# PUBLIC DISCLOSURE STATEMENT

MEDIBANK PRIVATE LIMITED

ORGANISATION CERTIFICATION
FY2023–24

Australian Government

# Climate Active
# Public Disclosure Statement

An Australian Government Initiative

| | |
|---|---|
| NAME OF CERTIFIED ENTITY | Medibank Private Limited |
| REPORTING PERIOD | Financial year 1 July 2023 – 30 June 2024<br>Arrears report |
| DECLARATION | *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.*<br><br>Andrew Retschko |
| | Andrew Retschko<br>Hub Lead – Talent Engagement, Diversity & Inclusion, Sustainability & Community<br>13 October 2024 |

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



Version 9.

# 1.CERTIFICATION SUMMARY

| | |
|---|---|
| TOTAL EMISSIONS OFFSET | 25,528 $tCO_2$-e |
| CARBON OFFSETS USED | 10.78% ACCUs, 44.18% VCUs, 45.05% VERs |
| RENEWABLE ELECTRICITY | 29.58% |
| CARBON ACCOUNT | Prepared by: Pangolin Associates |
| TECHNICAL ASSESSMENT | 8/04/2025 – FY2023-24<br>Organisation: Pangolin Associates<br>Next technical assessment due: FY 2027 |

Contents

# 2. CERTIFICATION INFORMATION

## Description of organisation certification

This organisation certification is for the business operations of Medibank Private Limited, ABN 47 080 890 259, including the subsidiaries listed in the table below.

| Legal entity name | ABN |
|---|---|
| Australian Health Management Group Pty Limited | 96 003 683 298 |
| Medibank Health Solutions Pty Ltd | 99 078 934 791 |
| Medibank Health Solutions Telehealth Pty Ltd | 40 069 396 792 |
| Integrated Care Services Pty Ltd | 71 059 950 695 |
| Live Better Management Pty Ltd | 93 003 457 289 |
| Medi Financial Services Pty Ltd | 94 138 752 815 |
| MH Investment Holdings Pty Ltd | 18 169 818 884 |
| Healthstrong Pty Ltd | 61 155 277 919 |
| Amplar Home Health Pty Ltd | 59 008 193 100 |
| MHSI Pty Ltd | 57 659 284 607 |
| MH Operations Pty Ltd | 15 659 287 680 |
| MH Solutions Investments Pty Ltd | 52 642 022 124 |
| Myhealth Medical Holdings Pty Ltd | 99 611 390 688 |

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

## Organisation description

We're committed to delivering the best health and wellbeing experience for Australia. From our beginnings as a health insurer, we've grown to a health company supporting around 4.2 million customers and delivering more than 4 million health interactions this year. We're focused on helping people live better, healthier lives by giving everyone greater choice, better access and more value from the health system.

We're working with innovators in health, including health professionals, hospitals and governments to develop innovative approaches to care, to expand health prevention programs and personalise health products and services. We're accelerating the health transition Australia needs to ensure quality healthcare remains accessible and affordable for everyone. Our purpose of Better Health for Better Lives is not just words. It's our commitment to our customers and community and is a driving force for our people.

Headquartered in Melbourne, Medibank has offices in Melbourne, Sydney, Adelaide and Wollongong and a significant work from home population. We have more than 70 retail locations across Australia and have expanded our reach by investing in flexible retail assets, such as vans and kiosks. These mobile solutions have increased our presence among regional and rural customers. Through these initiatives, we are able to offer health checks and engage in discussions around preventative health programs to communities

across Australia.

The operational boundary has been defined based on an operational control test, in accordance with the principles of the National Greenhouse and Energy Reporting Act 2007. This includes the following locations:

- 720 Bourke Street, Melbourne VIC 3000
- Level 11, 12 and 13, 259 George Street, Sydney NSW 2000
- 77 Market Street, Wollongong NSW 2500
- 1 and 123 Eagle Street, Brisbane QLD 4000
- 82 Wattle Street, Fullarton, SA, 5063
- Level 1, 440 King William Street, Adelaide SA 5000
- Retail locations across Australia
- 106 Myhealth Clinics across Australia

The methods used for collating data, performing calculations and presenting the carbon account are in accordance with the following standards:

- Climate Active Standards
- The Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard (Revised Edition)
- National Greenhouse and Energy Reporting (Measurement) Determination 2008

Where possible, the calculation methodologies and emission factors used in this inventory are derived from the National Greenhouse Accounts (NGA) Factors in accordance with "Method 1" from the National Greenhouse and Energy Reporting (Measurement) Determination 2008.

