

Whitehaven Coal's 2023-24 Gender Pay Gap: Employer Statement

Whitehaven's approach to gender equality

At Whitehaven Coal (Whitehaven), we believe in equal opportunity for all. We recognise the importance of fostering a diverse workforce and inclusive workplace culture to enable our people to feel safe, do their best work and deliver the best outcomes, as well as attract and retain employees.

A cornerstone of our approach to equal opportunity is our commitment to equal pay for equal roles. Where there are individual pay variations, these are based on experience and the demonstration of differing skill levels within roles. We maintain a firm stance against gender bias. This principle is rigorously applied in our performance and reward reviews under the vigilant oversight of our managers and Board, ensuring fairness and equity at all levels.

Our progress towards gender equality is underpinned by progressive policies and tangible actions. These include recruitment targets; tools and processes focused on increasing female participation; leadership development programs targeted at female employees; and robust policies against discrimination.

Whitehaven is committed to doing its part to reduce the gender pay gap and foster an environment of inclusivity and equality. Looking ahead, we remain focused on continuous improvement and consistent performance. We will continue to refine our strategy and practices to ensure that gender equality is not just an aspiration but a reality at Whitehaven.

Whitehaven's organisational context and its gender pay gap

Whitehaven had a workforce of 1,498 permanent employees at the time of the 2023-24 WGEA submission. Of these employees, 18.4% were women. This figure is comparable to with the 19% industry average that WGEA reported for organisations in the coal mining industry.

Our commitment to equitable pay is evident in our practices. We align remuneration with market medians for independently contracted employees and adhere to the terms of Enterprise Agreements for others. Key aspects of our approach include:

- **Systems supporting equal fixed pay in our annual remuneration reviews:** We have established default pay recommendations based on market data, aiming to minimise pay gaps over time.
- **Transparency on pay practices when reviewing remuneration:** When reviewing employees' fixed pay, reviewing Managers receive personalised data on the market competitiveness of their employees' fixed pay by gender, as well as details of the fixed pay recommendations allocated to men and women. This provides real-time feedback to reviewing Managers and is a key data point for our sign-off processes.
- **Gender-based reviews of performance rating outcomes:** Performance ratings are an important input into employees' fixed-pay reviews and variable-pay reviews. When assessing performance ratings, senior leaders (General Managers and above) receive information on the gender-based outcomes of the reviews. If any deviations are identified, specific review points are highlighted for the reviewing manager and variances are highlighted for approving managers.

Gender pay gap vs equitable pay

As noted previously, Whitehaven's approach to equal opportunity focuses on "equitable pay" i.e. a commitment to equal pay for equal roles. We believe this approach is the most appropriate for the unique characteristics of our workforce and it delivers the data we need to inform our remuneration practices.

We acknowledge this analysis approach differs slightly to WGEA's gender pay gap measure, which provides different insights into gender equity within a company. WGEA's gender pay gap is calculated by comparing average salaries and average total remuneration of male and female employees, regardless of their role type or seniority. This means that even with equitable pay for similar roles, a pay gap might still exist.

Whitehaven's equitable pay position

"Equitable pay" analysis conducted by Whitehaven in June 2024 showed a gender pay gap of fixed remuneration of 3.3% in market competitiveness between men's and women's remuneration for salaried employees. This analysis excluded Whitehaven's Executive Leadership Team, as these roles are overseen by the Board.

While this 3.3% gap requires continued management, a key driver of the difference is experience levels rather than gender bias. Whitehaven factors experience into its pay review decisions, and currently a disproportionate number of females are newer to their roles or to Whitehaven. This is evidenced by women representing 26.0% of new hires in FY24 (notably higher than the 17.3% female representation in the legacy business workforce at the start of the year) and

female leadership roles increasing from 14.1% in FY23 to 19.7% in FY24. This variance in experience should decrease over time and, based on our pay philosophy, this should lead to a reduction in the gender pay gap. We will actively monitor and manage this through our annual gender-based reviews and our remuneration review processes.

Whitehaven also reviewed its variable pay practices in 2024, finding that women received 101.9% of their target opportunity on average for the individual component of their incentives, compared to 100.9% for men. These results are a positive indicator of equitable pay practices.

Whitehaven's gender pay gap as defined by WGEA

While Whitehaven's equitable pay analysis shows equitable pay practices are being applied overall, data from our 2023-24 WGEA submission still shows a pay gap. Further detail on our current gender pay gap is outlined in the figure below.

2023-24 WGEA submission: gender pay gap

Measure	Pay gap
Average (mean) base salary	14.4%
Median base salary	5.6%
Average total remuneration	22.3%
Median total remuneration	17.4%

We acknowledge that both our average and median pay gap figures have increased slightly from the 2022-2023 WGEA submission. As noted above, a driver for this has been different experience levels for women as Whitehaven increases female representation in its workforce and leadership ranks. A further driver for this change is WGEA's adjusted calculation methodology, whereby it now includes the CEO in the pay comparisons. This adjustment increased the size of Whitehaven's reported pay gap.

