



Avetta Summit 2025

Confidence BEYOND Compliance



Confidence
BEYOND
Compliance

Avetta
Summit 2025
SYDNEY

BREAKOUT SESSION

Beyond Contractor Compliance: ESG in Action

ReGen
STRATEGIC



Avetta

Meet Your Presenters



Colin Davies

General Manager,
Sustainability & ESG



Katie Martin

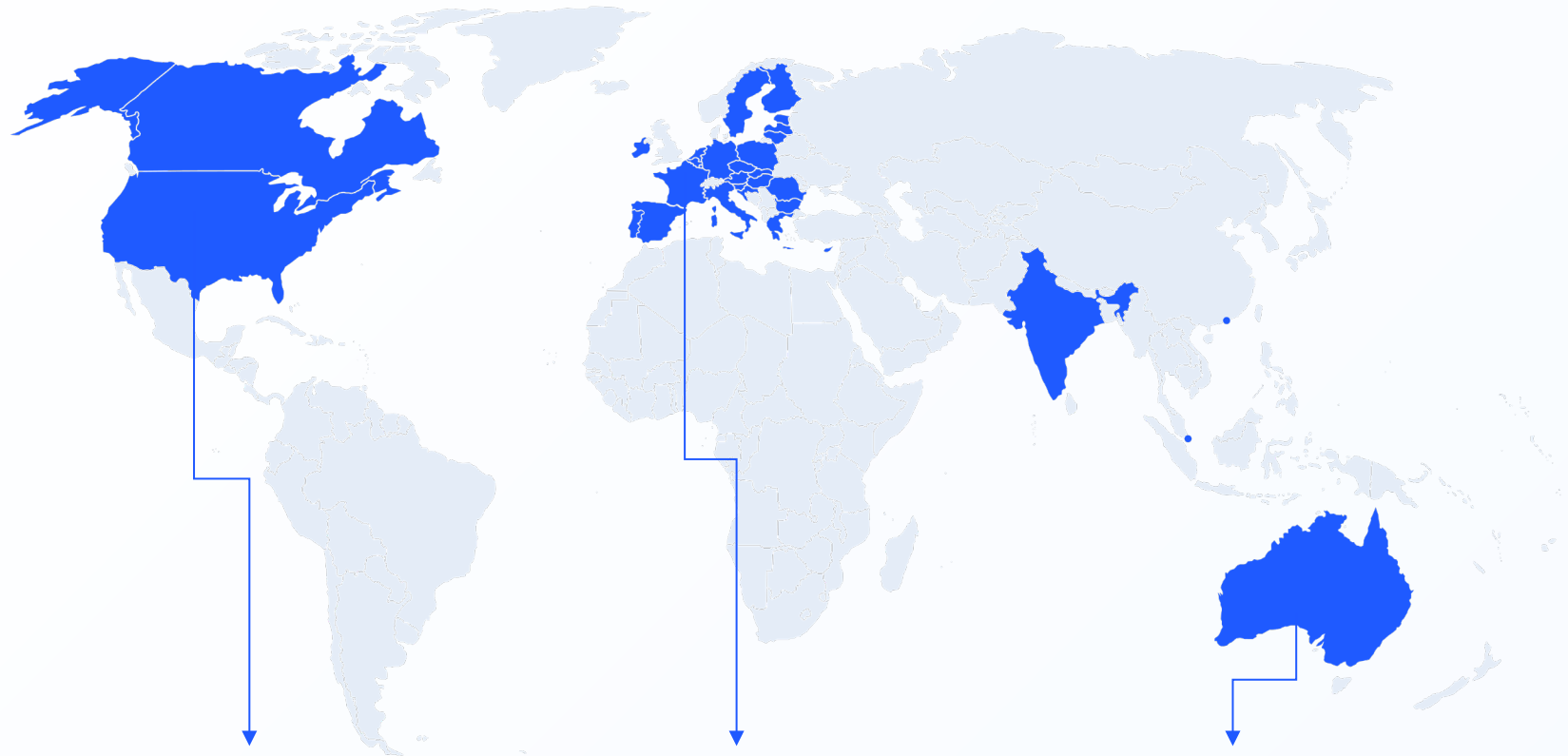
Director, Sustainability &
Innovation



1,255

1,255 new Sustainability
regulations introduced
worldwide in 2024...

Regional and global supply chain entanglement driving compliance



North America

- US PFAS Reproting under EPCRA / TSCA (2024)
- Canada Modern Slavery Act (2024)
- Canada OSFI (2024)
- US SEC Climate-related Disclosure Rule (2025: paused)
- California ABI305 (2025)
- California SB 253 / (2026)

European Union

- EU Taxonomy (2020)
- SFDR (2021)
- CSRD (2024)
- CBAM (2024)
- EU Battery Regulation (2025)
- CSDDD (2026)

Asia Pacific

- Australia Climate- Related Financial Disclosures Treasury Bill (2025; proposed)
- Singapore Mandatory Climate-related Reporting (2025)
- India Disclosure Framework on Climate-related Financial Risks (2025; proposed)
- Hong Kong Climate-related Disclosures under ESG Framework (2025)



While building and maintaining a strong reputation is challenging, it pales in comparison to restoring a damaged brand.

Deloitte, 2024

\$600B

Attributed to
brand reputation
by Australian
companies

\$194B

Total value of
Australia's
top 10 brands

Why the beyond compliance approach to sustainability?

