



PUBLIC DISCLOSURE STATEMENT

TELSTRA GROUP LIMITED

ORGANISATION CERTIFICATION
FY2023-24

Australian Government
Climate Active
Public Disclosure Statement



An Australian Government Initiative



NAME OF CERTIFIED ENTITY	Telstra Group Limited
REPORTING PERIOD	Financial year 1 July 2023 – 30 June 2024 Arrears report
DECLARATION	<i>To the best of my knowledge, the information provided in this public disclosure statement is true and correct and meets the requirements of the Climate Active Carbon Neutral Standard.</i> <i>Signature here</i> Justine Rowe Chief Sustainability Officer 30 October 2024

Commented [AR1]: Justine Rowe signature to be inserted



Australian Government
**Department of Climate Change, Energy,
the Environment and Water**

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Version 9.

1.CERTIFICATION SUMMARY

TOTAL EMISSIONS OFFSET	1,438,726 tCO ₂ -e
CARBON OFFSETS USED	100% VCUs
RENEWABLE ELECTRICITY	21.72% (domestic)
CARBON ACCOUNT	Prepared by: Telstra Group Limited
TECHNICAL ASSESSMENT	9/11/2022 Wibi Rockwood Deloitte

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2.CERTIFICATION INFORMATION

Description of organisation certification

This organisation certification is for the business operations of Telstra Group Limited, ABN 56 650 620 303. Telstra is Australia's leading telecommunications company with a proud Australian heritage and a strong international presence, particularly in the Asia-Pacific region. We offer a full range of products and services across a customer base that includes consumers, small business, large enterprise, and government organisations. Our leading mobile network reaches approximately 99.7 per cent of the Australian population. We have around 280 stores in Australia and 26 Telstra Business Technology Centres.

Our international operations (data centres, subsea landing stations, offices) are included within the scope of this certification. Telstra International provides telecommunication services, advanced technology solutions and network capacity and management to government and large enterprise and business customers outside of Australia. It provides wholesale services outside of Australia, including voice and data, and manages Telstra's networks outside of Australia, including international subsea cables.

The operations of Digicel Pacific have been excluded from Telstra's public emissions reporting and targets in FY24 as we have not yet been able to compile data that aligns to the Greenhouse Gas (GHG) Protocol and meets assurance standards. A multi-year program of education, capability and capacity building is in progress to uplift the data quality and associated data management systems. An uplift factor has been applied to this submission to account for a Digicel Pacific estimate in FY24. Refer to page 11 for more information.

The brands, products, and services under Telstra Energy, Telstra Mobile phone plans & mobile broadband plans inc. SIM kits and Belong, each have their own distinct Climate Active certifications. While these certifications intersect with the Telstra Group's certification, they maintain a distinct boundary. Within this boundary, emissions may not overlap with Telstra Group, requiring additional offsets for coverage.

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This Public Disclosure Statement includes information for FY2023-24 reporting period.

This is the last reporting period that Telstra will be seeking certification from Climate Active for our operations, products and for our other brands like Belong. Refer to our website for more information regarding this change: [How we're evolving our climate change commitments \(telstra.com.au\)](https://www.telstra.com.au/evolving-climate-commitments).

Organisation description

This report covers the business operations of Telstra Group Limited (ABN 56 650 620 303) and all its group entities from 1 July 2023 to 30 June 2024. In line with the Climate Active Organisation Standard, we have applied an operational control boundary which accounts for the GHG emissions from our business operations, facilities and network. Refer to section 3 for further insight into the certification boundary. Our boundary also encompasses all of Telstra's fixed and mobile data network as well as the specific operational emissions associated with the following Telstra brands, products & services and functions:

- Telstra Consumer
- Telstra Business
- Telstra Energy
- Telstra Enterprise
- Telstra Mobile Phone and Mobile Broadband Plans
- Telstra Wholesale
- Belong
- Other (excludes all brands associated with Telstra's equity investments)

Noting that Telstra Energy, Telstra Mobile phone plans & mobile broadband plans inc. SIM kits and Belong, each have their own distinct Climate Active certifications as outlined above.