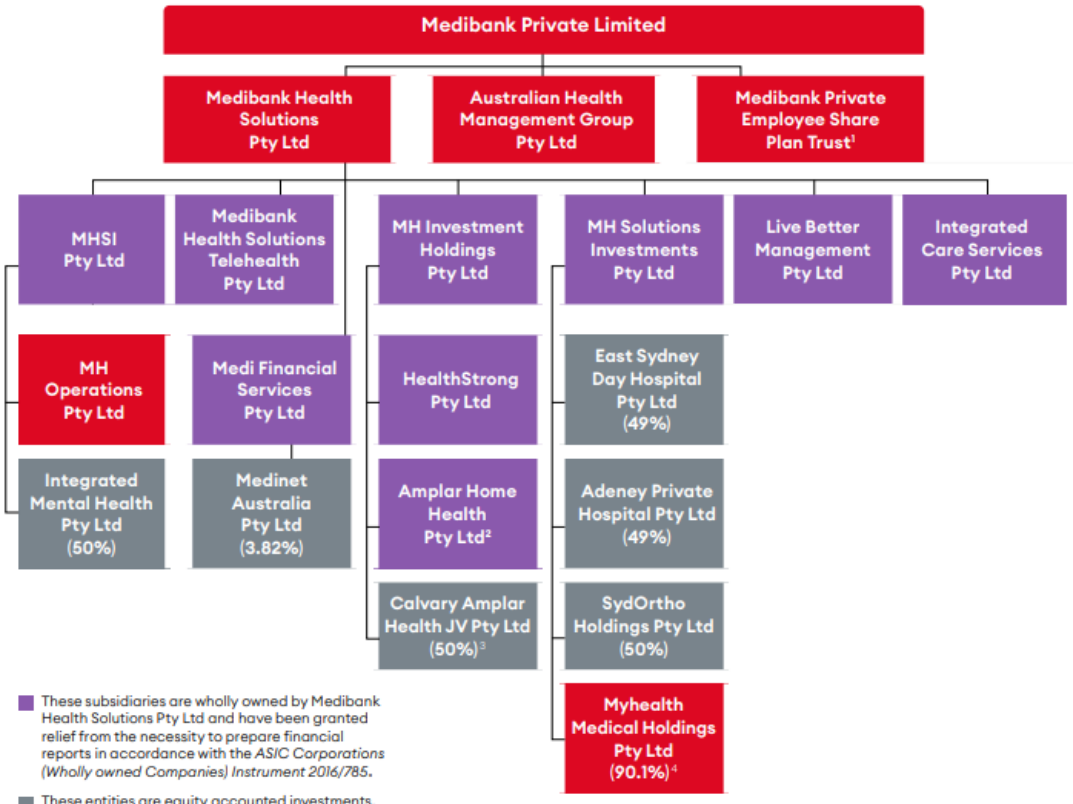
The greenhouse gases considered within the inventory are those that are commonly reported under the Kyoto Protocol; carbon dioxide ($CO_2$), methane ($CH_4$), nitrous oxide ($N_2O$) and synthetic gases - hydrofluorocarbons (HFCs), perfluorocarbons (PFCs) sulphur hexafluoride ($SF_6$) and nitrogen trifluoride ($NF_3$). These have been expressed as carbon dioxide equivalents ($CO_2$-e) using relative global warming potentials (GWPs).

*Figure 1: Organisational Structure*

## Note 16: Group structure

### (a) Group structure

The summary Medibank Group structure is shown below. All entities, unless otherwise stated, are 100% controlled.




These subsidiaries are wholly owned by Medibank Health Solutions Pty Ltd and have been granted relief from the necessity to prepare financial reports in accordance with the *ASIC Corporations (Wholly owned Companies) Instrument 2016/785*.

These entities are equity accounted investments. Refer to Note 16(b) for further information.

1. Refer to Note 18(a) for further information on the Employee Share Plan Trust.
2. Home Support Services Pty Ltd changed its name to Amplar Home Health Pty Ltd on 28 July 2023.
3. Calvary Medibank JV Pty Ltd changed its name to Calvary Amplar Health JV Pty Ltd on 26 October 2023.
4. On 5 January 2024, MH Solutions Investments Pty Ltd increased its shareholding in Myhealth Medical Holdings Pty Ltd from 49.0% to 90.1%. Refer to Note 16(b) for further information.

There are no related entities excluded from this certification.

For the avoidance of doubt, the operational boundary of our organisation assessment does not include investments in joint Ventures that are not controlled or in which Medibank has a minority interest, professional services  those not listed as quantified, including advertising, marketing, insurance, and  use of sold products, processing of sold products, franchises or end of life treatment of sold products as detailed in the following sections.

# 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**

- Stationary energy and fuels
- Electricity
- Accommodation
- Carbon neutral products and services
- Horticulture and agriculture
- Cleaning and chemicals
- Food
- ICT services and equipment
- Professional services – Employee education, memberships and periodicals
- Office equipment and supplies
- Postage, courier and freight
- Refrigerants
- Transport (air)
- Transport (land and sea)
- Waste – Office and Medical Waste
- Water
- Construction materials and services
- Machinery and vehicles
- Products (Purchased Goods & Services)
- Working From Home

**Non-quantified**

Anaesthetic gases are immaterial.

Energy use from allied health services performed on third-party sites (residential).

**Outside emission boundary**

**Excluded**

Investments

Professional Services – those not listed as quantified, including Advertising, Marketing, Insurance, and gifts.

Use of Sold Products – products and services purchased by our customers covered by our insurance products.

# 4.EMISSIONS REDUCTIONS

## Emissions reduction strategy

Medibank acknowledges and understands climate change and its impacts on environment and human health and uses the science of climate to understand and explore the potential climate-related risks and opportunities that may have an impact on our operational and financial performance. In 2021, we worked with independent specialists to undertake our first climate scenario analysis against 2 scenarios: a 2°C scenario aligned to the Paris Agreement (RCP* 2.6) and the high-emissions future (RCP 8.5) to align with the recommendations of the Climate Measurements Standards Initiative. We analysed opportunities and transitional risks, including emerging regulation, technology, legal, market and reputational risks. To support our transparent disclosure of climate-related risks and opportunities, we've followed the guidance of the Task Force on Climate-Related Financial Disclosures (TCFD) reporting framework and participated in the CDP (formerly the Carbon Disclosure Project), which aligns to the TCFD framework

We continue to undertake further steps to inform and guide our future strategic planning. In 2022 we accelerated our Net Zero pathway and are now committed to achieving Net Zero by 2040 from a base year of FY21, as based on our greenhouse gas inventory.

