



# Sustainability Strategy

July 2025



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## Responsibilities

This document is the responsibility of the Marinus Link Team, **Marinus Link Pty Ltd PO Box 721 Hobart Tasmania 7001**, ABN 47 630 194 562 (hereafter referred to as "MLPL").

Enquiries regarding this document should be addressed to:

**Stephanie McGregor**

**CEO Marinus Link Pty Ltd**

PO Box 721 Hobart TAS 7001

Email: [team@marinuslink.com.au](mailto:team@marinuslink.com.au)

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# 1 Introduction

This Sustainability Strategy (the **Strategy**) has been developed by Marinus Link Pty Ltd (**MLPL**) to establish a clear and practical roadmap for embedding sustainability across the organisation. MLPL is responsible for progressing the Marinus Link interconnector project (**Marinus Link or the project**). The Strategy has been updated to set the direction for how MLPL will continue to embed sustainability into the planning and delivery of this nationally significant energy infrastructure project as it transitions from the Design and Approvals (**D&A**) phase into the Manufacturing, Construction, and Commissioning (**MCC**) phase.

The Strategy has been developed to operationalise and ensure the effective implementation of MLPL's Sustainability Framework, which was adopted by the MLPL Board in 2023. The Framework defines the project's sustainability objectives and priorities across three core themes: Healthy Planet, Community Prosperity, and Trusted Organisation. This Strategy translates those objectives into practical targets, actions, and governance mechanisms to guide decision-making and delivery across all project phases.

As Marinus Link progresses from Final Investment Decision (**FID**) into delivery, the Strategy has been updated to reflect the current stage of the project, align with industry best practice, and maintain our commitment to continuous improvement. It continues to be underpinned by the MLPL Environment and Sustainability Policy and remains a key tool to ensure our activities deliver long-term environmental, social, and economic value.

The purpose of Marinus Link is to interconnect Australia's renewable energy for future generations. By embedding sustainability into every aspect of project delivery, the Strategy supports Marinus Link's broader ambition to provide secure, affordable, and clean energy, while leaving a lasting, positive legacy for communities, stakeholders, and the environment over its 40+ years' operational life.

## 2 Project Overview

Marinus Link is a nationally significant energy infrastructure project that will help accelerate Australia's transition to a clean energy future. It involves the development of a 1,500 megawatt (**MW**) high voltage direct current (**HVDC**) electricity and data interconnector between North West Tasmania and the Latrobe Valley in Victoria. By enabling the bidirectional flow of electricity across Bass Strait, Marinus Link will enhance renewable energy integration, improve grid reliability, and support decarbonisation of the National Electricity Market (**NEM**). The project will also improve digital connectivity between Tasmania and mainland Australia.

As a complex, multi-jurisdictional undertaking, Marinus Link is subject to a broad range of regulatory, policy, and stakeholder expectations spanning the Commonwealth, Tasmanian, and Victorian contexts.

### 2.1 The Project Scope

Marinus Link will comprise two 750 MW undersea and underground HVDC cables, delivering a combined 1,500 MW of capacity. These cables will traverse approximately 345 kilometres in total: 255 kilometres undersea through Bass Strait—from Heybridge in North West Tasmania to Waratah Bay in South Gippsland, Victoria—and a further 90 kilometres underground from Waratah Bay to Hazelwood in the Latrobe Valley. An overview of the Project's location is shown in Figure 1, below.

Converter stations will be built at both ends of the interconnector to convert electricity between alternating current (**AC**) and direct current (**DC**), facilitating integration with the transmission networks in Tasmania and Victoria. Fibre optic cables will also be installed to support enhanced data transfer capabilities between the two states. The first 750 MW link is planned for delivery by 2030, with a second link proposed for future development.

The proposed route for the undersea cable has been carefully selected to minimise environmental and social impacts. It avoids offshore oil and gas fields, existing telecommunications infrastructure, major fishing zones, marine national parks, biodiversity conservation areas, and maritime heritage sites.

The first phase of the project is the Design and Approvals (**D&A**) phase which includes obtaining the necessary primary approvals and making Financial Investment Decision (**FID**). The project will then move to the Manufacturing, Construction and Commissioning (**MCC**) phase which is anticipated to take four to seven years, after which the interconnector will enter its operational phase with a projected lifespan of over 40 years. Marinus Link is being delivered in coordination with the North West Transmission Developments (**NWTD**), ensuring the broader transmission network can support the additional energy capacity and contribute to national emissions reduction and energy security goals.



