"> Training Matrix Training records Position Descriptions
	<ul style="list-style-type: none"> The project induction will address appropriate Project-specific sustainability issues 		
	<ul style="list-style-type: none"> The Project will deliver (internally or externally facilitated) mandatory sustainability training opportunities as relevant to project team members including key functional leads which may include Environment manager, Procurement Manager, Commercial Manager and Design Manager. 		
	<ul style="list-style-type: none"> Undertake training evaluation and review 		

Element 3: Risk and opportunity assessment

Expectations	Required actions	Responsible / Key Contributor	Deliverables
<p>3.1 Assess Sustainability Risks and Opportunities</p>	<p>A multidisciplinary team including the Sustainability Representative, Design Manager and Construction Manager will participate in the risk and opportunity assessment processes. The identification of treatment/implementation options for sustainability risks/opportunities will be captured via risk and opportunity documents/processes which may include:</p> <ul style="list-style-type: none"> ▪ Overall Project Risk and/or Opportunity Register ▪ Sustainability and Innovation Opportunity Register ▪ Climate Change Risk Assessment ▪ Options Reports <p>The Risk and Opportunity assessment will consider direct (and indirect where possible) risks and opportunities for the full project lifecycle (design, construction and operations) including consideration of:</p> <ul style="list-style-type: none"> ▪ Governance risks and opportunities ▪ Economic and financial risks and opportunities ▪ Environmental risks and opportunities ▪ Social risks and opportunities <p>Where risks and opportunities are assessed separately from the projects overall risk and opportunity assessment, then:</p> <ul style="list-style-type: none"> ▪ Any risks rated as extreme, very high or high (or equivalent scale) must be included in the projects overall risk register or appropriate functional risk register ▪ Any opportunities rated as extreme, very high or high (or equivalent scale) must be included in the projects overall opportunity register. <p>Treatment/implementation options will be identified and implemented so that there are no residual extreme, high or very high risks.</p> <p>Refer Section 4.1 and Section 4.2 for more details.</p>	<ul style="list-style-type: none"> ▪ Sustainability Representative ▪ Project Manager ▪ Design Manager ▪ Engineering Manager ▪ Construction Manager ▪ Risk Manager ▪ Stakeholder/Social Inclusion Manager ▪ Workforce Manager ▪ Environment Manager ▪ Commercial Manager 	<p>External to SMP:</p> <ul style="list-style-type: none"> ▪ Sustainability and Innovation Opportunity Register ▪ Climate Change Risk Assessment

	<p>The Sustainability Representative will maintain a Sustainability and Innovation Opportunity Register or similar to capture ideas and initiatives that may lead to sustainable outcomes. The Sustainability and Innovation Opportunity Register will qualitatively assess individual opportunities based on Governance, Economic, Social and Environmental benefits. The Register will be used to track the status and responsibility for progressing sustainability and innovation opportunities.</p>	<ul style="list-style-type: none"> ▪ Sustainability Representative 	<p>External to SMP:</p> <ul style="list-style-type: none"> ▪ Sustainability and Innovation Opportunity Register
<p>3.2 Assess sustainability impacts</p>	<p>The Sustainability Representative will assist the project team assess feasible options/alternatives where appropriate for high impact/significant project related initiatives. High impact/significant initiatives will be defined by the project team and may include initiatives associated with high materiality, high cost or high impact initiatives. The options/alternatives will include a credible range of high level options.</p> <p>Feasibility of high impact/significant project related initiatives will initially be assessed using a qualitative assessment to score the relative merit of each option followed by a detailed assessment where required to justify and communicate benefits and costs.</p> <p>The Whole of Life costs of key/significant project initiatives will be considered over the assets lifecycle to assist decision making. Whole of life costing will consider where appropriate and feasible the total costs and potential benefits of the initiative across its life cycle.</p> <p>Refer Section 4.1 for more details.</p>	<ul style="list-style-type: none"> ▪ Sustainability Representative ▪ Commercial Manager ▪ Engineering Manager ▪ Design Manager ▪ Construction Manager 	<p>External to SMP:</p> <ul style="list-style-type: none"> ▪ Options Assessment

Element 4: Integrating sustainability in Design and Construction

Expectations	Required actions (refer to Part A for all actions/details)	Responsible / Key Contributor	Deliverables
4.1 Allocate appropriate resources and costs for sustainability	<p>The Construction and Commercial Directors will ensure that sufficient cost provisions for resources are included in design and construction phases to ensure clear accountability for contributing to the achievement of sustainability requirements/targets.</p> <p>The Sustainability Representative will advise the Commercial Manager of indicative Rating Scheme costs (registrations etc), cost uplift or savings associated with potential sustainability initiatives and any additional sustainability cost/benefit considerations.</p>	<ul style="list-style-type: none"> ▪ Commercial Manager ▪ Construction Director ▪ Sustainability Representative 	<p>External to SMP:</p> <ul style="list-style-type: none"> ▪ Functional Management Plans ▪ Design Plans ▪ Construction Plans
4.2 Integrate sustainability in design	<p>During design, The Sustainability Representative will identify sustainability opportunities and agree responsibilities with relevant design packages leads.</p> <p>The Sustainability Representative and Design Manager will define and agree on specific records and documentation required during the design phase to evidence and achieve the project sustainability requirements/targets (e.g. a table which could be included in the design report for each design package).</p> <p>The Sustainability Representative will:</p> <ul style="list-style-type: none"> ▪ Be provided updates to Design Schedules and progress reports to assist identify upcoming design review gateways for relevant design packages. ▪ Provide input at specified design review gateways for material design packages. ▪ Ensure that sustainability impacts are captured in the design process. E.g. include a sustainability section in template. <p>The Design Manager will add Sustainability as an ongoing agenda item for relevant meetings and/or establishment of a dedicated sustainability in design meeting.</p> <p>The Sustainability Representative will undertake a review of proposed design changes for sustainability initiatives. The review will include an</p>	<ul style="list-style-type: none"> ▪ Sustainability Representative ▪ Design Manager 	<p>External to SMP:</p> <ul style="list-style-type: none"> ▪ Functional Management Plans ▪ Design Plans ▪ Sustainability and Innovation Opportunity Register

	<p>evaluation of client, stakeholder, quality, environmental, community, safety, cost and program impacts.</p> <p>Refer Section 4.3 for more details.</p>		
4.3 Integrate sustainability in construction	<p>During Construction:</p> <p>The Sustainability Representative will identify sustainability opportunities and agree responsibilities with relevant construction lot leads.</p> <p>The Sustainability Representative and Construction Manager will define and agree on specific input into the Construction Plans and key construction planning controls/documents/processes (e.g. Work Packs and Construction Area Plans) as relevant to evidence and achieve the project sustainability requirements/targets.</p> <p>The Sustainability Representative will:</p> <ul style="list-style-type: none"> ▪ Be provided construction/procurement schedules and progress reports to enable input and review ▪ Provide input at specified construction review gateways for material packages. <p>The Construction Manager will add Sustainability as an ongoing agenda item for relevant meetings and/or establishment of a dedicated sustainability in construction meeting.</p>	<ul style="list-style-type: none"> ▪ Sustainability Representative ▪ Construction Manager 	<p>External to SMP:</p> <ul style="list-style-type: none"> ▪ Functional Management Plans ▪ Construction Plans
4.4 Prepare a register of sustainability requirements and responsibilities	<p>The Sustainability Representative will prepare a 'Sustainability Requirements Register' which will outline the project sustainability requirements and determine which functional leads/design and construction packages are associated with and responsible for the delivery of individual requirements.</p>	<ul style="list-style-type: none"> ▪ Sustainability Representative 	<p>External to SMP:</p> <ul style="list-style-type: none"> ▪ Sustainability Requirements Register ▪ Design Reports
4.5 Identify Material procurement scopes/packages	<p>The Sustainability Representative will engage early with the Procurement Team and Commercial Team to understand the procurement process specific to this project and identify the key packages/scopes associated with high materiality sustainability topics</p> <p>Refer Section 4.4.1 for more details.</p>	<ul style="list-style-type: none"> ▪ Sustainability Representative ▪ Commercial Manager ▪ Procurement Manager 	<p>Details included in SMP Refer to Section 4.4.1</p>

<p>4.6 Incorporate sustainability performance specifications (requirements) in subcontractor and supplier contract documents</p>	<p>The Sustainability Representative will develop a set of Sustainability Performance Specifications to clearly articulate the performance requirements associated with selected high materiality design/construction packages and/or technical disciplines to achieve the sustainability requirements/targets. The Sustainability Performance Specification will be included in relevant design, construction and procurement contract documentation.</p> <p>The Sustainability Performance Specifications and/or supply agreements will include the supplier/subcontractors reporting requirements.</p> <p>Where relevant, the Procurement Manager will include Sustainability Performance Specifications (requirements) in contracts outlining sustainability performance and targets associated with selected high materiality packages</p>	<ul style="list-style-type: none"> ▪ Sustainability Representative ▪ Procurement Manager 	<p>External to SMP:</p> <ul style="list-style-type: none"> ▪ Subcontractor Pack ▪ Subcontractor Contracts
<p>4.7 Incorporate sustainability considerations in subcontractor and supplier prequalification</p>	<p>The Procurement Manager will use the Request for Quotation to invite suppliers to identify project-specific opportunities/risks that may contribute to sustainability performance.</p> <p>The Procurement Manager will request suppliers complete CPB Contractors' Prequalification Questionnaire to confirm details of their sustainability and environmental policies/strategies and their implementation, objectives and recent achievements and incidents.</p>	<ul style="list-style-type: none"> ▪ Procurement Manager ▪ Sustainability Representative 	<p>External to SMP:</p> <ul style="list-style-type: none"> ▪ Pre-qualification questionnaire
<p>4.8 Consider environmental, social and financial aspects in tender evaluation</p>	<p>The Procurement Manager and Sustainability Representative will evaluate selected suppliers prior to contract award using CPB Contractors supplier evaluation process</p>	<ul style="list-style-type: none"> ▪ Procurement Manager ▪ Sustainability Representative 	<p>External to SMP:</p> <ul style="list-style-type: none"> ▪ Tender Evaluation
<p>4.9 Ensure supply chain partners report periodically on sustainability performance</p>	<p>The Commercial Manager will ensure suppliers and subcontractors provide applicable reporting as required with progress claims.</p> <p>The Project Reporting actions are outlined further in Section 5.2.</p>	<ul style="list-style-type: none"> ▪ Commercial Manager 	<p>External to SMP:</p> <ul style="list-style-type: none"> ▪ Supply Chain Sustainability Reports
<p>4.10 Review subcontractor/supplier performance</p>	<p>The Sustainability Representative and Construction Manager will monitor and/or audit suppliers and subcontractors to verify commitments made in tender documents and identify areas of risk and</p>	<ul style="list-style-type: none"> ▪ Sustainability Representative ▪ Construction Manager 	<p>External to SMP:</p> <ul style="list-style-type: none"> ▪ Audit / Inspection Report

	<p>identify areas for improvement. Regular feedback will be provided to celebrating success and collaboratively resolving non-conformances.</p> <p>Where appropriate, Suppliers' actual delivery performance post award will be assessed in accordance with the CIMIC Group Procurement Procedure.</p>		
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Element 5: Reporting, communication and information management

