

# 2023 Sustainability Reporting Appendix

This appendix contains our disclosures aligned to:

- Principles for Responsible Banking Reporting (PRB) and Self-Assessment Template
- Global Reporting Initiative (GRI) Standards Index
- Sustainability Accounting Standards Board (SASB) Index

Further information about our commitment to sustainability is included in our 2023 Annual Report, Climate Report and our Sustainability Performance metrics. These can be found on our website at commbank.com.au/sustainabilityreporting

Commonwealth Bank of Australia

## UN Principles for Responsible Banking (PRB) reporting and self-assessment template

We are a signatory to the UN Environment Programme Finance Initiative's Principles for Responsible Banking (UN PRB) and we continue to align our business practices to these principles. This is our third UN PRB self-assessment report to detail our progress against all six Principles.

Our responses to sections 2.1, 2.2, 2.3, 2.4, 5.1 within this PRB reporting and self-assessment template have been subject to PwC independent limited assurance under ASAE3000 as per the attached assurance report on pages 23-26 of this document.

#### Principle 1: Alignment

We will align our business strategy to be consistent with and contribute to individuals' needs and society's goals, as expressed in the Sustainable Development Goals, the Paris Climate Agreement and relevant national and regional frameworks.

#### **Business model**

Describe (high-level) your bank's business model, including the main customer segments served, types of products and services provided, the main sectors and types of activities across the main geographies in which your bank operates or provides products and services. Please also quantify the information by disclosing e.g. the distribution of your bank's portfolio (%) in terms of geographies, segments (i.e. by balance sheet and/or off-balance sheet) or by disclosing the number of customers and clients served.

Response	Links and references
Commonwealth Bank of Australia is one of the leading banks in Australia. We serve more than 17 million customers with a focus on providing retail and commercial banking services predominantly in Australia, and in New Zealand through our subsidiary ASB Bank Limited. Our products and services are provided through our divisions, Retail Banking Services, Business Banking, Institutional Banking and Markets (IB&M), and ASB New Zealand.	<u>2023 Annual Report</u> Directors' Report – page 82 Branch numbers – page 287
In August 2022, ASB became a UN PRB signatory. In line with the PRB requirements, ASB intends to publish its inaugural self-assessment in 2024.	<u>CBA website: About Us</u>
Key statistics about our business:	FY23 Results Presentation
<ul> <li>We are supporting Australians' home ownership goals by funding \$149 billion in new lending during FY23.</li> <li>We employ over 53,000 people of which, ~90% work in either Australia or New Zealand in FY23.</li> <li>We have over 860,000 shareholders with 78% of our shares Australian owned; additionally we support over 12 million Australians indirectly through their superannuation holdings.</li> <li>Customers have access to the largest branch network, with 741 branches in Australia.</li> </ul>	Building a brighter future for all – page 5
Strategy alignment Does your corporate strategy identify and reflect sustainability as strategic priority/ies for your bank?	
⊠ Yes □ No Please describe how your bank has aligned and/or is planning to align its strategy to be consistent with the Sustainable Development Goals (SDGs), t national and regional frameworks.	he Paris Climate Agreement, and relevant
Does your bank also reference any of the following frameworks or sustainability regulatory reporting requirements in its strategic priorities on UN Guiding Principles on Business and Human Rights International Labour Organization fundamental conventions UN Global Compact	r policies to implement these?

#### ☑ UN Declaration on the Rights of Indigenous Peoples

Any applicable regulatory reporting requirements on environmental risk assessments, e.g. on climate risk – please specify which ones: \_\_\_\_

🛛 Any applicable regulatory reporting requirements on social risk assessments, e.g. on modern slavery – please specify which ones: \_\_

#### □ None of the above

#### Response

Our purpose, building a brighter future for all, reflects our strategic ambition and it inspires and connects us to the Bank's reason for being.

We continue to execute our strategy of building tomorrow's bank today for our customers. Our strategy reflects a bolder ambition and our commitment to use the strength of CBA to help customers, communities and the country, particularly during challenging times.