**Figure 1: Marinus Link project location**

## 2.2 Project Benefits

Marinus Link is a critical enabler of Australia's transition to a low-emissions, reliable, and affordable energy future. As coal-fired power stations retire, the National Electricity Market (**NEM**) requires greater access to flexible, dispatchable, and renewable energy sources. Marinus Link will help meet this need by enabling the efficient transfer of renewable electricity between Tasmania and mainland Australia.

The interconnector will unlock Tasmania's existing hydropower and growing wind generation capacity—providing a stable, reliable source of clean energy—and allow the state to import surplus mainland solar and wind power when available. This two-way energy flow will strengthen grid resilience, reduce reliance on fossil fuels, and help meet demand during peak periods.

The Australian Energy Market Operator (**AEMO**) has confirmed that Marinus Link is a critical, and urgently required part of Australia's low-cost, reliable and clean energy future (Source: AEMO 2024 Integrated System Plan).

## 2.3 Sustainability Benefits

Marinus Link's contribution to sustainability extends beyond supporting Australia's clean energy transition. Aligned with the objectives of the MLPL Sustainability Framework, the project is expected to deliver wide-ranging environmental, social, and economic outcomes throughout its development and operation. As the project enters the MCC phase, the benefits will begin to materialise, reinforcing MLPL's role in enabling a more sustainable and resilient future.

Key sustainability benefits include:

- Supporting Australia's transition to a low-emissions energy future by enabling the flexible, two-way transfer of clean, renewable energy between Tasmania and mainland Australia, improving grid reliability and reducing reliance on fossil fuels.
- Placing downward pressure on wholesale electricity prices by enabling the flow of more stable, abundant, low-cost renewable energy across the NEM.
- Creating approximately 3,300 direct and indirect jobs and generating around \$3.9 billion in direct economic investment in Tasmania and Victoria.
- Stimulating growth in clean industries, including investment in Tasmania's pumped hydro storage and wind generation, and supporting the development of emerging sectors such as green hydrogen.
- Increasing fibre-optic capacity between Tasmania and Victoria, enhancing digital connectivity, customer choice, and regional competitiveness.
- Improving energy security by providing access to a more diverse and flexible mix of renewable energy sources and storage, including strategic use of Tasmania's hydropower and wind resources.

## 2.4 Policy Context and Compliance Obligations

Marinus Link is being delivered in the context of Australia's accelerating transition to a clean energy future and increasing expectations from governments, investors, and communities for sustainable and transparent business practices. As a complex, multi-jurisdictional project spanning Tasmanian, Victorian, and Australian Government regulatory environments, the project must meet a wide range of environmental, social, economic, and governance (**ESG**) requirements across all three jurisdictions.

Globally, strategic sustainability practices and reporting are becoming more prominent, with many jurisdictions introducing or planning to introduce mandatory disclosure regimes. These international developments have informed the structure and content of this Strategy, which draws on key global frameworks and standards.

In Australia, organisations must comply with a growing suite of state and federal policies and legislation relevant to environmental protection, social equity, procurement, and corporate governance. MLPL is subject to several mandatory sustainability compliance obligations, which are being embedded within the

Environmental Management System (EMS) and will feed into corporate governance monitoring to ensure compliance, transparency, and alignment with national legislation and industry standards. MLPL's related mandatory compliance obligations are:

- **Climate-Related Financial Disclosures (ASRS/AASB S2):** The *Treasury Laws Amendment (Financial Market Infrastructure and Other Measures) Bill 2024* received Royal Assent on 17 September 2024, introducing amendments to the *Corporations Act 2001* and *Australian Securities and Investments Commission Act 2001* to establish Australia's mandatory climate-related financial disclosure regime. The Australian Accounting Standards Board (AASB) has approved AASB S2 Climate-related Disclosures as the applicable standard under this framework.
  - MLPL is currently considered a Group 3 reporter, with its first report due 40 business days after 30 June 2028 covering the 2027–28 financial year, unless criteria are met that move it into Group 2 earlier.
  - Associated target reference: HP5
- **National Greenhouse and Energy Reporting Scheme (NGERS):** MLPL must report greenhouse gas emissions and energy use if it meets defined thresholds at a facility level (25,000 t CO<sub>2</sub>-e or 100 TJ energy) or corporate group level (50,000 t CO<sub>2</sub>-e or 200 TJ energy). These reports support compliance as well as strategic emissions reduction planning.
  - Based on projected emissions from the Balance of Works and Cables package activities, it is anticipated that thresholds will likely be triggered in either the 2025-26 or 2026-27 financial year, with the first NGER report due by 31 October 2026 (or 2027). Project energy consumption and greenhouse gas emissions will be tracked through the EMS.
  - Associated target reference: HP5
- **Project approval conditions:** MLPL must comply with environment and planning approval conditions, including Environmental Performance Requirements (EPRs), relating to greenhouse gas emissions, biodiversity, climate change, and resource use.
  - Data collection and reporting processes are being formalised through the EMS to ensure full compliance and traceability across delivery contractors.
- Associated target reference: HP2, HP4, HP5, CP5, CP8, CP9, CP10, CP11, CP12, CP13, TO7, TO9

This Strategy positions MLPL to successfully meet current regulatory requirements, future sustainability reporting obligations, and proactively respond to evolving expectations.