Expectations	Required actions (refer to Part A for all actions/details)	Responsible / Key Contributor	Deliverables
5.1 Project sustainability performance reported Monthly	<p>A monthly sustainability report will be prepared by the Sustainability Representative for the Support Services Director.</p> <p>Information to be provided to the Business Unit Sustainability Representative upon request includes:</p> <ul style="list-style-type: none"> ▪ Rating Scheme progress ▪ Evidence submitted ▪ Credit Summary Forms ▪ Weighting Assessment ▪ Verification summary spreadsheet / scorecard <p>Refer Section 5.2 for details</p>	<ul style="list-style-type: none"> ▪ Sustainability Representative ▪ Support Services Director 	<p>External to SMP:</p> <ul style="list-style-type: none"> ▪ Sustainability Report
5.2 Supply chain performance is tracked and reported	<p>Key supply chain providers will be required to report periodically on sustainability performance metrics as required by contract requirements and CPB Reporting Procedures.</p>	<ul style="list-style-type: none"> ▪ Sustainability Representative ▪ Commercial Manager ▪ Procurement Manager 	<p>External to SMP:</p> <ul style="list-style-type: none"> ▪ Supply Chain reports
5.3 Sustainability rating scheme actions are managed	<p>The project will utilise a Sustainability Action Management Tool such as/or similar to the CPB Contractors/EIC Activities IS Sustainability Action Management (SAM) Tool for projects with a Sustainability Rating Scheme.</p>	<ul style="list-style-type: none"> ▪ Sustainability Representative 	<p>External to SMP:</p> <ul style="list-style-type: none"> ▪ Rating Scheme Management tracking tool and progress reports
5.4 Project documents are managed and stored	<p>Relevant documents and records must be stored and managed using the designated electronic document management system.</p> <p>The following Systems apply:</p> <p>Energy consumption, water consumption and waste generation data will be reported in JDE and Synergy</p>	<ul style="list-style-type: none"> ▪ Sustainability Representative 	<p>External to SMP:</p> <ul style="list-style-type: none"> ▪ Sustainability Rating Submissions

	<p>(supporting evidence will be stored in within the designated doc management system)</p> <p>Incident reports and corrective actions will be stored and managed using Synergy</p> <p>Risk registers will be retained in excel spreadsheet and/or an applicable Risk Management System. Copies of risk registers will be saved to the designated electronic document management system periodically.</p> <p>The Project network drive (K: Drive) will be used to store working documents only. Final versions of key documents to be retained such as monthly reports, programme, etc. are to be stored on the designated electronic document management system</p> <p>Final copies of sustainability ratings, case studies, certificates etc. must be saved to the CPB Contractors Sustainability Shared Drive.</p>		
<p>5.5 Sustainability knowledge is captured and shared</p>	<p>Project sustainability knowledge, case studies and lessons learnt will be captured and shared as appropriate with CPB Contractors staff/projects.</p> <p>The Sustainability Representative (or appropriate personnel) will participate in the CPB Contractors Bi-Monthly Sustainability Network which has been developed as a forum for sharing knowledge across CIMIC and CPB Contractors projects.</p> <p>Any external project communication must be approved by the Project, Client, CPB Contractors Communications Manager and CIMIC prior to release of any information.</p>	<ul style="list-style-type: none"> ▪ Sustainability Representative ▪ Communications Manager 	<p>External to SMP:</p> <ul style="list-style-type: none"> ▪ Lessons Learnt Reports

Element 6: Evaluation and improvement

Expectations	Required actions	Responsible / Key Contributor	Deliverables
6.1 Sustainability performance is reviewed targeting continuous improvement	The Sustainability Management Plan will be reviewed annually by the Sustainability Representative to assess the adequacy of the Sustainability Management Plan and overall performance against Project sustainability requirements, targets and objectives. Applicable findings of the review will be incorporated into the Sustainability Management Plan and/or the CPB Sustainability Management System. Refer to 6 for more details.	<ul style="list-style-type: none"> ▪ Sustainability Representative ▪ Project Manager ▪ Business Unit Sustainability Representative ▪ CPB Contractors Group Sustainability Representative 	External to SMP: <ul style="list-style-type: none"> ▪ Project Audit Schedule ▪ Audit/Review Reports
6.2 Sustainability audits, review and inspections are scheduled	The Sustainability Representative will prepare a Review and Audit schedule or include requirements in the project audit schedule to identify required actions, frequency and responsibilities throughout design and construction including IS Rating requirements.		
6.3 Sustainability audits, review and inspections are undertaken	Audits, inspections and reviews are undertaken as scheduled and where required to achieve targeted rating scheme credit requirements.		

Element 7a: Project Specific Targets - SWTC Appendix D.5

Ref	Requirement	ISC credit	Reference
2.1 a)	The Contractor must develop, implement and maintain governance structures, processes and systems that ensure integration of all sustainability considerations, including but not limited to, vision, commitments, principles, objectives and targets, initiatives, knowledge sharing, monitoring and reporting.		This Plan
2.1 b)	A member of the Contractor's senior management team is to have central responsibility for managing sustainability and be responsible for achieving the IS Rating.	Man-3	Section 3.2 See, Support Services Director
2.1 c)	The Contractor must appoint a sustainability representative with sufficient and relevant sustainability experience to provide sustainability advice and guide the achievement of the IS rating, sustainability considerations (vision, commitments, principles, objectives and targets), initiatives, knowledge sharing, monitoring and reporting requirements. Sufficient and relevant experience means having provided the same or a similar role in at least one other project. The sustainability representative must be an Infrastructure Sustainability Accredited Professional having achieved this accreditation from the Infrastructure Sustainability Council of Australia. The sustainability representative must be engaged for 100% of the time throughout the design and As-Built phases of the Project	Man-3	Section 3.2 See, Sustainability Representative
2.1 d)	The Contractor's appointed sustainability representative must work in collaboration with the TfNSW Representative to facilitate ongoing reporting, knowledge sharing and continual improvement.		Section 3.2 See, Sustainability Representative
2.1 e)	The Contractor must develop, implement and document compliance with a procedure to ensure that for significant Project issues, the Contractor's Activities considers the related whole-of-life environmental, social and economic costs and benefits.	Man-7	Section 4.2
2.1 f)	The Contractor must develop, implement and maintain a sustainability assurance framework to track compliance with policy, objectives, targets and requirements in accordance with the items in section 2.1(a) to section 2.1(j) as well as the sustainability requirements contained within the Deed, the SWTC (including this Appendix) and the nominated sustainability targets included in the Contractor's Sustainability Management Plan.		Section 1.3.2
2.1 g)	The Contractor must ensure a suitably qualified person must be based onsite during the construction stage with responsibility for managing the day to day activities required to execute the Sustainability Management Plan. This person must demonstrate that a minimum of 50% of their time is utilised on implementing the Sustainability Management Plan. This person may also fulfil the role of sustainability representative if desired.	Man-3	Section 3.2 See, Sustainability Representative

2.1 h)	The Contractor must ensure a sustainability reviewer is engaged to be an independent sustainability professional and engaged to monitor and review sustainability performance. This sustainability reviewer must be a current member of the ISC verifier panel but cannot be the same person as the ISC appointed verifier for the Project.	Man-3	Section 5.3.1
2.1 i)	The Contractor must convene or participate in regular sustainability knowledge sharing workshops (to be arranged with the TfNSW Representative) during the design and construction stages of the Project. The frequency of such workshops is to be agreed with the TfNSW Representative and must meet the ISC requirements.	Man-6	Section 4.4.1
2.1 j)	Sustainability objectives, targets and requirements must be clearly articulated in the Contractor's Design Documentation and specifically addressed in:		
	design briefings for all personnel involved in the preparation of Design Documentation;		Section 4.3
	formal sustainability knowledge sharing workshops (to be arranged with the TfNSW Representative) at least once during each of the design and construction stages of the Project;	Man-6	Section 3.3 Section 4.4.1
	processes for the development of Design Documentation;		Section 4.3
	procurement briefings and preparation of procurement documentation;		Section 4.4
	site inductions for all the Contractor's personnel and Subcontractor personnel engaged in the Contractor's Activities; and		Section 4.5
	design and construction project plans.		Section 4.3
2.2 a)	The Contractor must note and review the registration for the Project, within 40 Business Days of the date of the Deed.		Section 2.3 Section 7
2.2 b)	The Contractor must review and note the weightings as developed for the Project with the ISC. The Contractor must use the IS Rating tool Version 1.2 to demonstrate how the IS Rating score for the design and As-Built stages of the Project Works and Temporary Works (the IS As-Built Rating) will be achieved.		Section 7
2.2 c)	The Contractor at its discretion can elect to undertake the ISC innovation challenges using credits from Version 2.0 of the IS Rating tool to support the overall assessment under Version 1.2.	Innovation	Section 7
2.2 d)	The Contractor must use the IS Rating tool to demonstrate how the IS Rating score for the design of the Project Works and Temporary Works (the IS Design Rating) will be achieved. Within three months of the commencement of any design the Contractor must complete sections 2.2(d)(i) to section 2.2(d)(iii) below, and submit them via the PDCS to the TfNSW Representative:		Section 2.3 Section 7

	<ul style="list-style-type: none"> i. use the IS Rating tool to calculate an updated IS Design Rating score for the design of the Project Works and Temporary Works; ii. identify the key steps required to achieve each IS Credit and IS Credit Level; and iii. nominate responsibility for the achievement of each IS Credit. 		
2.2 e)	<p>Within three months of the commencement of any construction, the Contractor must complete sections 2.2(e)(i) to section 2.2(e)(iii) below, and submit them via the PDCS to the TfNSW Representative:</p> <ul style="list-style-type: none"> iv. use the IS Rating tool to calculate an interim IS As-Built Rating score for the design and construction of the Project Works and Temporary Works; v. identify the key steps required to achieve each targeted IS Credit and IS Credit Level; and vi. nominate responsibility for the achievement of each IS Credit. 		<p>Section 2.3</p> <p>Section 7</p>
2.2 f)	<p>The Contractor must achieve an IS Design Rating score for the design of the Project Works and Temporary Works within six months of the last Substantial Detailed Design Stage Design Documentation submission. The IS Design Rating score must be independently verified in accordance with the IS Rating process described in the IS Rating scheme which is administered by the ISC. The IS Design Rating score must meet or exceed the score identified in Table D.5-2.</p>		<p>Section 2.3</p> <p>Section 7</p>
2.2 g)	<p>The Contractor must submit the first-round assessment for the IS As-Built Rating of the design and construction of the Project Works and Temporary Works to ISC within one month from the Date for Opening Completion. The Contractor must achieve an IS As-Built Rating score for the design and construction of the Project Works and Temporary Works within six months from the Date for Opening Completion. The IS As-Built Rating Score must be independently verified in accordance with the IS Rating process described in the IS Rating scheme which is administered by the ISC. The IS As-Built Rating score must meet or exceed the score identified in Table D.5-2.</p>		<p>Section 2.3</p> <p>Section 7</p>
2.2 h)	<p>A sustainability review must be undertaken by the sustainability reviewer engaged in accordance with the requirements of section 2.1(h).</p>	Man-3	Section 6.1

	<p>vii. The sustainability review must address the following as a minimum:</p> <ul style="list-style-type: none"> A. assess and report on progress against the Sustainability Management Plan; B. provide a provisional update to the interim IS Ratings submitted under sections 2.2(d)(i) and 2.2(e)(i); and C. identify opportunities or deficiencies to be addressed to meet the IS Rating requirement nominated in sections 2.2(f) and 2.2(g). <p>viii. The minimum frequency of the sustainability reviews are to be as follows:</p> <ul style="list-style-type: none"> A. two audits in the design phase; and B. three audits and/or a minimum frequency of one per year in the construction stage. <p>ix. The sustainability reviewer's report must be submitted to the TfNSW Representative within two weeks of the completion of the sustainability review. As a minimum, the sustainability reviewer's report must address and document the requirements as detailed in section 2.2(h)(i) above.</p>		
2.2 i)	The Contractor must also achieve the sustainability requirements in Table D.5-2.		Element 7b: Project Specific Targets - SWTC Appendix D.5, Table D5.2 Requirements
2.3 a)	The Contractor must undertake a climate change risk assessment for the construction and operational stage of the Project in accordance with AS 5334-2013 (Climate change adaptation for settlements and infrastructure – A risk based approach).	Cli-1 Cli-2	Section 8.1
2.3 b)	The Contractor must identify and implement adaptation measures to comprehensively address, as a minimum, 'extreme' and 'high' rated risks identified in the climate change risk assessment.	Cli-1 Cli-2	Section 8.1
2.4 a)	The Contractor must demonstrate that opportunities to maximise operational energy efficiency have been identified and analysed. Whole-of-life costs and benefits must be estimated for each opportunity identified.	Ene-1	Section 8.2.1
2.4 b)	The Contractor must demonstrate that opportunities to maximise construction energy efficiency (in particular from the tunnelling works) have been identified and analysed.	Ene-1	Section 8.2.1
2.4 c)	The Contractor must demonstrate that opportunities to use renewable energy or lower carbon energy during the construction and operational stages have been fully investigated.	Ene-1	Section 8.2.1
2.4 d)	The Contractor must ensure that all non-road diesel plant and equipment complies with the European Union or US EPA air emission standards.	Ene-1	Section 8.2.1