As part of the Bank's strategic priority, Leadership in Australia's recovery and transition, we are supporting our customers and the nation to help build a brighter, more sustainable future. We are committed to supporting Australia's transition to a more digital, resilient and sustainable economy, and aim to support Australia's climate change goals and help finance a secure, affordable energy transition. We have committed to transitioning our operational emissions<sup>1</sup> and financed emissions<sup>2</sup> in line with pathways that aim to limit global warming to 1.5°C. In supporting this ambition, our actions need to align with our purpose – building a brighter future for all – and aim to be inclusive. We remain committed to managing the risks and opportunities of climate change, and supporting our customers.

We continue to embed sustainability into our strategy and risk management practices, and we are evolving our policies, systems and processes around our sustainability commitments and priorities. This year we reviewed our Environmental and Social (E&S) Framework to update our position and commitments relating to financing of certain sectors after engaging with stakeholders.

We also performed an environmental, social and governance (ESG) materiality assessment to identify stakeholder priorities for us to consider in how we conduct business. The results of this assessment will support focused decision making and allow us to deliver on our purpose of building a brighter future for all our stakeholders. It also enables us to better understand how we can align with and positively deliver on the UN Sustainability Development Goals (SDGs).

In our 2023 Annual Report, our material themes have been mapped to the relevant SDGs and strategic responses to these material themes are included across the Annual Report.

We remain committed to playing our part in limiting climate change in line with the goals of the Paris Agreement and supporting Australia's transition to net zero emissions by 2050. Learn more about our climate strategy in our 2023 Climate Report.

In line with our Net Zero Banking Alliance (NZBA) commitment (joined in January 2022), we are required to use decarbonisation scenarios which to the extent possible, minimise misalignment with other SDGs. Detail on how we have selected our reference scenarios is included on pages 69-71 of our 2023 Climate Report.

Our corporate reporting suite contains detailed information on CBA's strategic priorities, risk management and corporate governance frameworks, as well as our financial, non-financial and sustainability performance. Transparent reporting is essential in communicating to our shareholders and other key stakeholders. We continually evolve our reporting to align with best practice, feedback from our stakeholders, and legislation and frameworks.

We are signatories or members of programs that align with our values and sustainability goals including UN PRB, NZBA, and Equator Principles. We are members of international programs of action including RE100 and the Taskforce on Nature-related Financial Disclosures (TNFD) Forum.

#### Links and references

#### 2023 Annual Report

About this report – page 2 Chairman and CEO's message – pages 6-7 How we create value – pages 4-5 Our strategic priorities – pages 8-17 Our commitment to sustainability – pages 18-39 Our approach to ESG – pages 20

#### 2023 Climate Report

Message from the Chairman and CEO – pages 2-3 Financed emissions – pages 54-55 Selecting our reference scenarios – pages 69-71

<u>CBA webpage: Commitment to</u> inclusion and diversity

Commonwealth Bank Code of conduct

<sup>&</sup>lt;sup>1</sup> Operational emissions as defined in our 2023 Climate Report (page 93): Scope 1, 2 and selected Scope 3 emissions (excluding financed emissions) resulting from the operations of our business for the Commonwealth Bank of Australia Group, including ASB Bank Limited and other overseas operations.

<sup>&</sup>lt;sup>2</sup> Financed emissions as defined in our 2023 Climate Report (page 92): The emissions financed by a financial institution's loans and/or investments. They are estimated based on an attributed proportion of the financial institution's customers' emissions. These financed emissions are part of the financial institution's Scope 3, Category 15 emissions.

We seek to provide transparent reporting on our progress in line with legislation and seek to align to industry recognised standards including the Global Reporting Initiative (GRI), Task Force on Climate-related Financial Disclosures (TCFD), Sustainability Accounting Standards Board (SASB), Reconciliation Australia, Climate Active, Toitū Envirocare carbonzero and Modern Slavery Act 2018.

We calculate our reported financed emissions metrics aligned with the Partnership for Carbon Accounting Financials (PCAF) Standard.

#### Principle 2: Impact and Target Setting

We will continuously increase our positive impacts while reducing the negative impacts on, and managing the risks to, people and environment resulting from our activities, products and services. To this end, we will set and publish targets where we can have the most significant impacts.

