



PUBLIC DISCLOSURE STATEMENT

COMMONWEALTH BANK OF AUSTRALIA

ORGANISATION CERTIFICATION

FY2024–25

Australian Government
Climate Active
Public Disclosure Statement



NAME OF CERTIFIED ENTITY	COMMONWEALTH BANK OF AUSTRALIA
REPORTING PERIOD	1 July 2024 – 30 June 2025 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><i>Jennifer A Saiz</i></p> <p>Jennifer Saiz Executive General Manager, Group Corporate Services 9 June 2026</p>



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

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Version 10.



1. CERTIFICATION SUMMARY

TOTAL EMISSIONS OFFSET	58,500 tCO ₂ -e
CARBON OFFSETS USED	100% ACCUs
RENEWABLE ELECTRICITY	97.29% ^{1,2}
CARBON ACCOUNT	Prepared by: ERM Australia Sustainability Pty Ltd
TECHNICAL ASSESSMENT	December 2023 Jessica Antunes ERM Australia Sustainability Pty Ltd Next technical assessment due: FY 2026

Contents

1. Certification summary.....	3
2. Certification information.....	4
3. Emissions boundary.....	6
4. Emissions reductions.....	9
5. Emissions summary.....	13
6. Carbon offsets.....	18
7. Renewable Energy Certificate (REC) Summary.....	23
Appendix A: Additional Information.....	26
Appendix B: Electricity summary.....	33
Appendix C: Inside emissions boundary.....	40
Appendix D: Outside emissions boundary.....	41

¹ Percentage relates to Australian electricity use, including Base Building electricity outside of CBA's operational control.

² CBA has retired large-scale generation certificates (LGCs) against all electricity consumption in Australia, and local renewable certificates for all international electricity consumption under CBA's operational control, consistent with the GHG Protocol guidance. Where local energy attribute certificates are considered ineligible by Climate Active, additional Australian Carbon Credit Units (ACCUs) were purchased to offset these emissions.

2. CERTIFICATION INFORMATION

Description of organisation certification

This organisation certification is for the business operations Commonwealth Bank of Australia, ABN 48 123 123 124 including the subsidiaries listed in the table below.

This Public Disclosure Statement (PDS) presents our FY25 emissions inventory that covers the Australian business operations of Commonwealth Bank of Australia, as well as our operations in India and 'other overseas' offices located in Asia, Europe, and North America.

This Public Disclosure Statement includes information for FY25 reporting period.

Organisation description

The Commonwealth Bank of Australia (ABN 48 123 123 124) is Australia's largest bank serving more than 18 million customers. We provide retail and commercial banking services predominantly in Australia and in New Zealand through our subsidiary, ASB. Our products and services are provided through our businesses: Retail Banking Services, Business Banking, Institutional Banking and Markets, and our New Zealand subsidiary, ASB. While these businesses and their associated emissions are included within the scope of this certification, the certification does not extend to products and services themselves.

Our subsidiary, ASB New Zealand, is certified Net Carbon Zero through Toitū Envirocare, and has been certified since 2019.

We set our organisational boundary and measure our operational emissions with reference to the GHG Protocol Corporate Standard, accounting for the operations, facilities and subsidiaries owned or controlled by the Group. We take an operational control approach to establish our boundary for reporting our operational emissions inventory. We have extended our boundary to include selected Scope 3 emissions sources beyond our operational control that occur as part of the Group's value chain activities and where reliable data is available. The operational control boundary encompasses our Australia-based operations, including Bankwest (ABN 48 123 123 124), and includes commercial, retail and residential properties, data centres, ATMs and our company fleet. We have extended our boundary to include selected Scope 3 emissions sources beyond our operational control, such as the base buildings of our commercial sites, business travel activities, employees working from home, employee commuting, paper and courier services used by the Bank.

The following subsidiary is also included within CBA's Australian operational boundary for this certification:

Legal entity name	ABN	ACN
Bankwest	48 123 123 124	

For this carbon neutral certification, we are also including our India and "other overseas" operations located in Asia, Europe, and North America.

Financed emissions are not included within our inventory boundary as our carbon neutral assessment is limited to CBA's operations. This is in line with the approach taken by major Australian Banks in their most recent Climate Active certifications. However, we recognise the importance of measuring our financed emissions and supporting our customers to reduce their emissions through our overall approach to climate change. Our [2025 Annual Report](#) outlines our approach to supporting Australia's transition to a net zero economy by 2050 and demonstrates our progress, including further information on our financed emissions.

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**.

Emission sources included in this certification are for our Australia-based operations (CBA and Bankwest). Emissions for our India and 'other overseas' operations based in Asia, Europe and North America are **optionally included**. Further details on the methodology used to calculate international emissions are available in Appendix A.

Uplift factors are not applicable to our FY25 carbon inventory. Emissions associated with waste or retail sites are based on a scaling approach, using the relative floor area (m² net lettable area - NLA) of our commercial sites. Emissions associated with water for retail sites where consumption is not metred is based on an average kL consumption per m² NLA for retail branches that provide metred data. This is an estimation method based on extrapolation, rather than an overall uplift factor.

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.

The following emission sources have been excluded in line with the provisions of the Climate Active Carbon Neutral Standard for Organisations. The exclusions are based on our organisational boundary, aligning with our peers, data limitations, materiality considerations and/or the fact that we have limited potential to influence the reduction of these scope 3 emissions from a particular source.

- **Other purchased goods and services:** Other than emissions from the production and distribution of our annual report, our Annual General Meeting and the use of copy paper, we currently exclude emissions associated with purchased goods and services from our organisational boundary due to data limitations. We will continue to focus on quantifying our Scope 3 emissions in line with new mandatory climate reporting requirements by working with suppliers to better measure these emissions.
- **Capital goods:** While CBA recognises there are embedded emissions associated with capital goods, emissions associated with capital expenditure have been excluded from our organisational boundary. We will continue to focus on quantifying our Scope 3 emissions in line with new mandatory climate reporting requirements.
- **Retail sites base building:** Base building emissions associated with our commercial sites (offices) have been quantified and included in the inventory. However, emissions associated with our base building energy use at retail sites have been excluded due to the difficulty of obtaining data (portfolio with large numbers of sites), immaterial contribution of this emission source, and our limited ability to influence emissions reductions (being minor tenant in large building such as shopping centres).