Telstra Group has a direct or indirect interest in over 210 controlled entities across approximately 30 countries. We have controlled entities in Australia, Asia, the South Pacific, New Zealand, Europe, Middle East and the United States of America. We conduct most of our business through our controlled entities Telstra Limited and Telstra Corporation Limited. Refer to the Consolidated Entity Disclosure Statement in our [2024 Annual Report](#) (pages 179-186) for a complete list of Telstra Group and its controlled entities as at 30 June 2024.

3.EMISSIONS BOUNDARY

Inside the emissions boundary

All emission sources listed in the emissions boundary are part of the carbon neutral claim.

Quantified emissions have been assessed as relevant and are quantified in the carbon inventory. This may include emissions that are not identified as arising due to the operations of the certified entity, however are **optionally included**.

Non-quantified emissions have been assessed as relevant and are captured within the emissions boundary, but are not measured (quantified) in the carbon inventory. All material emissions are accounted for through an uplift factor. Further detail is available at Appendix C.

Outside the emissions boundary

Excluded emissions are those that have been assessed as not relevant to an organisation's operations and are outside of its emissions boundary or are outside of the scope of the certification. These emissions are not part of the carbon neutral claim. Further detail is available at Appendix D.

Inside emissions boundary

Quantified

- Transport (air)
- Electricity
- Electricity (international)
- ICT services and equipment
- Land and sea transport (fuel)
- Land and sea transport (km)
- Upstream leased assets (international)
- Office equipment & supplies
- Postage, courier and freight
- Products
- Professional services
- Stationary energy
- Stationary energy (international)
- Waste
- Working from home
- Purchased goods and services
- Capital goods
- Upstream transportation and distribution

Non-quantified

- Refrigerants
- Emissions associated with accommodation and meals within business travel.
- Emissions associated with immaterial spend on outsourcing of business processing.
- Emissions associated with international staff working from home.
- Emissions associated with Digicel Pacific acquisition

Optionally included

None

Outside emission boundary

Excluded

- Upstream emissions associated with Telstra's products and services:
 - Embodied emissions Distribution to Telstra
 - Marketing and advertising associated with products and services.
- Downstream emissions associated with Telstra's products and services:
 - Distribution to customers
 - Customer use & disposal of products
 - Marketing and advertising associated with products and services.
- Emissions associated with Telstra's proportionate investments
- Waste generated from international operations

4. EMISSIONS REDUCTIONS

Emissions reduction strategy

For Telstra, addressing climate change means taking ambitious steps to decarbonise our business and our supply chain. We are committed to achieving net-zero emissions by 2050, through the Business Ambition for 1.5°C campaign. Towards this, we have set near-term emissions reduction targets aligned to a trajectory to limit global warming to 1.5°C. Our near-term climate-related targets are to:

- reduce our absolute scope 1+2 emissions by at least 70 per cent by 2030 (from a FY19 baseline)
- reduce our absolute scope 3 emissions by at least 50 per cent by 2030 (from a FY19 baseline)
- enable renewable energy generation equivalent to 100 per cent of our consumption by 2025.

Our progress against the targets listed above for FY24:

Progress
Reduced our combined scope 1+2 emissions by 37% from an FY19 baseline
Reduced our scope 3 emissions by 37% from an FY19 baseline
Supported renewable energy generation equivalent to 27% of our consumption. Telstra has now contracted renewable energy generation which is projected to be equivalent to more than 100% of its forecast consumption at the end of 2025

For more information on our targets, climate strategy and progress, please refer to the [Acting on climate and nature](#) chapter of our 2024 Annual Report.

Emissions reduction actions

Electricity consumption from our network, data centres, offices and other buildings accounts for around 96 per cent of our total FY24 scope 1+2 emissions. We strive to reduce energy consumption across every aspect of our business through considered planning, equipment modernisation, monitoring and energy optimisation. Our network sites, including fixed network sites and data centres, are our largest consumers of electricity. Our investment in energy reduction projects including both energy efficiency and decommissioning in FY24 was \$23 million.

In FY24, our energy efficiency programs delivered a collective annualised saving of 6,295 tCO₂-e and 8,082 MWh electricity. In addition to our energy efficiency projects, we saved a further 54,659 tCO₂-e and 73,694 MWh annualised through decommissioning legacy network equipment and network energy efficiency enhancements.