#### 2.1 Impact Analysis (Key Step 1)

Show that your bank has performed an impact analysis of its portfolio/s to identify its most significant impact areas and determine priority areas for target-setting. The impact analysis shall be updated regularly and fulfil the following requirements/elements (a-d):

a. Scope: What is the scope of your bank's impact analysis? Please describe which parts of the bank's core business areas, products/services across the main geographies that the bank operates in (as described under 1.1) have been considered in the impact analysis. Please also describe which areas have not yet been included, and why.

Response	Links and references
CBA provides retail and commercial banking services in Australia, and in New Zealand through our subsidiary ASB Bank Limited.	2022 Annual Report
Excluded from our scope for our impact analysis is:	Directors report, Principal activities – page 80
<ul> <li>Our subsidiary ASB Bank Limited, as ASB Bank Limited is a UN PRB signatory and will report separately.</li> <li>Our subsidiary PT Bank Commonwealth (Indonesia), as its contribution to total income is below 5%<sup>3</sup>.</li> </ul>	Financial report, Financial reporting by segment – pages 143, 146
In our 2022 UN PRB reporting, we disclosed our impact areas which included: Climate change and Social and human rights.	0000 Annual Dan art
2023 review:	2023 Annual Report Directors report, Principal activities –
As detailed in the following sections, we considered areas where CBA can have potential positive or negative impacts by:	page 82
<ul> <li>Performing a materiality assessment to determine material topics for stakeholders in Australia and whether CBA could influence these topics, and</li> <li>Piloting the UN PRB Consumer and Business Banking Impact analysis tool to identify specific social impact areas. The results of the tool were used to support the relevance of previously identified impact areas. This impact analysis focussed on Australia, and specifically on Retail and Business banking segments. It therefore excluded, Institutional Banking and Markets. This approach was based on these segments contributing 73% total banking income<sup>4</sup>.</li> </ul>	2022 Sustainability Reporting Appendix (UN PRB, GRI and SASB) UN PRB – page 3

b. Portfolio composition: Has your bank considered the composition of its portfolio (in %) in the analysis? Please provide proportional composition of your portfolio globally and per geographical scope by sectors & industries for business, corporate and investment banking portfolios (i.e. sector exposure or industry breakdown in %), and/or by products & services and by types of customers for consumer and retail banking portfolios.

If your bank has taken another approach to determine the bank's scale of exposure, please elaborate, to show how you have considered where the bank's core business/major activities lie in terms of industries or sectors.

<sup>4</sup> 2022 Annual Report, page 143 – Note 2.7 Financial reporting by segments, Total banking income. Retail Banking Services and Business Banking is ~73% of total banking income (11,007+7,131=18,138/24,688=73%).

<sup>&</sup>lt;sup>3</sup> 2022 Annual Report, page 146 – Note 2.7 Financial reporting by segments, Financial performance and position. Indonesia is included as part of 'Other locations' which is 3.4% (\$846m/ \$25,143m) of the Group's total income.

