



PUBLIC DISCLOSURE STATEMENT

FELIX MOBILE

SERVICE CERTIFICATION

CY2024

Australian Government
Climate Active
Public Disclosure Statement



An Australian Government Initiative



NAME OF CERTIFIED ENTITY	TPG Telecom Limited – Trading as felix mobile
REPORTING PERIOD	1 January 2024 – 31 December 2024 arrears report
DECLARATION	<p><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></p>  <p>Ian Lilley Head of Sustainability 3rd February 2026</p>



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

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Version 9.1.



1. CERTIFICATION SUMMARY

TOTAL EMISSIONS OFFSET	753 tCO ₂ -e
CARBON OFFSETS USED	100% VERs
RENEWABLE ELECTRICITY	100%
CARBON ACCOUNT	Prepared by: South Pole
TECHNICAL ASSESSMENT	Not required for this year Next technical assessment due: CY 2026

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2. CERTIFICATION INFORMATION

Description of service certification

This Climate Active Service certification is for the business and customer support operations of felix mobile. This service includes all emissions that are non-attributable to felix mobile's Climate Active Carbon Neutral Product certification, but which are of relevance to the operations of felix, as defined through the Climate Active Relevance Test. The scope of this service includes the operation of head office in Sydney— including electricity consumption, natural gas consumption, diesel oil consumption, waste and water; working from home; Information and Telecommunication Technology ('ICT') services and equipment; business travel; employee commuting; third-party business services (e.g. consulting); advertising services; as well as the operations of retail stores (including electricity consumption and natural gas consumption) where felix mobile SIM cards are sold as a 'self-service'.

- Functional unit: One year of business and customer support services for one felix mobile customer.
- Offered as: full coverage service
- Life cycle: cradle-to-grave

The responsible entity for this service certification is TPG Telecom Limited, ABN 76096304620.

This Public Disclosure Statement includes information for CY2024 reporting period.

In the CY 2023 reporting period, retail store operations were considered non-attributable, as SIM cards were sold directly by felix mobile and not through supermarkets, petrol stations, or other retail locations. In CY 2024, this emission source has been quantified by including retail store operations (including electricity and natural gas consumption) within the reporting boundary.

During the CY 2023 reporting period, felix was headquartered in a Climate Active certified building at 177 Pacific Highway, North Sydney. As felix relocated from this building during CY 2023, emissions associated with this site are not applicable to the CY 2024 reporting period.

Description of business

felix mobile ('**felix**') is a digital mobile service provider, launched by TPG Telecom Limited ('**TPG Telecom**') (ABN 76096304620) in 2020, which offers mobile phone plans leveraging the TPG Telecom mobile network. felix exists as a business unit within TPG Telecom (ABN 76096304620) and is not a registered business with a unique ABN. As a result, certification as an 'Organisation' under the Climate Active Carbon Neutral Standard for Organisations was not possible.

felix has both a service and product Climate Active certification. The service certification is deemed to be the parent certification and as such, any shared emission sources between felix's product and service will be offset through the service certification only as per the Climate Active guidance on Emission boundary: Shared emissions.

The service certification covers all emissions associated with the administration and running of the felix business unit within TPG Telecom. The service is full coverage and includes the emissions from cradle-to-grave. Additionally, in 2024, felix SIM cards were also available for purchase at retail stores like Woolworths and Woolworths Metro, Coles, Big W and Officeworks as a 'self-service' from retail hooks.

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 'attributable processes' of a product or service. These attributable processes are services, materials and energy flows that become the product or service, make the product or service and carry the product or service through its life cycle. These attributable emissions have been quantified in the carbon inventory.

Non-quantified emissions have been assessed as attributable 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.