## 3 Sustainability Management Overview

MLPL is committed to delivering the project sustainably to support Australia's renewable energy future, providing clean, reliable energy, and economic benefits to communities. To support this commitment, a suite of sustainability management documentation has been established to ensure regulatory compliance, effective risk management, and alignment with industry best practices. The following provides a summary of MLPL's key sustainability documentation.

### 3.1 Environment and Sustainability Policy

The MLPL Environment and Sustainability Policy (Appendix A) defines MLPL's commitments for managing environmental impacts and outlines the sustainability goals that guide the project throughout its lifecycle.

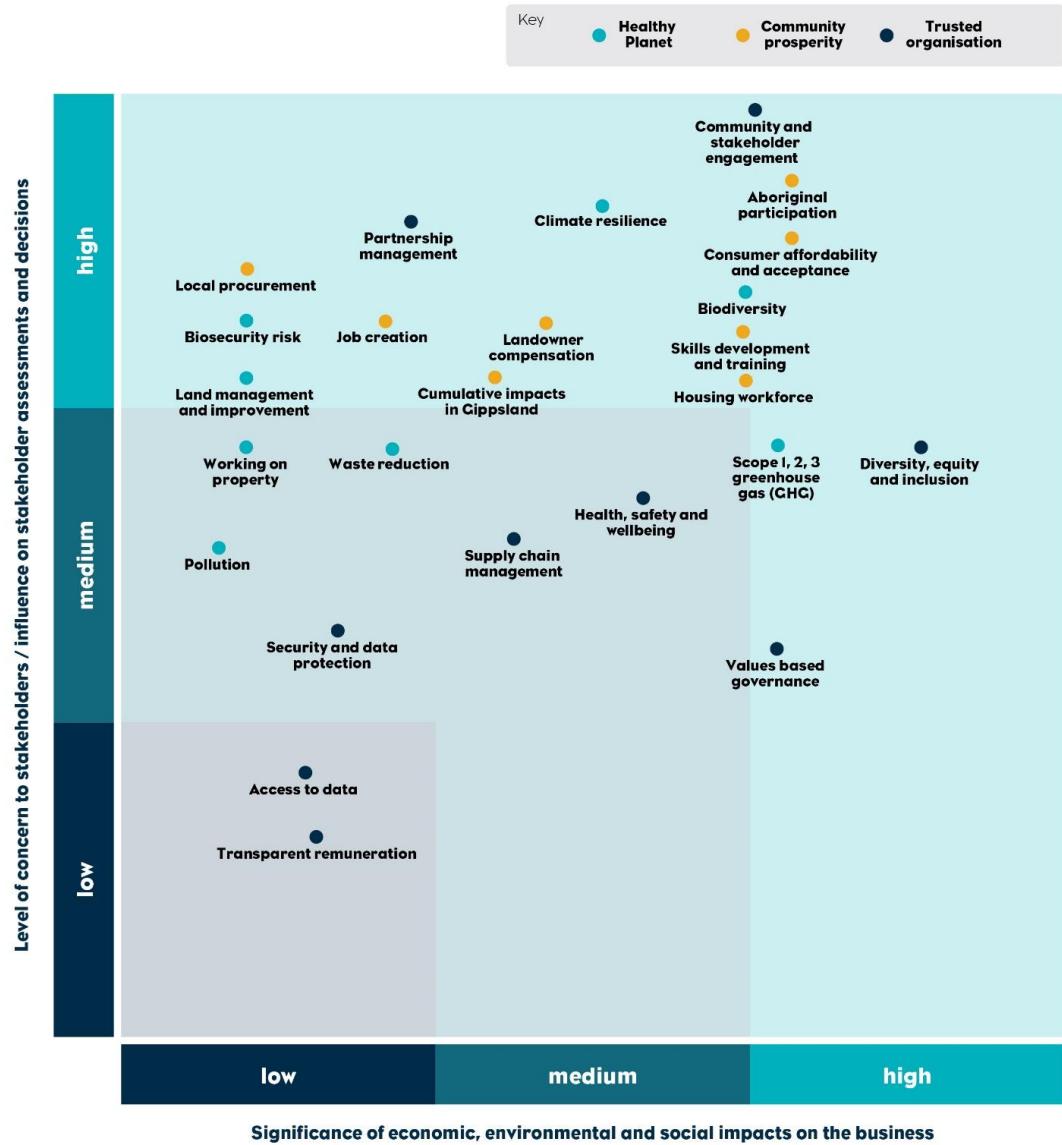
### 3.2 Sustainability Framework

The MLPL Sustainability Framework (Appendix B) establishes key objectives, priorities, and focus areas aligned with the United Nations Sustainable Development Goals (**SDGs**), ensuring a best-practice approach to sustainable development. A materiality assessment and extensive stakeholder engagement resulted in identification of the following three core objectives:

1. Healthy Planet
2. Community Prosperity
3. Trusted Organisation

These objectives are supported by nine (9) priorities. A summary of the materiality assessment is illustrated in the materiality map in Figure 2, below.

The Sustainability Framework was approved by the MLPL Board in February 2023 and it is publicly available on MLPL's website. It aims to provide a clear roadmap for creating long-term value, strengthening trust, building our brand, and securing a lasting positive legacy, while also supporting talent attraction and retention.



**Figure 2: Materiality map**

### 3.3 Sustainability Strategy

This Sustainability Strategy has been developed to guide the implementation of sustainability objectives across MLPL and all phases of the project. The purpose of the Strategy is to translate the Sustainability Framework's objectives into clear sustainability targets and actions across MLPL and the project lifecycle, aligned with the themes of Healthy Planet, Community Prosperity, and Trusted Organisation. Sustainability targets developed for MLPL are discussed further in Section 3.4, below.