Inside emissions boundary		Outside emission boundary
<p><u>Quantified</u></p> <ul style="list-style-type: none"> • Accommodation • Air transport • Land and sea transport (taxis, car hire, business use of private vehicles and own vehicles): diesel, LPG, petrol and ethanol • Electricity consumption - Australia (market-based) • Electricity at international offices (Asia, Europe, and North America) (market-based) • Office equipment and supplies: paper • Professional services – annual report production and distribution • Refrigerants • Stationary energy: diesel, natural gas • Working from home • Employee commuting • Water: commercial, retail and data centre • Waste: (municipal waste and not recycled): commercial, retail and data centre 	<p><u>Non-quantified</u></p> <p>N/A</p>	<p><u>Excluded</u></p> <p>Other purchased goods and services</p> <p>Capital expenditure</p> <p>Base building retail sites</p>

Note: Financed emissions are not included within the scope of our carbon neutral assessment, as the inventory boundary is limited to CBA's operations.

1 See Appendix A for details on International Scope 3 emissions for CBA's overseas locations.

4. EMISSIONS REDUCTIONS

Emissions reduction strategy

CBA is committed to supporting Australia’s transition to net zero emissions by 2050, in line with the goals of the Paris Agreement. Our strategy to reduce operational emissions, following the emission reduction hierarchy outlined in section 2.4 the Climate Active Neutral Standard for Organisations, focuses on the following:

- Energy Efficiency:** We maintain a minimum weighted average of 4.5 Star NABERS Energy – Office Tenancies rating for our main commercial spaces and design new retail branches to a minimum 5 Star Green Star rating standard where possible. We continue to consolidate our property portfolio into energy-efficient precincts and buildings where feasible.
- Sourcing Renewable Electricity:** We aim to source renewable electricity equivalent to 100% of our global electricity needs by 2030. In Australia, we have retired large-scale generation certificates (LGCs) against all electricity consumption, and for our international offices, we have secured local renewable certificates. Where local certificates are not eligible for Climate Active certification, we purchase additional Australian Carbon Credit Units (ACCUs) to offset these emissions.
- Operational Emissions Targets:** We have set clear reduction targets for our operational emissions:

	Scope 1 & 2 operational emissions	Scope 3 Operational emissions
Targets	2020 Baseline: 19,282tCO ₂ -e Reduction by 21% by 2025 Reduction by 75% by 2030	2020 Baseline: 34,939 tCO ₂ -e Reduction by 16.3% by 2025
Progress	Since 2020, we have reduced Scope 1 and 2 emissions by 72% from our 2020 baseline, exceeding our 2025 target of a 21% reduction.	Since 2020, we have reduced Scope 3 emissions within the target by 36% from our 2020 baseline, meeting our 2025 target of a 16.3% reduction.

This year we completed an evaluation of our operational emissions strategy as part of our five-year review cycle. The review considered our Scope 1 and 2, and Scope 3 reduction targets, boundaries and inventories, and incoming new mandatory climate reporting requirements.

Given the significant progress in executing our reduction strategies for Scope 1 and 2, we are increasing our reduction target from 42% to 75% by 2030 against our 2020 baseline. We are also able to expand our Scope 1 and 2 target coverage from 2026 onwards as we now have better data for our other overseas offices, including India.



We have also made several changes to improve how we measure, manage and represent Scope 3 operational emission sources, particularly those associated with our supply chain. Where we do not currently have activity data available, we are developing spend-based estimates. We have conservatively estimated our expanded footprint as an increase of approximately 600% from our reported 2024 operational emissions. As our current Scope 3 target accounts for only 13% of our expanded estimated emissions, the existing Scope 3 target is no longer meaningful in its present form. Accordingly, we will reassess this target and focus on more accurately quantifying our Scope 3 operational emissions in line with new mandatory climate reporting requirements in 2026.

Full detail of our targets and progress are disclosed in our [2025 Annual Report](#).

Emissions reduction actions

We implement a range of initiatives to reduce our operational emissions, as outlined below:

1. Emission Avoidance:

- **Fleet Transition:** our Australian and New Zealand businesses have reduced fleet emissions by 57% since 2020, primarily through the transition of our fleet to hybrids and EVs. Continued transition of our fleet to hybrids and EVs provides the greatest opportunity for ongoing reductions.
- **Air Travel:** Our Australian business monitors business travel and tracks actual emissions against internal carbon budgets to balance the demand for business-critical travel while focusing on meeting our Scope 3 target.

2. Emission Reductions:

- **Energy Efficiency Initiatives:** We have upgraded LED lighting, HVAC equipment, building controls, and electricity metering, and rolled out smart sensors across our sites.
- For commercial buildings, we have adjusted temperature set points and installed more energy-efficient air conditioning units for all Main Computer Rooms (MCRs) and Floor Computer Rooms (FCRs) since July 2024. Additionally, a lifecycle asset management program has been implemented to install more energy-efficient Computer Room Air Conditioners (CRACs) and Packaged Air Conditioners (PAC) units.
- **Retail HVAC systems:** A lifecycle asset management program is in place to install more energy-efficient HVAC systems for our retail sites using inverter technology that adjusts to specific load requirements. A building management platform has been introduced to remotely adjust HVAC equipment operating schedules, such as turning off equipment during public holidays.
- **Water Reduction:** We have integrated with water meters to remotely monitor consumption at owned retail sites and there are plans to integrate with water meters at leased sites.

- **Waste Reductions:** As part of our ongoing efforts to reduce waste to landfill, we trialled reusable coffee cups, expanded the roll out of coffee cup sorting stations, upgraded our waste infrastructure and signage, and introduced a dry waste stream into our Sydney commercial offices this year.
- **Freight Optimisation:** We continue to see benefits from optimising our freight demand and partnering with a supplier with a growing EV delivery fleet, reducing freight-related Scope 3 emissions by an additional 29% this year.

3. Renewable Energy:

- **Onsite Solar Program:** Since installation began in 2015, we have installed a total capacity of 2.46 MW across 105 branches and business centres, and one data centre, meeting our 2025 target.
- **Renewable Electricity Procurement:** Our Australian operations have sourced the equivalent of 100% renewable electricity since January 2020. In 2021, we extended this to our other overseas operations. In Australia, we procure large generation certificates (LGCs) through a power purchasing agreement with a windfarm in New South Wales, along with retail contracts in other states, including nominated renewable electricity sources for the remaining LGCs. Energy attribute certificates have also been secured locally for the consumption of electricity across international operations in compliance with RE100 guidelines. Where local energy attribute certificates are considered ineligible by Climate Active, additional Australian Carbon Credit Units (ACCU) were purchased to offset these emissions.