Medibank's pathway to Net Zero is aligned to the following short, medium and long-term targets:

- Net Zero against our Scope 1 and 2 emissions by FY25;
- 50% reduction from FY21 base year in our Scope 3 emissions by FY30; and
- Net Zero across our Scope 3 emissions and offset residual emissions with removals, by 2040.

Our Net Zero pathway is based on Medibank Group's 2022 business-as-usual operations and does not account for any future partnership or investment activity. Our Net Zero strategy does not include our recent acquisition of Myhealth Medical Group. We expect that our Net Zero strategy will be reassessed during FY25, following Medibank's increased investment in Myhealth in January 2024. Our investment portfolio is also currently out of scope, but we are considering a pathway to Net Zero for this. We transitioned to a lower-carbon equity portfolio for our domestic and international equities in 2019. Further details on Medibank's Net Zero pathway can be found here on pg 68: Medibank Sustainability Report 2024

During the year, we have developed a strategy for transitioning to 100% renewable electricity and progressed the development of our new Melbourne head office and at 30 June 2024, 64% of Medibank's electricity (excluding Myhealth) was being procured from renewable sources. The Melbourne building seeks to be certified by the Green Building Council of Australia as a 6-star Green Star building with a 5.5 NABERS rating to be administered by the NSW Office of Environment and Heritage.

Medibank is committed to managing the direct and indirect environmental impacts of our operations, including working with our supply chain and health partners. We are also embedding environmental sustainability into our business strategy and decision making. Our planned approach and pathways to address environmental and climate issues are detailed in our sustainability strategy, and are further supported by our Environmental Policy, Medibank External Partners' and Suppliers' Code of Conduct,

Responsible Investment Policy, business continuity planning, and greenhouse gas inventory management.

Our Environmental Policy outlines our commitment to seek to reduce emissions, improve the environmental efficiency of our premises and raise awareness of the health impacts of climate change. It also details responsibilities in relation to investing, reporting, reducing and offsetting emissions and engaging with others we work with.

Medibank acknowledges that climate change increases the severity and frequency of natural disasters, and we consider the risk of these events in our broader business continuity planning.

## Emissions reduction actions

During 2024 we saw an increase in our emissions and environmental impacts due to the investment in Myhealth and an overall increase in Scope 3 emissions. Myhealth emissions were measured for the period from 5 January to 30 June 2024. A revised baseline to include Myhealth in the Net Zero pathway will be established over the coming year, therefore we have disclosed Myhealth emissions separately in our Sustainability Report 2024.

We also note that the emissions included in this PDS are different to the emissions disclosed in the 2024 Sustainability Report due to the release of new Climate Active emission factors after the audit had been finalised for the FY24 Medibank GHG calculations.

To minimise our impact on the environment we progressed across a number of activities aimed at reducing our energy, water consumption and waste, increasing our recycling and minimising our emissions including:

- As part of our office relocation, we refurbished approximately 800 chairs otherwise destined for landfill. We also donated over 80 boxes of gloves to Medical Pantry for repurposing in animal welfare shelters.
- As at 30 June 2024 we are procuring 64% of our electricity (excluding Myhealth) from renewable sources.
- Better Knee, Better Me (BKBM) is our preventative program to manage knee osteoarthritis without total knee replacement (TKR) surgery – which often requires significant travel, multiple appointments and lengthy hospital stays that impact quality of life. We undertook a Life Cycle Analysis comparing BKBM and TKR for patients in both rural and urban environments, and in person and virtual settings, to evaluate environmental impacts. The findings show BKBM virtual health delivery consistently provided lower environmental impacts than TKR in-hospital care. This was due to lower transportation needs for patients and health professionals and approximately 60% less waste, compared with in-hospital scenarios. We found room for improvement though, with waste generated from the BKBM hardcopy welcome pack. The independent analysis has been completed and the results have undergone a comprehensive peer review process.
- Our mobile Amplar Health team is transitioning from petrol to hybrid vehicles to help reach our Net Zero goal. We are aiming to increase the number of hybrid cars in our fleet across Victoria, Queensland, South Australia, Western Australia and New South Wales. Transitioning from

traditional petrol-powered cars will significantly reduce our emissions, carbon footprint and air pollution. Hybrid cars provide our mobile nursing and Allied Health team with the range and flexibility to safely drive to patients in metro and rural areas.

- Our Melbourne office building received a 6-Star Green Star design review rating, with the As-Built* rating submission planned for FY25. Our developer entered into a NABERS Commitment Agreement to achieve a specific NABERS energy rating, and the developer intends to seek formal certification when occupancy and operational data requirements are met.

- Our approach to self-managing teams reduced travel by 11,415 km in May 2023 – April 2024, contributing to reduced environmental impact.

- Our Responsible Investment Policy outlines our continued commitment to invest in green bonds that fund projects with environmental benefits. Some examples include wind farms, solar farms, cleaner transportation and lower-carbon commercial properties. We continued to hold $15 million in green bonds as of 30 June 2024. During the year, we maintained our lower-carbon equity portfolio for both international and domestic investments.