This Strategy also sets out governance and monitoring mechanisms to support implementation of sustainability on the project and achievement of identified sustainability objectives and targets, this is discussed further in Section 3.4, below. The Strategy is intended to be a living document that evolves alongside the project, with

sustainability targets and initiatives to be further refined through the design and delivery process in close collaboration with contractors and partners.

## 3.4 Sustainability Targets

Sustainability targets are a core component of this Strategy, providing clear goals against which MLPL's performance will be tracked, reported, and continually improved. The targets have been structured across two key project phases:

- Final Investment Decision (FID) phase
- Manufacturing, Construction, and Commissioning (MCC) phase.

Development of these targets considered relevant Commonwealth and State legislation and policy, stakeholder expectations, project-specific risks and opportunities, and MLPL's broader market, delivery, and sustainability context. The resulting targets are designed to be robust, realistic, and responsive to the evolving needs of the project.

Following FID, a review of all sustainability targets was undertaken, resulting in six (6) targets having been deemed complete and the remainder carried forward for ongoing monitoring during the MCC phase. The MCC phase targets, including those carried forward are listed in Table 1, below. Details of the status review of targets following FID are provided in Appendix C.

**Table 1: MLPL sustainability objectives and targets for MCC Phase**

Objectives and Key Focus Areas	Target for MCC phase
<b>HEALTHY PLANET</b>	<p>Biodiversity</p> <p>HP2 - Develop Environmental Management System (incl. Environment &amp; Sustainability Policy).</p> <p>Climate resilience</p> <p>HP4 - Support local environmental group biodiversity initiatives (via Community Benefits Sharing Scheme).</p> <p>Emissions reduction</p> <p>HP5 - Achieve a 15% reduction in lifecycle carbon emissions for the project (Scope 1, 2 and 3 emissions).</p> <p>HP6 - Report on 'Priority Actions' and 'Better Practice Opportunities' of Energy Charter 'Better Practice Social Licence Guidelines'.</p>