4. Use of low-emission alternatives:

- **Embodied Carbon:** We measure the impact of our offices via major projects aiming to achieve lower embodied carbon compared to previous comparable buildings in our portfolio. This year we completed the Bankwest Place refurbishment in Perth, achieving a 42% reduction in embodied carbon. This is compared to the estimated emissions for a typical fitout with conventional material selections.
- **ATM refresh project:** Our three-year project, covering approximately 1,700 ATMs, is implementing a modular construction system using lower-carbon, natural and renewable materials. A circular design approach is being taken, facilitating efficient installation and easy disassembly for repairs and reuse.
- **Container branch design:** Designed to support communities after natural disasters, our container branch considers sustainable design principles. The container itself has been reused, and approximately 70% of its interior is fitted with lower-carbon and circular materials, such as wall linings made from upcycled packaging, recycled plastic acoustic panelling and furniture, as well as lower-carbon carpet and joinery panels.

5. Supporting climate action beyond our value chain

- **ACCUs:** This year CBA signed several multi-year agreements supporting improved social, cultural and environmental impacts through projects within the ACCU scheme. Our portfolio focuses on projects supporting Australia's Indigenous communities and aligns with our Reconciliation Action Plan.
- **Sustainable Aviation Fuel (SAF):** Given air travel emissions are particularly hard to reduce, CBA has also been part of the Qantas SAF coalition for the past two years. The coalition aims to support the scaling of the SAF industry to reduce aviation emissions. During the year we increased our level of participation to become a 'partner', which contributes to the airline's incremental cost of purchasing SAF. The use of SAF purchased through CBA's partnership would be equivalent to avoiding 1,000 tCO₂-e of CBA's air travel emissions.

5. EMISSIONS SUMMARY

Emissions over time

Emissions in FY25 have decreased by 8,011 tCO₂-e compared to FY24. The reduction is primarily attributed to a decrease in the emission factors for flights that reduced the total emissions for business travel. Additionally, courier emissions have declined, as the FY24 reporting period included emissions from both FY23 and FY24, resulting in a temporary inflation of figures in the previous year.

Emissions since base year		
	Total tCO ₂ -e (without uplift)	Total tCO ₂ -e (with uplift)
Base Year: 2018-19	142,361	142,361
Year 1: 2019-20	35,530	35,530
Year 2: 2020-21	27,512	27,512
Year 3: 2021-22	30,084	30,084
Year 4: 2022-23	58,927	58,927
Year 5: 2023-24	66,511	66,511
Year 6: 2024-25	58,500	58,500

Significant changes in emissions

The table below shows all individual emissions source that have significant change compared to FY24 emissions.

Significant changes in emissions			
Emission source	Previous year emissions (t CO ₂ -e)	Current year emissions (t CO ₂ -e)	Reason for change
Flight emissions	24,396.82	16,852.48	New bespoke line - calculated separately using DEFRA/DESNZ factors for CBA's sustainability report, which was due before the release of Climate Active template. These factors updated in 2025 provide a more accurate representation of the emissions intensity of CBA air travel. Overall, flight emissions decreased compared to FY24 as the emission factors have decreased this year.
Employee commuting	17,909.95	18,788.53	New bespoke line - calculated separately using DEFRA/DESNZ factors for CBA's sustainability report, which was due before the release of Climate Active template. CBA is now using a customised calculator for employee commuting that more accurately calculates their data and uses the most up to date emission factors. Overall, employee commute emission has only increased by 878.58 t CO ₂ -e.
Working from home	7,431.75	8,133.27	New bespoke line - calculated separately using NGER electricity factors for CBA's sustainability report, which was due before the release of Climate Active template. Overall, work from home emission has only increased by 701.52 t CO ₂ -e.

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

Some base buildings where CBA is a tenant are either certified as a Carbon Neutral Building or included in the building owner's Organisation Certification in FY25.

Certified brand name	Product/Service/Building/Precinct used
Lendlease	1 and 11 Harbour St, Sydney NSW 2000
Lendlease	COMMONWEALTH BANK SQUARE (35 Tumbalong Boulevard, Sydney NSW 2000)

Emissions summary

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

	Sum of Scope 1 emissions (tCO2-e)	Sum of Scope 2 emissions (tCO2-e)	Sum of Scope 3 emissions (tCO2-e)	Sum of Total emissions (tCO2-e)
Accommodation and facilities	0.00	0.00	1,575.50	1,575.50
Climate Active carbon neutral products and services	0.00	0.00	0.00	0.00
Domestic electricity (market-based) ¹	0.00	0.00	2,422.34	2,422.34
Food	0.00	0.00	0.00	0.00
Horticulture and agriculture	0.00	0.00	0.00	0.00
ICT services and equipment	0.00	0.00	0.80	0.80
International Electricity ²	0.00	122.85	72.45	195.30
Office equipment and supplies	0.00	0.00	737.33	737.33
Postage, courier and freight	0.00	0.00	1,367.18	1,367.18
Products	0.00	0.00	0.00	0.00
Professional services	0.00	0.00	65.90	65.90
Refrigerants	1,253.48	0.00	0.00	1,253.48
Stationary combustion	8.97	0.00	0.00	8.97
Stationary energy (gaseous fuels)	62.91	0.00	597.59	660.51
Stationary energy (liquid fuels)	190.35	0.00	46.91	237.26
Stationary energy (solid fuels)	0.00	0.00	0.00	0.00
Transport (air)	0.00	0.00	16,852.48	16,852.48
Transport (land and sea)	3,163.85	0.00	20,213.73	23,377.58
Waste	0.00	0.00	1,243.05	1,243.05
Water	0.00	0.00	368.15	368.15
Working from home	0.00	0.00	8,133.27	8,133.27
Grand Total	4,679.55	122.85	53,696.69	58,499.09

11,285 LGCs were surrendered and 3,690,263 kWh (adjusted for RPP) of GreenPower purchased for base building use on behalf of CBA. Refer to Appendix B for further details.

² For USA and Japan, local types of renewable energy certificates (RECs and NFCs) were available, and therefore prioritised over iRECs, consistent with the GHG Protocol guidance². Since Climate Active only accredits iRECs, GO and REGOs, additional ACCUs were procured to offset electricity used in USA and Japan under Climate Active certification. See Appendix A.

² [GHG Protocol scope 2 guidance](#), table 7.1, item 5.

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.

Calculation of emissions for this organisation certification did not use any uplift factor.