Response	Links and references
The materiality assessment performed was focused on our Australia-based stakeholders.	2022 Annual Report
For the UN PRB impact analysis tool pilot, we included only the Retail and Business banking segments in Australia in the portfolio mapping. For the Business Banking segment, only credit activities were included in the analysis to align with the tool methodology.	Directors report, Principal activities – page 80
The Bank's core business activities are reflected in our lending portfolio, which is disclosed in the Basel III Pillar 3 Capital Adequacy and Risk disclosures as at 30 June 2022 (page 26). In terms of credit risk exposure, Australia makes up 82% <sup>5</sup> of our portfolio and is therefore the focus of our	Financial report, Financial reporting by segment – pages 143, 146
impact areas.	Basel III Pillar 3 Capital Adequacy and
Australia accounts for 85% <sup>6</sup> of the Group's total income.	Risk disclosures as at 30 June 2022 Credit risk exposure by portfolio type and
Refer to our 2022 Annual Report, pages 143 and 146, Note 2.7 Financial reporting by segments, for further detail supporting our geographical scoping focus on Australia.	geographic distribution – page 26
c. Context: What are the main challenges and priorities related to sustainable development in the main countries/regions in which your bank and/or these have been considered, including what stakeholders you have engaged to help inform this element of the impact analysis. This step aims to put your bank's portfolio impacts into the context of society's needs.	your clients operate? Please describe how
Response	Links and references
Steps taken to determine our priorities: We performed a materiality assessment (during the period September 2022 to May 2023) to enable us to engage with stakeholders and identify topics with the potential to most impact the Australian people, community and environment. It also ranks the Bank's ability to	<u>2023 Annual Report</u> Our approach to ESG – pages 20-21 Managing our risks – pages 60-65
influence these impacts – directly or indirectly. Our materiality assessment follows a multi-step process – including issue identification through desk research and interviews, stakeholder	2022 Annual Report
identification, and topic validation and prioritisation.	2022 Climate Report
Stakeholder engagement included interviews with internal executive management (including the chief financial officer), internal subject matter experts (on customers, employees, suppliers, investors, and community, government and regulator topics), an external research organisation and an industry association. In addition, internal documents, such as the emerging risks report, investor and analyst meeting notes, material risk types, stakeholder group council meeting minutes and SpeakUP <sup>7</sup> and complaints themes were reviewed.	<u>2022 Sustainability Reporting</u> Appendix (UN PRB, GRI and SASB)
As part of our materiality assessment we looked over regulatory reporting requirements and commitments as explained in Principle 1, including the Banking Code of Practice (Part 4 – Inclusive and accessible banking) and the following published reports and plans:	<u>Elevate Reconciliation Action Plan</u> FY23-25
<ul> <li>2022 Annual Report</li> <li>2022 Climate Report (as part of our commitment to NZBA)</li> <li>2022 UN PRB report</li> </ul>	Accessibility and Inclusion Plan 2021–2023
<ul> <li>Accessibility and Inclusion Plan 2021 – 2023</li> <li>Reconciliation Action Plan (RAP)</li> <li>Financial Inclusion Action Plan 2016 – 2017</li> </ul>	<u>Financial Inclusion Action Plan</u> 2016–2017

<sup>5</sup> Basel III Pillar 3 Capital Adequacy and Risk disclosures as at 30 June 2022 (page 26) – Australia's total credit exposure of as a percentage of total credit exposure (\$1,054,674m/ \$1,290,925m). <sup>6</sup> 2022 Annual Report, page 146 – Note 2.7 Financial reporting by segments, Financial performance and position. Australia contributes \$21,281m of the Group's total income of \$25,143m.

<sup>7</sup> The Bank's SpeakUP service is available 24/7 for our people and external partners who do not feel comfortable raising concerns through other channels, or want to remain anonymous.

#### We reviewed the results of our impact analysis tool pilot:

The portfolio mapping pilot completed using the UN PRB modules highlighted that the bank has key impact associations with financial inclusion as a topic. The findings were discussed with the Financial Inclusion Project Steering Group. This analysis confirmed our focus on the financial inclusion of victims of domestic violence and financial abuse, and Indigenous Australians. It also highlighted potential additional areas of focus for further consideration. The analysis of our Business portfolio was limited to credit activities, in accordance with the tool. As a result, insights from the tool only covered a portion of our activities.

Australia's national context, legislation and social priorities inform CBA's position on social issues. Contextual elements include:

## • National legislation, government initiatives and regulatory priorities from various sources to identify key national topics.

For example, in February 2022, Australia updated its National Financial Capability Strategy. The Strategy provides a framework to build Australia's financial capability in priority areas. It noted existing government financial capability initiatives targeted: young people, women, small business, low income earners/ vulnerable people and Indigenous Australians. In September 2022, the Australian Senate passed the Climate Change Bill 2022, which legislated Australia's greenhouse gas emissions reduction targets of a 43% reduction from 2005 levels by 2030 and net zero by 2050. In addition, we reviewed the APRA Corporate plan 2022-2023, RBA corporate plan 2022-2023 and the Australian Nature Positive Plan. Common themes included climate change, sustainable finance and diversity and inclusion. These sources were included in the materiality assessment.

- A study by the **Centre for Social Impact** released in 2022 found that employment status is the primary source of income from most Australian households and is thus a key driver of financial wellbeing. This study was considered by our Financial Inclusion Working Group in determining our impact areas.