- Investors and shareholders demanding more rigour
- Emerging global reporting standards – voluntary but pressure to adopt and report from stakeholders
- Evolving market demands and opportunities to expand

- Demonstrate greater commitment to attract and retain sustainability professionals
- Growing consciousness about climate change, diversity, culture etc.
- Community expectations in terms of understanding, involvement, communication

What are the benefits of beyond compliance?

Sustainability Impact

- Positive stakeholder relationships
- Improved environmental performance
- Greater social cohesion
- Better H&S performance
- Increased staff morale, staff attraction and retention
- Positive regulatory approvals outcomes

Financial Impact

- Organisational resilience / future proofing
- Operational efficiencies
- Customer loyalty
- Brand and reputation
- Market access
- Bank finance / raising capital
- M&A opportunities

How do we get there?



Executive Education



Maturity Assessment



Materiality Assessment



Baseline



Strategy



Reporting

Core components...

Sustainability Strategies

- Agreed framework for sustainability efforts
- Contains goals, targets and initiatives for material topics
- Guides resource allocation
- Drives performance
- Ensures accountability

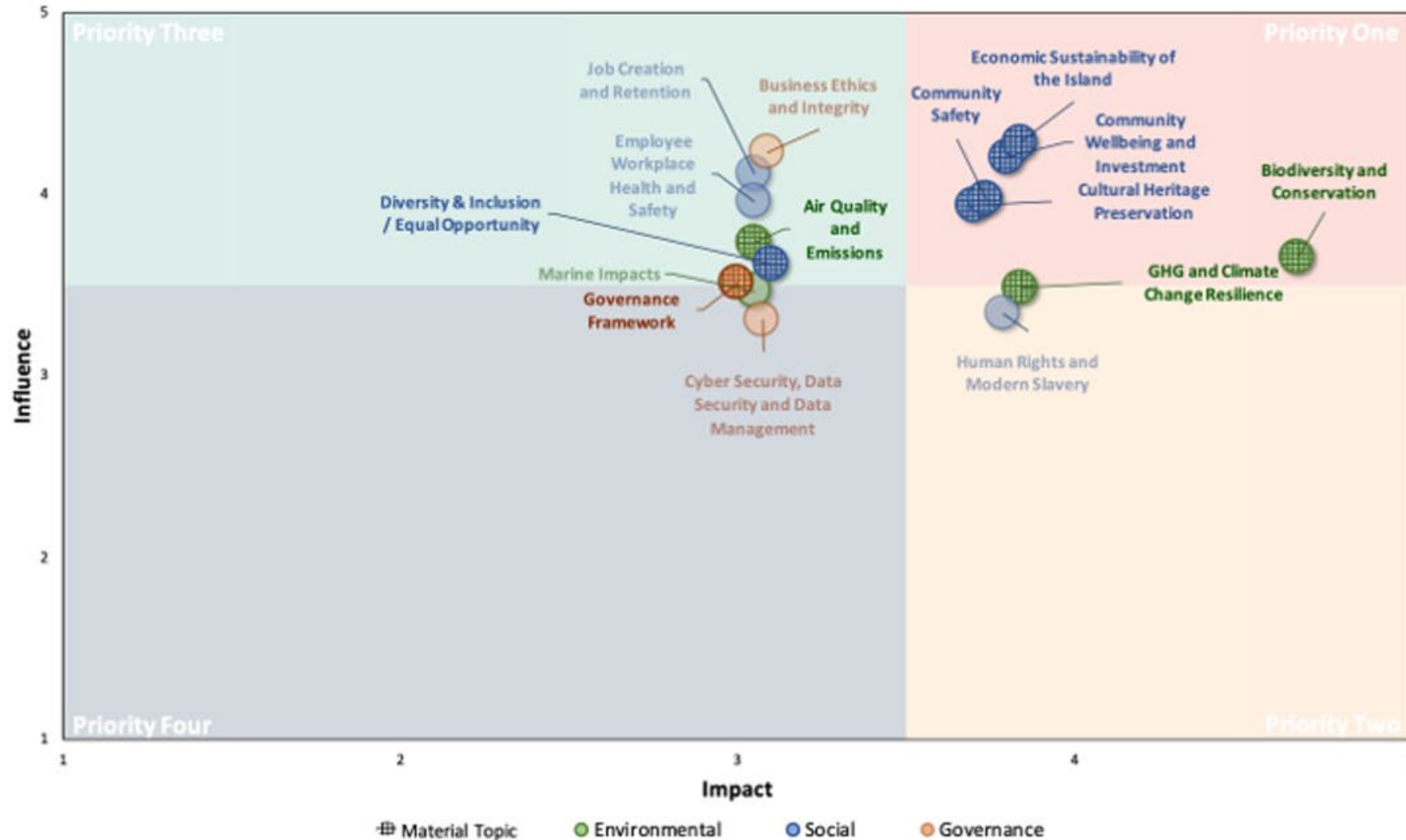
Sustainability Materiality Assessments

- Foundation of the sustainability strategy
- Identifies focus areas or material topics
- Sustainability risks and opportunities
- Financial risks and opportunities
- Meaningful stakeholder engagement
- Validation

ReGen's approach to double materiality assessments



Materiality Matrix Example



Key inclusions of a sustainability strategy

- 'Why' or reason for the strategy, including statements of commitment to sustainability
- Material topics
- Methodology used to identify material topics, including extent stakeholders were involved
- SMART goals and initiatives
- Baseline information
- Governance process for implementation, measurement and monitoring
- Review frequency

Communicating and reporting performance to stakeholders

Methods

- Disclosure of sustainability strategy
- Voluntary annual sustainability report
- Mandatory sustainability report
- Website case studies
- Engagement sessions

Important principles

- Transparent
- Complete information
- Accurate and truthful
- Evidence to back up claims
- Explain any conditions / qualifications
- Easy to understand language
- Direct and open

Sustainability Strategy Examples

Our sustainability journey

Fremantle Ports has been evolving our objectives and business strategy to incorporate sustainability since 2007, when we developed a Sustainability Framework and Business Principles for sustainable decision making. Through the 2000s we integrated sustainability into our strategies and organisational structure. In 2022, we published our 2027 Strategic Plan, which for the first time included sustainability as a foundational pillar.