Emissions reductions activities include piloting hydrogen fuel cells as backup power at five mobile sites in place of diesel generators, the installation of demand flow chiller water optimisation systems and transitioning 20% of our operational vehicle fleet to hybrid models. Please refer to [Telstra's Sustainability Report 2024](#) for further information on our Emissions Reduction Strategy.

5.EMISSIONS SUMMARY

Emissions over time

Emissions since base year			
		Total tCO ₂ -e (without uplift)	Total tCO ₂ -e (with uplift)
Base year:	2021-2022 ¹	1,648,012	N/A
Year 1:	2021 (Jan 2021-Jun 2022) ²	1,010,798	N/A
Year 2:	2022	1,648,012	N/A
Year 3:	2023	1,534,465	1,628,005
Year 4:	2024	1,330,512	1,438,726

Significant changes in emissions

Significant changes in emissions			
Emission source	Previous year emissions (t CO ₂ -e)	Current year emissions (t CO ₂ -e)	Reason for change
Australian based Electricity consumption (scope 2)	825,242	737,519	The reduction in emissions associated with electricity (market-based method, scope 2) is in line with the reduction in kWh consumption. This reflects Telstra's continued efforts towards power saving measures, some of which are outlined in section 4 of this document.

Use of Climate Active carbon neutral products, services, buildings or precincts

N/A – no Climate Active carbon neutral products and services used.

¹ The base year has been restated from 2020 (Jan 2020 – Dec 2020) total of 2,075,614 tCO₂-e to FY22 total of 1,648,012 t CO₂-e as agreed with Climate Active. A base year recalculation was required due to changes in the FY22 calculation methodologies resulting in >10% change to total emissions.

² This submission is for the 6-month period ending 30 June 2021 and therefore not representative of a full 12 months. This is the rationale for not utilising 2021 as our base year.

Emissions summary

The electricity summary is available in Appendix B. Electricity emissions were calculated using a market-based approach for domestic operations and location-based approach for international operations.

Emission category	Scope 1 emissions (tCO ₂ -e)	Scope 2 emissions (tCO ₂ -e)	Scope 3 emissions (tCO ₂ -e)	Total emissions (t CO ₂ -e)
Electricity - international	0	26,476	53,698	80,174
Electricity - domestic	0	737,519	91,052	828,571
ICT services and equipment	0	0	137,871	137,871
Office equipment & supplies	0	0	0	0
Postage, courier and freight	0	0	0	0
Products	0	0	169,880	169,880
Professional Services	0	0	0	0
Refrigerants	0	0	0	0
Stationary Energy (gaseous fuels)	590	0	87	677
Stationary Energy (liquid fuels)	10,052	0	2,397	12,449
Transport (Air)	0	0	5,297	5,297
Transport (Land and Sea)	22,524	0	90,210	112,734
Waste	0	0	2,364	2,364
Working from home	0	0	-19,505	-19,505
Total emissions (tCO₂-e)	33,166	763,995	533,351	1,330,512

Uplift factors

An uplift factor is an upwards adjustment to the total carbon inventory to account for relevant emissions that cannot be reasonably quantified or estimated. This conservative accounting approach helps ensure the integrity of the carbon neutral claim.

Reason for uplift factor	tCO ₂ -e
8.1% uplift to account for non-quantified sources where data is unavailable for Digicel Pacific (acquired in FY23).	108,213
Total of all uplift factors (tCO ₂ -e)	108,213
Total emissions footprint to offset (tCO₂-e) <i>(total emissions from summary table + total of all uplift factors)</i>	1,438,726

6. CARBON OFFSETS

Eligible offsets retirement summary

Offsets retired for Climate Active certification

Type of offset unit	Quantity used for this reporting period	Percentage of total units used
Verified Carbon Units (VCUs)	1,438,726	100.00%