Overall we achieved reductions across our Scope 1, due to a reduction in fuel use by Medibank owned vehicles and a reduction across our Scope 2 emissions excluding Myhealth reduced as a result of purchased electricity across our operations as we switched to renewable electricity.

We saw an increase across separate categories within the Medibank portfolio. Acquiring a controlling interest in Myhealth has introduced an additional 106 new sites within the organisation-controlled boundary of Medibank from 89 locations in FY23 to 204 locations in FY24. This has directly increased the base building consumption and scope 3 electricity. The use of natural gas within base buildings increased from 4,324 GJ in FY23 to 8,174 GJ in FY24 largely due to the additional clinics. Increased emissions across Products, Materials & Equipment is due to the increase in medical supplies, consumables, pharmaceutical goods and chemicals required across the Myhealth operations.

Business Travel and Employees categories increased due to more frontline staff commuting to sites as required by their roles.

An increase across Construction & Repair Services is due to the completion of our new Melbourne office and the refit of some of our retail stores. Purchasing new equipment for the Melbourne office, refits and ongoing operational activity has also resulted in an increase across ICT Services and ICT Equipment.

We continue to improve the way we measure and capture our Scope 3 emissions as guided by appropriate practices, frameworks and standards. We have received limited assurance on our FY24 emissions in accordance with the Australian Standard on Assurance Engagements (ASAE) 3000 and ASAE 3410.

* To be certified by the Green Building Council of Australia

# 5.EMISSIONS SUMMARY

## Emissions over time

| Emissions since base year | | | |
|---|---|---|---|
| | | **Total $tCO_2$-e** (without uplift) | **Total $tCO_2$-e** (with uplift) |
| Base year/Year 1: | 2017-18 | 17,825.8 | NA |
| Year 2: | 2018-19 | 13,420.7 | NA |
| Year 3: | 2019-20 | 12,652.2 | NA |
| Year 4: | 2020-21 | 15,629.6 | NA |
| Year 5: | 2021-22 | 15,395.4 | NA |
| Year 6: | 2022-23 | 19,367.2 | NA |
| Year 7: | 2023-24 | 25,527.51 | NA |

## 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** |
| **Electricity (market-based method, scope 2)** | 1,575.61 | 3,756.32 | Medibank acquired Myhealth from the 5th of January 2024 |
| **Electricity (market-based method, scope 3)** | 1,084.85 | 3,042.54 | Medibank acquired Myhealth from the 5th of January |

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

| Certified brand name | Product/Service/Building/Precinct used |
|---|---|
| ISPT | Building - 644 George Street, Sydney |
| Cbus Property | Building - 720 Bourke Street, Melbourne |
| GPT Group | Building - 123 Eagle Street, Brisbane |
| GPT Group | Building - 200 Karrinyup Road |
| GPT Group | Building - 2 Hooker Boulevard |
| Barangaroo | Precinct - Level 1, 300 Barangaroo Avenue |

## Emissions summary

The electricity summary is available in Appendix B. Electricity emissions were calculated using a market-based approach.

| 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) |
|---|---|---|---|---|
| Accommodation and facilities | 0.00 | 0.00 | 205.24 | 205.24 |
| Climate Active Carbon neutral products and services | 0.00 | 0.00 | 0.00 | 0.00 |
| Cleaning and chemicals | 0.00 | 0.00 | 277.05 | 277.05 |
| Construction materials and services | 0.00 | 0.00 | 1817.84 | 1817.84 |
| Electricity | 0.00 | 3756.32 | 3042.54 | 6798.85 |
| Food | 0.00 | 0.00 | 78.93 | 78.93 |
| Horticulture and agriculture | 0.00 | 0.00 | 213.85 | 213.85 |
| ICT services and equipment | 0.00 | 0.00 | 5448.58 | 5448.58 |
| Machinery and vehicles | 0.00 | 0.00 | 66.71 | 66.71 |
| Office equipment and supplies | 0.00 | 0.00 | 1326.53 | 1326.53 |
| Postage, courier and freight | 0.00 | 0.00 | 346.57 | 346.57 |
| Products | 0.00 | 0.00 | 1243.09 | 1243.09 |
| Professional services | 0.00 | 0.00 | 2152.43 | 2152.43 |
| Refrigerants | 17.43 | 0.00 | 0.00 | 17.43 |
| Stationary energy (gaseous fuels) | 138.57 | 0.00 | 17.82 | 156.39 |
| Stationary energy (liquid fuels) | 2.42 | 0.00 | 0.60 | 3.02 |
| Transport (air) | 0.00 | 0.00 | 1862.03 | 1862.03 |
| Transport (land and sea) | 574.76 | 0.00 | 776.01 | 1350.77 |
| Waste | 0.00 | 0.00 | 230.90 | 230.90 |
| Water | 0.00 | 0.00 | 1.92 | 1.92 |
| Working from home | 0.00 | 0.00 | 1929.38 | 1929.38 |
| **Grand Total** | **733.19** | **3,756.32** | **21,038.01** | **25,527.51** |

- FY24 greenhouse gas inventory (t CO2-e/year) data has been calculated based on the new Climate Active Carbon Inventory Version 9.1.