Reason for uplift factor	tCO ₂ -e
	N/A
Total of all uplift factors (tCO ₂ -e)	
Total emissions footprint to offset (tCO₂-e) <i>(total emissions from summary table + total of all uplift factors)</i>	58,499.87

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 (ACCU)		58,500		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
Wunambal Gaambera Unguu Fire Project – EOP100641	KACCU	ANREU	4/09/2024	8,370,658,855 - 8,370,663,711	2022-2023	4,857	1,072	0	3,785	6.47%
Dambimangari Fire Project - EOP100647	KACCU	ANREU	12/06/2025	8,378,919,669 - 8,378,934,063	2022-2023	14,395	0	0	14,395	24.61%
Wilinggin Fire Project - EOP100642	KACCU	ANREU	12/06/2025	8,995,592,303 - 8,995,606,696	2023-2024	14,394	0	0	14,394	24.61%
Wunambal Gaambera Unguu Fire Project - EOP100641	KACCU	ANREU	12/06/2025	9,012,474,430 - 9,012,488,824	2023-2024	14,395	0	0	14,395	24.61%
Northern Savanna Project – ERF104944	KACCU	ANREU	12/06/2025	9,013,651,717 - 9,013,664,747	2024-2025	13,031	0	1,500	11,531	19.70%
						61,072	1,072	1,500	58,500	



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6 September 2024

VC202425-00555

To whom it may concern,

Voluntary cancellation of units in ANREU

This letter is confirmation of the voluntary cancellation of units in the Australian National Registry of Emissions Units (ANREU) by ANREU account holder, Wanjina-Wunggurr (Native Title) Aboriginal Corporation RNTBC (account number AU-2466).

The details of the cancellation are as follows:

Date of transaction	4 September 2024
Transaction ID	AU35763
Type of units	KACCU
Total Number of units	4,857
Serial number range	8,370,658,855 - 8,370,663,711
ERF Project	Wunambal Gaambera Unguu Fire Project – EOP100641
Vintage	2022-23

Details of all voluntary cancellations in the ANREU are published on the Clean Energy Regulator’s website, [Voluntary cancellations register | Clean Energy Regulator \(cer.gov.au\)](#).

If you require additional information about the above transaction, please email CER-RegistryContact@cer.gov.au

Yours sincerely,



David O'Toole
ANREU and International
NGER and Safeguard Branch
Scheme Operations Division

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05 August 2025

VC202526-00804

To whom it may concern,

Voluntary cancellation of units in ANREU

This letter is confirmation of the voluntary cancellation of units in the Australian National Registry of Emissions Units (ANREU) by ANREU account holder, Wanjina-Wunggurr (Native Title) Aboriginal Corporation RNTBC (account number AU-2416).

The details of the cancellation are as follows:

Date of transaction	12 June 2025
Transaction ID	AU41968
Type of units	KACCU
Total Number of units	14,395
Serial number range	8,378,919,669 - 8,378,934,063
ERF Project	Dambimangari Fire Project – EOP100647
Vintage	2022-23
Transaction comment	Retired on behalf of Commonwealth Bank

Details of all voluntary cancellations in the ANREU are published on the Clean Energy Regulator’s website, [Voluntary cancellations register | Clean Energy Regulator \(cer.gov.au\)](#).

If you require additional information about the above transaction, please email CER-RegistryContact@cer.gov.au

Yours sincerely



David O'Toole
ANREU and International
NGER and Safeguard Branch
Scheme Operations Division



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05 August 2025

VC202526-00803

To whom it may concern,

Voluntary cancellation of units in ANREU

This letter is confirmation of the voluntary cancellation of units in the Australian National Registry of Emissions Units (ANREU) by ANREU account holder, Wanjina-Wunggurr (Native Title) Aboriginal Corporation RNTBC (account number AU-2467).

The details of the cancellation are as follows:

Date of transaction	12 June 2025
Transaction ID	AU41970
Type of units	KACCU
Total Number of units	14,394
Serial number range	8,995,592,303 - 8,995,606,696
ERF Project	Wilinggin Fire Project – EOP100642
Vintage	2023-24
Transaction comment	Retired on behalf of Commonwealth Bank

Details of all voluntary cancellations in the ANREU are published on the Clean Energy Regulator’s website, [Voluntary cancellations register | Clean Energy Regulator \(cer.gov.au\)](#).

If you require additional information about the above transaction, please email CER-RegistryContact@cer.gov.au

Yours sincerely

David O’Toole
ANREU and International
NGER and Safeguard Branch
Scheme Operations Division



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05 August 2025

VC202526-00805

To whom it may concern,

Voluntary cancellation of units in ANREU

This letter is confirmation of the voluntary cancellation of units in the Australian National Registry of Emissions Units (ANREU) by ANREU account holder, Wanjina-Wunggurr (Native Title) Aboriginal Corporation RNTBC (account number AU-2466).

The details of the cancellation are as follows:

Date of transaction	12 June 2025
Transaction ID	AU41972
Type of units	KACCU
Total Number of units	14,395
Serial number range	9,012,474,430 - 9,012,488,824
ERF Project	Wunambal Gaambera Uunguu Fire Project – EOP100641
Vintage	2023-24
Transaction comment	Retired on behalf of Commonwealth Bank

Details of all voluntary cancellations in the ANREU are published on the Clean Energy Regulator’s website, [Voluntary cancellations register | Clean Energy Regulator \(cer.gov.au\)](#).

If you require additional information about the above transaction, please email CER-RegistryContact@cer.gov.au

Yours sincerely

David O’Toole
ANREU and International
NGER and Safeguard Branch
Scheme Operations Division



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15 September 2025

VC202526-00880

To whom it may concern,

Voluntary cancellation of units in ANREU

This letter is confirmation of the voluntary cancellation of units in the Australian National Registry of Emissions Units (ANREU) by ANREU account holder, GONDWANA CARBON PTY LTD (account number AU-3687).

The details of the cancellation are as follows:

Date of transaction		12 June 2025
Transaction ID		AU41979
Type of units		KACCU
Total Number of units		13,031
Block 1	Serial number range	9,013,651,717 - 9,013,656,618 (4,902 KACCUs)
	ERF Project	Northern Savanna Project – ERF104944
	Vintage	2024-25
Block 2	Serial number range	9,013,656,619 - 9,013,664,747 (8,129 KACCUs)
	ERF Project	Northern Savanna Project – ERF104944
	Vintage	2024-25
Transaction comment		Retired on behalf of Commonwealth Bank

Details of all voluntary cancellations in the ANREU are published on the Clean Energy Regulator’s website, [Voluntary cancellations register | Clean Energy Regulator \(cer.gov.au\)](#).

If you require additional information about the above transaction, please email RegistryContact@cer.gov.au

Yours sincerely,

Unit and Certificate Registry Section
 NGER and Safeguard Branch
 Scheme Operations Division



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Co-benefits

CBA has sourced ACCUs from four Indigenous savanna burning carbon projects:

- [Dambimangari Fire Project](#)
- [Wilingin Fire Project](#)
- [Wunambal Gaambera Unguu Fire Project](#)
- [Northern Savanna Project–RF104944](#)

Savanna burning projects aim to reduce greenhouse gas emissions by controlled patch burning in the early dry season to reduce hot, damaging wildfires, helping prevent emissions and supporting the fight against climate change.