Project name	Type of offset unit	Registry	Date retired	Serial number	Vintage	Total quantity retired	Quantity used in previous reporting periods	Quantity banked for future reporting periods	Quantity used for this reporting period	Percentage of total used this reporting period
ReNew Solar Power Project by ReNew Solar Power Private Limited, India	VCU	Verra Registry	2/03/2023	11584-341826066-342826065-VCS-VCU-997-VER-IN-1-1851-01012020-31122020-0	2020	1,000,000	0	0	1,000,000	69.51%
ReNew Solar Power Project by ReNew Solar Power Private Limited, India	VCU	Verra Registry	13/09/2022	11585-343222398-343969115-VCS-VCU-997-VER-IN-1-1851-01012021-25052021-0	2021	746,718	10,045 ³	357,857	378,816	26.33%
ReNew Solar Power Project by ReNew Solar Power Private Limited, India	VCU	Verra Registry	13/09/2022	11584-341512784-341766065-VCS-VCU-997-VER-IN-1-1851-01012020-31122020-0	2020	253,282	193,372 ⁴	0	59,910	4.16%

³ The following allocations have been used in 2024 for other Telstra related Climate Active certifications - St Vincent de Paul (10,045).

⁴ 71,498 offsets were used in 2023 reporting for Telstra Group and for other Climate Active certifications - St Vincent de Paul (9,311). The following allocations have been used in 2024 for other Telstra related Climate Active certifications - Telstra Mobile Plans (86,038), Belong (34,475) and Telstra Energy (1,361).

Co-benefits

The main purpose of this project activity is to generate electricity through renewable solar energy sources. The project activity involves total capacity of 977 MW solar power project which are installed in Gujarat, Karnataka, Madhya Pradesh, Rajasthan and Telangana states of India. The solar projects have been developed by the SPVs of ReNew Power Limited. Over the 10 years of first crediting period, the project will replace anthropogenic emissions estimated to be approximately 1,511,532 tCO₂-e per year, displacing 1,595,299 MWh/year amount of electricity from the generation-mix of power plants connected to the Indian grid.

7. RENEWABLE ENERGY CERTIFICATE (REC) SUMMARY

Renewable Energy Certificate (REC) summary

N/A

APPENDIX A: ADDITIONAL INFORMATION

N/A

APPENDIX B: ELECTRICITY SUMMARY

There are two international best-practice methods for calculating electricity emissions – the location-based method and the market-based method. Reporting electricity emissions under both methods is called dual reporting.

Dual reporting of electricity emissions is useful, as it provides different perspectives of the emissions associated with a business's electricity usage.

Location-based method:

The location-based method provides a picture of a business's electricity emissions in the context of its location, and the emissions intensity of the electricity grid it relies on. It reflects the average emissions intensity of the electricity grid in the location (State) in which energy consumption occurs. The location-based method does not allow for any claims of renewable electricity from grid-imported electricity usage.

Market-based method:

The market-based method provides a picture of a business's electricity emissions in the context of its renewable energy investments. It reflects the emissions intensity of different electricity products, markets and investments. It uses a residual mix factor (RMF) to allow for unique claims on the zero emissions attribute of renewables without double-counting.

For this certification, electricity emissions have been set by using the market-based approach.

This Appendix B: Electricity Summary applies to our domestic electricity use only.

Market-based approach summary			
Market-based approach	Activity Data (kWh)	Emissions (kg CO ₂ -e)	Renewable percentage of total
Behind the meter consumption of electricity generated	12,246,548	0	1%
Total non-grid electricity	12,246,548	0	1%
LGC Purchased and retired (kWh) (including PPAs)	0	0	0%
GreenPower	0	0	0%
Climate Active precinct/building (voluntary renewables)	0	0	0%
Precinct/Building (LRET)	0	0	0%
Precinct/Building jurisdictional renewables (LGCS surrendered)	0	0	0%
Electricity products (voluntary renewables)	0	0	0%
Electricity products (LRET)	0	0	0%
Electricity products jurisdictional renewables (LGCS surrendered)	0	0	0%
Jurisdictional renewables (LGCs surrendered)	24,884,295	0	2%
Jurisdictional renewables (LRET) (applied to ACT grid electricity)	6,284,015	0	1%
Large Scale Renewable Energy Target (applied to grid electricity only)	209,152,973	0	18%
Residual Electricity	910,517,328	828,570,769	0%
Total renewable electricity (grid + non grid)	252,567,831	0	22%
Total grid electricity	1,150,838,611	828,570,769	21%
Total electricity (grid + non grid)	1,163,085,160	828,570,769	22%
Percentage of residual electricity consumption under operational control	100%		
Residual electricity consumption under operational control	910,517,328	828,570,769	
Scope 2	810,460,479	737,519,036	
Scope 3 (includes T&D emissions from consumption under operational control)	100,056,849	91,051,733	
Residual electricity consumption not under operational control	0	0	
Scope 3	0	0	