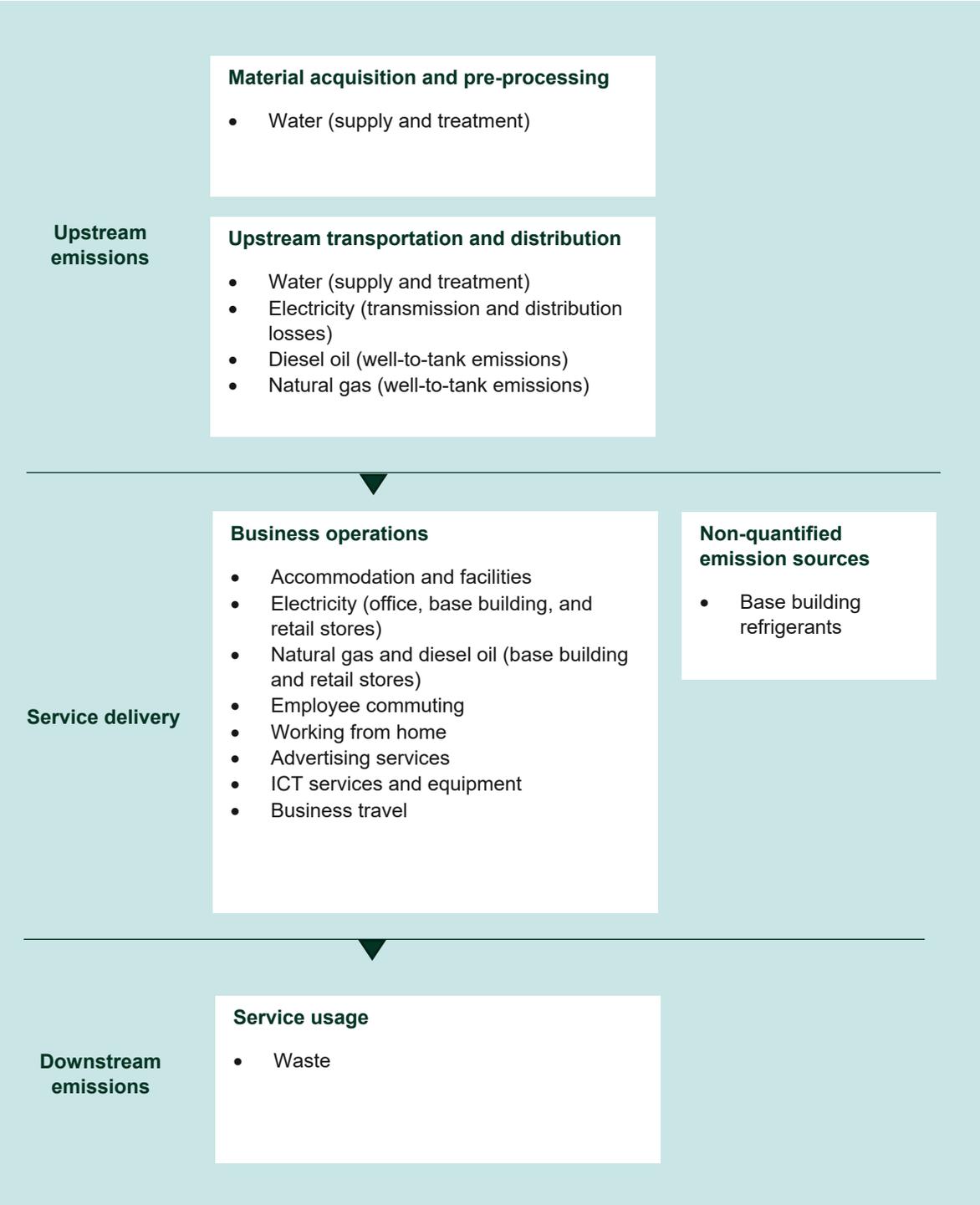
Outside the emissions boundary

Non-attributable emissions have been assessed as not attributable to a product or service. They can be **optionally included** in the emissions boundary and therefore have been offset, or they can be listed as outside of the emissions boundary (and are therefore not part of the carbon neutral claim). Further detail is available at Appendix D.

Inside emissions boundary		Outside emission boundary
<p><u>Quantified</u></p> <p>Accommodation and facilities</p> <p>Stationary energy (incl. well-to-tank emissions) – base building and retail stores.</p> <p>Electricity (incl. transmission and distribution losses) – office, base building and retail stores.</p> <p>Business travel</p> <p>Waste</p> <p>Water (supply and treatment)</p> <p>Working from home</p> <p>ICT services and equipment</p> <p>Business services</p> <p>Advertising services</p> <p>Employee commuting</p>	<p><u>Non-quantified</u></p> <p>Base building refrigerants</p>	<p><u>Non-attributable</u></p> <p>N/A</p>
	<p><u>Optionally included</u></p> <p>N/A</p>	

Service process diagram

Cradle-to-grave boundary



4. EMISSIONS REDUCTIONS

Emissions reduction strategy

At felix, sustainability is one of our key foundational values and we strive to operate our business in an environmentally friendly way. The felix service is provided using the TPG Telecom mobile network, and the construction, maintenance and operation of this mobile network accounts for the majority of greenhouse gas (GHG) emissions relating to the felix service.