2.4 e)	The Contractor must undertake a greenhouse gas assessment to estimate construction and operational emissions and demonstrate that opportunities to minimise emissions during the construction and operational stages have been identified, analysed and adopted. These must be undertaken in accordance with the 'Greenhouse Gas Assessment Workbook for Road Projects, Transport Authorities Greenhouse Group' for at least scope 1 and 2 emissions.	Ene-1	Section 5.2 Section 8.2.1
2.4 f)	The Contractor must monitor, record and report energy use and greenhouse gas emissions (at least scope 1 and 2 emissions) during the construction stage.	Ene-1	Section 5.2 Section 8.2.1
2.4 g)	At the Date of Opening Completion, the Contractor must update the greenhouse gas assessment (for at least scope 1 and 2 emissions) for the operation of the Project based on the As-Built Project.	Ene-1	Section 2.3 Section 5.2 Section 8.2.1
2.4 h)	The Contractor must propose and analyse road designs to minimise energy consumed by vehicles using the Motorway.	Ene-1	Section 8.2.1
2.5 a)	The Contractor must demonstrate that opportunities to reduce material used during construction have been identified and analysed. Whole-of-life costs and benefits must be estimated for each opportunity identified.	Mat-1	Section 8.2.3
2.5 b)	The Contractor must demonstrate that opportunities to use materials with low embodied environmental impact (e.g. recycled content) during construction have been identified and analysed. Whole-of-life costs and benefits must be estimated for each opportunity identified	Mat-1	Section 8.2.3
2.5 c)	The Contractor must source all timber products used in the Project from either reused timber, recycled timber, or from timber sustainably managed forests that have obtained Forest Management Certification (FMC). Acceptable FMC schemes include: (i) Programme for the Endorsement of Forest Certification; (ii) Forest Stewardship Council; and (iii) Australian Forest Certification Scheme	Mat-1	Section 8.2.3
2.5 d)	The Contractor must demonstrate that opportunities for the beneficial reuse of useable spoil excavated during construction have been identified and analysed (including consideration of the volumes of spoil to be generated by other projects)	Was-1 Was-2	Section 8.2.4
2.5 e)	The Contractor must demonstrate that opportunities have been fully investigated to: (i) minimise waste generation;	Was-1 Was-2	Section 8.2.4

2.5 e)	(ii) maximise waste segregation and storage for different waste streams; and	Was-1 Was-2	Section 8.2.4
2.5 e)	(iii) maximise waste reuse, recycling, and landfill diversion	Was-1 Was-2	Section 8.2.4
2.5 f)	The Contractor must negotiate and implement packaging take-back arrangements with suppliers	Was-1	Section 8.2.4
2.5 g)	The Contractor must monitor, record and report on, in accordance with sections 2 and 2.1 of Appendix C.2 (Contractor Documentation Schedule), the following: (i) quantities of materials used (for each material type) during the construction stage;	Was-2	Section 5.2
2.5 g)	(ii) quantities of waste to be beneficially reused (for each waste material type, e.g. spoil, timber) during the construction stage;	Was-1 Was-2	Section 5.2
2.5 g)	(iii) quantities of waste to be recycled (for each waste material type, e.g. steel) during the construction stage	Was-1 Was-2	Section 5.2
2.5 g)	(iv) quantities of waste unable to be recycled or beneficially reused in accordance with section 2.5(g)(ii) and section 2.5(g)(iii) above during the construction stage	Was-1 Was-2	Section 5.2
2.6 a)	The Contractor must undertake and report on, in accordance with section 2 and section 2.1 of Appendix C.2 (Contractor Documentation Schedule), a water balance study to estimate the quantities of potable and non-potable water uses, volumes, sources that would be used and generated during the construction and operational stages of the Project	Wat-1 Wat-2	Section 8.3 Water reuse strategy
2.6 b)	The Contractor must demonstrate that opportunities to reduce water use (in particular potable water use) and reuse water (rainwater, stormwater, wastewater, and groundwater) during the construction (for both surface works and tunnelling works) and operational stages have been identified and analysed. Costs and benefits must be estimated for each opportunity identified	Wat-1 Wat-2	Section 8.3 Water reuse strategy
2.6 c)	The Contractor must monitor, record and report on, in accordance with section 2 and section 2.1 of Appendix C.2 (Contractor Documentation Schedule), the following during the construction stage: (i) quantities of water use (potable and non-potable); and	Wat-1 Wat-2	Section 5.2 Water reuse strategy

2.6 c)	(ii) quantities of water reuse, treatment and harvesting.	Wat-1 Wat-2	Section 5.2 Water reuse strategy
2.6 d)	The Contractor must document in the relevant Design Documentation, estimates of the quantities of the following items that will be used during the operational stage of the Project: (i) water use (potable and non-potable); and	Wat-1 Wat-2	Section 5.2 Water reuse strategy
2.6 d)	(ii) water reuse, treatment and harvesting.	Wat-1 Wat-2	Section 5.2 Water reuse strategy
3.1 a)	The Contractor must comply with all relevant Laws that relate to workforce development and social procurement.		Section 8.7 Workforce Development and Industry Participation Plan
3.1 (b)	The Contractor must comply with, in addition to the requirements set out by the Deed: (i) the NSW Government Aboriginal Participation in Construction Policy 2018, available at: https://buy.nsw.gov.au/policy-library/policies/aboriginal-participation-construction ; (ii) the NSW Procurement Board Direction PBD 2020-03: Skills, training and diversity in construction, available at: https://arp.nsw.gov.au/pbd-2020-03-skills-training-and-diversity-in-construction (iii) the Training Management Guidelines: Skills, training and diversity in construction (July 2020), available at: https://www.training.nsw.gov.au/forms_documents/programs_services/islp/training_management_guidelines.pdf (iv) the Australian Industry Participation Plan contained in Exhibit K of the Deed; and (v) TfNSW Social Procurement Workforce Policy.		Section 8.7 Workforce Development and Industry Participation Plan
3.1 (c)	c) The Contractor is responsible for the achievement of these requirements both directly and through their supply chain.		Section 8.7 Workforce Development and Industry Participation Plan

3.1 (d)	The workforce to which these requirements apply are those engaged by the Contractor and throughout their supply chain in Australia.		Section 8.7 Workforce Development and Industry Participation Plan
3.1 (e)	The Contractor must assess current and future workforce skill needs	Wfs -1-4	Section 8.7 Workforce Development and Industry Participation Plan
3.1 (f) i	The Contractor must: (i) prepare the following documents using the templates provided by the TfNSW Representative: A. 'Jobs and Skills Profile (V.1 TfNSW ES-FT-435 - 26.08.2020)'; and B. 'Workforce Development Output Delivery Profile (V.1 TfNSW ES-FT-435 - 26.08.2020)'; (ii) prepare the following documents using the NSW Government templates: A. 'Aboriginal Participation Report' (as defined in the Aboriginal Participation in Construction Policy) in the format prescribed by Schedule 17 of the Deed; and B. 'Aboriginal Participation Plan' (as defined in the Aboriginal Participation in Construction Policy) in the format prescribed by Schedule 17 of the Deed; and (iii) include the documents identified in sections 3.1(f)(i) to 3.1(f)(ii) above in the Workforce Development Management Plan.		Section Workforce Development and Industry Participation Plan
3.1 (g)	The Contractor must engage and deploy suitable resources to manage, coordinate and deliver the workforce development, Aboriginal participation, social procurement and industry participation requirements of the Deed, including this Appendix. These personnel must have relevant experience and qualifications to establish, monitor, and implement strategies relating to workforce development, Aboriginal participation, social procurement, and industry participation. This must include a dedicated fulltime project officer for the duration of the project until Date of Opening Completion focused solely on achieving Infrastructure Skills Legacy Program targets;		Section 8.7 Workforce Development and Industry Participation Plan
3.1 (h)	The Contractor must ensure that employment conditions for the workforce, including apprentices and trainees, employed by the Contractor and throughout the Contractor's supply chain meet or exceed the obligations and expectations of the National Employment Standards as defined in the Fair Work Act 2013 (Cth) (NES), which provides a safety net for minimum wages; and		Section 8.7 Workforce Development and Industry Participation Plan
3.1 (i)	The Contractor must participate in the Infrastructure Skills Legacy Program (administrated by Training Services NSW) in accordance with the NSW Procurement Board Direction PBD 2020-03: Skills, training and diversity in construction	Hea-1 Wfs -1-4	Section 8.7

	(Information in relation to the Infrastructure Skills Legacy Program is available at: https://www.training.nsw.gov.au/programs_services/funded_other/islp/index.html).		Workforce Development and Industry Participation Plan
3.1 (j)	With regards to the Training Management Guidelines: Skills, training and diversity in construction (July 2020), the Contractor must: (i) meet all requirements relating to projects over \$100 million including those requirements that apply to projects over \$10 million; (ii) meet all requirements relating to construction contractors; and (iii) ensure its Subcontractors meet all requirements relating to Subcontractors.	Hea-1 Wfs -1-4	Section 8.7 Workforce Development and Industry Participation Plan
3.2 (a)	The Contractor must ensure that by the Date of Opening Completion, the workforce engaged for the Contractor's Activities by the Contractor and its Subcontractors, and throughout their supply chain has included a minimum of at least: (i) the Minimum Aboriginal Participation Spend was achieved in accordance with clause 7.13 of the Deed. Consistent with the application of the NSW Government Aboriginal Participation in Construction Policy 2018, the minimum Aboriginal Participation Spend must be directed towards the four eligible spend categories detailed in Table D.5-3; (ii) 20% of all trades positions were apprentices; (iii) 8% of the overall workforce were aged under 25 years old at the date of engagement on the Project; (iv) 20% of the total labour force were made up of 'learning workers'. Learning workers are defined in the Training Management Guidelines: Skills, training and diversity in construction (July 2020). This may not include training otherwise required by legislation, associated regulations, standards and accreditations or in the various approvals, licences, and permits that may be necessary for commencement, implementation and control of the Project Works, Temporary Works and Contractor's Activities; and (v) 2% of the workforce were women in non-traditional roles/occupations as defined in the Training Management Guidelines: Skills, training and diversity in construction (July 2020). Note: excludes Traffic Controllers.	Hea-1 Wfs -1-4	Section 8.7 Workforce Development and Industry Participation Plan
3.2 (b)	The Contractor must implement a system to record, track and report the Contractor's (including Subcontractors and other relevant entities in their supply chain) performance against the priority group targets in section 3.2(a) of this Appendix	Hea-1 Wfs -1-4	Section 8.7 Workforce Development and Industry Participation Plan
3.2 (c)	In addition to the monthly reporting requirements in Appendix C.2 (Contractor Documentation Schedule), the Contractor must submit a quarterly report to the TfNSW Representative detailing the Contractor's (including Subcontractors and other relevant entities in their supply chain) performance against the priority group targets in section 3.2(a) of this Appendix using the template provided in Attachment A to the Training Management Guidelines: Skills, training and diversity in construction (July 2020).		Section 8.7 Workforce Development and Industry Participation Plan

3.3 (a)	<p>The Contractor must:</p> <ul style="list-style-type: none"> (i) work with local community groups, training providers and employment support organisations to maximise employment opportunities for people and businesses in the local area; (ii) maximise opportunities for small to medium enterprises and social enterprises to participate in the delivery of the Contractor’s Activities by providing services or supplies to the Contractor and the Contractor’s supply chain; (iii) alert small to medium enterprises of potential tenders and supply opportunities; (iv) develop and implement programs for engagement with local universities including scholarships, cadetships and graduate opportunities; (v) identify and implement programs offering community benefits; and (vi) meet the Contractor’s obligations and support and facilitate TfNSW meeting its obligations (where reasonable and possible) contained in the Australian Industry Participation Plan contained in Exhibit K of the Deed 	<p>Pro-1 Hea-1 Wfs -1-4</p>	<p>Section 8.7 Workforce Development and Industry Participation Plan</p>
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Element 7b: Project Specific Targets - SWTC Appendix D.5, Table D5.2 Requirements