Total renewables (grid and non-grid)	21.72%
Mandatory	18.52%
Voluntary	2.14%
Behind the meter	1.05%
Residual scope 2 emissions (t CO₂-e)	737,519.04
Residual scope 3 emissions (t CO₂-e)	91,051.73
Scope 2 emissions liability (adjusted for already offset carbon neutral electricity) (t CO₂-e)	737,519.04
Scope 3 emissions liability (adjusted for already offset carbon neutral electricity) (t CO₂-e)	91,051.73
Total emissions liability (t CO₂-e)	828,570.77

Figures may not sum due to rounding. Renewable percentage can be above 100%

Location-based approach summary						
Location-based approach	Activity Data (kWh) total	Under operational control			Not under operational control	
Percentage of grid electricity consumption under operational control	100%	(kWh)	Scope 2 Emissions (kgCO ₂ -e)	Scope 3 Emissions (kgCO ₂ -e)	(kWh)	Scope 3 Emissions (kgCO ₂ -e)
ACT	33,568,454	33,568,454	22,826,549	1,678,423	0	0
NSW	387,599,475	387,599,475	263,567,643	19,379,974	0	0
SA	77,150,913	77,150,913	19,287,728	6,172,073	0	0
VIC	285,469,432	285,469,432	225,520,852	19,982,860	0	0
QLD	211,911,427	211,911,427	154,695,342	31,786,714	0	0
NT	16,616,632	16,616,632	8,972,981	1,163,164	0	0
WA	113,339,428	113,339,428	60,069,897	4,533,577	0	0
TAS	25,182,850	25,182,850	3,021,942	251,828	0	0
Grid electricity (scope 2 and 3)	1,150,838,611	1,150,838,611	757,962,933	84,948,614	0	0
ACT	1,013	1,013	0	0		
NSW	956,311	956,311	0	0		
SA	1,006,020	1,006,020	0	0		
VIC	932,044	932,044	0	0		
QLD	2,936,975	2,936,975	0	0		
NT	1,738,311	1,738,311	0	0		
WA	4,536,101	4,536,101	0	0		
TAS	139,774	139,774	0	0		
Non-grid electricity (behind the meter)	12,246,548	12,246,548	0	0		
Total electricity (grid + non grid)	1,163,085,160					
Residual scope 2 emissions (t CO₂-e)					757,962.93	
Residual scope 3 emissions (t CO₂-e)					84,948.61	
Scope 2 emissions liability (adjusted for already offset carbon neutral electricity) (t CO₂-e)					757,962.93	
Scope 3 emissions liability (adjusted for already offset carbon neutral electricity) (t CO₂-e)					84,948.61	
Total emissions liability					842,911.55	

Operations in Climate Active buildings and precincts

Operations in Climate Active buildings and precincts	Electricity consumed in Climate Active certified building/precinct (kWh)	Emissions (kg CO ₂ -e)
Nil	0	0
Climate Active carbon neutral electricity is not renewable electricity. These electricity emissions have been offset by another Climate Active member through their building or precinct certification. This electricity consumption is also included in the market based and location-based summary tables. Any electricity that has been sourced as renewable electricity by the building/precinct under the market-based method is outlined as such in the market-based summary table.		

Climate Active carbon neutral electricity products

Climate Active carbon neutral electricity product used	Electricity claimed from Climate Active electricity products (kWh)	Emissions (kg CO ₂ -e)
Nil	0	0
Climate Active carbon neutral electricity is not renewable electricity. These electricity emissions have been offset by another Climate Active member through their electricity product certification. This electricity consumption is also included in the market based and location-based summary tables. Any electricity that has been sourced as renewable electricity by the electricity product under the market-based method is outlined as such in the market-based summary table.		

APPENDIX C: INSIDE EMISSIONS BOUNDARY

Non-quantified emission sources

The following emissions sources have been assessed as relevant, are captured within the emissions boundary, but are not measured (quantified) in the carbon inventory. They have been non-quantified due to one of the following reasons:

1. **Immaterial** <1% for individual items and no more than 5% collectively
2. **Cost effective** Quantification is not cost effective relative to the size of the emission but uplift applied.
3. **Data unavailable** Data is unavailable but uplift applied. A data management plan must be put in place to provide data within 5 years.
4. **Maintenance** Initial emissions non-quantified but repairs and replacements quantified.