In 2023, we engaged a sustainability consultant to review our sustainability journey and current approach to sustainability.

The project was divided into the following tasks:

01



Maturity assessment and gap analysis

We completed a maturity assessment and gap analysis to identify our current and target state maturity across 15 sustainability areas. We benchmarked our maturity against 18 Australian ports and referenced the GRESB Infrastructure Asset Framework to identify areas for improvement. The assessment included a desktop review of our governance documents and processes related to sustainability.

02



Materiality assessment

We conducted a materiality assessment to prioritise sustainability topics most relevant to our business activities and stakeholders from across our value chain. We extensively engaged internal and external stakeholders using both surveys and interviews. The final list of 10 material topics was prioritised using rankings calculated by an independent sustainability consultant.

03



Set targets and initiatives

Based on the outcomes of the materiality assessment, we aligned existing targets and initiatives drawn from Fremantle Ports' 2027 Strategic Plan with the relevant material topics. We noted those topics for which targets and initiatives needed to be developed in future.

04



Sustainability Approach development

We developed our Sustainability Approach to state our commitment to sustainability, address material sustainability topics, provide transparency relating to our targets and priorities, and align our efforts with stakeholder expectations.



Fremantle Ports is a government trading enterprise (GTE) accountable to the Minister for Ports and administered and managed under the Port Authorities Act 2009 (the Act) and the Government Trading Enterprise Act 2002 (the GTE Act).

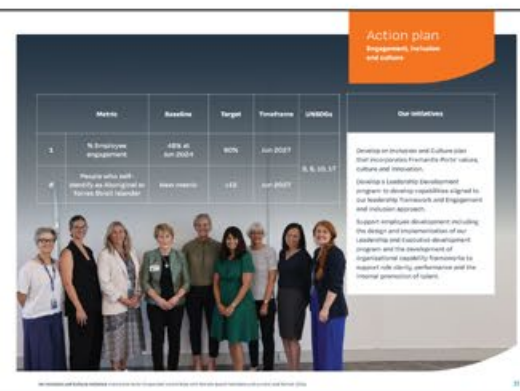


The 14 Act and the GTE Act make responsibility for the strategic direction of Fremantle Ports in its Board of Directors, who are appointed by and responsible to the Minister for Ports.



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[READ IT HERE](#)

Sustainability Strategy Examples



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Approach to Materiality

BCI adopted a double materiality assessment approach, enabling the company to:

1. Maximise positive impacts while minimising negative effects on people and the environment.
2. Identify financial risks and opportunities, strengthen stakeholder relationships, and enhance our reputation.

The double materiality assessment considered:

Sustainability Impact: Identifying and rating the risks of BCI's activities negatively impacting people and/or the environment, as well as the opportunities for BCI's activities to positively impact people and/or the environment.

Financial Impact: Identifying and rating the risks of BCI's financial performance being negatively impacted, as well as opportunities for the company's financial performance to be positively impacted.

Influence Assessment: Assessing the extent to which BCI's performance in each area has the potential to influence stakeholder perceptions of the company, or decisions stakeholders make in relation to the company.



Potential Material Topic Identification



Influence Assessment



Impact Assessment



Prioritisation and Reporting

BCI Minerals | Sustainability Strategy

Monitoring and Reporting

Refreshing Materiality Assessment

BCI is committed to ensuring our materiality assessment remains relevant and effective in driving long-term sustainability success. Our approach includes:

- **Annual Reviews:** Conducted by management to monitor performance, assess effectiveness, and adjust priorities where necessary.
- **Full Materiality Reassessment:** Every three years to account for emerging risks, opportunities, and evolving stakeholder expectations.

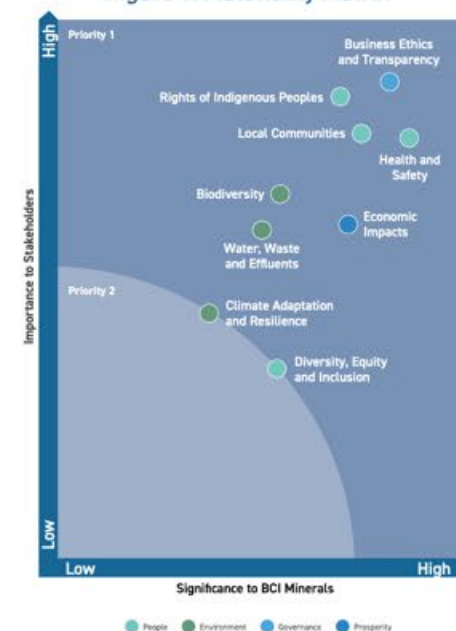
Reporting

BCI is committed to transparent and accountable reporting on our sustainability progress. Our performance against defined goals, targets, and initiatives will be publicly reported every year as part of our sustainability report.