No.	Sustainability Target	How is target Calculated	Required actions
1.	IS V1.2 Design Rating : Excellent (65/100)	Assessment of the M6 Stage 1 against of ISC's IS Rating Tool version 1.2 and application of the ISC Scorecard	<p>CGU will meet this expectation through:</p> <ul style="list-style-type: none"> Previous knowledge and expertise in obtaining leading IS ratings for Design and As-Built Knowledge sharing through experiences on other projects Gap analysis to identify where knowledge and application of ISC can be improved Ensuring ISC requirements are imbedded in decision-making through the design process Preparation of meaningful and concise evidence to address relevant ISC credits Ongoing evaluation to ensure that ISC requirements are being fulfilled. <p>Discussed further in Section 7</p>
2.	IS V1.2 As-Built Rating : Excellent (65/100)	Assessment of the M6 Stage 1 against of ISC's IS Rating Tool version 1.2 and application of the ISC Scorecard	Same as above
3.	95% Percentage of usable spoil (uncontaminated surplus excavated material) reused/recycled (not including Virgin Excavated Natural Material (VENM))	Waste quantities classified under Waste Classification Guidelines, Part 1: Classifying Waste (NSW EPA November 2014).	<p>CGU will meet this expectation through:</p> <p>Previous knowledge associated with quantifying waste streams and quantities from similar projects</p> <p>Excellent working relationships with waste recovery service providers to maximise recycling and reduce waste to landfill</p> <p>investigate the use of project-specific resource exceptions in collaboration with the Environment Protection Authority (EPA) to allow inert waste</p> <p>Discussed further in Section 8.2.4</p>
4.	100% Percentage of VENM reused/recycled		
5.	80% Percentage of construction and demolition waste (overall uncontaminated material excluding spoil) reused/recycled: 80%		
6.	100% Clean concrete beneficially reused		
7.	100% Clean asphalt pavement reclaimed		

8.	20% Percentage of construction stage electricity sourced from renewable energy generated onsite and/or accredited GreenPower : 20%	Percentage of purchased GreenPower or onsite generated electricity compared to construction electricity consumption (measured in kWh)	CGU will meet this expectation through purchase of 20% GreenPower or onsite generated electricity for construction electricity Discussed further in Section 8.2.1
9.	6% Percentage of construction stage energy use offset (in accordance with the Australian Government National Carbon Offset Standard)	Quantity of Australian Government National Carbon Offset Standard offset with compared to construction electricity carbon footprint (measured in tonnes co2-e)	CGU will meet this expectation through purchase of Australian Government National Carbon Offset Standard offset at construction completion Discussed further in Section 8.2.1
10.	N/A Percentage of annual operational stage energy sourced from renewable energy generated onsite	N/A	
11.	15% of non-potable water demand which is sourced from non-potable water sources during construction	Quantifying the quantity of non-potable water used during construction compared to total non-potable water demand.	CGU's strategy for replacing potable water with water from non-potable sources during deliver of the M6 Stage 1 Project Works' is detailed Section 8.3of this Plan. <ul style="list-style-type: none"> ▪ Indicative initiatives that may be used to meet this target include: ▪ On-site capture of rainwater for use i.e. wash-down, flushing toilets, dust suppression ▪ On-site capture of treated water for above ground construction activities, i.e. dust suppression ▪ ReInjection of treated water to ground water, pending design approval
12.	15% of non-potable water demand which is sourced from non-potable water sources during operation: 15%	Modelling quantity of non-potable water used during operation compared to total non-potable water demand.	CGU's strategy for replacing potable water with water from non-potable sources during deliver of the M6 Stage 1 Project Works' is detailed Section 8.3of this Plan. Indicative initiatives that may be used to meet this target include: On-site capture of rainwater for use i.e. wash-down, flushing toilets, landscaping

13.	15% of water (rainwater, stormwater, wastewater, groundwater, tunnel inflow water) generated/collected during construction which is reused, recycled or reclaimed	<p>Quantifying water generated/collected during construction which has been which is reused, recycled or reclaimed compared to total water generated/collected during construction</p> $\frac{\text{non – potable water use}}{\text{generated water} + \text{non – potable water use}}$ <p>where</p> $\text{generated water} = \text{discharged water} - \text{mains water}$	See target 11
14	5% of water (rainwater, stormwater, wastewater, groundwater, tunnel inflow water) generated/collected during operation which is reused, recycled or reclaimed	<p>Quantifying water generated/collected during construction which has been which is reused, recycled or reclaimed compared to total water generated/collected during operation</p>	<p>CGU's strategy for replacing potable water with water from non-potable sources during operation of the M6 Stage 1 Project Works' is detailed Section 8.3 of this Plan.</p> <p>Indicative initiatives that may be used to meet this target include use of:</p> <ul style="list-style-type: none"> ▪ on-site captured of rainwater for use, and ▪ treatment of tunnel inflow water.
15	0% of non-potable water that is used during operation of the Road headers/tunnelling machines	N/A	
16	10% of cement replacement material, measured by mass, used in concrete during the construction stage	Average supplementary cementitious material will be calculated from mix specifications	<p>CGU will meet this expectation through:</p> <ul style="list-style-type: none"> ▪ incorporating CSM replacement targets into design criteria and/or procurement process ▪ Reducing the overall quantity of cementitious material and optimizing the cement content for imposed performance criteria ▪ Replacing a percentage of Portland Cement with supplementary cementitious materials including

			cement, fly ash, silica fume or ground granulated (iron) blast furnace slag.
17	10% of recycled material used in road base and sub base during the construction stage	Average recycled material content will be calculated from mix specifications	CGU will meet this expectation through incorporating recycled content requirements into design criteria and/or procurement process
18	15% improvement in operational energy intensity versus a business-as-usual design	Greenhouse gas footprint analysis for energy consumption to assess modelled emission generated during the operation compared to the base case footprint	CGU will meet this expectation through the energy minimisation hierarchy; elimination, efficiency and substitution. Refer to Section 8.2
19	10% improvement in construction energy efficiency versus a business-as-usual baseline	Greenhouse gas footprint analysis to assess actual emission generated during the construction compared to the base case footprint	
20	100% LED light sources in street lighting and other permanent area lighting installed for public amenity or safety purposes	Percentage of permanent lighting which utilises LED lighting	CGU will meet this expectation through incorporating LED requirements into design criteria and/or procurement process
21	10% improvement in supply chain carbon emissions intensity (including embodied energy in materials) versus a business-as-usual baseline	Greenhouse gas footprint analysis for embodied carbon (materials) to assess modelled emission generated compared to the base case footprint	CGU will meet this expectation through consideration of elimination, reuse and substitution of materials during design and construction. Refer to Section 8.2
22	100% of tree canopy cover; calculated from pre-project total area versus final design total area	Quantification of tree canopy cover at final design compared to pre-project tree canopy cover	CGU will meet this expectation through maximising tree canopy cover. Refer to Section 8.4
23	100% of suppliers and supply chain applying sound labour practices	Percentage of engaged suppliers and supply chain that undertook CGU procurement process	CGU will meet this expectation through prequalification and onboarding processes, including Anti- Bribery and Business Integrity Declarations. Refer to Section 4.4.2
24	100% of office paper used on the project site that is high	Percentage of project site' office paper which contains 50% or more recycled content	CGU will meet this expectation through the communication of requirements to office representatives

	recycled content paper (50 per cent or more recycled content)		
25	Minimum 5 Star NABERS Energy and Green Star standard rating for new buildings or refurbished offices (>1000 m2)	N/A	
26	0% of single use and/or non-recyclable kitchen items supplied to on-site facilities	Number of single-use kitchen items supplied by CGU in on-site kitchens	CGU will meet this expectation through the supply of reusable kitchen items in on-site kitchens.
27	100% of timber to be sourced from either reused/recycled timber or from sustainably managed forests that have obtained Forest Management Certification (FMC)	Percentage of timber product reused, or sourced from sustainably managed forests that have obtained Forest Management Certification (FMC)	CGU will meet this expectation through: <ul style="list-style-type: none"> ▪ Reusing materials, thereby reducing the need to source new timber for some uses ▪ Sourcing timber from sustainably managed forests that have obtained Forest Management Certification (FMC), including ▪ FSC-certified suppliers or ▪ Forestry Corporation NSW-managed schemes which can provide Chain of Custody from using PEFC certification.

Element 8: Environmental Mitigation Measures

Ref	Requirement	ISC credit	Reference
GG1	Targets to reduce GHG emissions, including the use of GreenPower and/or other renewable energy sources, will be included as part of the project's Sustainability Management Plan to assist in achieving 'Design' and 'As Built' ratings of Excellent under the Infrastructure Sustainability Council of Australia infrastructure rating tool.	Ene-1 Ene-2	Section 7 Section 8.2
GG2	An updated GHG assessment based on detailed design will be undertaken for ongoing monitoring and review of emissions during construction.	Ene-1	Section 8.2
GG3	Energy efficiency will be considered during the design of mechanical and electrical systems such as the tunnel ventilation system, tunnel lighting, water treatment systems and electronic toll and surveillance systems. Energy efficient systems will be installed where reasonable and practicable. The installation and use of solar power on operational infrastructure will be considered as part of detailed design, in order to improve the operational energy efficiency of the project.	Ene-1	Section 8.2
GG4	Opportunities to use low emission construction materials, such as recycled aggregates in road pavement and surfacing, and cement replacement materials will be investigated and incorporated where feasible and cost-effective.	Mat-1	Section 8.2
GG5	Construction site layouts will be designed to reduce travel distances and double handling of materials so as to reduce fuel usage and emission generation.	Ene-1	Section 8.2
GG6	Construction plant and equipment will be well maintained to allow for optimal fuel efficiency	Ene-1	Section 8.2
GG7	Raw materials will be managed to reduce energy requirements for their processing. For example, stockpiled materials will be covered or provided undercover storage where possible to reduce moisture content of materials, and therefore the process and handling requirements.	Mat-1 Was-1	Section 8.2
GG8	Locally produced goods and services will be procured where feasible and cost effective to reduce transport fuel emissions	Ene-1 Mat-1	Section 8.2
SEARs 1	The Proponent must assess the sustainability of the project in accordance with the Infrastructure Sustainability Council of Australia (ISC) Infrastructure Sustainability Rating Tool and recommend an appropriate target rating for the project.		Section 7
SEARs 2	The Proponent must assess the project against the current guidelines including targets and strategies to improve Government efficiency in use of water, energy and transport.		This Plan
CC1	A review of the climate change risk assessment will be undertaken during detailed design, with adaptation actions implemented to address extreme and high risks. Adaptation measures for medium risks will be considered and implemented where reasonable and feasible.	Cli-1 Cli-2	Section 8.1
CC2	The increased potential for heat stress among construction personnel will be considered when refining construction Work Health and Safety Management Plans. Measures will be implemented to create greater awareness and education of personnel around health and wellbeing during periods of extreme heat.		Occupational Health, Hygiene and Wellness Management Plan

CC4	The projected increase in the intensity and frequency of extreme rainfall, which may lead to exacerbated risk of road incidents, will be considered during detailed design.	Cli-1 Cli-2	Section 8.1
CC5	Implementation of operational procedures will be considered for surface connections to increase safety during extreme rainfall events, including the potential use of variable speed signs and reduced speed limits.	Cli-1 Cli-2	Section 8.1
CC6	Emergency management planning will include consultation and collaboration with other key agencies to enable a coordinated response.		Project Emergency Response Plan Communications Strategy
CC7	Emergency management procedures will consider worst case scenarios with multiple events (e.g. evacuation of the tunnel required during a storm/ flash flood event).		Project Emergency Response Plan
CC8	The upgrade of bus stop facilities on President Avenue in proximity to the tunnel portals to incorporate shading/ areas of respite for commuters will be considered during detailed design.	Urb-1 Urb-2	Section 8.6 Urban design and Landscape Plan
CC9	Roads and Maritime will consider the possibility of using treated water, normally discharged to waterways to irrigate green space (if feasible) in proximity to the project to provide cooling, particularly during periods of extreme heat. This approach will depend on suitability and salinity of water and potential for reuse.	Wat-2	Section 5.2 Water reuse strategy