Objectives and Key Focus Areas	Target for MCC phase
<b>COMMUNITY PROSPERITY</b>	<p>Aboriginal and/or Torres Strait Islanders participation</p> <p>CP5 - 10% MLPL workforce undergoing supported training/upskilling (headcount).</p> <p>CP8 - First Nations employment is to be maximised in alignment with requirements defined in contracts and the Reconciliation Action Plan.</p> <p>CP9 - Maximise procurement from First Nations-owned businesses.</p> <p>Affordable housing</p> <p>CP10 - Engage 'local' businesses where possible (100km radius from project sites or as defined by the package contract).</p> <p>Local Employment Pathways</p> <p>CP11 - Maximise procurement from social enterprises.</p> <p>CP12 - 15% of works delivered by trainees, apprentices, cadets and/or upskilling workers (% labour hours across Balance of Works package).</p> <p>CP13 - Implement the Workforce Accommodation Strategy.</p>
<b>TRUSTED ORGANISATION</b>	<p>Community and Stakeholder engagement</p> <p>TO7 - Implement Community Benefit Sharing Scheme.</p> <p>TO8 - Publicly report on MLPL's sustainability progress.</p> <p>Diversity, equity &amp; inclusion</p> <p>TO9 - Ensure construction partners implement robust and compliant safe systems of work and drive continuous improvement in safety and wellbeing outcomes.</p> <p>TO10 - Balance of Works (BoW) Contractor to implement Infrastructure Sustainability Council rating scheme for 'As Built' seeking 'Silver' Rating.</p> <p>Transparency, accountability &amp; integrity</p> <p>TO11 - Redacted</p> <p>TO12 - Redacted</p> <p>TO13 - Reach &gt; 80% participation rate in the annual employee engagement survey.</p> <p>TO14 - Redacted</p> <p>TO15 - Redacted</p>

Achieving the targets requires coordinated action from both MLPL and its delivery contractors. To support this, progress is tracked through the Sustainability Implementation Plan, a live management tool that supports accountability, transparency, and continuous improvement (discussed further in Section 5.4, below).

Sustainability initiatives will continue to be refined as part of the detailed design process, with contractors required to identify how, where, and when specific objectives and targets will be met. This approach is intended to drive innovation, encourage value-for-money solutions, and embed sustainability within project delivery methodologies and the broader supply chain.

## 4 Infrastructure Sustainability Rating

Marinus Link has committed to achieving an Infrastructure Sustainability (**IS**) Rating through the Infrastructure Sustainability Council (**ISC**), reflecting its objective to deliver a sustainable, future-ready interconnector. The IS Rating provides a recognised and comprehensive framework for measuring economic, environmental, social, and governance outcomes across infrastructure projects. It will help demonstrate MLPL's alignment with best-practice sustainability standards and support its goal of building social licence and community trust.

Following consultation with the ISC and key project stakeholders, Marinus Link will pursue 'Design' and 'As Built' IS Ratings for the Balance of Works (**BoW**) scope only. The Rating will be delivered in line with version 2.1 of the IS Rating scheme. MLPL will hold the IS Rating registration, while the BoW contractor will be responsible for achieving the targeted rating. This approach has been adopted to align with the project's commercial structure, environmental and planning requirements, and delivery schedule. The converter station equipment supply and cable manufacture scopes have been excluded from the IS Rating process due to procurement constraints and less opportunity to influence sustainability outcomes within those packages.

The IS Rating scores that determine certification levels (under version 2.1) are outlined in Table 2. Based on preliminary assessments, Marinus Link is targeting a 'Silver' Rating for both the Design and As Built phases. Achieving this will demonstrate leadership in infrastructure sustainability and support MLPL's goal of being recognised as a trusted organisation.

**Table 2: IS Rating scheme version 2.1 – rating levels and scores**

IS Rating Award	IS Rating Score Range
Platinum	80 – 100
Gold	60 – 79.9
Silver	35 – 59.9
Bronze	20 – 34.9

To facilitate the delivery of the IS Rating, MLPL has developed an Infrastructure Sustainability Management Plan (**ISMP**) outlining governance arrangements, clarifying roles and responsibilities, and setting out the approach for meeting IS Rating milestones.

## 5 Governance

Effective governance is essential to delivering the MLPL Sustainability Strategy. It establishes the structures, roles, and processes that ensure sustainability objectives are embedded in decision-making, risk is appropriately managed, and commitments are translated into measurable outcomes. Governance also supports accountability and transparency, providing a foundation for continuous improvement throughout the life of the project.

The following outlines MLPL's sustainability governance, detailing responsibilities, oversight mechanisms, and implementation processes.

### 5.1 Overarching Management Systems

The Environment & Sustainability Policy, Sustainability Framework, and this Strategy, as described in Section 3, above, are an integrated part of the MLPL EMS. Construction Environmental Management Plans (and associated subplans) will address requirements derived from the project's environment and planning approvals which will also be managed under the EMS. Social sustainability will be addressed in community and procurement plans. The Contractor Sustainability Management Plans (**SMPs**) will address governance processes, sustainability in design requirements, performance monitoring, regular reporting methods, and delivery of an ISv2.1 Rating for the BoW scope of works (discussed further in Section 4, below).