In addition to this annual reporting, the Sustainability Management Meetings will continue to track progress, identify challenges, and ensure alignment with sustainability goals.

BCI Minerals | Sustainability Strategy

Figure 1: Materiality Matrix



BCI Minerals | Sustainability Strategy

Sustainability Report Examples

4. Horizon's Priority Areas and the UN SDGs

Our Sustainability Vision

Throughout FY26, Horizon's sustainability vision remained unchanged, and it continues to guide the way the Company manages operations and assets. This vision is embedded in our approach to responsible energy production, placing a strong focus on health and safety, environmental performance, and community engagement. Sustainability is not treated as a standalone initiative but as a core principle influencing decisions across the business.

We have a role to play in the World's energy transition, and we are committed to making the right kind of impact: through excellence in health and safety, reducing our emissions, and enhancing the communities where we operate.

FY26 Materiality Topics and Priority Areas

Materiality: Horizon's key material environmental, social and governance issues arising from our operations



The ESG topics identified through Horizon's previous materiality assessment remained relevant throughout FY26. These topics continued to underpin Horizon's four ESG priority areas, and performance was assessed against defined goals and targets aligned with each area. This framework provided a consistent basis for Horizon to track progress and effectively communicate outcomes during the FY26 reporting period.

Priority Areas	Our Commitment	Sustainable Goals
Health, Safety and Environment	Horizon's first priority is the health and safety of our workforce and communities, and the protection of the environment in which we operate. We work closely with our operators in China, New Zealand and Australia to maintain asset integrity and have in place appropriate workplace management systems that reflect our high expectations for health, safety and environmental performance. Horizon actively oversees our operators' programs to maintain focus on safety and environmental protection.	<ul style="list-style-type: none"> SDG 3: Good Health and Well-being SDG 13: Climate Action SDG 15: Life on Land
Governance	Horizon is committed to making the right kind of impact and applying best practice consistently to what we do, whether in-country or in our overseas operations, such as China and New Zealand. We promote and are committed to a high standard of integrity, ethical and transparent behaviour in business.	<ul style="list-style-type: none"> SDG 8: Decent Work and Economic Growth SDG 16: Peace, Justice and Strong Institutions
Our People and Communities	Our employees will deliver Horizon's future and so we want our employees to be proud to work for Horizon. Horizon recognises that we must empower employees and promote diversity so that our people can achieve their personal best. We also acknowledge the communities that we work in, and that our social licence comes from investing in our communities.	<ul style="list-style-type: none"> SDG 5: Gender Equality SDG 8: Decent Work and Economic Growth
Climate Change	Horizon recognises the responsibility and role it has to play to advance clean, affordable energy for all by 2030 and reach net zero emissions by 2050. Horizon is committed and focused on supporting our operators in emissions reduction initiatives. Horizon is using the TCFD recommendations to guide our disclosures and is monitoring the requirements to implement AASB and/or ISSB standards in the jurisdictions where we operate.	<ul style="list-style-type: none"> SDG 7: Affordable and Clean Energy SDG 13: Climate Action

Completion of new materiality assessment for FY26

In FY26, Horizon completed a comprehensive double materiality assessment, incorporating the Company's expanded asset base, including the Harenia oil and gas field acquired in June 2024. The assessment evaluated potential topics based on both impact materiality (i.e. the actual and potential effects of Horizon's activities on the environment and society) and financial materiality (assessing how sustainability risks and opportunities may influence the Company's financial position and long-term value). Extensive stakeholder engagement informed the process, including interviews and surveys with internal personnel, JV partners, and external stakeholders. Both qualitative and quantitative data were used, supported by a structured impact assessment methodology. The results of this review will shape Horizon's future material topics and focus areas, with the newly identified material topics to be embedded into the Company's sustainability strategy through clear goals, targets, and performance indicators, to be reported on from FY28 onward.

B. Governance

Our Goals

- We have a zero-tolerance policy on bribery and other forms of corruption. We will continue to strengthen and update the highest standard of integrity and ethical business conduct in all our business activities.
- We promote, and are committed to, a high standard of integrity and ethical and transparent behaviour in business.

Our Targets for FY26

- Conduct a full Materiality assessment to identify ESG issues that can affect Horizon's ability to create value, manage risks and meet the expectations of its stakeholders.

Our Commitment to Ethical Business Conduct

Horizon remains committed to conducting business ethically and transparently across all jurisdictions in which we operate. In FY26, we maintained strong governance systems and reinforced a culture of integrity through our Anti-Bribery and Whistleblower policies, internal reviews, and ongoing staff engagement. Our ethical commitment is supported by an experienced Board and leadership team that oversees compliance, governance performance, and risk management across the business.

This year also saw significant changes to our Board composition that bring valuable skills and experience to support our strategic growth and operational excellence.

Corporate Governance

In FY26, we advanced our governance framework through important leadership updates and ongoing oversight activities. Our Board continued to oversee, oversee of its Chair and corporate policies, alongside six monthly evaluations of the Risk Management System, ensuring effective risk management and compliance throughout our operations.

Our Executive Director, appointed Non-Executive Director, is a seasoned generalist with deep technical knowledge of oil and gas exploration and production. His experience will enhance our operational insights and technical governance, supporting informed decision-making in asset development and sustainability.

Dr Peter Gould, appointed Non-Executive Director, is a seasoned generalist with deep technical knowledge of oil and gas exploration and production. His experience will enhance our operational insights and technical governance, supporting informed decision-making in asset development and sustainability.