Relevant non-quantified emission sources	Justification reason
Refrigerants	Immaterial
Emissions associated with accommodation and meals within business travel	Immaterial
Emissions associated with immaterial spend on outsourcing of business processing.	Immaterial
Emissions associated with international staff working from home	Immaterial
Emissions associated with Digicel Pacific acquisition	Data unavailable (but uplift applied & data plan in place)

Data management plan for non-quantified sources

The data management plan below outlines how more rigorous quantification can be achieved for material (greater than 1%) non-quantified emission sources.

Emission Source	Data Management Plan	Timeline
Emissions associated with Digicel Pacific acquisition	A detailed program of work has been launched to align environment data processes and controls with the aim to quantitatively disclose the Digicel Pacific impact in our FY25 reporting	FY25

APPENDIX D: OUTSIDE EMISSIONS BOUNDARY

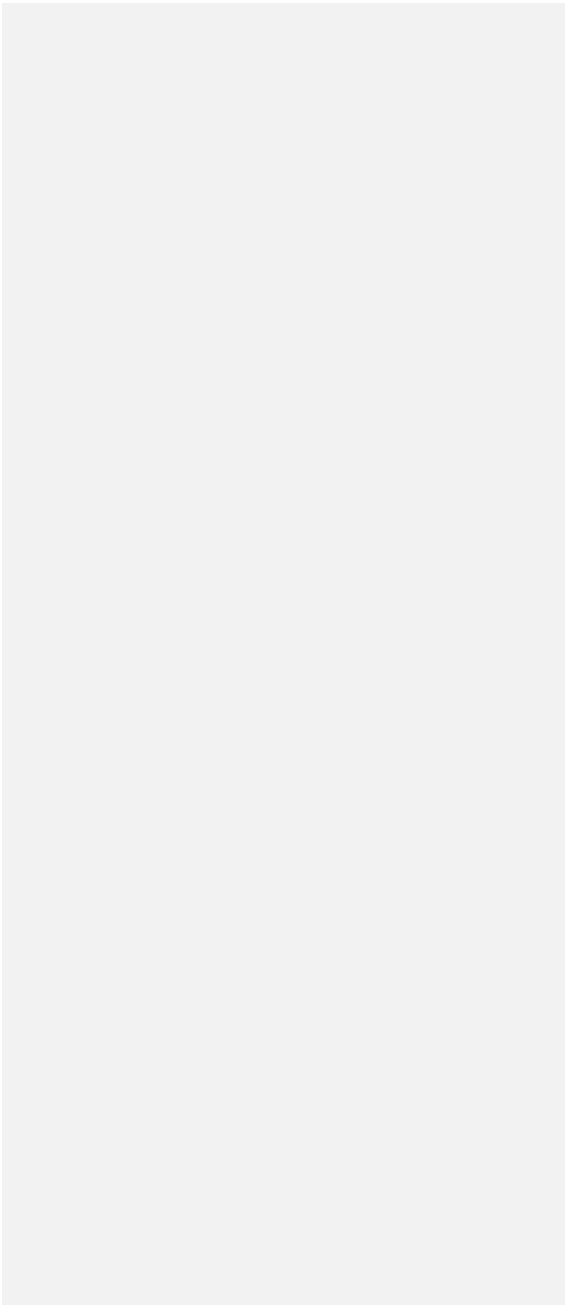
Excluded emission sources

The below emission sources have been assessed as not relevant to this organisation's operations and are outside of its emissions boundary. These emissions are not part of the carbon neutral claim. Emission sources considered for relevance must be included within the certification boundary if they meet two of the five relevance criteria. Those which only meet one condition of the relevance test can be excluded from the certification boundary.