Element 9: Motorway Works' overarching sustainability objectives

No.	Sustainability Objectives	Action	Related CGU Sustainability Objected
1.	demonstrate sustainability leadership and continual improvement	<ul style="list-style-type: none"> CGU ensures sustainability in integrated into project leadership roles (refer to Section 3) CGU ensure continual improvement practices (refer to Section 6.4) CGU will show leadership to the wider industry through knowledge sharing (Section 4.6.1) 	<ul style="list-style-type: none"> Demonstrate industry-leading sustainability performance by driving innovation, encouraging critical thinking and building on a culture of continual improvement
2	protect and enhance the natural environment and local heritage;	<ul style="list-style-type: none"> The project design and construction contribute to protect and enhance the natural environment and local heritage through approximately 4.4 hectare of new and upgraded community recreational facilities, refer to project EIS chapter 12, 13 and the Recreational Facilities Replacement Plan. Details on local heritage initiatives and urban design, refer to Section 8.4 , 8.5 and 36□ 	<ul style="list-style-type: none"> Mitigate pollution and avoid environmental harm in accordance with environmental requirements Protect, promote and enhance heritage values through appropriate design, planning, and management controls Achieve net positive benefits for the environment and community and leave a positive legacy
3	contribute to liveable communities (ease congestion, connect communities, integrate land use and transport planning and facilitate urban revitalisation);	<ul style="list-style-type: none"> The project design and construction contribute to reducing congestion on existing road networks and maintain and/or improve pedestrian and cycle paths, refer to project EIS chapter 5 Refer above (item #2) for detail on urban revitalisation 	<ul style="list-style-type: none"> Achieve net positive benefits for the environment and community and leave a positive legacy
4	optimise resource efficiency (materials, energy, water, land) and waste management;	<ul style="list-style-type: none"> Refer to Section 8.2 	<ul style="list-style-type: none"> Maximise efficiencies to reduce our footprint in relation to energy, water, materials, and waste
5	increased resilience to future climate;	<ul style="list-style-type: none"> Refer to Section 8.1 	<ul style="list-style-type: none"> Achieve net positive benefits for the environment and community and leave a positive legacy
6	design allows for future transport needs (transport modes, extensions, access points);	<ul style="list-style-type: none"> The project design considers access to future transport and location roads, refer to project EIS chapter 5 	<ul style="list-style-type: none"> Achieve net positive benefits for the environment and community and leave a positive legacy
7	sustainable procurement – whole-of-life environmental, social and economic considerations; and	<ul style="list-style-type: none"> Refer to Section 4.4. 	<ul style="list-style-type: none"> Drive sustainable procurement processes and influence subcontractors and suppliers to adopt sustainable practices and initiatives

8	maximise equitable/fair training and employment opportunities		<ul style="list-style-type: none">▪ Drive sustainable procurement processes and influence subcontractors and suppliers to adopt sustainable practices and initiatives
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Appendix A Sustainability Policy

Sustainability Policy

This Policy sets out requirements for sustainability for CPB Contractors, Ghella & UGL Engineering (CGU) on the M6 Stage 1 Upgrade Project. Sustainability is the integration of environmental, social and governance factors into decision making to maximise short- and long- term shareholder value, seek competitive advantage, and contribute to safe and healthy employees, communities and ecosystems.

This Policy is consistent with the CIMIC Sustainability Policy and applies to all employees, and third parties engaged by CGU. The objectives of this Sustainability Policy are to:

- Focus CGU's efforts on managing sustainability risks and opportunities, enhancing business performance and supporting the long-term interests of CGU;
- Promote a culture of accountability for sustainability outcomes and improve the sustainability knowledge and skills of employees;
- Integrate consideration of environmentally and socially responsible sourcing and governance factors into CGU's operating and procurement processes, and seek opportunities to collaborate with the supply chain to drive innovation and create mutual value;
- Drive the efficient use of resources and continual innovation in the delivery of the Project;
- Support the adoption and delivery of the Infrastructure Sustainability (IS) rating schemes and other standards that drive sustainability outcomes;
- Encourage and pursue sustainability initiatives and programs that are consistent with the scope of work and technical criteria and meet client expectations, provide value for money, and leave net positive legacies for CGU, our client, project stakeholders, the environment and communities; and
- Enhance resilience to climate change.

CGU will regularly review strategies, reporting and performance to ensure compliance with all legislative requirements and support continuous improvement in sustainability and business performance.

Glen Ashton

M6 Stage 1 Project Director

Date: 14 July 2021

Appendix B Environment Policy

Environment Policy

Purpose

This Policy sets out the minimum mandatory requirements for the management of environmental risks and impacts from our construction activities.

Application

This Policy applies to all business entities controlled by the business, including alliances, joint ventures and consortia where the business exerts management control. It applies at all levels of the organisation including Corporate, Business Unit and Project.

Minimum Requirements

- Senior leaders must demonstrate a personal visible commitment to our SH&E Cultural Framework and ensure all workers understand the requirements of the Management System as it applies to the work they are undertaking, so that work is undertaken to minimise our environmental impact.
- Environment Management Plans (EMP) must be developed and implemented for each Project to outline how the project environmental risk will be managed and controlled.
- Environmental objectives, targets and key performance indicators must be established at all levels of the organisation, with performance against these monitored and analysed to provide a baseline for continual improvement.
- The Environment Procedures must be used to eliminate or minimise environmental risk from construction activities.
- Construction Area Plans and Work Packs must be developed and include an assessment of environmental risk and associated controls.
- Site Environment Plans must be developed for Work Packs where environmental risk dictates; these must be used to inform as content of Daily Pre Starts.
- As part of the risk management process, personnel and teams at the Project, Business Unit and Corporate level should seek to identify opportunities for improving efficiency in the use of natural resources, enhancing positive environmental impacts and driving innovation.
- All environmental incidents must be reported in accordance with the incident notification requirements. They must be thoroughly investigated and appropriate corrective action undertaken with the aim of preventing recurrence of the incident.
- Reporting of energy consumption, water use and waste generation, as well as reporting on initiatives and environmental achievements must be completed by projects and business units as requested.

- All levels of the organisation must be prepared to respond to an emergency and in the event of an emergency, plans and capabilities are in place to eliminate or minimise damage to the environment, preserve ongoing operations and our reputation.
- Effective communication, cooperation and consultation channels must be in place to consult with workers who may impact upon the environment.
- All project personnel responsible for environmental risk shall be appropriately trained and competent and understand their legal obligations with regard to environment management.



Appendix C CPB Contractors Procurement Policy

GROUP PROCUREMENT POLICY

This Policy sets out the requirements for the acquisition of goods and services (**Procurement**) across CIMIC Group Limited and entities it controls (**the Group**). Procurement is a key element of the Group's operations that is crucial for project delivery, cost control, sustainability and financial performance – for the Group and for its clients.

This Policy should be read in conjunction with the *Group Delegations of Authority (DoA)*, *Group Code of Conduct (the Code)*, the *Accounting Manual* (incl. EIS/JDE and EIS/FPM) and the *Dealing with Third Parties, Subcontract Management, Expense Reimbursement, Card and Travel* policies.

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

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

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

- Achieve strong procurement value.
- Support project delivery, cost control, sustainability, safety and financial performance.
- Support compliance with legal requirements.

1. Procurement Principles

The aim of this Policy is to ensure Group employees **procure goods and services in a transparent, competitive, compliant** and sustainable manner and to maximise value by encouraging effective competition and employee accountability.

When a need for the acquisition of goods or services is identified, employees must follow this Group Procurement Policy. Key principles of CIMIC procurement activities include:

- Requiring an approved **Purchase Order and signed contract¹ as per the Group Delegations of Authority (DoA)** with an approved supplier² before any goods or services are delivered or work is commenced³ (approval post-delivery or after work commencing is considered as an act of non-compliance and employees may face disciplinary action). **Any extension or variation of more than 10% requires the same approval⁴ as the original contract.⁵**
- **Ensuring the separation of duties is adhered to** with three different persons responsible for approving, receipting and paying.⁶
- Any **deviation from the Procurement Policy requires CIMIC CEO approval** based on a recommendation from the Operating Company General Counsel and Managing Director (MD). This includes any reasons in any country or joint venture not to comply with this policy.
- All procurement activities, including specifications, timing and costs need to be **in line with the project procurement plan** (or cost centre budget for corporate procurement). **Unplanned items** require approval, as per the DoA. **Select cost types require specific approval** as per the DoA.

¹ In some cases procurement can occur without a signed contract as per the DoA.

² Refer to Dealing with Third Parties Policy and sections 6.2. of this Policy for requirements.

³ Upfront approval can be set-up in exceptions as per section 6.4. of this Policy for specific procurement activities to ensure continuous business operations.

⁴ Changes where the cumulative value of the contract including all extensions/variations exceeds the authority of the original contract approver require approval from the person with the authority for the cumulative value as per the DoA.

⁵ Any deviations from plans as per the contract should be considered indicators for potential cost overruns.

⁶ Expense Reimbursement Policy defines select expenses, which only require two persons, including the approving person.

- No **supplier commitments are to be made during the Group’s work tendering activities** that influence the Group’s procurement in project delivery, unless approved as per the DoA.
- When entering into **Joint Ventures (JVs)**, the **JV shall follow this Policy as a minimum requirement** and the Group’s JV representative has to have at least the same authority in the JV as the Project Manager on Group projects. The Group’s JV representative has to participate in the development of the JV procurement standards and the project procurement plan, and can approve procurement decisions up to their authority as per the CIMIC DoA. Exceptions require CIMIC CEO approval.
- **Strategic procurement partnering, including delivery/procurement partners and frame contracts with suppliers** or a panel of suppliers that affect future procurement decisions (i.e. exclusivity agreements, minimum volume uptakes), or are mandated for use anywhere in a Group Company (new agreements or amendments) require approval as per the DoA. Approved mandated agreements must be used where defined and are set out in the Strategic Partnering Agreements.

2. Group Delegations of Authority (DoA)

Employees must seek approval for each procurement activity as defined in the DoA and in line with the project procurement plan:

- Contract values must not be divided into separate parts for the purpose of avoiding procurement thresholds. Where mandated frame contracts are in place, multiple orders are not considered as dividing into parts and such cases have to be considered in the development of frame contracts.
- Organisational reporting structures are to be adhered to from an approval perspective. Where Executives are required to approve as per the DoA, all subordinated approvals between the requesting and approving role must be obtained.⁷
- Delegated authority can be reduced, but limits can’t be increased. Authority can’t be re-allocated permanently to others, and only in case of absences from work can it be delegated up to four weeks, requiring one-up approval (longer periods or extensions require CIMIC CEO or MD approval).

3. Standard Contracts and Contract Conditions

Specific CIMIC Standard Contracts, including contract conditions are to be used for all goods or services procured (refer to section 8. CIMIC Standard Contracts for details).

- All contracts are required in writing and to be signed as per the DoA.
- Deviations from the standard contracts are not permitted unless approved as per the DoA.

⁷ Including Business Unit Procurement Manager approval before GM level and above approval.

4. Group Company Systems and Processes

Group Companies are expected to have systems and processes in place, which adhere to this policy:

- **Procurement category management** including definitions, spend data and strategic agreements.
- **An approved supplier list**, including supplier details, supplier ratings, background checks and supplier performance assessment details, which must be actively managed and updated.
- **ICT systems** (as approved by CIMIC CIO) to support the procurement process, including Enterprise Resource Planning, inventory management, financial and document management systems:
 - Records need to be kept to document the procurement process, including details on RFQ, quote comparisons, signed contract, progress certificate, billing and contract settlement.
 - Actions outside ICT systems (e.g. changes to contracts or involving petty cash) must be minimised and added in a timely manner to the relevant system(s) to ensure transparency.
 - Responsibilities and access rights must align with this policy and the DoA. Where timely action is required to avoid commercial disadvantages, mobile approvals should be implemented in line with the DoA.⁸
- Published procurement procedures, forms and employee communication.
- **Procurement Training:** All employees engaged in procurement must be adequately trained to comply with this policy.