Catherine Castello, appointed Non-Executive Director, brings extensive expertise in resource project development, commercial negotiations, and risk management from her leadership roles in major resources and infrastructure projects. Her skills will strengthen our ability to execute complex development projects and optimise commercial outcomes.

These appointments followed the retirement of our previous Chairman and mark a strategic refresh of the Board, aligning leadership capabilities with our evolving business priorities. Through these governance enhancements, we are well-positioned to navigate industry challenges, drive sustainable growth, and uphold transparency and accountability for all stakeholders.

For more information on our governance framework and Board members, please visit <https://www.horizonenergy.com.au/about-us> and our dedicated corporate governance website.

ESG Governance

In FY26, we continued to strengthen our ESG governance framework through ongoing oversight by our Board and the Sustainability Board Committee (SBC). The SBC, chaired by our CEO and including key representatives from executive management, Finance, Production, and Development, supports the Board and Risk Management Committee in implementing our ESG Action Plan and monitoring performance. Regular updates on sustainability matters are provided at every Board meeting to ensure ESG risks and opportunities remain fully integrated into our strategic planning and risk management.

A key milestone in FY26 was the completion of a comprehensive double materiality assessment, informing our expanded asset base, including the acquisition of our interest in the Harenia oil and gas field in June 2024. This assessment considered both impact materiality (i.e. evaluating how our assets affect the environment and society and financial materiality (i.e. assessing how sustainability risks and opportunities could influence our financial position and long-term value).

To ensure robust and inclusive processes, we engaged extensively with stakeholders through interviews and surveys involving our internal teams, JV partners, and external stakeholders. We combined qualitative insights with quantitative data, underpinned by a structured impact assessment methodology.

Risk Management

The Board's Risk Management Committee continues to play a vital role in supporting the Board's oversight of material business risks. The Committee is responsible for ensuring that all significant risks are identified, assessed, monitored, and escalated as appropriate, alongside the implementation of effective mitigation strategies and controls.

Our risk management framework follows a robust bottom-up methodology aligned with ISO 26000 principles, assessing short-, medium-, and long-term financial and operational risks. Horizon also conducts an annual top-down analysis of strategic risks and opportunities, focused on the medium to long term, to complement the operational risk review and provide a comprehensive check and balance in our risk management process.

In FY26, we expanded the previous 'climate change' risk category into a broader 'sustainability' risk category, reflecting contemporary industry practices and aligning with emerging sustainability-related disclosure expectations, including those gradually being incorporated into AASB reporting requirements.

B. Governance (cont.)

The materiality assessment identified eight priority areas that are highly significant to investors and our stakeholders.



The priority areas will form the foundation of our revised sustainability strategy, with specific goals, targets, and initiatives to be developed and integrated from FY28 onward. This structured and transparent approach ensures Horizon's sustainability efforts align with stakeholder expectations and focus on managing the key risks and opportunities that drive long-term value creation.

Our Executive Director, appointed Non-Executive Director, is a seasoned generalist with deep technical knowledge of oil and gas exploration and production. His experience will enhance our operational insights and technical governance, supporting informed decision-making in asset development and sustainability.

As at FY26, Horizon's risk categories include:



Cyber Security

In FY26, we strengthened our cyber resilience through targeted upgrades to IT infrastructure and proactive risk management strategies. Building on the results of an independent IT assessment completed at the end of FY24, we initiated key improvements to further secure digital operations and address evolving threats. These efforts reflect our broader commitment to operational continuity and data integrity across all jurisdictions.

HORIZON

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Sustainability Report Examples

SUSTAINABILITY STRATEGY

During CY2024, our four-pillar framework remained at the core of our sustainability approach, allowing integration of our sustainability practices into core business planning and decision making. This enables a systematic, data driven approach to continuous improvement, aligning our material sustainability topics with broader business objectives and long-term value creation. Informed by the United Nations SDGs, the approach ensures our commitments are both globally relevant and operationally effective.

As our monitoring and reporting systems evolve, we will continue to refine and expand our targets, focusing on material topics that drive performance, manage risk, and support the achievement of our overarching corporate goals.

ENVIRONMENTAL STEWARDSHIP

We commit to responsibly managing and protecting the flora, fauna, and biodiversity in our operational areas to benefit current and future generations. This involves minimising negative impacts on water and air quality, ensuring appropriate tailings management and disposal and land rehabilitation, and actively measuring and reducing our carbon emissions to lower our environmental footprint.

PEOPLE & WELLBEING

To be trusted by our employees, contractors, consultants, and the communities in which we operate and to be recognised for building and maintaining a safe, clean and healthy work environment.

COMMUNITIES & SOCIAL PERFORMANCE

We are dedicated to proactively adopting and integrating new technologies and innovations to advance our business sustainability goals. This includes enhancing worker safety and well-being, protecting the environment, reducing carbon emissions, maintaining our social license to operate, and boosting shareholder value through improved profitability. Our efforts are guided by strategic plans and policies that emphasise ethical behaviour, business integrity, and transparent governance.

INNOVATION & RESPONSIBLE BUSINESS

We commit to build and uphold a reputation for fostering a positive culture by upholding respect for human rights and championing diversity, equity, and inclusion. This involves actively engaging with stakeholders, respecting and protecting indigenous cultures and heritage, and contributing to sustainable communities through local employment, donations, and investments that offer long-lasting economic, social, and environmental benefits.