The four projects' primary objectives are: supporting traditional fire management practices to protect and improve conservation outcomes; protecting cultural sites; facilitating intergenerational transmission of Traditional Knowledge; and providing jobs, skills and development opportunities to Traditional Owners. In this way, participating in the carbon market allows the Indigenous carbon project partners to earn revenue from traditional fire management practices, contributing to financial sustainability and improved community outcomes.

These projects deliver positive outcomes such as greater employment, preservation and transmission of cultural knowledge, biodiversity protection and remote community development. These projects are Indigenous owned and operated, create employment and income for Traditional Owners managing Indigenous cultural values and sites. Fire management activities support ecosystem function and protect important animal and plant species.

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)*	67,163
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* LGCs in this table only include those surrendered voluntarily (including through PPA arrangements), and do not include those surrendered in relation to the LRET, GreenPower, and jurisdictional renewables or those surrendered on behalf of CBA for base building electricity.

Project supported by LGC purchase	Project location	Eligible unit type	Registry	Surrender date	Accreditation code	Certificate serial number	Generation year	Fuel source	Quantity (MWh)
Merredin Solar – WA	WA, Australia	LGC	REC Registry	4 Apr 2025	SRPVWAB8	113926-114184	2024	Solar	259
Merredin Solar – WA	WA, Australia	LGC	REC Registry	4 Apr 2025	SRPVWAB8	113553-113925	2024	Solar	373
Middlemount Solar Farm - Solar - QLD	QLD, Australia	LGC	REC Registry	4 Apr 2025	SRPVQLO1	7097-7644	2024	Solar	548
FLATROCKS_WF1 - Wind Farm - WA	WA, Australia	LGC	REC Registry	4 Apr 2025	WD00WA26	103741-104632	2024	Wind	892
Yendon Wind Farm - VIC	VIC, Australia	LGC	REC Registry	4 Apr 2025	WD00VC34	6338-8553	2024	Wind	2,216
Yendon Wind Farm - VIC	VIC, Australia	LGC	REC Registry	4 Apr 2025	WD00VC34	20020-21560	2024	Wind	1,541
Mt. Mercer Wind Farm - VIC	VIC, Australia	LGC	REC Registry	4 Apr 2025	WD00VC17	17377-18679	2024	Wind	1,303
Cattle Hill Wind Farm - TAS	TAS, Australia	LGC	REC Registry	4 Apr 2025	WD00TA12	32679-33879	2024	Wind	1,201
Sapphire Wind Farm - NSW	NSW, Australia	LGC	REC Registry	4 Apr 2025	WD00NS13	61324-63361	2024	Wind	2,038
Sapphire Wind Farm - NSW	NSW, Australia	LGC	REC Registry	4 Apr 2025	WD00NS13	326207-332158	2024	Wind	5,952
Sapphire Wind Farm - NSW	NSW, Australia	LGC	REC Registry	4 Apr 2025	WD00NS13	304009-309768	2024	Wind	5,760

Sapphire Wind Farm - NSW	NSW, Australia	LGC	REC Registry	4 Apr 2025	WD00NS13	298057-304008	2024	Wind	5,952
Sapphire Wind Farm - NSW	NSW, Australia	LGC	REC Registry	4 Apr 2025	WD00NS13	265582-271341	2024	Wind	5,760
Sapphire Wind Farm - NSW	NSW, Australia	LGC	REC Registry	4 Apr 2025	WD00NS13	63362-69313	2024	Wind	5,952
Sapphire Wind Farm - NSW	NSW, Australia	LGC	REC Registry	4 Apr 2025	WD00NS13	205389-211340	2024	Wind	5,952
Sapphire Wind Farm - NSW	NSW, Australia	LGC	REC Registry	4 Apr 2025	WD00NS13	1-6696	2025	Wind	6,696
Sapphire Wind Farm - NSW	NSW, Australia	LGC	REC Registry	30 Jun 2025	WD00NS13	475097-478472	2024	Wind	3,376
Sapphire Wind Farm - NSW	NSW, Australia	LGC	REC Registry	30 Jun 2025	WD00NS13	42049-46244	2025	Wind	4,196
Snowtown Wind Farm Stage 2 - SA	SA, Australia	LGC	REC Registry	10 July 2025	WD00SA16	40236-42535	2025	Wind	2,300
Sapphire Wind Farm - NSW	NSW, Australia	LGC	REC Registry	30 Jun 2025	WD00NS13	129394-134289	2025	Wind	4,896
Total LGCs surrendered this report and used in this report									67,163

APPENDIX A: ADDITIONAL INFORMATION

International Scope 3 emissions for CBA's 'other overseas' locations were calculated by either using activity data or estimated based on CBA's Australian Full-time Equivalent (FTE) or average base building ratio of Australian commercial sites. CBA's international emissions calculated in this way excludes electricity, which is accounted for separately. Emissions from employee commuting and employee working from home are included in the international emissions calculation.

CBA Group has purchased International Renewable Energy Certificates (iRECs) in China (Beijing and Shanghai), Hong Kong and India, Tradeable instruments for Global renewables (TIGR) in Singapore, Guarantees of Origin GO (Europe) in the Netherlands and Renewable Energy Guarantees of Origin (REGO) in the United Kingdom to underpin its renewable energy claims.

Location	Consumption (MWh)	Certificate type	Registry	Serial number	Generation year	Fuel source	Qty
China	186.8	iREC	Swiss Carbon Assets Ltd and Scheme	See below	2024	Wind	254
Hong Kong	86.7	iREC	Swiss Carbon Assets Ltd and Scheme	See below	2024	Wind	120
India	2,865.9	iREC	Swiss Carbon Assets Ltd and Scheme	See below	2025	Solar	4,321
Netherlands	51.4	GO (Europe)	Swiss Carbon Assets Ltd and Scheme	See below	2025	Solar	145
Singapore	215.2	TIGR	Swiss Carbon Assets Ltd and Scheme	See below	2024	Solar	292
United Kingdom	585.2	REGO	Swiss Carbon Assets Ltd and Scheme	See below	2025	Wind	695

For all countries in the table above, iRECs, TIGR, GO and REGOs were sourced from renewable energy projects. For USA and Japan, local types of renewable energy certificates (RECs and J-credits) were available, and therefore prioritised over iRECs, consistent with the GHG Protocol guidance³. Since Climate Active only accredits iRECs, GO and REGOs, additional ACCUs were procured to offset electricity used in USA and Japan under Climate Active certification. This accounts for the 'International electricity' category in CBA's inventory.