Other drivers for these pay gaps have been thoroughly analysed by Whitehaven management and are summarised in the next section.

Gender pay gap drivers for average base salary

Despite Whitehaven's commitment to equitable paying for equivalent roles, there is a 14.4% gap in remuneration on average base salary. Whitehaven's analysis of its remuneration data has identified the pay gap is not the result of equal pay issues, rather it is the outcome of two key pay gap drivers.

Pay gap driver 1: Different levels of representation in job categories

At Whitehaven, 18.4% of permanent employees are women. However, this representation differs amongst the different job categories. Of particular note, women compose a high number of employees in the Clerical and Administrative job category, where they represent 85.5% of this category. This is significant in that it is the lowest paying job category. This means that the larger than usual representation of women in this category is skewing the female average down.

Conversely, women represent just 7.5% of the "Technicians and Trade Workers" category. This is the highest paying category at Whitehaven outside of Managers, skewing Whitehaven's results.

Pay gap driver 2: Lower representation of females in senior roles

The second major driver of the pay gap is lower than average levels of female representation at the senior management level. In the 'General Manager' and 'Key Management Personnel' levels, women represent 14.8% of the roles i.e. a lower rate than Whitehaven's average. Given these are among the highest remunerated positions at Whitehaven, this disparity influences the overall remuneration gap for base salary comparisons and more materially for total remuneration comparisons.

These drivers underscore the complexity of the gender pay gap issue at Whitehaven and guide our targeted strategies for improvement. While our approach to equitable pay for equivalent roles is robust, these pay gap factors highlight the multifaceted nature of the challenge we face and the nuances involved in analysing the data.

Actions and Strategies

Whitehaven is committed to fostering a diverse workforce and an inclusive workplace culture, and reducing the pay gap is an important enabler of this goal. We have several focused strategies that aim to reduce the gender pay gap and reinforce our dedication to pay equity. Key actions and initiatives are outlined below.

- **Enhanced recruitment procedures:** We have designed our recruitment process to eliminate unconscious bias, making it more inclusive for traditionally under-represented groups in mining. This includes inclusive

advertisements; a policy to shortlist women for all senior roles; ensuring gender diversity is considered at every level of recruitment; and recruitment targets for members of our recruitment team.

- **Women's Leadership Development Program:** This program is integral to our strategy for improving gender balance in leadership roles. By supporting the development of high-potential and senior female leaders, we aim to increase female representation at the top. The program focuses on cultivating internal successors, building resilience, visibility, self-awareness, and influencing skills. In FY24, 20 women across the business participated in this initiative.
- **Industry leading Parental Leave Policy:** Introduced in FY22, our parental leave policy includes 26 weeks for primary carers, acknowledging the role of parental leave in promoting equality and attracting high-performing female talent. In FY24, 18 employees took leave under this policy, demonstrating its effectiveness in supporting our female workforce.
- **2024 NSW Women in Mining Awards:** Our active participation in events like the NSW Women in Mining Awards underscores our commitment to recognising and celebrating the achievements of women in our industry.
- **Formalising equitable pay:** Whitehaven will maintain its commitment to ensuring that employee remuneration is determined by their skills and experience by establishing a formal policy for equitable pay and implementing a structured process for analysing and finalising annual remuneration through an official procedure document.
- **Female representation targets:** since the release of the 2023/24 WGEA results, Whitehaven has successfully achieved its goal of 20% female representation across both overall employees and leadership roles by FY26, surpassing the target more than a year ahead of schedule. This milestone reflects our commitment to normalising female participation in all job categories and specifically targeting leadership to address the gender pay gap.

Enhanced Remuneration Review Process

In 2023, we enhanced our remuneration review process to increase transparency and focus on gender-pay practices. This included providing managers with detailed, gender-specific data, enabling them to make informed decisions regarding pay equity. These improvements were carried forward in the 2024 annual review, reflecting our ongoing commitment to fostering more equitable remuneration practices and ensuring continuous progress in addressing gender pay disparities.

Future enhancements

In FY25, we will further integrate gender pay gap analysis into our annual budgeting decisions. This will include adjustments for experience in the role, ensuring a more nuanced approach to pay equity. Additionally, where appropriate, separate adjustments will be made to specifically address pay equity issues.

As we move forward, Whitehaven remains dedicated to continuous improvement in our pursuit of gender equality. With these strategies, bolstered by tangible actions and clear targets, we are proud to be making significant progress in reducing the gender pay gap and enhancing gender equity within our organisation.

Conclusion

Whitehaven remains focused on addressing the gender pay gap. Recognising the complexities of this issue, our approach is driven by clear, actionable strategies and a commitment to meaningful progress within our organisation.

We have identified the underlying causes that are unique to Whitehaven's gender pay gap and, guided by this understanding, our efforts are focused on implementing effective measures to achieve gender equity in our workplace. We have made measurable progress that reflects our commitment to ongoing improvement and transparency, and we will continue to strive for further improvements.