PERFORMANCE DATA

TYPE	MEASURE	2024	2023	2022	2021	2020	2019
Climate	Scope 1 & 2 emissions (tCO ₂ e)	2,500,000	2,400,000	2,300,000	2,200,000	2,100,000	2,000,000
	Scope 3 emissions (tCO ₂ e)	10,000,000	9,500,000	9,000,000	8,500,000	8,000,000	7,500,000
	Total emissions (tCO ₂ e)	12,500,000	11,900,000	11,300,000	10,700,000	10,100,000	9,500,000
	Intensity (tCO ₂ e/USD million revenue)	0.15	0.14	0.13	0.12	0.11	0.10
	Renewable energy usage (MWh)	5,000	4,500	4,000	3,500	3,000	2,500
	Water consumption (ML)	1,000	950	900	850	800	750
	Waste to landfill (t)	50	45	40	35	30	25
	Recycling rate (%)	90	88	86	84	82	80
	Landfill reduction (%)	95	93	91	89	87	85
	Carbon footprint (tCO ₂ e/employee)	1.2	1.1	1.0	0.9	0.8	0.7
Water	Water consumption (ML)	1,000	950	900	850	800	750
	Water efficiency (ML/USD million revenue)	0.01	0.009	0.008	0.007	0.006	0.005
	Water recycling (%)	85	82	80	78	75	72
	Water reuse (%)	75	72	70	68	65	62
	Water discharge (ML)	100	95	90	85	80	75
	Water quality compliance (%)	99	98	97	96	95	94
	Water footprint (ML/employee)	0.01	0.009	0.008	0.007	0.006	0.005
	Water stress index	Low	Low	Low	Low	Low	Low
	Water risk assessment	Low	Low	Low	Low	Low	Low
	Water governance	Strong	Strong	Strong	Strong	Strong	Strong
Waste	Waste to landfill (t)	50	45	40	35	30	25
	Recycling rate (%)	90	88	86	84	82	80
	Landfill reduction (%)	95	93	91	89	87	85
	Waste management cost (USD million)	0.5	0.4	0.3	0.2	0.1	0.0
	Waste management efficiency (%)	95	93	91	89	87	85
	Waste management compliance (%)	99	98	97	96	95	94
	Waste management innovation (%)	85	82	80	78	75	72
	Waste management risk assessment	Low	Low	Low	Low	Low	Low
	Waste management governance	Strong	Strong	Strong	Strong	Strong	Strong
	Waste management strategy	Clear	Clear	Clear	Clear	Clear	Clear

OUR STAKEHOLDERS

STAKEHOLDER	INTERESTS & EXPECTATIONS	MANAGEMENT STRATEGIES
Board of Directors	Strategic direction, financial performance, risk management, sustainability integration	Regular meetings, clear communication, alignment of goals
Senior Management	Operational execution, resource allocation, performance monitoring	Clear delegation of responsibilities, regular reporting, accountability
Employees	Job security, fair compensation, professional development, safe working conditions	Transparent communication, training opportunities, fair wages, safety protocols
Suppliers	Timely payments, quality of goods, long-term partnership	Clear contracts, prompt payments, quality standards, long-term relationships
Customers	Product quality, customer service, value for money	High standards, excellent service, competitive pricing, innovation
Investors	Return on investment, financial stability, growth potential	Transparent financial reporting, clear communication, strategic vision
Local Communities	Employment opportunities, social services, environmental protection	Local hiring, community support, environmental stewardship
Government	Regulatory compliance, fair competition, social responsibility	Adherence to laws, ethical business practices, social contribution
Academics	Research collaboration, knowledge sharing, innovation	Partnerships, joint research, knowledge exchange
NGOs	Environmental protection, social justice, human rights	Collaboration, transparency, accountability
Media	Public relations, brand reputation, transparency	Clear communication, transparency, crisis management
Financial Institutions	Financial stability, creditworthiness, risk management	Strong financial performance, clear communication, risk management



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The New Business Paradigm

Defining ESG & Sustainability

Environment

- GHG Emissions
- Air Quality
- Energy Management
- Water & Wastewater Mgmt.
- Waste & Hazardous Materials Mgmt.
- Ecological Impacts
- Climate Change

Social Capital

- Human Rights & Community Relations
- Customer Privacy
- Data Security
- Access & Affordability
- Product Quality & Safety
- Working Conditions
- Customer Welfare
- Selling Practices & Product Labeling

Human Capital

- Psychological Safety
- Labor Practices
- Employee Health & Safety
- Employee Engagement, Diversity & Inclusion
- Business Ethics
- Board Diversity & Structure

Leadership & Governance

- Business Ethics
- Competitive Behavior
- Management of the Legal & Regulatory Environment
- Critical Incident Risk Mgmt.
- Systemic Risk Mgmt.

Business Model & Innovation

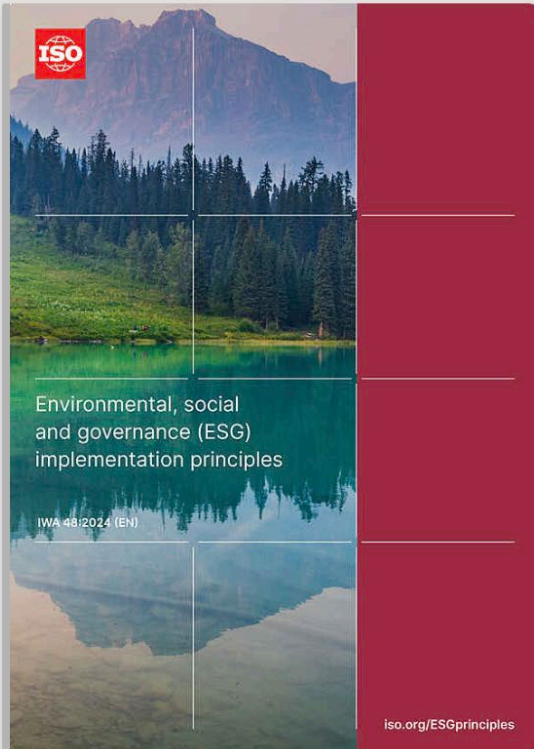
- Product Design & Lifecycle Mgmt.
- Business Model Resilience
- Supply Chain Mgmt.
- Materials Sourcing & Efficiency
- Tax Transparency
- Corruption & Bribery