- **CBA's Australian Consumer Financial Wellbeing Report from March 2022** found that 2022 saw a 2% increase in the proportion of Australians with an insufficient safety net and a 6% increase in the proportion of Australians who are consistently spending at high levels. This study was considered by our Financial Inclusion Working Group in determining our impact areas.
- Other national initiatives and research for more information on social impact areas, including:
  - Reconciliation with First Nations Australians

Efforts in reconciliation in Australia's corporate sector have been driven by Reconciliation Australia, as it encourages organisations to develop and publish Reconciliation Action Plans (RAP). This initiative was considered in the development of our FY23-25 RAP.

- The Closing the Gap report 2020

The report outlined that the target to halve the gap in employment outcomes within a decade was not met. In 2018, the Indigenous employment rate was around 49% compared to around 75% for non-Indigenous Australians. This report was considered in the development of our FY23-25 RAP.

Refer to our 2023 Annual Report for detail on our materiality process and material themes (pages 20-21). Previously published reports and plans are available online.

Based on these first 3 elements of an impact analysis, what positive and negative impact areas has your bank identified? Which (at least two) significant impact areas did you prioritize to pursue your target setting strategy (see 2.2)? Please disclose.

Response	Links and references
Our material themes identified through our materiality analysis included: Customer support and experience; Engaged and supported workforce; Governance, culture and accountability; Cyber security and data privacy; Digitisation, innovation and emerging technology; and Climate transition.	<u>2023 Annual Report</u> Our approach to ESG – pages 20-21
The result of the impact analysis identified Financial inclusion as a key positive impact association of relevance across all product types. This was considered by the Financial Inclusion Project Steering group in May 2023 in confirming Financial Inclusion and Wellbeing as a key priority.	<u>2022 Sustainability Reporting</u> Appendix (UN PRB, GRI and SASB)
Based on the impact analysis explained in 2.1 (a) to (c), our two priority PRB impact areas include:	Appendix (ON PRB, GRI and SASB)

APRA Corporate Plan 2022-23

Corporate Plan | RBA

Climate change bill 2022

Nature Positive Plan: better for the environment, better for business

<u>CSI research (page 12)</u>

Australian Consumer Financial Wellbeing Report March 2022

ASIC's Indigenous Financial Services Framework

Closing the Gap Report 2020

(2)

3

#### Climate change

Financial inclusion and wellbeing, with a focus on victims of domestic violence and financial abuse, and First Nations people.

#### Impact area one: Climate change

Our impact assessment in 2.1 (a) to (c), supported our choice of climate change as a significant impact area – it is a key theme in our materiality analysis as an area of ongoing stakeholder interest; and our commitment to the NZBA requires that we continue to prioritise our approach to climate change.

#### Impact area two: Financial inclusion and wellbeing

Previously, we identified the potential to make a positive impact on our stakeholders in the area of financial inclusion and wellbeing, with a focus on victim-survivors of financial abuse and on First Nations peoples in Australia. This is evident in our publications as stated in 2.1(c).

Our analysis explained in 2.1(a) to (c), relied predominantly on the findings of our materiality assessment; internal and external research and insights across the broader Australian population; and the FY23 impact analysis tool pilot. This supported our choice of our previously determined impact areas.

d. For these (min. two prioritized impact areas): Performance measurement: Has your bank identified which sectors & industries as well as types of customers financed or invested in are causing the strongest actual positive or negative impacts? Please describe how you assessed the performance of these, using appropriate indicators related to significant impact areas that apply to your bank's context.

In determining priority areas for target-setting among its areas of most significant impact, you should consider the bank's current performance levels, i.e. qualitative and/or quantitative indicators and/or proxies of the social, economic and environmental impacts resulting from the bank's activities and provision of products and services. If you have identified climate and/or financial health&inclusion as your most significant impact areas, please also refer to the applicable indicators in the Annex.

If your bank has taken another approach to assess the intensity of impact resulting from the bank's activities and provision of products and services, please describe this. The outcome of this step will then also provide the baseline (incl. indicators) you can use for setting targets in two areas of most significant impact.