As an operator and provider of critical communication services, TPG Telecom recognises the importance of supporting Australia’s net zero commitment by finding new and better ways to reduce the carbon footprint of its networks and supply chains.

TPG Telecom’s GHG emissions reduction targets, set at the end of 2022, were formally validated by the Science Based Target initiative (SBTi) in late October 2023. At the time of validation, TPG Telecom became the fourth company in the Oceania region and the first telco in Australia to have its long-term and net zero targets validated.

TPG Telecom targets	
We commit to reach net-zero GHG emissions across our value chain by 2050	
Near-Term Targets	
We commit to reduce absolute scope 1 and 2 GHG emissions 95% by 2030, from a 2021 base year.	We also commit to reduce absolute scope 3 GHG emissions* 30% by 2030, from a 2021 base year. *From purchased goods and services, fuel- and energy-related activities, upstream leased assets, and use of sold products
Long-Term Targets	
We commit to maintaining at least 95% absolute scope 1 and 2 GHG emissions reductions from 2030 through 2050, from a 2021 base year.	We commit to reduce absolute scope 3* GHG emissions 90% by 2050, from a 2021 base year. *From purchased goods and services, fuel- and energy-related activities, upstream leased assets, and use of sold products

Supporting TPG Telecom’s commitment to the Business Ambition for 1.5°C campaign, the SBTi classified its targets as aligned with the 1.5°C trajectory. This is the trajectory to limit global temperature increases to 1.5 degrees Celsius, required to avoid the worst effects of climate change. These targets are absolute reductions and will not be achieved through the purchase of carbon offsets. They require a genuine reduction in the amount of emissions released into the atmosphere.

Underpinning TPG Telecom's science-based targets are a set of emission reduction pathways which guide their achievement. TPG Telecom expects to achieve its scope 1 and 2 emissions reduction targets through its renewable electricity commitment. Powering its Australian operations with 100 per cent renewable electricity will reduce associated emissions to zero. As these emissions account for the vast majority of its scope 1 and 2 emissions footprint, maintaining its renewables commitment should allow TPG Telecom to meet or exceed its target of a 95 per cent reduction from its 2021 baseline.

TPG Telecom's renewable energy procurement strategy is focused on long-term power purchase agreements (PPAs) and Large-scale Generation Certificates (LGCs), aligned with our Energy Management Policy and dependent on availability and cost considerations. We will also continue to investigate increasing our on-site solar capacity where feasible.

In 2024, TPG Telecom entered into two renewable PPAs which, alongside top-up LGCs, supports the achievement of powering our operations with 50 per cent renewable electricity from 1 January 2025. The PPAs will provide renewable electricity to roughly 1,400 sites across Queensland, New South Wales, Australian Capital Territory and South Australia.

Scope 3 emissions are the most significant aspect of TPG Telecom's emissions profile, with the majority concentrated in two areas:

- Emissions from suppliers in the manufacture and delivery of goods and services it procures. These include the building and maintaining of its mobile and fixed networks, as well as devices it sells to customers.
- Emissions from customers using the products and services it provides.

Recognising the influence and impact suppliers have in both of these areas, TPG Telecom aims to achieve its scope 3 targets by working with suppliers to set and achieve their own emissions reduction targets.

In 2024, we received 67 responses from a survey sent to our top 150 suppliers which showed that:

- 60 per cent report on energy and emissions, with an additional 10 per cent expected within the next two years.
- 42 per cent have a renewable energy target, with an additional 15 per cent expected within the next two years.
- 51 per cent have emissions reduction targets (43 per cent are aligned to SBTi), with an additional 31 per cent expected within the next two years.

We will use these results to guide our engagement efforts with key suppliers going forward.

Maintaining strong engagement with suppliers is critical for TPG Telecom to meet its science-based targets. This helps identify activities it can influence and monitor performance towards meeting these targets.

For felix, the GHG emissions reduction targets will reduce our total emissions in a way that is aligned with the 1.5°C trajectory (as classified and validated by the SBTi). Our core differentiator is that every decision we make is focused on the customer and the impact on our planet. We are more than just talk, we take things seriously and that is why our service proposition for every customer who signs up is that we will plant a tree on their behalf for every month they remain connected. Through this business model, we have donated 3,199,902 million trees since launch in 2020, with a goal to donate 5 million trees by July 2026. Furthermore, 64% of our customers chose our eSIM option when signing up through our digital channels, though our goal is to increase this number up to 80% as device technology evolves and consumers move towards eSIM compatible devices.