The Business Case for ESG & Sustainability



ISO Mapping ESG Regulations into New Guidelines – Standards to Follow



IWA 48:2024

Framework for implementing environmental, social and governance (ESG) principles

Published (Edition 1, 2024)



Increasing Overlap of HSE and ESG Metrics and Responsibilities

What EHS Teams Drive

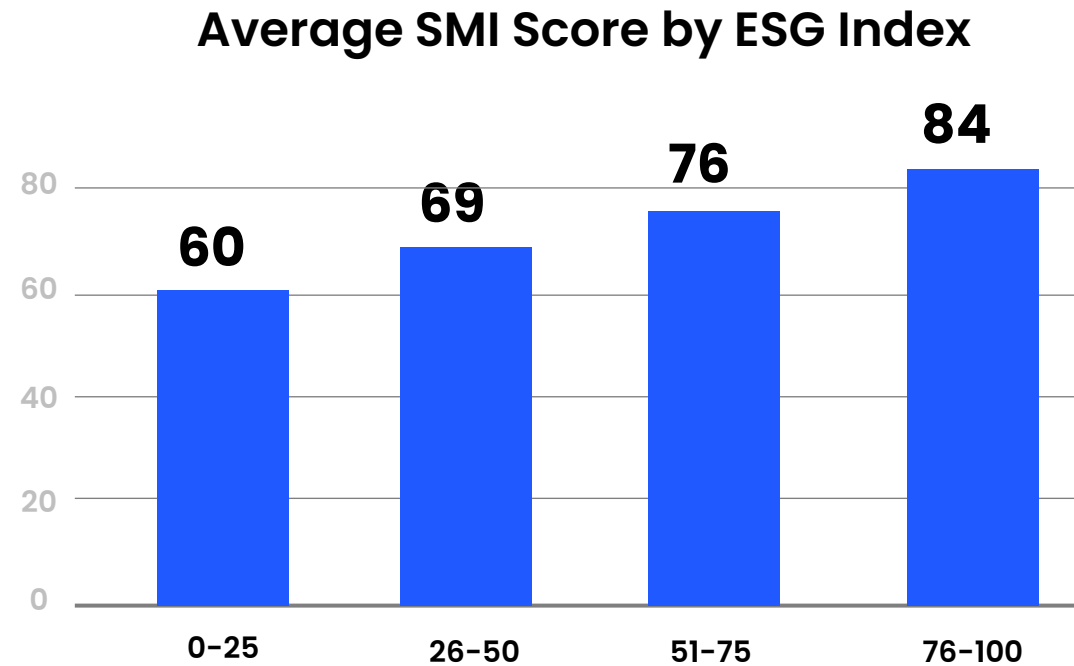
- Pollution prevention
- Waste management
- Chemical safety
- Worker health & safety
- Occupational health

How It Supports ESG Goals

- Environmental compliance
- Carbon & waste reduction
- Safer workplaces
- Mental well-being
- Climate resilience



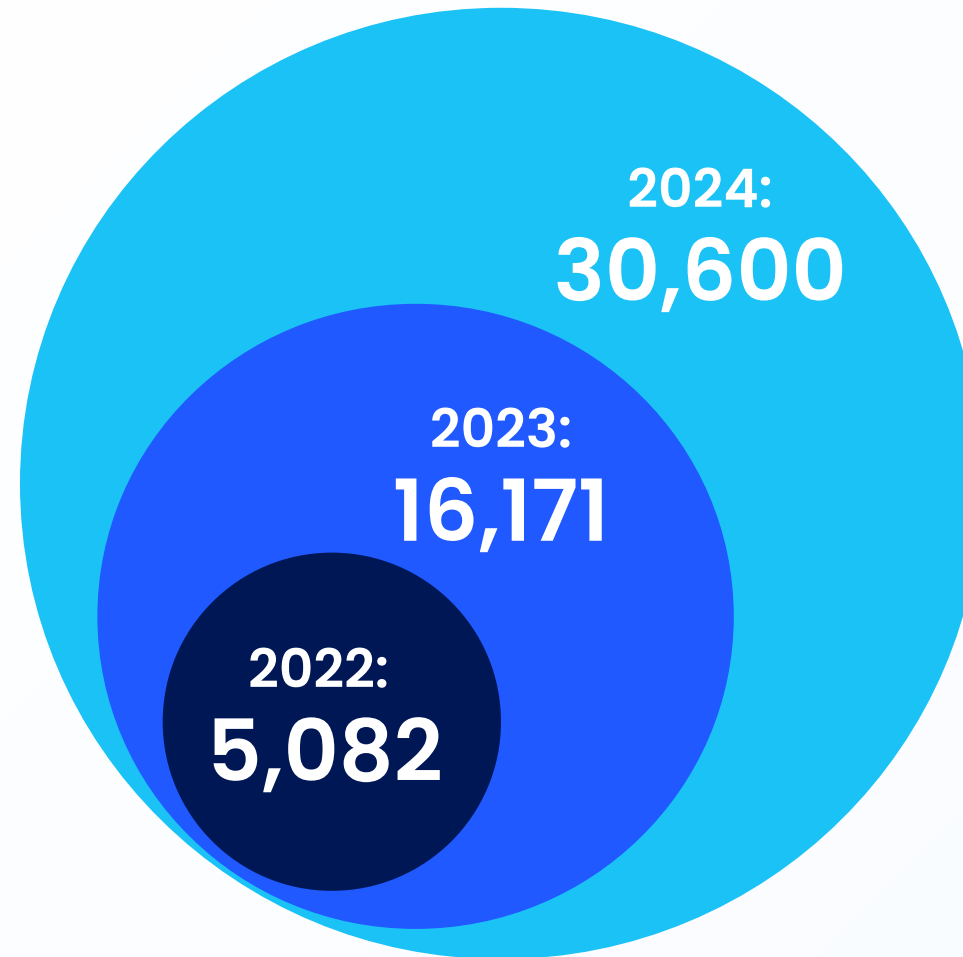
Interconnectivity of EHS and ESG as Safety Management and Performance Driver