5. Types of Procurement and Definitions

The acquisition of goods and services can be differentiated into four types of procurement: project works, service, supply and hire. To accommodate the needs of each procurement type, standard contracts are differentiated (refer to section 8. CIMIC Standard Contracts).

An **approved Purchase Order** is the digital confirmation in the Group's ICT System that a specific procurement activity has been approved and is also used as an identifier throughout the process.

Approval for operational and capital expenditure requires different levels of authority as specified in the DoA. The following definitions are used:

- **Capital Expenditure (capex):** a commitment to the long-term use of a depreciating asset, regardless of how the asset is funded, including leases, hiring and rentals of more than twelve months or rentals with material break costs⁹. The value is calculated as the total cost of the asset, if purchased by the Group or the total rental commitment over the life of the contract.¹⁰
- **Operational Expenditure (opex)** – any purchase that does not fall under the capex classification.

Procurement is differentiated into **project procurement** (project related procurement; spend on projects) and **corporate procurement** (supports the activities of corporate functions and business units). Requirements for each type of procurement are detailed in following sections.

⁸ Limited validity of request of up to three work days.

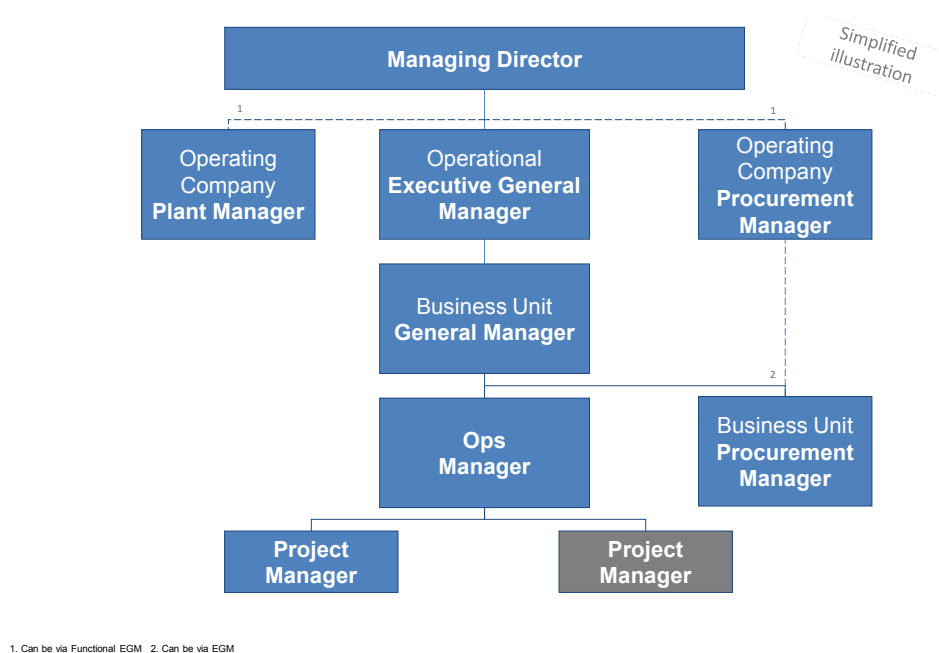
⁹ Material Break Costs applies to rental arrangements whereby the cost of early termination equates to or is greater than three months rental.

¹⁰ Multiple short term rentals of the same item that combined exceed 12 months are capex; the extension exceeding 12 months requires approval as per the capex DoA.

6. Project Procurement

Ensuring compliance and optimising procurement value requires input from several stakeholders. Exhibit 1 provides an overview of key roles relevant to the project procurement process.

Exhibit 1: Overview on key project procurement roles

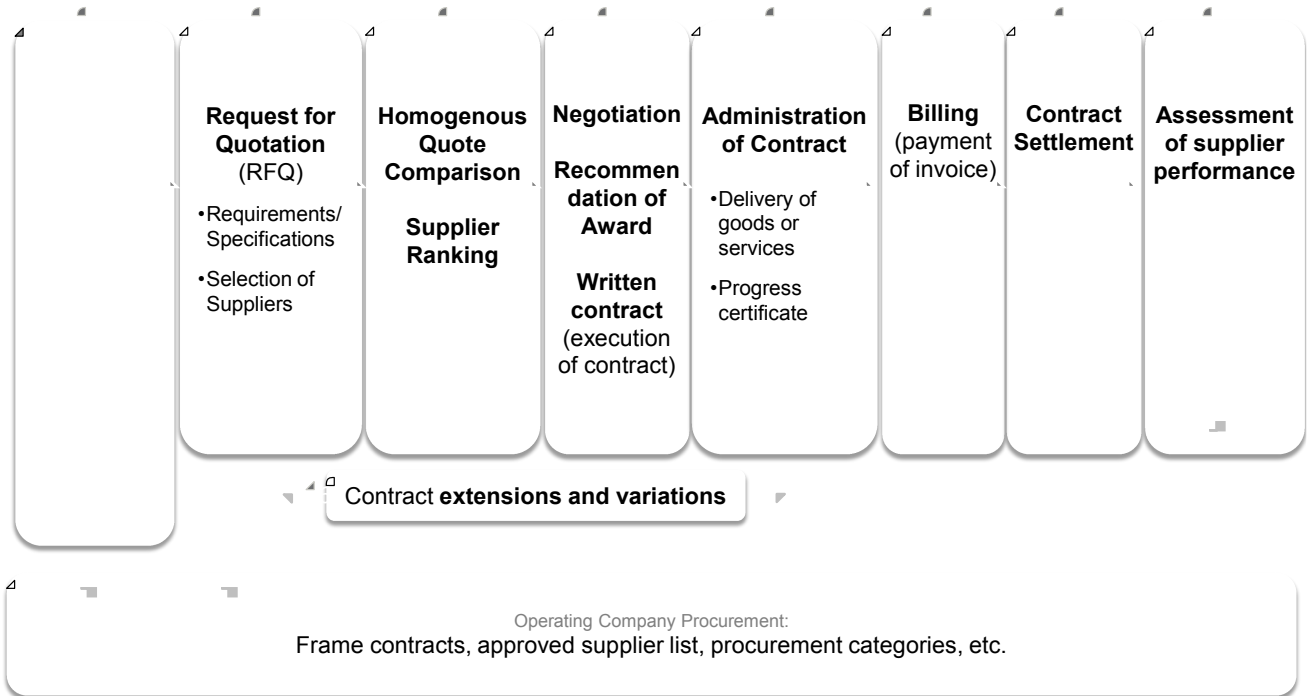


- Project Manager** (head of project and responsible to client and business unit for delivery of all project parts on time and on budget): Plan all project expenditure before project start or extension, propose and approve procurement activities, including development of procurement strategies, preparation of specifications, documents and requirements, preparation of request for quotations (RFQs), quote comparison, negotiation and supplier selection, preparation and management of contracts and completion of supplier assessments as per the DoA.
- Business Unit Operations Manager:** (responsible for multiple projects): Where applicable, endorse project procurement plans and individual procurement proposals from a scope/technical/timing/financial perspective.
- Business Unit Procurement Manager¹¹:** Ensure compliance with the procurement policy and related procedures, assist the Project Managers (PMs) with procurement plans and selection of suppliers; review and submit quote comparisons, recommendations of award and contracts to the GM and assist in maintaining the approved suppliers list.
- Operating Company Procurement Manager:** Ensure compliance with procurement policy and related procedures across the Operating Company and provide functional leadership for Business Unit Procurement Managers; manage cross-Operating Company procurement topics, including frame contracts, approved supplier list and supplier reviews, procurement categories and reporting; support business units and projects, with expert sourcing knowledge, including international sourcing and negotiation strategies; endorse project procurement plans and review selective individual procurement proposals from a purchasing perspective.
- Operating Company Plant Manager:** Manage and optimise current plant and equipment assets held by the Operating Company; support projects in hiring, buying and selling decisions as required; provide plant rate quotes to projects as required.
- Business Unit Manager (incl. GMs, EGMs, MD):** Sign off project procurement plans and approve individual procurement activities as per the DoA.

¹¹ Reports to the BU General Manager (can be the EGM in exceptions) with functional reporting to the Operating Company Procurement Manager.

Exhibit 2 lays out the key steps of the project procurement process, which are detailed in the following chapters.

Exhibit 2: Overview of project procurement process



6.1. Project Procurement Plan

The Project Manager (PM) will plan all project expenditure before the project start, including any detailing documents. The plan will include the following elements for each procurement package¹²:

- **Outcome:** Specifications of procurement items, volumes, project/client requirements, testing, documentation, certification, and other key requirements.
- **Cost:** Budget cost (consistent with FPM and including target improvements) for each procurement item, including totals for supply cost categories across packages.
- **Contingencies:** Any expected procurement items yet to be finalised should be included as contingency packages with respective budget (consistent with FPM and including target improvements). No procurement activity can be done using a contingency package as basis for an RFQ.¹³
- Supplier options for the RFQs.
- **Timing:** When the process starts and key milestones such as work start, contract signing (including time limits) and work completion dates.
- **Risks and dependencies:** Critical path packages, substantial packages, links between packages, long lead time items, constrained supply market risks, delivery risks and mitigation plans.
- Planned CIMIC Standard Contract to be used.
- Logistics and offsite manufacturing strategy, including inventory requirements.
- Sourcing responsibility

Minimum requirements for the development of the project procurement plan include:

- In projects where the volume of work can change (e.g. mining), the plan should encompass the expected volumes (e.g. annual mine plans) with **deviations planned for**.
- The PM assessing **self-performance vs. external procurement** for “works”, leveraging the Group’s capabilities and comparing risks for each alternative.
- Assessing where commercially advantageous, **the purchase of plant/equipment instead of hiring**, considering risks, including project changes and post-project plan changes for the asset. Buying can only be considered, if risks appear minimal and benefits clearly outweigh hiring. Full depreciation on the project must be aimed for and approval as per the DoA is required.

The project procurement plan has to be approved as per the DoA before project start and is to be reviewed at least every 4 months in alignment with FPM reviews.¹⁴

- Before project procurement plan approval by GM and above, approval from the Business Unit Operations Manager (for scope/ technical aspects/timing/financials of plan; involving EIC as relevant), the Business Unit Procurement Manager and the Operating Company Procurement Manager (for supplier options and pricing) is required.
- Cost deviations of more than 5% for procurement packages, supply categories or annual procurement plans for mining contracts, compared to tender estimates, require acknowledgement as per the DoA for the procurement plan.

6.2. Requirements/ Specifications, Selection of Suppliers and Request for Quotation (RFQ)

All of the following **requirements/specifications** are to be defined and signed off as per the DoA for a defined package of the project procurement plan before the request for quotation (RFQ) is sent to suppliers:

¹² For repeat order items, each planned contract is to be specified for the entire project. Procurement packages can contain several procurement items.

¹³ If further information and planning is available at procurement plan reviews, procurement packages can be specified, reducing contingency values and allocating package specific budget cost.

¹⁴ Additionally, the project procurement plan should be reviewed and re-approved, if total procurement costs differ from FPM by more than 1-3%.

- Specifications¹⁵
- Volumes and possible variations
- Timing

Client requirements, including back-to-back arrangements (contractual requirements, fit for purpose, penalties and warranties)

- Group standard contract conditions¹⁶
- Safety requirements, especially Operating Company safety policies and procedures, safety legislation, Australian and international standards as they relate to procurement.
- Further requirements, including insurance, warranties, (cross-) guarantees, site requirements and environment.

The approved supplier list is used to assist supplier selection and **only approved suppliers are to be sent a RFQ**. Suppliers that are currently not on the approved supplier list may be included in the RFQ, if they have completed a pre-qualification form.¹⁷ Supplier approval is confirmed together with the RFQ by the approver, **ensuring appropriate supplier due diligence is completed prior to RFQ distribution**.