Emissions reduction actions

felix continued our ambition to operate under 100% renewable energy by purchasing renewable energy certificates for our portion of electricity use within TPG Telecom. This includes purchasing renewable energy for our share of TPG Telecom office electricity and network electricity. Electricity is a major contributor to emissions for felix and by purchasing renewable energy for the office, felix was able to avoid 9.10 tCO₂-e for the office-based activities and 5,959.28 tCO₂-e from the network electricity (total of 5,968.38 tCO₂-e).

5. EMISSIONS SUMMARY

Emissions over time

Emissions since base year			
		Total tCO ₂ -e	Emissions intensity of the functional unit
Base Year:	FY 2018-19	55	0.0055
Year 1: (projected)	FY 2020-21	139	0.0055
Year 1: (true-up)	FY 2020 - 21	388	0.09
Year 2:	FY 2021 - 22	196	0.0048
Year 3:	CY 2022	126	0.0026
Year 4:	CY 2023	551	0.0071
Year 5:	CY 2024	753	0.0059

Significant changes in emissions

Significant changes in emissions			
Attributable process	Previous year emissions (t CO ₂ -e)	Current year emissions (t CO ₂ -e)	Reason for change
Computer and technical services activity (from ICT services and equipment category)	158.67	112.33	Activity data, i.e. spend has decreased between year 2023 and 2024
Advertising services	369.67	617.46	Activity data, i.e. spend has increased between year 2023 and 2024

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

N/A

Emissions summary

Emission source	tCO ₂ -e
Accommodation and facilities	0.21
Purchased electricity (including transmission and distribution losses and base building electricity)	0.09
ICT services and equipment	116.77
Business services	4.46
Stationary energy (gaseous fuel – natural gas)	0.16
Stationary fuels (liquid fuel – diesel oil)	0.01
Transport (land and sea) - taxi	3.24
Transport (air)	1.80
Waste	0.48
Water	0.01
Working from home	7.66
Advertising services	617.46
Attributable emissions (tCO₂-e)	752.36

Service offset liability	
Emissions intensity per functional unit	0.0059 tCO ₂ -e per one year of business and customer support services for one felix customer
Emissions intensity per functional unit including uplift factors	N/A
Number of functional units covered by the certification	127,103
Total emissions (tCO₂-e) to be offset	753*

* Figures may not sum due to rounding.

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 Emissions Reductions (VERs)	753	100%



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
Hoa Binh 1 Wind Power Project	VER	Gold Standard Impact Registry	20/05/2025	GS1-1-VN-GS10794-12-2022-27163-13416-20674	2022	7,259	6,506 ¹	0	753	100.00%
Offset Totals:						7,259	6,506	0	753	100.00%

¹ 6,506 credits were used for the CY2024 product certification for felix mobile



7. RENEWABLE ENERGY CERTIFICATE (REC) SUMMARY

Renewable Energy Certificate (REC) Summary

The following RECs have been surrendered to reduce electricity emissions under the market-based reporting method.

1. Large-scale Generation certificates (LGCs)*	10
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* LGCs in this table only include those surrendered voluntarily (including through PPA arrangements), and does not include those surrendered in relation to the LRET, GreenPower, and jurisdictional renewables.

Project supported by LGC purchase	Project location	Eligible unit type	Registry	Surrender date	Accreditation code	Certificate serial number	Generation year	Fuel source	Quantity (MWh)
Edenvale Solar Park	QLD, Australia	LGC	REC Registry	6 June 2025	SRPVQLW5	000025266-SRPVQLW5-2024-0159604 – 000025266-SRPVQLW5-2024-0166162	2024	Solar	6,559
Total LGCs surrendered this report and used in this report									10²

² 6,549 MWh were used for the CY2024 product certification for felix mobile

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**.