Myhealth greenhouse gas inventory (t CO2-e/year) data has been calculated from 5 January 2024 when Medibank increased investment from 49% to 90.1%. Due to the limitations on sourcing data we have included the following assumptions for Myhealth:

• Employee commute data has been modelled on Medibank retail employee commute data for total Myhealth employees

• Scope 2 purchased electricity has been modelled based on commercial building types and locations electricity consumption using the health facilities emissions factor provided by the Department of Climate Change, Energy, the Environment and Water

- Waste emissions methodology changed from last financial year
- Due to improved data collection some Medibank Scope 2 emissions were reclassified to Scope 3 category 13
- N/A categories were not included in accordance with the Climate Active Relevance Test Principles

Emissions reflected within Climate Active will be different when compared to the Medibank 2024 Sustainability report as Climate Active released new emissions factors in August 2024 and these factors have been used in this PDS.

## Uplift factors

N/A

# 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 |
|---|---|---|
| Australian Carbon Credit Units (ACCUs) | 2,751 | 10.78% |
| Verified Carbon Units (VCUs) | 11,277 | 44.18% |
| Verified Emissions Reductions (VERs) | 11,500 | 45.05% |

| Project name | Type of offset unit | Registry | Date retired | Serial number | Vintage | Stapled Quantity | 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 |
|---|---|---|---|---|---|---|---|---|---|---|---|
| Olkola Ajin – Olkola Fire Project | ACCU | ANREU | 06/09/2024 | 9,010,652,955 - 9,010,655,954 | 2023-24 | | 3,000 | 0 | 249 | 2,751 | 10.78% |

| | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|
| 300MW Wind Energy Project by Green Infra Wind Energy Limited Stapled with: Mount Sandy Conservation Project | ABU + VER | Gold Standard Impact | 25/10/2024 | GS1-1-IN-GS7468-12-2021-23421-173945-181944 | 2021 | 8,000 | 8,000 | 0 | 0 | 8,000 | 31.34% |
| Katingan Peatland Restoration and Conservation Project | VCU | Verra | 25/10/2024 | 12730-430700187-430708575-VCS-VCU-263-VER-ID-14-1477-01012020-31122020-0 | 2020 | | 8,389 | 0 | 0 | 8,389 | 32.86% |
| Katingan Peatland Restoration and Conservation Project | VCU | Verra | 25/10/2024 | 12730-430128537-430128647-VCS-VCU-263-VER-ID-14-1477-01012020-31122020-0 | 2020 | | 111 | 0 | 0 | 111 | 0.43% |
| SSE1 Solar PV 1 – 10 Power Plant Project | VER | Gold Standard Impact | 25/10/2024 | GS1-1-TH-GS4273-2-2021-27225-3660-7159 | 2021 | | 3,500 | 0 | 0 | 3,500 | 13.71% |
| Delta Blue Carbon – 1 | VCU | Verra | 25/10/2024 | 13916-537345492-537345800-VCS-VCU-466-VER-PK-14-2250-01012020-31122020-1 | 2020 | | 309 | 0 | 309 | 0 | 0% |

| | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|
| Delta Blue Carbon – 1 | VCU | Verra | 25/10/2024 | 13916-537325949-537325952-VCS-VCU-466-VER-PK-14-2250-01012020-31122020-1 | 2020 | 4 | 0 | 4 | 0 | 0% |
| Delta Blue Carbon – 1 | VCU | Verra | 25/10/2024 | 13916-537358622-537358853-VCS-VCU-466-VER-PK-14-2250-01012020-31122020-1 | 2020 | 232 | 0 | 232 | 0 | 0% |
| Delta Blue Carbon – 1 | VCU | Verra | 25/10/2024 | 13916-537324329-537324343-VCS-VCU-466-VER-PK-14-2250-01012020-31122020-1 | 2020 | 15 | 0 | 15 | 0 | 0% |
| Bundled Solar Photovoltaic Project By ACME | VCU | Verra | 15/11/2024 | 9031-62308881-62311657-VCS-VCU-997-VER-IN-1-1753-01012019-31122019-0 | 2019 | 2,777 | 0 | 0 | 2,777 | 10.88% |

## Offsets retirement approach

This certification has taken an in-arrears offsetting approach. The total emission to offset is 25,528 t CO2-e. The total number of eligible offsets used in this report is 25,528 of the total eligible offsets used, 0 were previously banked and 26,337 were newly purchased. 809 are remaining and have been banked for future use.

## Co-benefits

Our approach to carbon offsets focuses on investing in projects that closely align with the Medibank Sustainability Strategy. We have purchased carbon credits from the following projects and their associated co-benefits:

## Olkola Savannah Burning

The 'Olkola Ajin – Olkola Fire project' is an early dry season savanna burning project. Through fire management in the early dry season, the Olkola's project aims to reduce greenhouse gas emissions by avoiding the release of 70,000 tonnes (on average) of carbon dioxide per year that would otherwise occur due to larger, higher intensity late dry season fires.

The strategic burning activities are a cultural tradition amongst Indigenous populations of Northern Australia having been used for generations to manage the land. The Olkola's project has direct cultural, social, economic and environmental co-benefits including:

- Protection of cultural sites
- Olkola rangers receive education, training and jobs
- Mosaic burns lead to improved biodiversity outcomes

The income generated by ACCU sales is further used for the good of the Olkola community including:

- funding employment;
- increased access to country through the purchase of vehicles;
- purchase of infrastructure for ongoing development of a tourism business; and
- monitoring of the golden shouldered parrot – one of the Olkola's totem animals and an endangered species

## Mt Sandy

Located on the traditional lands of the Ngarrindjeri people, Traditional Custodians of the Coorong, Mount Sandy is a rare pocket of intact native vegetation in a region now dominated by farmlands. The 200-hectare project site features a unique mix of coastal shrublands and saline swamplands that provide strategic habitat for iconic native wildlife, such as the short-beaked echidna, purple-gaped honeyeater and elegant parrot. Over thousands of years, the Ngarrindjeri people have cared for Coorong country, developing an intimate connection to the land that sustains them. Project management itself is made possible through close collaboration with local Ngarrindjeri Elders, Clyde and Rose Rigney, who oversee the ongoing management and conservation of vegetation at the Mount Sandy site.