Together with the RFQ, **quote evaluation criteria and weightings** have to be developed for the decision making process. These criteria should include pricing along with other factors, including supplier ability to meet specifications, contract conditions, warranties, total life-cycle cost, indigenous and local community involvement and supplier rating as per the approved supplier list.

Minimum requirements include:

- The RFQ has to be distributed to sufficient suppliers¹⁸ to **ensure three to six comparable and compliant quotes are received**.¹⁹ Deviations require approval as per the DoA.
- The RFQ has to **align with the project procurement plan** and noted as to what procurement package it relates to in the plan. If **unplanned**, RFQs require approval as per the DoA and the project procurement plan has to be reviewed. If requested by the approver, the project procurement plan has to be re-approved as per the original DoA.
- **Suppliers should be provided with the same information at the same time** to ensure fairness.
- Answers to **material questions raised by any of the suppliers are to be shared with all suppliers**.
- RFQs requiring GM approval must have the prior approval of the Business Unit Procurement Manager and are to be sent to the Operating Company Procurement Manager for selective review to ensure that the best sourcing options are considered.
- Where capex is required (for purchase or hiring by the project), the project will always **consider internal and external sourcing options**, requesting a quote from the Operating Company Plant team **in addition to the three quotes from external suppliers**.

Frame contracts and strategic partnership agreements aim to agree favourable purchasing conditions with large and technically leading suppliers. They can be optional or mandatory and on CIMIC Group or Operating Company level for a specified good or service and geographical scope.²⁰

- **Mandated frame contracts**/strategic partners (refer to Strategic Partnering Agreements) **must be used** and 'three quotes' are not required as a comprehensive assessment will have taken place as part of the frame contract agreement.²¹ Any decision not to use mandated frame contracts requires approval as per the DoA.

¹⁵ Including documentation on technical and particular specifications, drawings, plans, certificates, applicable legislation, trials and testing.

¹⁶ The CIMIC Standard Contract is only to be distributed in non-editable formats (e.g. PDF).

¹⁷ As defined by the Operating Company. With RFQ distribution, pre-qualified suppliers are added to the approved suppliers list.

¹⁸ Suppliers that have supported in a project tendering phase should also be included in the RFQ distribution.

¹⁹ Compliance of at least three quotes is confirmed as per the DoA with the ranking of supplier as part of the quote comparison.

²⁰ Frame contracts have to follow CIMIC Standard Contracts and Conditions, unless approved by the MD based on a General Counsel recommendation.

²¹ Further policies might apply and approvals can be required depending on the strategic agreement (e.g. travel policy or IT equipment purchasing). Please refer to frame contract responsible and/or Group governance guidance.

- **Optional frame contracts/strategic partners must be included in respective RFQs** and are always subject to negotiations.
- In order to use a frame contract on a project, a contract based on the frame contract conditions is to be approved and signed as per the DoA.
- Information on frame contract prices or conditions that are inferior to other quotes should be forwarded to the Operating Company Procurement Manager to inform future negotiations.

At the end of this step, the following information is provided to the contract signatory²² (as per the DoA) as well as the BU Procurement Manager: RFQ details and selected suppliers for distribution.

6.3. Quote Comparison and Supplier Ranking

Received quotes need to be compared on a homogenous basis to identify the best option for the Group. A **quote comparison table** as shown in Exhibit 3 is to be used to compare planned pricing as per the project procurement plan with supplier quotes and to identify the lowest cost option for each item and the RFQ overall. Quote evaluation criteria from the RFQ are to be included along with any deviations and supplier ratings from the approved supplier list.

Exhibit 3: Quote Comparison Table

	Volume	Budget price as per Project Procurement plan <small>(per volume unit)</small>	Price paid by client <small>(per volume unit)</small>	Lowest price of all quotes <small>(per volume unit)</small>	Supplier quotes			
					Quote 1 <small>(per volume unit)</small>	Quote 2 <small>(per volume unit)</small>	...	Quote 6 <small>(per volume unit)</small>
Item 1 [Specification]								
Item 2 [Specification]								
...								
Item n [Specification]								
Total Price <small>(price x volume)</small>								
Deviations from RFQ <small>(including specifications or timing, client requirements incl. back-to- back arrangements, standard contract deviations)</small>								
Other evaluation criteria								
Supplier rating <small>(based on approved supplier list)</small>								

Using the evaluation criteria defined in the RFQ, suppliers are then to be ranked and each quote compared to the minimum quote price received (multiplying item volumes with the lowest quote price received for each item).

Suppliers are to be identified for further negotiations (**typically 2-3 suppliers**), and **negotiation targets** (including price, conditions, non-negotiables, minimum outcomes) and a **negotiation strategy** are to be defined and approved²³ as per the DoA before negotiations commence.

At the end of this step, the following information is provided to the contract signatory²⁴ (as per the DoA) as well as the Business Unit Procurement Manager: Quote comparison table, suppliers for negotiation, negotiation targets and strategies.

6.4. Negotiation, Recommendation of Award and Contract with Supplier (execution of contract)

²² If this person is at GM level or above the information is also sent to the Operating Company Procurement Manager.

²³ If GM approval is needed, prior approval by the Business Unit Procurement Manager must be obtained.

²⁴ If this person is at GM level or above the information is also sent to the Operating Company Procurement Manager.

Negotiations aim to drive the best procurement outcome for the Group and agree a written contract with a supplier for a defined maximum contract spend. Requirements include:

- Avoiding the risk to enter into verbal or otherwise binding contracts prior to contract signing.
- Considering restarting the whole process or adjusting target outcomes, if no possible outcome can fulfil the set targets or negotiations result in a major change to the original RFQ.

When negotiation targets are met and no further improvement of the Group's position is expected, a **recommendation of award** is to be approved as per the DoA as basis for an **approved purchase order** that is generated in the ICT system and as basis for the following signing of a written contract.²⁵

A **written CIMIC Group standard contract**²⁶, signed by the PM (for contract values <\$500k) or the operational GM (for contract values ≥ \$500k) and signed by the supplier (execution of contract)²⁷, **IS REQUIRED BEFORE ANY GOODS OR SERVICES ARE DELIVERED OR WORK IS COMMENCED.**

- Any **decision to use external plant (hire or purchase), where an internal sourcing option is available has to be approved by the Operating Company MD** to ensure that the best commercial outcome is selected (in addition to approval for capex or operational expenditure as per the DoA).
- A contract can include several draw-downs that are then used to fulfil the contract.
- **The PM can prepare in advance for cases where immediate action outside business hours might be required to ensure continuous operations:**²⁸
 - The PM can specify when a procurement activity can happen based on a clearly defined trigger/case. A maximum item price and item specifications have to be defined for each specific case and a ranked order of supplier options to be used.
 - Each case is to be signed off by the EGM or above ('approval of recommendation of award' as per the DoA) and the contract has to be signed as required by this policy after the event.

²⁵ Specifying the same elements as defined in the RFQ, including a maximum approved procurement value.

²⁶ For purchase of goods under \$20k, either a supplier-provided contract or no contract is allowed as per the DoA.

²⁷ Two copies of the contract are sent to the supplier in a non-editable format. The supplier has to sign both copies and once reviewed (by the Business Unit Procurement Manager for all contracts requiring GM signature), both copies are signed by the PM or GM as required and one copy is returned to the supplier.

²⁸ Where not defined, procurement activities have to be approved as per the DoA outside business hours.

6.5. Administration of Contract: delivery of goods and/or services (progress certificate)

Once a contract has been signed with the supplier, the delivery of the goods and services commences and the contract is to be administered. All deliveries have to be **compliant with the signed contract**. The administration of the contract includes the following requirements:

- A project manager delegate will review deliveries of goods and services on the project against accruals created for the contract, and issue a signed **progress certificate** for the compliant delivery, including a calculation of the respective accrual amount. **Progress certificates are then to be approved by the PM** and the client, if required, and provided to Accounts Payable for forwarding to the supplier as basis for an invoice.
- **Goods and works are to be physically inspected, tests and analyses conducted and certificates provided** to confirm that the correct items/works have been delivered, that there is no damage and all relevant documentation, including guides, supplier manuals and warranties are present. All documentation is to be kept for future use and compliance.
- Regular and timely **progress and commercial meetings on site with the supplier** are to be held to discuss performance according to the contract, including, but not limited to: progress, safety, quality, environment, variations and claims.
- **Contract notices** pursuant to the relevant contract clauses are issued to the supplier.
- Requests for information, extensions of time, claims, delays, disruption and variation registers are to be reviewed on a weekly basis by the PM.

6.6. Contract Extensions and Variations

Contracts are to be delivered as agreed with the supplier. Potential extensions or variations are early indications of cost overruns - these have to be identified early to provide all sourcing options and require upfront approval as per the DoA.

- Changes that increase the contract value by more than 10% require the same approval as the original contract.
- Changes where the cumulative value of the contract including all extensions/variatioins exceeds the authority of the original contract approver require approval from the person with the authority for the cumulative value as per the DoA.
- The approver will decide if the extension/variation has to go out to the market.

6.7. Billing (payment of invoice)

Invoices shall only be paid, if (a) supplier delivery is compliant with the contract, (b) all elements of the invoice are consistent with the progress certificate approved by the PM, (c) all discussions, negotiations and supplier claims are finalised and (d) the supplier has complied with all contractual requirements (e.g. statutory declarations).²⁹

²⁹ In certain cases limited to purchases where supplier contracts or no contracts are used, payment might be required before receipting is confirmed (an approved purchase order is required before the procurement occurs). In such cases only Finance approved payment methods are accepted.

6.8. Contract Settlement

When a contract is nearing completion and before the final payment of the last invoice is performed, the following requirements have to be met for the release of the final payment and for the setting of the commencement date of the warranty period:

- Confirmed as per the written contract that the supplier has met all obligations, including submission of documentation (including design certificates, warranty deeds, O&M manuals, authority certificates and licenses), removal of equipment and temporary structures, defects fixed or agreed to be fixed and client approvals as required
- All tests required under the contract have been successfully passed and verified.
- Certificate of compliance is signed by the supplier.
- Balance is determined and final settlement is drawn up. This will take into account variations, counter claims, other costs, losses and damages suffered by the parties and payable in accordance with the contract.
- Where existing, the 'Form of Release' in the contract is to be completed and approved by the PM and issued to the supplier for execution.

The **release of any security** held in accordance with the terms of the contract will be approved by the EGM subject to satisfactory completion of all obligations under the contract and expiry of any defects liability period.

6.9. Assessment of supplier performance and approved supplier list

Once contract settlement is completed, a supplier assessment as per the following is to take place to inform future supplier selections (supplier assessments for each completed contract are coordinated by the Operating Company Procurement Manager and assisted/reviewed by the Business Unit Procurement Manager):

- **Suppliers are assessed for the following performance dimensions (proposed weighting):**³⁰ compliance with health, safety and labour standards (15%), compliance with sustainability/ environmental regulations (15%), quality (15%), schedule compliance (15%), technical assistance (10%), responsiveness (10%), contract terms and conditions (10%), quality certificates (5%), withholdings and warranties (5%).
- Each of the dimensions is to be scored between 0 (low performance) to 10 (high performance).
- Assessment results are to be **incorporated into the approved supplier list as soon as available, which contains all approved suppliers and their latest rating.**
- A supplier rating consists of a **letter indicating the rating level and a figure indicating the maximum value the supplier has been used for** (e.g. A20):
 - **Rating:** I(initial; pre-qualified), A(Excellent), B(Recommended), C(Acceptable), U(unsatisfactory)³¹
 - Maximum level of past **contract values with suppliers:** 1 (<A\$1m), 5 (<A\$5m), 20 (<A\$20m), 50 (<A\$50m), 100 (<A\$100m), 100+ (≥A\$100m).

³⁰ Supplier assessment criteria and criteria weighting can be adjusted as required by the Operating Company Procurement Manager.

³¹ A score of 0 in any of the following criteria will automatically result in a U (Unsatisfactory) rating (qualitative explanation must be given): compliance with health and safety regulations, compliance with environmental regulations, quality, or schedule compliance.