Emissions tested for relevance are detailed below against each of the following criteria:

1. **Size** The emissions from a particular source are likely to be large relative to the organisation's electricity, stationary energy and fuel emissions.
2. **Influence** The responsible entity has the potential to influence the reduction of emissions from a particular source.
3. **Risk** The emissions from a particular source contribute to the organisation's greenhouse gas risk exposure.
4. **Stakeholders** Key stakeholders deem the emissions from a particular source are relevant.
5. **Outsourcing** The emissions are from outsourced activities previously undertaken within the organisation's boundary, or from outsourced activities typically undertaken within the boundary for comparable organisations

Excluded emissions sources summary



Emission sources tested for relevance	Size	Influence	Risk	Stakeholders	Outsourcing	Justification
Downstream emissions associated with Telstra's products and services: - Distribution to customers - Customer use & disposal of products Marketing and advertising associated with products and services.	N	Y	N	N	N	Size: No - These emissions are not associated with our Organisational business activities as they do not relate to the operations of the network and its facilities (e.g. head office and retail stores). They instead relate to the products and services we purchase/develop and on sell to customers which are downstream focused. These emissions would be captured as part of a wider Services and Product boundary in line with the Climate Active standards and so are not applicable for the Organisational boundary. Influence: Yes - Telstra have recognised within our vendor spend data that we have some ability to influence the spend and in turn the associated emissions. Risk: No - These emissions are not associated with Telstra's core Organisational business activities, namely the emissions associated Telstra's operation of the network and its facilities (e.g. head office and retail stores). Stakeholders: - No - These emissions are not associated with Telstra's core Organisational business activities, namely the emissions associated Telstra's operation of the network and its facilities (e.g. head office and retail stores), as such it is unlikely there would be an expectation by stakeholders to include these emissions. Outsourcing: No - these are products and services which we conduct as part of our wider business operations.
Upstream emissions associated with Telstra's products and services: - Embodied emissions - Distribution to Telstra Marketing and advertising associated with products and services.	N	Y	N	N	N	Size: No - These emissions are not associated with our Organisational business activities as they do not relate to the operations of the network and its facilities (e.g. head office and retail stores). They instead relate to the products and services we purchase/develop and on sell to customers which are downstream focused. These emissions would be captured as part of a wider Services and Product boundary in line with the Climate Active standards and so are not applicable for the Organisational boundary. Influence: Yes - Telstra have recognised within our vendor spend data that we have some ability to influence the spend and in turn the associated emissions. Risk: No - These emissions are not associated with Telstra's core Organisational business activities, namely the emissions associated Telstra's operation of the network and its facilities (e.g. head office and retail stores). Stakeholders: - No - These emissions are not associated with Telstra's core Organisational business activities, namely the emissions associated Telstra's operation of the network and its facilities (e.g. head office and retail stores), as such it is unlikely there would be an expectation by stakeholders to include these emissions. Outsourcing: No - these are products and services which we conduct as part of our wider business operations.
Emissions associated with Telstra's proportionate investments	N	Y	N	N	N	Size: No - Proportionate emissions from our investments have been excluded as they do not relate to the operations of facilities and the network. They are instead investments that are held for the purpose of making a profit. Influence: Yes - As these investments are made for commercial based decisions with the intent to generate profit, the emissions generated through our investments are considered influenceable.

Emission sources tested for relevance	Size	Influence	Risk	Stakeholders	Outsourcing	Justification
						Risk: No - Given our investments are not a material source of emissions or a core component of our business, it will not pose a significant greenhouse gas risk exposure. Stakeholders: No - Given our investments are not a material source of emissions or a core component of our business, we deem that these are not of key interest to key stakeholders. Outsourcing: No - Emissions generated from our investments bear no impact on outsourced activities related to organisational emissions and therefore have no relevance
Waste generated from international operations	N	Y	N	N	N	Size: No - Historically, Telstra's international based emissions from electricity, fuel and stationary energy represent a relatively small percentage of Telstra's total GHG footprint. Subsequently, international operations including its subsidiaries represent a small presence in Telstra's organisational boundary. Influence: Yes - Telstra have adequate control/influence over its international operations that produce solid waste as demonstrated by their historic ability to reduce waste to landfill and increase recycled materials. Risk: No - Given it is not a material source of emissions, and is not a core component of Telstra's business, waste from international operations will not pose a significant greenhouse gas risk exposure. Stakeholders: No - The emissions generated from international operational waste are not considered relevant by key stakeholders and historically contributes less than 1% of total emissions. Outsourcing: No - While these emissions are generated from international operations, it is typically measured and managed by Telstra.



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