The Mount Sandy project ensures permanent protection for a regionally and culturally important pocket of biodiversity-rich land in partnership with its Traditional Owners. Local birds, animals and plants flourish undisturbed, while native plants for revegetation will be supplied by the local nursery at Raukkan Aboriginal Community, a self-governed Indigenous community 50 kilometres northwest of the project site. Raukkan community members are also employed for onsite works including vegetation monitoring and mapping, fencing, and pest and weed control.

Source: Mount Sandy Conservation - South Pole Projects

## Kutch Wind Power

By harnessing strong prevailing winds in the state of Gujarat, 143 carefully located wind turbines generate clean electricity for India's national grid. This helps to reduce the need for fossil-fuel-generated electricity and increase energy security in India. The project provides electricity to support India's growing economy, and also brings benefits, such as jobs and infrastructure, to the Kutch district in Gujarat.

Helping to reduce the need for coal-derived energy, the project effectively avoids emissions from being released into the atmosphere, helping to drive the transition towards a low-carbon economy. Thanks to the project, 73 employment opportunities have been created for local workers, both during the construction and operational phases of the wind farm. In addition to this, 92 training sessions have been held for these employees to date, helping to upskill the local workforce and future-proof the local economy.

Source: Kutch Wind Power

## Katingan Mentaya Peatland Restoration

The Katingan Project seeks to protect and restore 149,800 hectares of peatland ecosystems, in Borneo to offer local people sustainable sources of income, and to tackle global climate change – all based on a solid business model. The project area stores vast amounts of CO2, and plays a vital role in stabilizing water flows, preventing devastating peat fires, enriching soil nutrients and providing clean water. It is rich in biodiversity, being home to large populations of many high conservation value species, including some of the world's most endangered; such as the Bornean Orangutan (Pongo pygmaeus) and Proboscis Monkey (Nasalis larvatus). It is surrounded by villages for which it supports traditional livelihoods including farming, fishing, and non-timber forest products harvesting.

The Project's expected co-benefits include:

- Climate benefits - Average 7,451,846 tons of GHG emission reductions annually through avoided deforestation and forest degradation, prevention of peat drainage and fires - Ecological enhancement at the landscape scale through ecosystem restoration

- Community benefits - Improved quality of life and reduced poverty of the project-zone communities through a creation of sustainable livelihoods options and economic opportunities - Stronger community resilience through increased capacity to cope with socio-ecological risks - Enhanced ecosystem services for the overall well-being of the project-zone communities through ecosystem restoration

- Biodiversity benefits - Stabilized and healthy populations of faunal and floral species in the project zone by eliminating drivers of deforestation and forest degradation - Enhanced natural habitats and ecological integrity through ecosystem restoration

Source: Katingan Peatland Restoration and Conservation Project Verra

## Siam Solar

Thailand is one of the largest energy consumers in Southeast Asia and the region's second largest oil importer, with fossil fuels currently meeting around 80% of total energy demand. The Thai Government is looking to tackle national dependence on fossil fuels and help pioneer Southeast Asia's renewable energy sector.

Solar is poised to play a crucial role in Thailand’s clean energy transition. The Siam Solar Energy 1 project bundles 10 solar photovoltaic (PV) power plants across Kanchanaburi and Suphanburi Provinces in central Thailand. The solar PV systems are a cutting-edge, environmentally-sound technology with a capacity of approximately 10 MW per plant and deliver generated electricity to the grid.

This bundled project reduces Thailand’s reliance on imported energy and drives both national and regional economic growth. Aside from meeting the energy demands of regional Thai communities, the project improves local infrastructure and provides employment opportunities for local skilled and unskilled workers in manufacturing, installation, operation and maintenance of equipment.

Source: Siam Solar Power - A sustainable energy future in Southeast Asia

## Bundled Solar Photovoltaic Project By ACME

For many developing countries, switching from fossil fuels to renewables to generate electricity creates an additional economic challenge and it is often seen to detract from pressing development agendas. As a result, India's renewable potential is still largely untapped. Carbon finance provides the finance needed to kick-start clean energy projects, bringing a low-carbon world one step closer.

The Bundle of Solar project installs new grid-connected renewable solar energy power plants with a total AC capacity of the project activity is 1,107.50 MW. These power plants connect to India’s power grid to reduce the reliance on fossil fuels.

Not only does the energy generated by this project displace the electricity generated from thermal power stations feeding into India’s power grid, but it also replaces the need for diesel generators used to meet the power demand during shortage periods.

Source: Bundle of sun solar

# 7. RENEWABLE ENERGY CERTIFICATE (REC) SUMMARY

## Renewable Energy Certificate (REC) summary

N/A

# APPENDIX A: ADDITIONAL INFORMATION

## EcoAustralia – Mt Sandy + Kutch Wind Power

EcoAustralia is a stapled product that blends carbon credits with biodiversity protection. Each EcoAustralia credit consists of one Australian Biodiversity Unit, equal to 1.5m2 of government-accredited, permanently protected Australian vegetation, and 1 tCO2e of avoided emissions from a Gold Standard certified project.