### 5.2 Sustainability Working Group

The MLPL Sustainability Working Group (**SWG**) is tasked with managing, monitoring and reporting on MLPL's performance against its sustainability objectives, priorities, and focus areas as defined in MLPL's Sustainability Framework and supporting documents. Operating under an approved Terms of Reference, the SWG is responsible for overseeing implementation of the Sustainability Framework, Strategy, and Implementation Plan, including the allocation and review of sustainability targets. The group monitors risks and opportunities, ensures alignment with broader project delivery, and provides direction on matters requiring escalation to the Executive Management Team and/or Board.

Comprising representatives from key functional areas across the organisation, the SWG meets monthly and is also tasked with leading the annual assurance review of sustainability targets to ensure they remain fit-for-purpose and drive continuous improvement. Through regular reporting and cross-functional collaboration, the SWG helps embed sustainability across all levels of MLPL's governance and delivery.

## 5.3 Roles and Responsibilities

The delivery of the sustainability objectives, priorities, and targets set out in this Strategy is a shared responsibility across MLPL and its contractors. Effective implementation relies on strong leadership, clear accountability, and integration of sustainability into all levels of project delivery.

The key elements of this Strategy—namely, the sustainability targets and governance structure—have been approved by the MLPL Board. The CEO of MLPL is the designated Executive Sponsor of the sustainability program and holds ultimate responsibility for ensuring that the project delivers long-term social, environmental, and economic value. The CEO is supported by the Executive Management Team, which provides oversight and ensures alignment with project scope and shareholder expectations.

Operational responsibility for sustainability flows through to the Heads of Departments and Package Leads, who are accountable for attending the SWG as required and for ensuring sustainability is integrated into their respective workstreams. Their engagement is critical to achieving the Strategy's objectives and aligning sustainability actions with the broader project schedule and delivery milestones.

All MLPL team members have a role to play in fostering a strong sustainability culture. This includes proactively identifying opportunities for improvement, contributing to sustainability performance, and supporting implementation of the Strategy in day-to-day activities. Project delivery contractors will also have defined responsibilities for achieving relevant sustainability objectives and targets during the MCC phase, with these obligations embedded contractually.

Table 3, below, summarises the key roles and responsibilities for achieving the sustainability objectives, priorities, and targets outlined in this Strategy and the accompanying Sustainability Implementation Plan.

**Table 3: MLPL sustainability roles and responsibilities**

Role / Function	Responsibilities
MLPL Board	<ul style="list-style-type: none"> <li>Providing endorsement of the key elements of the Sustainability Strategy, including material changes to MLPL's sustainability targets and governance structure.</li> <li>Providing an escalation point for major sustainability risks and issues.</li> <li>Overseeing implementation of strategic objectives of MLPL and the project.</li> <li>Advised of outcomes of the annual assurance review including response report from the MLPL Executive Management Team.</li> </ul>
CEO MLPL	<ul style="list-style-type: none"> <li>Accountability for ensuring that the project leaves a positive legacy for people and the planet.</li> <li>Providing endorsement and approval of the Sustainability Strategy not otherwise subject to the Board's consideration.</li> </ul>

Role / Function	Responsibilities
	<ul style="list-style-type: none"> <li>Communicating key sustainability matters and risks as appropriate to Shareholders and MLPL Board.</li> </ul>
MLPL Executive Management Team	<ul style="list-style-type: none"> <li>Approving the Sustainability Implementation Plan.</li> <li>Providing an escalation point for sustainability risks and issues.</li> <li>Providing ongoing approvals of changes to sustainability targets following assurance review.</li> <li>Responding to the outcomes of the annual assurance review and preparing a response report for submission to MLPL Board.</li> </ul>
MLPL Heads of Departments and Package Leads	<ul style="list-style-type: none"> <li>Attend the Sustainability Working Group (SWG) as required to represent their functional area and contribute to sustainability decision-making.</li> <li>Ensure sustainability objectives, priorities, and targets are embedded in their workstream planning and delivery.</li> <li>Support alignment between sustainability requirements and broader project delivery milestones, scope, and budget.</li> <li>Promote a sustainability-focused culture within their teams and across delivery partners.</li> </ul>
MLPL Sustainability Working Group	<ul style="list-style-type: none"> <li>Managing, monitoring and reporting on MLPL's performance against its sustainability objectives, priorities, and focus areas as defined in MLPL's Sustainability Framework and supporting documents.</li> <li>Monitor the implementation of MLPL's Sustainability Framework, Strategy, and Implementation Plan, including mobilising resources to achieve commitments, determining actions required, identifying corrective actions for off-track targets and monitoring alignment with Project scope and schedule.</li> <li>Oversee MLPL's sustainability risk and opportunity management program, assessing and identifying risks and opportunities that could impact the reputation, safety, security, social licence, or financial success of MLPL.</li> <li>Review collaboration with SMEs (internal/external) to ensure the MLPL Sustainability Framework, Strategy, and Implementation Plan are delivered in alignment with other relevant MLPL and government initiatives.</li> <li>Determine which matters and decisions need to be escalated to the MLPL Executive Management Team and/or MLPL Board.</li> <li>Manage changes to targets through MLPL's change management processes (as appropriate).</li> <li>Establish and oversee MLPL's sustainability reporting program to key stakeholder groups including Shareholders, MLPL Board, MLPL Executive Management Team, Regulators, and communities in North West Tasmania and Gippsland.</li> <li>Oversee annual review of MLPL's sustainability targets, to ensure they are allocated appropriately, being progressed and remain fit-for-purpose (including consideration of need for new targets).</li> <li>Determine when circumstances require a new materiality assessment to be undertaken.</li> </ul>