Location	Consumption (MWh)	Certification types	Certificates purchased	Emissions (tCO ₂ -e)	ACCUs purchased
USA	539.0	REC	509	152.82	153
Japan	60.4	J-credit	83	28.11	29
Total	599.5		592	180.93	182

China Certificates Evidence



This Redemption Statement has been produced for

COMMONWEALTH BANK OF AUSTRALIA

by

SWISS CARBON ASSETS LTD

confirming the Redemption of

254.000000

I-REC Certificates, representing 254.000000 MWh of electricity generated from renewable sources

This Statement relates to electricity consumption located at or in

China

in respect of the reporting period

2024-07-01 to 2025-06-30

The stated Redemption Purpose is

Cancelled as part of the Commonwealth Bank of Australia's Financial Year 2025 RE100 commitment for the RE100 reporting period of July 01, 2024 - June 30, 2025 for its China operations.

Japan Certificates Evidence

³ [GHG Protocol scope 2 guidance](#), table 7.1, item 5.

ByWill inc.
(Account number : JP-100-20000-00001-00798-00)

12506300030
30 June 2025

J-credit System Administrator

Retire Notice

As a result of the application for invalidation based on the J-credit system implementation guidelines 3.2, we have processed into the Credit Register system as follows.

Record

Transaction number JP-20000-00000- 40380
Account type Retire account for J-credit
Account number JP-100-20000-00000-00400-00
Processing date 30 June, 2025

Credit information

No	Type	Credit Authorization Number (: Project Title)				
		Credit identification number			Quantity (t-CO2)	
		Energy saving Amount (kl: crude oil conversion)	Calculated amount of renewable energy (Electricity : MWh)	Calculated amount of renewable energy (Gas Energy : gj)	Amount of NFC energy (Electricity: kWh)	Amount of NFC energy (Gas Energy: gj)
1	ERL	1900410: CO2 reduction by the PV installation in residentials, Nagoya				
		JCL-400-000-010-245-709~ JCL-400-000-010-245-745			37	
			82,615		82,615	
Total			82,615		82,615	37

Above

Netherlands Certificates Evidence

Cancellation Statement

This cancellation statement provides the proof of origin for 145 MWh consumed energy.

This cancellation statement proves that 145 Guarantees of Origin has been cancelled in the Norwegian Energy Certificate System (NECS).

Performed by

Account Holder Name Swiss Carbon Assets Ltd
Account Holder Code 08XG12LB6J
VAT Number CHE114124413
Account 707052300001299948
Domain Norway
Street Technoparkstrasse 1
Postal Code 8005
City Zurich
Country Switzerland

On behalf of

Name of Beneficiary Commonwealth Bank of Australia
Consumption Start 2025-01-01
Consumption End 2025-06-30
Country of Consumption Norway
Location of Beneficiary Netherlands
Usage Category Disclosure
Type of Beneficiary End Consumer

Transaction Information

Transaction Date 2025-06-25 03:02
Transaction Number 202506250000004
Cancellation Purpose Cancelled as part of the Commonwealth Bank of Australia's Financial Year 2025 RE100 commitment for the RE100 reporting period of July 01, 2024 – June 30, 2025 for its Netherlands operations.
Volume Cancelled (sum) 145

This cancellation statement acts as a receipt of the cancellation of the certificates listed and for the purpose shown. With this Cancellation Statement, released on the 2025-06-25, the indicated certificates are no longer tradable.

Onward sale of this Cancellation Statement is prohibited. The environmental qualities of the associated energy have been consumed and this Cancellation Statement and these certificates may not be transferred to any party other than the energy supplier or end-consumer specified above.



View cancellation statement here.

Oslo, 2025-06-25

Ole Jacob Høyland
Ole Jacob Høyland
Director, market operations
Statnett SF

List of production devices included in cancellation

Production Device Name	803255132001551665-1A2 Melfi
Production Device ID	803255132001551665
Country	Italy - GSE3
Electrical Capacity, MW	0,493
Date Operational	2011-07-01
Location	85025 MELFI, IT
Technology	T010000 - Solar / Unspecified / Unspecified
Energy Source	F01040100 - Renewable / Heat / Solar / Unspecified
Volume Cancelled (sum)	145

Singapore Certificates Evidence



This Redemption Statement has been produced for

COMMONWEALTH BANK OF AUSTRALIA

by

SWISS CARBON ASSETS LTD

confirming the Redemption of

292.000000

I-REC Certificates, representing 292.000000 MWh of electricity generated from renewable sources

This Statement relates to electricity consumption located at or in

Singapore

in respect of the reporting period

2024-07-01 to 2025-06-30

The stated Redemption Purpose is

Cancelled as part of the Commonwealth Bank of Australia's Financial Year 2025 RE100 commitment for the RE100 reporting period of July 01, 2024 - June 30, 2025 for its Singapore operations.

US Certificates Evidence

Transaction Confirmation



Date: 06-26-2025

M-RETS Organization: South Pole USA Inc.

Retiring 509 active RECs

Account	ID	Project	Fuel Type	Vintage	Location	Quantity	Serial Number
302176 - CJ	0196ea6d-3131	Sac County Wind LLC	Wind	2024-04-01	IA	509	3753-IA-04-2024-314D4BC8-24251-24759

Transaction Notes:

Cancelled as part of the Commonwealth Bank of Australia's Financial Year 2025 RE100 commitment for the RE100 reporting period of July 01, 2024 – June 30, 2025 for its United States operations.

Retirement reason:

Beneficial Ownership - For Beneficial Owner 'Individual'

Retirement reason details:

to this retirement account

DefaultRET

Eligibilities

None

M-RETS hereby declares this transaction confirmation shall serve as proof that the above transaction was completed on the date listed.

Hong Kong Certificates Evidence



This Redemption Statement has been produced for

COMMONWEALTH BANK OF AUSTRALIA

by

SWISS CARBON ASSETS LTD

confirming the Redemption of

120.000000

I-REC Certificates, representing 120.000000 MWh of electricity generated from renewable sources

This Statement relates to electricity consumption located at or in

Hong Kong

in respect of the reporting period

2024-07-01 to 2025-06-30

The stated Redemption Purpose is

Cancelled as part of the Commonwealth Bank of Australia's Financial Year 2025 RE100 commitment for the RE100 reporting period of July 01, 2024 – June 30, 2025 for its Hong Kong operations.

India Certificates Evidence



This Redemption Statement has been produced for

COMMONWEALTH BANK OF AUSTRALIA

by

SWISS CARBON ASSETS LTD

confirming the Redemption of

4 321.000000

I-REC Certificates, representing 4 321.000000 MWh of
electricity generated from renewable sources

This Statement relates to electricity consumption located at or in

India

in respect of the reporting period

2024-07-01 to 2025-06-30

The stated Redemption Purpose is

Cancelled as part of the Commonwealth Bank of Australia's Financial Year 2025 RE100 commitment for the RE100 reporting period of July 01, 2024 – June 30, 2025 for its India operations.