Higher SMI scores correlate to higher ESG index ratings



Avetta ESG Supplier Participation



Not including industry, risk topic, and regional specific forms

70% US/NORAM



Transparent Baseline for Targeted, Impactful ESG Risk Management

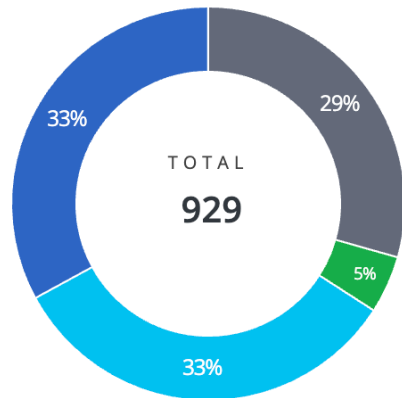
What are the overall scores for each ESG grouping?

ESG Evaluation

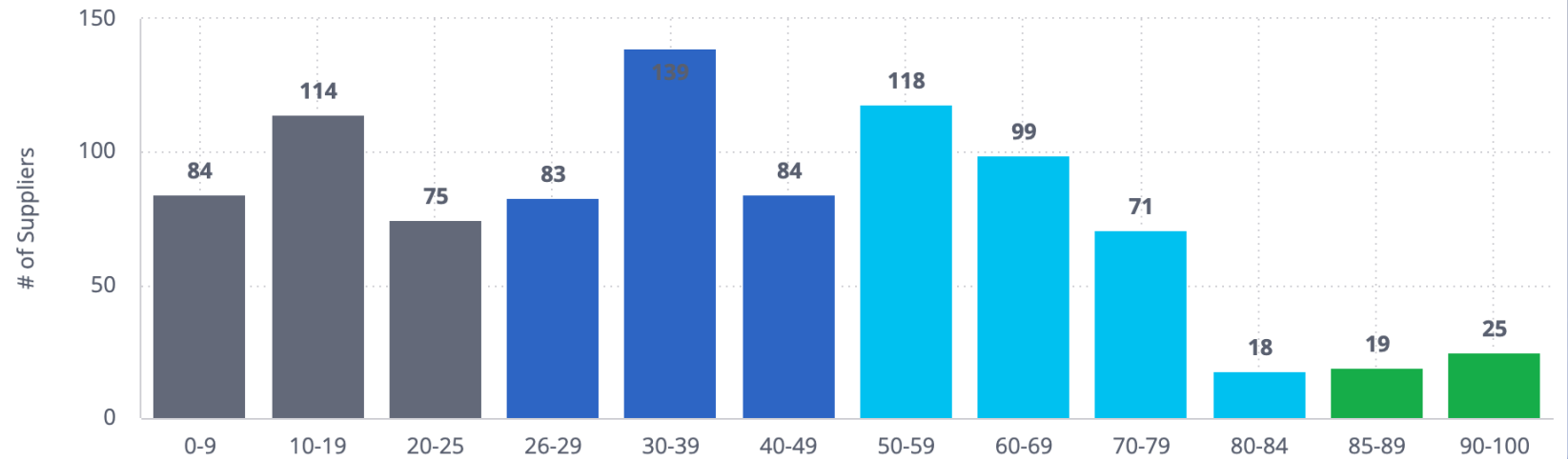
GRI

SDG

ISSB (VRF)



Early (273 / 29%)
Leader (306 / 33%)
Innovator (44 / 5%)
Learner (306 / 33%)



LOOKING AHEAD:

Avetta's Sustainability Suite supports supply chain compliance and proactive risk management



Which ESG regulations apply and where is my risk exposure?

Rapid ESG supply chain risk assessment

Sustainability Regulatory reporting eligibility

Average savings of \$125k and 6 months



What is the ESG maturity baseline within my supply chain?

Critical review mapped to each supplier's risk

Fit to regional maturity and compliance

Average 80% supplier response rates



How can I verify supplier data and support their ESG maturity?

Supplier ESG Maturity Training & Playbooks

Sustainability Audits and exposure assessments

Supplier YoY ESG compliance growth and risk reduction



Placeholder – risk analysis and desktop audits @katie



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Questions?



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Thank you