Market-based approach summary			
Market-based approach	Activity Data (kWh)	Emissions (kgCO ₂ -e)	Renewable percentage of total
Behind the meter consumption of electricity generated	0	0	0%
Total non-grid electricity	0	0	0%
LGC Purchased and retired (kWh) (including PPAs)	10,000	0	82%
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)	0	0	0%
Jurisdictional renewables (LRET) (applied to ACT grid electricity)	0	0	0%
Large Scale Renewable Energy Target (applied to grid electricity only)	2,267	0	18%
Residual Electricity	0	0	0%
Total renewable electricity (grid + non grid)	12,267	0	100%
Total grid electricity	12,267	0	100%
Total electricity (grid + non grid)	12,267	0	100%
Percentage of residual electricity consumption under operational control	100%		
Residual electricity consumption under operational control	0	0	
Scope 2	0	0	
Scope 3 (includes T&D emissions from consumption under operational control)	0	0	
Residual electricity consumption not under operational control	0	0	
Scope 3	0	0	

Total renewables (grid and non-grid)	100.00%
Mandatory	18.48%
Voluntary	81.52%
Behind the meter	0.00%
Residual scope 2 emissions (t CO₂-e)	0.00
Residual scope 3 emissions (t CO₂-e)	0.00
Scope 2 emissions liability (adjusted for already offset carbon neutral electricity) (t CO₂-e)	0.00
Scope 3 emissions liability (adjusted for already offset carbon neutral electricity) (t CO₂-e)	0.00
Total emissions liability (t CO₂-e)	0.00

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	0	0	0	0	0	0
NSW	12,267	12,267	8,342	613	0	0
SA	0	0	0	0	0	0
VIC	0	0	0	0	0	0
QLD	0	0	0	0	0	0
NT	0	0	0	0	0	0
WA	0	0	0	0	0	0
TAS	0	0	0	0	0	0
Grid electricity (scope 2 and 3)	12,267	12,267	8,342	613	0	0
ACT	0	0	0	0		
NSW	0	0	0	0		
SA	0	0	0	0		
VIC	0	0	0	0		
QLD	0	0	0	0		
NT	0	0	0	0		
WA	0	0	0	0		
TAS	0	0	0	0		
Non-grid electricity (behind the meter)	0	0	0	0		
Total electricity (grid + non grid)	12,267					

Residual scope 2 emissions (t CO₂-e)	8.34
Residual scope 3 emissions (t CO₂-e)	0.61
Scope 2 emissions liability (adjusted for already offset carbon neutral electricity) (t CO₂-e)	8.34
Scope 3 emissions liability (adjusted for already offset carbon neutral electricity) (t CO₂-e)	0.61
Total emissions liability	8.95

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)
N/A	0	0
<p><i>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.</i></p>		

Climate Active carbon neutral electricity products

Climate Active carbon neutral product used	Electricity claimed from Climate Active electricity products (kWh)	Emissions (kg CO ₂ -e)
N/A	0	0
<p><i>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.</i></p>		

APPENDIX C: INSIDE EMISSIONS BOUNDARY

Non-quantified emission sources

The following emissions sources have been assessed as attributable, are captured within the emissions boundary, but are not measured (quantified) in the carbon inventory. These emissions are accounted for through an uplift factor. 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
Base building refrigerants	Emissions for refrigerants are deemed to be immaterial based on the size of the carbon account and small potential leakage rates from refrigeration in shared office spaces. Due to the immateriality, no uplift is applied.

Data management plan for non-quantified sources

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

Excluded emission sources

Attributable emissions sources can be excluded from the carbon inventory, but still considered as part of the emissions boundary if they meet **all three of the below criteria**. An uplift factor may not necessarily be applied.

1. A data gap exists because primary or secondary data cannot be collected (**no actual data**).
2. Extrapolated and proxy data cannot be determined to fill the data gap (**no projected data**).
3. An estimation determines the emissions from the process to be **immaterial**.

Emissions Source	No actual data	No projected data	Immaterial	Justification
N/A				

APPENDIX D: OUTSIDE EMISSION BOUNDARY

Non-attributable emissions have been assessed as not attributable to a product or service (do not carry, make or become the product/service) and are therefore not part of the carbon neutral claim. To be deemed attributable, an emission must meet two of the five relevance criteria. Emissions which only meet one condition of the relevance test can be assessed as non-attributable and therefore are outside the carbon neutral claim. Non-attributable emissions are detailed below.

1. **Size** The emissions from a particular source are likely to be large relative to other attributable emissions.
2. **Influence** The responsible entity could influence emissions reduction from a particular source.
3. **Risk** The emissions from a particular source contribute to the responsible entity's greenhouse gas risk exposure.
4. **Stakeholders** The emissions from a particular source are deemed relevant by key stakeholders.
5. **Outsourcing** The emissions are from outsourced activities that were previously undertaken by the responsible entity or from outsourced activities that are typically undertaken within the boundary for comparable products or services.

Non-attributable emissions sources summary

N/A



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