UK Certificates Evidence



For the period 01.07.2024 to 30.06.2025 Commonwealth Bank of Australia has purchased energy attribute certificates (EACs) equivalent to

695 MWh

This certificate confirms that South Pole redeemed the purchased amount of REGOs for electricity consumed in the United Kingdom.

The renewable energy certificates were generated in the Wind Energy (North Rhins) Limited power plant in Scotland.

Daniel Oliver Klier
CEO, South Pole



Thank you for committing to bold climate action. Your contribution is not only a meaningful step towards mitigating climate change globally, but also changes lives for the better by contributing to the Sustainable Development Goals set out by the UN.

This certificate is issued by South Pole.
For more information about our renewable energy solutions, please visit: southpole.com/sustainability-solutions/renewable-energy.



This certificate verifies the retirement of REGOs
Distributed among the sites below

VOLUME	COUNTRY	TECHNOLOGY	PRODUCTION PERIOD	CERTIFICATE NUMBER START CERTIFICATE NUMBER END	DEVICE NAME	CAPACITY	COMMISSIONING DATE
695	Scotland	Wind	Jan-2025	G01559NWS0000005562010125310125GEN G01559NWS0000005296010125310125GEN	Wind Energy (North Rhins) Limited	22 MW	11/01/2009

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 renewable electricity generated	2,362,926	0	2%
Total non-grid renewable electricity	2,362,926	0	2%
LGC purchased and retired (kWh) (including PPAs)	68,448,000	0	70%
GreenPower	3,690,262	0	4%
Climate Active certified - Precinct/Building (voluntary renewables)	2,610,234	0	3%
Climate Active certified - Precinct/Building (LRET)	580,761	0	1%
Climate Active certified - Precinct/Building jurisdictional renewables (LGCs surrendered)	0	0	0%
Climate Active certified - Electricity products (voluntary renewables)	0	0	0%
Climate Active certified - Electricity products (LRET)	0	0	0%
Climate Active certified - Electricity products jurisdictional renewables (LGCs surrendered)	0	0	0%
Jurisdictional renewables (LGCs surrendered)	302,712	0	0%
Jurisdictional renewables (LRET) (applied to ACT grid electricity)	69,272	0	0%
Large Scale Renewable Energy Target (applied to grid electricity only)	16,628,614	0	17%
Residual electricity	2,632,979	2,422,341	0%
Total renewable electricity (grid + non grid)	94,692,782	0	97%
Total grid electricity	94,962,835	2,422,341	95%
Total electricity (grid + non grid)	97,325,761	2,422,341	97%
Percentage of residual electricity consumption under operational control	0%		
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	2,632,979	2,422,341	
Scope 3	2,632,979	2,422,341	

Total renewables (grid and non-grid)	97.29%
Mandatory	17.75%
Voluntary	77.11%
Behind the meter	2.43%
Residual scope 2 emissions (t CO₂-e)	0.00
Residual scope 3 emissions (t CO₂-e)	2,422.34
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)	2,422.34
Total emissions liability (t CO₂-e)	2,422.34

Figures may not sum to total 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 (kg CO ₂ -e)	Scope 3 Emissions (kg CO ₂ -e)	(kWh)	Scope 3 Emissions (kg CO ₂ -e)
ACT	380,722	380,722	251,277	15,229	0	0
NSW	65,571,738	65,571,738	43,277,347	2,622,870	0	0
SA	2,164,019	2,164,019	497,724	108,201	0	0
VIC	10,057,893	10,057,893	7,744,578	905,210	0	0
QLD	5,975,760	5,975,760	4,242,789	597,576	0	0
NT	423,686	423,686	237,264	29,658	0	0
WA	8,631,059	8,631,059	4,401,840	517,864	0	0
TAS	1,757,957	1,757,957	263,694	52,739	0	0
Grid electricity (scope 2 and 3)	94,962,836	94,962,836	60,916,514	4,849,346	0	0
ACT	8,920	8,920	0	0		
NSW	974,467	974,467	0	0		
SA	200,625	200,625	0	0		
VIC	691,653	691,653	0	0		
QLD	152,421	152,421	0	0		
NT	22,194	22,194	0	0		
WA	312,646	312,646	0	0		
TAS	0	0	0	0		
Non-grid electricity (behind the meter)	2,362,926	2,362,926	0	0		
Total electricity (grid + non grid)	97,325,761					

Residual scope 2 emissions (t CO ₂ -e)	60,916.51
Residual scope 3 emissions (t CO ₂ -e)	4,849.35
Scope 2 emissions liability (adjusted for already offset carbon neutral electricity) (t CO ₂ -e)	58,810.46
Scope 3 emissions liability (adjusted for already offset carbon neutral electricity) (t CO ₂ -e)	4,721.71
Total emissions liability (t CO₂-e)	63,532.16

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)
Climate-Active certified base building (NSW)	3,190,995	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.		

The following tables outline the consumption of Climate Active certified buildings non-certified buildings. For non-certified buildings the property owners procure 100% renewable electricity for these assets and appropriately surrender the associated certificates (via either surrender of LGCs or purchase of GreenPower). Hence, emissions for these base buildings are zero.

Breakdown of certified and non-certified buildings as follows:

Climate Active certified buildings

Certified brand name	Base building address	State	Electricity consumption (kwh)
Lendlease	84510_1 HARBOUR ST - NTH BLDG	NSW	1,062,326
Lendlease	84526_11 HARBOUR ST - STH BLDG	NSW	876,285
Lendlease	85563_COMMONWEALTH BANK SQUARE	NSW	1,252,384
Total			3,190,995

Non-certified base buildings that use 100% renewable energy

Certified brand name	Base building address	State	Electricity consumption (kwh)
Mirvac	70127_SOUTH EVELEIGH - COMMUNITY CENTRE (GREENPOWER)	NSW	72,731
Mirvac	70125_SOUTH EVELEIGH – AXLE (GREENPOWER)	NSW	1,876,054
Mirvac	70126_SOUTH EVELEIGH - THE FOUNDRY (GREENPOWER)	NSW	2,562,262
Charter Hall	70402_BANKWEST PLACE PERTH (LGC SURRENDER)	WA	1,569,778
Total			6,080,825

Evidence of 100% renewable energy for non-certified buildings included below:

22/09/2025

To whom it may concern

SUBJECT: EVIDENCE OF 100% GREENPOWER SUPPLY FOR BASE BUILDING OF SOUTH EVELEIGH (AXLE, FOUNDRY, COMMUNITY CENTRE)

This is to certify that Mirvac has purchased 100% GreenPower to cover the base building electricity usage and carbon offsets for scope 1 emissions for the following South Eveleigh sites, where CBA is one of the tenants:

- Axle (5-7 Central Avenue)
- Foundry (2 Locomotive Street)
- South Eveleigh Community Centre (2 Davy Road)

Financial Period:

July 2024 – June 2025

Renewable Electricity Type:

Onsite solar PV (RECs are not generated)

GreenPower (accredited renewable electricity)

We confirm that all electricity usage and GreenPower purchases for these sites have undergone third-party verification. Supporting GreenPower invoices and verification documentation are available upon request.