Definition

**Net Zero** - Reducing Scope 1, 2 and 3 (excluding financed emissions associated with our investment portfolio) greenhouse gas emissions (or as otherwise stated in this PDS) to a residual level that is consistent with the Intergovernmental Panel on Climate Change recommendation of a 1.5°C warming scenario, with any residual emissions in the net zero target year (and thereafter) offset through the permanent removal and storage of carbon from the atmosphere.

Important Information

References to “Net Zero” and “Net Zero pathway” in this PDS, are based on Medibank Group’s business-as-usual operations in 2022 and do not account for any future partnership and investment activity or its investment portfolio.

This report contains forward-looking statements, including with respect to Medibank’s greenhouse gas emissions reduction commitments and Net Zero pathway. These statements are provided as a general guide only. They reflect expectations which involve risks, uncertainties and other factors which may be beyond Medibank’s control, many of which are described on page 95 of Medibank’s 2024 Sustainability Report. These factors may impact Medibank’s ability to meet climate-related and other commitments and targets expressed or implied in this PDS. Readers are cautioned not to place undue reliance on any forward-looking statements.

# 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**.

## 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 | 23,537 | 0 | 0% |
| **Total non-grid electricity** | **23,537** | **0** | **0%** |
| LGC Purchased and retired (kWh) (including PPAs) | 0 | 0 | 0% |
| GreenPower | 270,294 | 0 | 3% |
| Climate Active precinct/building (voluntary renewables) | 812,983 | 0 | 8% |
| Precinct/Building (LRET) | 199,416 | 0 | 2% |
| Jurisdictional renewables (LGCs surrendered) | 57,887 | 0 | 1% |
| Jurisdictional renewables (LRET) (applied to ACT grid electricity) | 14,618 | 0 | 0% |
| Large Scale Renewable Energy Target (applied to grid electricity only) | 1,781,712 | 0 | 17% |
| Residual Electricity | 7,524,125 | 6,846,954 | 0% |
| **Total renewable electricity (grid + non grid)** | **3,160,447** | **0** | **30%** |
| **Total grid electricity** | **10,661,035** | **6,846,954** | **29%** |
| **Total electricity (grid + non grid)** | **10,684,572** | **6,846,954** | **30%** |
| Percentage of residual electricity consumption under operational control | 62% | | |
| **Residual electricity consumption under operational control** | **4,670,238** | **4,249,916** | |
| Scope 2 | 4,157,025 | 3,782,893 | |
| Scope 3 (includes T&D emissions from consumption under operational control) | 513,213 | 467,024 | |
| **Residual electricity consumption not under operational control** | **2,853,887** | **2,597,038** | |
| Scope 3 | 2,853,887 | 2,597,038 | |

| | |
|---|---|
| **Total renewables (grid and non-grid)** | **29.58%** |
| **Mandatory** | **18.68%** |
| **Voluntary** | **10.68%** |
| **Behind the meter** | **0.22%** |
| **Residual scope 2 emissions (t $CO_2$-e)** | **3,782.89** |
| **Residual scope 3 emissions (t $CO_2$-e)** | **3,064.06** |
| **Scope 2 emissions liability (adjusted for already offset carbon neutral electricity) (t $CO_2$-e)** | **3,756.32** |
| **Scope 3 emissions liability (adjusted for already offset carbon neutral electricity) (t $CO_2$-e)** | **3,042.54** |
| **Total emissions liability (t $CO_2$-e)** | **6,798.85** |

*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** | **56%** | **(kWh)** | **Scope 2 Emissions ($kgCO_2$-e)** | **Scope 3 Emissions ($kgCO_2$-e)** | **(kWh)** | **Scope 3 Emissions ($kgCO_2$-e)** |
| ACT | 78,088 | 43,661 | 29,689 | 2,183 | 34,427 | 25,132 |
| NSW | 4,226,462 | 2,363,115 | 1,606,918 | 118,156 | 1,863,347 | 1,360,244 |
| SA | 163,943 | 91,664 | 22,916 | 7,333 | 72,278 | 23,852 |
| VIC | 4,192,432 | 2,344,088 | 1,851,829 | 164,086 | 1,848,344 | 1,589,576 |
| QLD | 1,687,370 | 943,448 | 688,717 | 141,517 | 743,922 | 654,651 |
| NT | 21,076 | 11,784 | 6,363 | 825 | 9,292 | 5,668 |
| WA | 184,507 | 103,162 | 54,676 | 4,126 | 81,345 | 46,367 |
| TAS | 107,158 | 59,915 | 7,190 | 599 | 47,243 | 6,142 |
| **Grid electricity (scope 2 and 3)** | **10,661,035** | **5,960,836** | **4,268,299** | **438,826** | **4,700,199** | **3,711,631** |
| ACT | 430 | 430 | 0 | 0 | | |
| NSW | 8,760 | 8,760 | 0 | 0 | | |
| SA | 688 | 688 | 0 | 0 | | |
| VIC | 8,865 | 8,865 | 0 | 0 | | |
| QLD | 3,365 | 3,365 | 0 | 0 | | |
| WA | 1,429 | 1,429 | 0 | 0 | | |
| **Non-grid electricity (behind the meter)** | **23,537** | **23,537** | **0** | **0** | | |
| **Total electricity (grid + non grid)** | **10,684,572** | | | | | |

| | |
|---|---|
| **Residual scope 2 emissions (t $CO_2$-e)** | **4,268.30** |
| **Residual scope 3 emissions (t $CO_2$-e)** | **4,150.46** |
| **Scope 2 emissions liability (adjusted for already offset carbon neutral electricity) (t $CO_2$-e)** | **3,803.29** |
| **Scope 3 emissions liability (adjusted for already offset carbon neutral electricity) (t $CO_2$-e)** | **3,709.96** |
| **Total emissions liability** | **7,513.25** |