7. Corporate Procurement

Corporate procurement (i.e. non-project related procurement) occurs at a CIMIC and Operating Company level and supports the activities of corporate functions and business units (**BU**). A similar role to project managers is delivered by BU cost centre owners with delegated authority (**cost centre owner**). Corporate procurement follows a similar underlying logic ssas projects, but differs given different requirements and context. Key roles of the corporate procurement process include:

- **Cost Centre Owner (CIMIC and Group Company):** Prepare and manage the budget for a defined cost centre.
- **Operating Company Procurement Manager:** Ensure compliance with the procurement policy, manage mandated frame contracts and manage/coordinate the approved supplier list.
- **Group Company Managing Director:** Agree Group Company cost centre budget with CIMIC CEO. Define corporate function and business unit overheads with Group company cost centre owners.
- **CIMIC CEO:** Approve cost centre budgets for CIMIC and Group company budgets.

Each cost centre owner will **plan annually for next year's expected procurement** of goods and services, seeking approval by the Group Company MD, who seeks approval for the Group Company cost centre budget from the CIMIC CEO³² as part of the budget planning process. The **plan will include the total budget value, based on specifications, volume and pricing of the planned procurement for each cost category** (itemising single cost items >A\$20k). The plan defines the maximum spend for each cost category and guides cost centre owners in their procurement during the year. It is the cost centre owner's responsibility that actual costs remain within budget. Any total budget adjustments require approval as per the original budget DoA.

When a need for procurement is identified during the year, employees need to identify procurement options, seek approval and ensure compliance with the separation of duties.

- **For any professional services or any other procurement ≥A\$50k, three to six comparable and compliant quotes are to be obtained** and compared using the decision matrix (Exhibit 3). Exceptions require approval as per the DoA.
- Procurement approval as per the DoA is to be sought with **select procurement activities requiring specific approval**, including contracts where spending affects next year's budget/expenditures, contracts influencing future Group procurement (e.g. exclusivity agreements, minimum uptake) and procurement outside mandated frame contracts.
- **CIMIC Standard Contracts must be used**, unless approved as per the DoA.
- **All deliveries have to be compliant with the agreed contract** and be receipted. Any **extension or variation of more than 10% requires the same approval as the original contract**.
- **Cash or credit card payments should be avoided**, but if not possible then the payer must adhere to the expense reimbursement policy (select procurement items) and card policy (card payment).
- Only **suppliers from the approved supplier list** can be used (or require pre-qualification) and **supplier assessment is to occur post-delivery**.

³² The CIMIC CEO also approves all budgets for CIMIC cost centres.

8. CIMIC Standard Contracts

Depending on the procurement activity, the appropriate form of procurement contract must be used for the written contract signed with the counterparty for the supply of goods or services. In case of questions, the advice of the respective Group Company General Counsel is to be sought.

8.1. Payment Terms

Payment terms shall be set by the Operating Company Managing Directors for each Group entity. Deviation to these payment terms is only allowed:

- a) where a specific project's head contract or state/national laws mandate other payment terms, or;
- b) where the Operating Company Managing Director has appointed a delegate to review and approve specific contracts.

Payment terms negotiated and structured with suppliers must aim to keep the cash flow positive and must only be made in approved currencies³³. Payments made in currencies other than the revenue currency under the head contract must be avoided; if the contract requires this, the Operating Company CFO must be consulted to establish, if spot FX payments is required and approval must be given as per the DoA. If hedging is required this must be approved separately as per the DoA.

8.2. Cap on Liability

Any cap on liability should be avoided in a procurement contract. However, where a cap on liability is insisted upon:

- a) it must be commensurate with the potential impact that a breach of the contract can have on the project's outcome; this should never be limited to the value of the consultant's fee or contract sum.
- b) where the services include design, Professional Indemnity (PI) insurance must be of a sufficient value. If any cap on liability is agreed to, it must not be less than the amount of PI insurance.
- c) the clause wording must be obtained from Operating Company Legal Counsel and included as a special condition.
- d) it must be approved by the Operating Company MD.

8.3. Back-to-Back Arrangements: Forwarding of Client Requirements to the Supplier

Where project specific procurement contracts are not applicable, client requirements must, to the maximum extent applicable, be passed down to a subcontractor or supplier on a back-to-back basis, including (but not limited to) legal liabilities, payment securities, time and cost relief etc. Where the head contract imposes fit for purpose obligations, these must be passed down in the subcontract on a back to back basis. In particular, goods and services must always, at a minimum, be fit for their intended purpose.

³³ Approved currencies refer to currencies in countries where CIMIC has approved operating companies to work.

8.4. Standard Forms of Procurement Contracts

Type of procurement	Standard contract	Definition
PROJECT WORKS 'Supply and fix' or 'fix only' works	Works Contract	For works that make up a substantial portion of construction activities and/or will expose CIMIC to financial or other risks (including Design & Construct). <i>Example:</i> Subcontract to design and construct permanent works, "supply and fix" or "construct only".
SERVICES	Services Contract	For the engagement of all disciplines of general engineering and building consultants, including design consultants, particularly design of permanent works. <i>Example:</i> Design consultants, architectural consultants.
	Independent Contractors Agreement	Engagement of non-design related consultancy services for less complex scopes of work. <i>Example:</i> Bid writers.
	Pre-bid Agreement	An agreement prior to a tender to establish terms of exclusivity and cooperation during the tender phase.
MINOR WORKS AND SERVICES	Minor Works and Services Contract	For minor works and services that will not expose CIMIC to significant financial or other risks and generally will not form part of the permanent works. <i>Example:</i> day-works, personnel hire, supply and install for low value/low risk items.
SUPPLY Acquisition of goods	Supply Contract (w/o install)	For the supply and delivery without installation, of manufactured-to-order major equipment (including minor equipment if its manufacture, installation or performance could expose CIMIC to financial or other risks). <i>Example:</i> goods to be incorporated into the permanent works such as steel, concrete etc.
	Minor Supply Contract	For the purchase of goods (including manufactured-to-order minor equipment) which will not expose CIMIC to financial, contractual or other risk. <i>Example:</i> Off the shelf items, stationery.
HIRE	Plant Hire Contract	For the hire of plant or equipment, with or without an operator, (including minor items if their performance could result in CIMIC's exposure to significant financial or other risks). <i>Example:</i> works under direct supervision and on a time charged basis.

8.5. CIMIC Standard Contracts Management

CIMIC Standard Contracts are managed by the CIMIC General Counsel. Standard Contracts are controlled documents that must not be distributed in an unlocked or editable format outside the Operating Company Legal Team. Any change to the CIMIC Standard Contracts forms (general changes that apply to all future contracts; not just for one procurement activity) requires CIMIC CEO approval based on a CIMIC General Counsel recommendation.

Policy Information

Owner:	General Manager Strategy, CIMIC
Approved by:	Chief Executive Officer, CIMIC and Executive Chairman, CIMIC
Version Number:	2.0

Effective date:	29 September 2016 amended 1 November 2016, August 2017
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Note: CIMIC Group policies may be amended from time to time.

Appendix D Optional Sustainability Initiatives

Option Description	Cost CAPEX & OPEX	CAPEX	OPEX	Bennefits	Program Impacts	Comments/Issues

Appendix E IS Rating Credit Target and Score - Design

Note: The sustainability weightings and targets within the table are subject to change during project delivery.

Credit	Design Weight	Targeted Level	Target Score	Stretch Level	Stretch Score	Design Verified Level	Design Verified Score
Man-1	0.88	3	0.88	3	0.88		
Man-2	0.88	2	0.88	2	0.88		
Man-3	0.88	2	0.88	2	0.88		
Man-4	0.88	2	0.88	2	0.88		
Man-5	0.88	3	0.88	3	0.88		
Man-6	1.98	2	1.32	3	1.98		
Man-7	2.86	2	1.91	3	2.86		
Pro-1	1.10	3	1.10	3	1.10		
Pro-2	1.10	3	1.10	3	1.10		
Cli-1	4.40	2	2.93	3	4.40		
Cli-2	4.40	2	2.93	3	4.40		
Ene-1	11.87	2.0	7.91	3.0	11.87		
Ene-2	1.98	1.0	0.66	3.0	1.98		
Wat-1	5.94	1.0	1.98	3.0	5.94		
Wat-2	3.30	0.0	0.00	3.0	3.30		
Mat-1	5.28	2	2.64	3	5.28		
Dis-1	3.13	2	2.09	3	3.13		
Dis-2	3.13	3	3.13	3	3.13		
Dis-3	3.13	3	3.13	3	3.13		
Dis-4	4.18	3	4.18	3	4.18		
Dis-5	1.76	1	1.76	1	1.76		
Lan-1	2.20	3.0	2.20	3.0	2.20		
Lan-2	0.00	2	0.00	3	0.00		
Lan-3	3.52	2	2.35	3	3.52		
Lan-4	1.98	1	0.99	2	1.98		
Was-1	1.76	2	1.76	2	1.76		
Was-3	0.66	1	0.22	3	0.66		

Eco-1	6.60	2	4.40	3	6.60		
Eco-2	2.64	1	0.88	2	1.76		
Hea-1	2.20	2	1.47	3	2.20		
Hea-2	2.20	2	2.20	2	2.20		
Her-1	2.20	2	1.47	3	2.20		
Sta-1	1.65	2	1.10	3	1.65		
Sta-2	1.65	1	0.55	2	1.10		
Sta-3	1.65	2	1.65	2	1.65		
Sta-4	1.65	0	0.00	1	0.83		
Urb-1	3.52	2	2.35	3	3.52		
Inn-1	10.00	2	5	3	10		
			71.75		107.77		

Appendix F IS Rating Credit Target and Score – As-built

Note: The sustainability weightings and targets within the table are subject to change during project delivery

Credit	As-Built Weight	Targeted Level	Target Score	Stretch Level	Stretch Score	Asbuilt Verified Level	Asbuilt Verified Score
Man-1	0.81	3	0.81	3	0.81		
Man-2	0.81	2	0.81	2	0.81		
Man-3	0.81	2	0.81	2	0.81		
Man-4	0.81	2	0.81	2	0.81		
Man-5	0.81	3	0.81	3	0.81		
Man-6	1.81	2	1.21	3	1.81		
Man-7	2.62	2	1.75	3	2.62		
Pro-1	1.01	3	1.01	3	1.01		
Pro-2	1.01	3	1.01	3	1.01		
Pro-3	1.01	0	0	0	0		
Pro-4	1.01	0	0	0	0		
Cli-1	4.03	2	2.69	3	4.03		
Cli-2	4.03	2	2.69	3	4.03		
Ene-1	10.87	2	7.25	3	10.87		
Ene-2	1.81	1	0.6	3	1.81		
Wat-1	5.44	1	1.81	3	5.44		
Wat-2	3.02	0	0	3	3.02		
Mat-1	4.83	2	2.42	3	4.83		
Mat-2	0.81	2	1.91	3	2.87		
Dis-1	2.87	3	2.87	3	2.87		
Dis-2	2.87	3	2.87	3	2.87		
Dis-3	2.87	3	3.82	3	3.82		
Dis-4	3.82	1	1.61	1	1.61		
Dis-5	1.61	3	2.01	3	2.01		
Lan-1	2.01	2	0	3	0		
Lan-2	0.00	2	2.15	3	3.22		
Lan-3	3.22	1	0.91	2	1.81		

Lan-4	1.81	2	1.61	2	1.61		
Was-1	1.61	0	0	0	0		
Was-2	2.82	1	0.2	3	0.6		
Was-3	0.60	2	4.03	3	6.04		
Eco-1	6.04	1	0.81	2	1.61		
Eco-2	2.42	2	1.34	3	2.01		
Hea-1	2.01	2	2.01	2	2.01		
Hea-2	2.01	2	1.34	3	2.01		
Her-1	2.01	0	0	0	0		
Her-2	2.01	2	1.01	3	1.51		
Sta-1	1.51	1	0.5	2	1.01		
Sta-2	1.51	2	1.51	2	1.51		
Sta-3	1.51	0	0	1	0.76		
Sta-4	1.51	2	2.15	3	3.22		
Urb-1	3.22	0	0	0	0		
Urb-2	0.81	2	5	3	10		
Inn-1	100	3	0.81	3	0.81		
			66.12		99.51		