Role / Function	Responsibilities
MLPL Head of Sustainability	<ul style="list-style-type: none"> <li>Developing the Sustainability Strategy, overseeing the implementation of the strategy and the IS Rating scheme.</li> <li>Providing key point of contact for Sustainability Manager(s) of the major contractor(s) in the MCC phase.</li> </ul>
Major contractor(s)' Sustainability Manager	<ul style="list-style-type: none"> <li>Overseeing achievement of sustainability objectives, priorities, and targets as prescribed in the contract provisions.</li> <li>Providing key point of contact point for MLPL Head of Sustainability and Sustainability Working Group for information about contractor(s) achievement of sustainability objectives, priorities, and targets as prescribed in the contract provisions.</li> </ul>
MLPL Sustainability Target Owner	<ul style="list-style-type: none"> <li>Developing plans and processes to achieve the target.</li> <li>Responding to requests for information from the MLPL Sustainability Working Group and MLPL Head of Sustainability, including contribution to reporting.</li> <li>Monitoring budget to support target delivery, flagging risks and issues to the MLPL Sustainability Working Group.</li> <li>Responding and assisting with enquiries from the sustainability assurance review process.</li> </ul>

## 5.4 Sustainability Implementation Plan

The MLPL Sustainability Implementation Plan (**Implementation Plan**) has been developed to support the delivery of this Sustainability Strategy by translating MLPL's sustainability targets into actionable, measurable activities. Currently maintained in spreadsheet format, the Implementation Plan details each target alongside its associated Key Performance Indicators (**KPIs**) and measures. It serves as the primary mechanism for the SWG to monitor performance, manage risk, and track progress. Each Sustainability Target Owner is responsible for monthly updates, including reporting on status and remedial actions where required.

The Implementation Plan ensures alignment between sustainability objectives and broader project delivery. It allows key interested personnel to view progress on the full suite of targets at any time and enable issues to be escalated within the MLPL management structure as necessary.

## 5.5 Monitoring and reviews

MLPL has established a regular cadence of reviews to monitor and progress performance against this Strategy, as outlined in Table 4, below.

**Table 4: Monitoring and review cadence**

Activity	Cadence	Timing
Sustainability Working Group meetings (1 hour)	Monthly	Monthly, with additional meetings convened as needed
Sustainability Implementation Plan review and update	Monthly	In line with broader project monthly reporting timeframes
Sustainability Assurance Review (overseen by Sustainability Working Group)	Annual	12-month cycle after MLPL Executive Management Team approval of the Strategy
Review of Sustainability Strategy and targets	Annual	Aligned with end of financial year

## 5.6 Risk Management

During the delivery of the project, sustainability risks will be identified, assessed, and captured in MLPL's Risk Register. Risks assessed to have an impact on the overall delivery of the project will be captured in the Operational Risk Register while those which may impact on the project's strategic objectives will be added to the Strategic Risk Register.

The Head of Environment and Sustainability in consultation with each MLPL Sustainability Target Owner will provide information to the MLPL Sustainability Working Group regarding the status of sustainability risks across both Risk Registers. Operational or strategic risks that are determined to influence the achievement of a target will be raised with the relevant Sustainability Target Owner for appropriate action. Risk Registers (Operational and Strategic) will be reviewed regularly.

## Appendix A: Environment and Sustainability Policy



# Environment and Sustainability Policy

### Purpose

The purpose of Marinus Link Pty Ltd (MLPL) is to interconnect Australia's renewable energy for future generations. We design, construct and operate electricity transmission infrastructure to a high environmental standard, embed sustainability principles across our entire organisation and foster a culture of innovation, excellence and continuous improvement. Our environmental and sustainability objectives are to create a positive legacy by keeping our planet healthy, creating and contributing to prosperous communities, and being a trusted organisation. In doing this we act with transparency, integrity and accountability.