## 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) |
|---|---|---|
| *Barangaroo & 644 George Street (World Square)* | **59,529** | **0** |
| *720 Bourke* | **985,435** | **0** |
| *GPT - 200 Karrinyup Road* | **10,592** | **0** |
| *GPT - 2 Hooker Boulevard & 123 Eagle Street* | **9,700** | **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) |
|---|---|---|
| *N/A* | **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 |
|---|---|
| Anaesthetic gases are immaterial. | Immaterial |
| Energy use from Allied health services performed on third-party sites (residential). | Immaterial |

## Data management plan for non-quantified sources

There are no non-quantified sources in the emission boundary that require a data management plan.

# 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.

| Emission sources tested for relevance | Size | Influence | Risk | Stakeholders | Outsourcing | Justification |
|---|---|---|---|---|---|---|
| Professional Services – Except for employee based professional services (memberships, education & periodicals) | Y | N | N | N | N | **Size:** The emissions source is material compared to the total emissions from electricity, stationary energy and fuel emissions.<br><br>**Influence:** While some professional services represent a significant portion of spend, Medibank has assessed these sources as having low potential for influence. These services are not under Medibank's operational control, limiting our ability to drive emissions reductions through supplier selection or process changes. As such, they have been excluded under the relevance test.<br><br>**Risk:** Medibank has determined that emissions associated with professional services are unlikely to contribute meaningfully to our greenhouse gas risk exposure as of FY24.<br><br>**Stakeholders:** Our stakeholders would not expect these to be included.<br><br>**Outsourcing:** These services are not under Medibank's operational control, limiting our ability to drive emissions reductions through supplier selection or process changes. As such, they have been excluded under the relevance test. However, as the data landscape evolves and we gain access to access to accurate emissions information, we will continue to reassess this category to ensure our approach remains aligned with best practice and emerging capabilities. |
| Investments | Y | N | N | N | N | **Size:** While the emissions source may appear material when compared to core sources such as electricity, stationary energy, and fuel, Medibank does not currently have access to reliable third-party data to accurately estimate emissions from this source. In the absence of robust activity data or emissions factors, we are unable to confidently assess the projected size of emissions. Therefore, this source has been excluded under the relevance test.<br><br>**Influence:** Medibank currently does not have access to reliable third-party data to assess emissions associated with our investment portfolio. As a result, we are unable to determine the emissions intensity of individual holdings or influence emissions outcomes through investment decisions in a meaningful way. Given this limited visibility and control, this source has been excluded under the relevance test.<br><br>**Risk:** Medibank does not currently consider emissions associated with investments to pose a material greenhouse gas risk. This is a developing area of climate disclosure, and methodologies for accurately measuring financed emissions are still evolving. As the market matures, Medibank plans to deepen its understanding of financed emissions and assess their relevance to future reporting.<br><br>**Stakeholders:** Medibank considers that stakeholders would not reasonably expect investment-related emissions to be included at this stage. The methodologies for measuring financed emissions are still under development and may not yield reliable results. However, Medibank is actively exploring ways to improve transparency and measurement of these emissions in future reporting periods. |

| Emission sources tested for relevance | Size | Influence | Risk | Stakeholders | Outsourcing | Justification |
|---|---|---|---|---|---|---|
| | | | | | | **Outsourcing:** Investment activities are managed externally and have not previously been included within Medibank's operational emissions boundary. This approach is consistent with industry practice, where comparable organisations typically exclude investment-related emissions from their Climate Active boundaries. Therefore, this source has been excluded under the relevance test. |
| Use of Sold Products | N | N | N | N | N | Medical supplies and services purchased by Medibank customers and covered under our insurance are considered indirect emissions and are therefore optional under the GHG Protocol. Given the complexity and variability of data accessibility, these emissions cannot be accurately measured and have been excluded under the relevance test.<br><br>**Size:** Medibank acknowledges that the use of sold products could be material in some business models; however, as a health insurer and service-based organisation, we do not sell physical products that generate downstream emissions. Accurately estimating emissions is currently not feasible, given the lack of reliable data and the complexity of individual health-related purchasing behaviours. As such, this source has been excluded under the relevance test.<br><br>**Influence:** Low ability to influence<br><br>**Risk:** Medibank has assessed that emissions associated with the use of sold products present a low risk exposure. As a health-focused organisation, Medibank does not sell physical products that generate downstream emissions. Our operations are primarily service-based, and therefore this emissions source is not material to our overall greenhouse gas profile. Accordingly, it has been excluded under the relevance test.<br>**Stakeholders:** Medibank has assessed that stakeholders would not reasonably expect this emissions source to be included in our current boundary.<br><br>**Outsourcing:** This activity has not previously been included within Medibank's emissions boundary and is managed externally without operational control. This approach is consistent with industry practice, as comparable organisations typically exclude similar outsourced activities from their Climate Active boundaries. Therefore, this source has been excluded under the relevance test. |

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