We understand that CBA reports this as part of their Scope 3 emissions for Climate Active. Mirvac confirms that base building usage for these sites is 100% renewable for the stated period.

Yours sincerely



David Palin

Director ESG



Charter Hall Holdings Real Estate Pty. Ltd
 ACN 062 342 018
 Level 20, No.1 Martin Place
 Sydney NSW 2000
 GPO Box 2704 Sydney NSW 2001
 T +61 2 8551 9000
 F +61 2 9221 4655
 www.charterhall.com.au

25 September 2025

To whom it may concern,

SUBJECT: EVIDENCE FOR LGC VOLUNTARILY SURRENDERED FOR BASE BUILDING OF BANKWEST PLACE (300 MURRAY STREET PERTH)

This is to confirm that Charter Hall has purchased, and voluntarily surrendered Large Scale Generation Certificates (LGCs) to meet its 100% renewables commitment for both base building and tenancy for the Bankwest Place building, in which Commonwealth Bank of Australia is a tenant during the 01 July 2024 – 30 June 2025 period. In addition, Charter Hall has also surrendered carbon offsets to offset the residual base building scope 1 emissions. Please find below the details of the surrendered LGCs and Carbon Offsets.

Coverage	Electricity Usage (MWH)	Compliance Renewable (MWH)	Voluntary surrendered LGCs (MWH)
Base building	2,353	428	1,925
Tenancy	2,889	527	2,362
Total	5,242	955	4,287

Coverage	Scope 1 Emissions (t CO2e)	Surrendered Carbon Offsets
Base building	160.48	161

Details of the surrendered LGCs and carbon offsets are included in an appendix below.

Yours sincerely,

Ben McCluskey
 Operations Efficiency Manager
 Charter Hall



Appendix A – LGCs surrendered to cover 1 July 2024 to 30 June 2025

Certificate type	Accreditation Code	Fuel Source	Generation year	Creation year	Certificate Serial number	Certificate quantity	Surrender ID
LGC	WD00WA24	Wind	2024	2024	82966-84345	1,380	11077
LGC	WD00WA24	Wind	2024	2024	192203-192299	97	11077
LGC	WD00WA24	Wind	2024	2024	288023-288550	528	11077
LGC	WD00WA24	Wind	2024	2024	13615-13616	2	11522
LGC	WD00WA24	Wind	2024	2024	195761-195832	72	11522
LGC	WD00WA24	Wind	2024	2025	653467-654842	1,376	11522
LGC	WD00WA24	Wind	2025	2025	173980-174811	832	11522
Total FY25						4,287	

Appendix B – Carbon Offsets surrendered to cover 01 July 2024 to 30 June 2025

Certificate type	Accreditation Code	Vintage	Certificate Serial number	Certificate quantity	Transaction ID
KACCU	Biodiverse Carbon Conservation - EOP101147	2022-23	8356310654-8356310706	52	AU43375
KACCU	Jawoyn Fire 2 - ERF102021	2021-22	8330538367-8330538475	109	AU43375

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.

Data management plan for non-quantified sources

There are no non-quantified sources in the emission boundary.

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
Other purchased goods and services	Y	N	N	N	N	<p>Size: Emissions from purchased goods and services are material. CBA has captured aspects of this category, including couriers, emissions from the production and distribution of our annual report and the use of copy paper.</p> <p>Influence: CBA does not have full operational control over certain aspects of this category. Nonetheless, CBA is aiming to influence this by measures such as evaluating new suppliers on their proficiency in measuring and managing their emission impacts and the ability to provide lower emission goods and services.</p> <p>Risk: There are no relevant laws or regulations that apply to limit emissions specifically from this source, the source does not create supply chain risks.</p> <p>Stakeholders: Key stakeholders, including the public, are unlikely to consider the remaining unquantified goods and services as relevant source of emissions for our business.</p> <p>Outsourcing: CBA has not previously undertaken this activity within our emissions boundary and comparable organisations do not typically undertake this activity within their boundary</p>
Capital goods	Y	N	N	N	N	<p>Size: Embodied emissions from capital goods such as office fit outs, IT infrastructure and fleet vehicles are possibly material sources of emission for CBA. However, they have not been included in CBA's emissions boundary in line with the approach taken by major Australian Banks in their most recent Climate Active certifications. Where feasible, CBA implements measures to reduce emissions from capital goods, such as utilising more sustainable materials in office fit outs.</p> <p>Influence: CBA has limited ability to influence emissions reductions within the capital goods supply chain due to the scale and nature of its purchasing relative to the broader market.</p> <p>Risk: There are no relevant laws or regulations that apply to limit emissions specifically from this source, the source does not create supply chain risks, and it is unlikely to be of significant public interest.</p> <p>Stakeholders: Key stakeholders, including the public, are unlikely to consider this a relevant source of emissions for our business</p> <p>Outsourcing: CBA has not previously undertaken this activity within our emissions boundary and comparable organisations do not typically undertake this activity within their boundary</p>

Emission sources tested for relevance	Size	Influence	Risk	Stakeholders	Outsourcing	Justification
Retail sites: Base building	N	N	N	N	N	<p>Size: Emissions from base building of retail sites are deemed immaterial</p> <p>Influence: CBA does not have operational control and does not have the potential to influence the emissions from this source, including by shifting to a different lower-emissions supplier for our business.</p> <p>Risk: There are no relevant laws or regulations that apply to limit emissions specifically from this source, the source does not create supply chain risks, and it is unlikely to be of significant public interest.</p> <p>Stakeholders: Key stakeholders, including the public, are unlikely to consider this a relevant source of emissions for our business</p> <p>Outsourcing: CBA has not previously undertaken this activity within our emissions boundary and comparable organisations do not typically undertake this activity within their boundary</p>

Financed emissions are not included within the scope of our carbon neutral assessment, as the inventory boundary is limited to CBA’s operations. This is in line with the approach taken by major Australian Banks in their most recent Climate Active certifications. However, we recognise the importance of measuring our financed emissions and supporting our customers to reduce their emissions through our overall approach to climate change. Our [2025 Annual Report](#) outlines our approach to supporting Australia’s transition to a net zero economy by 2050 and demonstrates our progress, including further information on our financed emissions.



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