### Scope

This policy applies to the MLPL Board and Executive Management Team, our employees, contractors and service providers whilst engaged in activities undertaken as part of their work with MLPL. We commit to working together to achieve the following outcomes.

### Integrate environment and sustainability principles into our activities over the entire lifecycle of our assets to:

- Minimise our environmental footprint and promote biodiversity;
- Manage our resources efficiently including adopting sustainable procurement practices and addressing supply chain sustainability risks and opportunities;
- Strengthen our actions on climate change;
- Strengthen relationships by listening, understanding and learning from First Peoples and become informed about the Country we operate within, so that we can preserve its value;
- Understand local community needs and work with governments and local partners to build resilience and leave a positive legacy;
- Facilitate pathways to inclusive employment that support the renewable energy transformation; and
- Deliver affordable energy.

### Our Policy Principles

We apply the following policy principles to environment and sustainability:

**Fulfil compliance obligations** – Meet and where possible exceed our legislative and compliance requirements through the proactive identification and management of environmental,

cultural heritage and sustainability risks throughout the lifecycle of our assets and activities, to reduce the potential of harm to both human health and the environment.

**Implement robust management systems** – Ensure our environmental and sustainability management systems are developed and implemented, to provide the necessary tools to enable compliance with applicable statutory obligations, standards, codes of practices and other regulatory requirements.

**Make equitable decisions** – Make decisions that equitably meet the needs of the present without compromising the ability of future generations to meet their own needs.

**Support our workforce** – Ensure our team members are adequately aware, consulted, trained and competent to meet, contribute to and implement the requirements of this policy, and work respectfully with all stakeholders.

**Create a positive workplace** – Create and maintain a safe, diverse, inclusive and collaborative working culture that empowers our people to make responsible and proactive choices when managing and reducing potential risks of harm to people and the planet.

**Regularly review our performance** – Monitor and review our environmental and sustainability performance, objectives, priorities and targets through robust governance oversight and adjust them accordingly to ensure continuous improvement in line with global best practice.

### Compliance

All MLPL employees, contractors and service providers are responsible for complying with this Policy and any breaches will be treated seriously and may result in disciplinary action or contractor performance management being undertaken.

### Administration of this policy

This policy is administered by the Governance and Compliance team and will be reviewed and approved every two years or updated where applicable.

*Stephanie McGregor*

**Stephanie McGregor**  
Chief Executive Officer  
Marinus Link Pty Ltd

16 August 2025

## Appendix B: Sustainability Framework

# Sustainability Framework

At Marinus Link, we're building infrastructure for Australia's renewable energy future.  
But it's not just WHAT we're building, it's HOW we're building it.

Sustainable Development Goals	Our objectives	Our priorities	Key focus areas
13 CLIMATE ACTION  14 LIFE BELOW WATER  15 LIFE ON LAND 		<ol style="list-style-type: none"><li>1 Promote biodiversity.</li><li>2 Minimise our environmental footprint.</li><li>3 Strengthen our actions on climate change.</li></ol>	<ul style="list-style-type: none"><li>● Biodiversity</li><li>● Climate resilience</li><li>● Emissions reduction</li></ul>
11 SUSTAINABLE CITIES AND COMMUNITIES  17 PARTNERSHIPS FOR THE GOALS 		<ol style="list-style-type: none"><li>4 Strengthen relationships by listening, understanding and learning from Traditional Custodians.</li><li>5 Understand the local community needs and work with governments and local partners to leave a positive legacy.</li><li>6 Facilitate pathways to inclusive employment that support the renewable energy transformation.</li></ol>	<ul style="list-style-type: none"><li>● Aboriginal and Torres Strait Islander participation</li><li>● Affordable housing</li><li>● Local employment pathways</li></ul>
7 AFFORDABLE AND CLEAN ENERGY  8 DECENT WORK AND ECONOMIC GROWTH  12 RESPONSIBLE CONSUMPTION AND PRODUCTION 		<ol style="list-style-type: none"><li>7 Listen and work respectfully with all stakeholders.</li><li>8 Create and maintain a safe, inclusive and collaborative working culture.</li><li>9 Deliver affordable energy and be clear about the end consumer costs and benefits of Marinus Link.</li></ol>	<ul style="list-style-type: none"><li>● Community &amp; stakeholder engagement</li><li>● Diversity, equity &amp; inclusion</li><li>● Transparency, accountability &amp; integrity</li></ul>

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learn more on website [marinuslink.com.au](http://marinuslink.com.au)

## Appendix C: Status of FID Sustainability Targets

REDACTED