Response	Links and references
Impact area one: Climate	2023 Climate Report
Our primary reporting for our climate strategy, transition roadmap, metrics and targets, and progress is included in our 2023 Climate Report, our TCFD-aligned report. The release of our Climate Report is authorised by the Board. Please refer to the 2023 Climate Report for detailed disclosures and the limited assurance report.	Our climate strategy – pages 10–29 Environmental and Social Framework
In our 2022 Climate Report we published our transition roadmap to set targets on a majority of our FY20 financed emissions by 2025. These sectors were also identified by NZBA as priority sectors.	Commitment to play our part in limiting climate change in line with the goals of the Paris Agreement and actions we take
In our 2023 Climate Report, we published our transition roadmap along with sector-level targets for the following sectors: thermal coal mining,	– page 6
upstream oil extraction, upstream gas extraction, power generation, Australian home loans and heavy industry (steel, alumina, aluminium, and cement). Our report also reaffirms our intention to set targets for the following sectors in 2024: Australian Agriculture, Australian commercial property and transport.	Next Chapter webpage
In line with our NZBA commitments, we take a sector-level approach to measure and track the alignment of our financed emissions with limiting global warming to 1.5°C. For sectors where we have set sector-level financed emissions targets we aim to measure customer emissions across a	Elevate Reconciliation Action Plan FY23-25

defined component of the sector scope<sup>8</sup> that captures the most material emissions with the value chain, and set reduction targets that are consistent with limiting global warming to 1.5°C<sup>9</sup>. Refer to page 69 of our 2023 Climate Report.

#### Impact area two: Financial inclusion and wellbeing

#### Financial inclusion and wellbeing for victim survivors of domestic violence and financial abuse

• We launched the CommBank Next Chapter program in 2020, a bank-wide commitment to help end financial abuse and support people on their road to long-term financial independence. In partnership with Good Shepherd, CBA supported the establishment of the Financial Independence Hub (FIH). This service provides free, confidential, on-going support for people who have experienced financial abuse – feel more confident with money and plan for the future, regardless of who they bank with.

To measure our performance we obtain data from Good Shepherd on the number of participants supported through the Financial Independence Hub. Good Shepherd manage and protect the sensitive data collected from interactions with participants of the FIH (in compliance with Privacy obligations).

• To measure our performance on the support we provide to customers in vulnerable circumstances, we are monitoring the number of interactions with customers in vulnerable circumstances using the specialist services provided by our Next Chapter and Community Wellbeing teams. These teams are specifically trained to provide additional empathetic and trauma informed support, resources and referrals to both internal and external experts for our customers.

#### Financial inclusion for First Nations people

Our performance measure is the representation of Aboriginal and/or Torres Strait Islander peoples in our domestic workforce, to reflect parity with the Australian population. This is aligned to our RAP.

#### 2.2 Target Setting (Key Step 2)

Show that your bank has set and published a minimum of two targets which address at least two different areas of most significant impact that you identified in your impact analysis. The targets have to be Specific, Measurable (qualitative or quantitative), Achievable, Relevant and Time-bound (SMART). Please disclose the following elements of target setting (a-d), for each target separately:

a. Alignment: which international, regional or national policy frameworks to align your bank's portfolio with have you identified as relevant? Show that the selected indicators and targets are linked to and drive alignment with and greater contribution to appropriate Sustainable Development Goals, the goals of the Paris Agreement, and other relevant international, national or regional frameworks.

You can build upon the context items under 2.1.

Response	Links and references
Impact area one: Climate	2023 Climate Report
Our primary reporting for our climate strategy, transition roadmap, metrics and targets, and progress is included in our 2023 Climate	Sector targets – pages 12-27
Report, our TCFD-aligned report. The release of the Climate Report is authorised by the Board. Please refer to the 2023 Climate Report for	Performance summary – page 53
detailed disclosures and the limited assurance report.	Sector-level target methodology – pages 69-73

<sup>&</sup>lt;sup>8</sup> For more information on emissions scope choices made in each sector, see pages 72-73 of our 2023 Climate Report.

<sup>&</sup>lt;sup>9</sup> As a member of NZBA, CBA is required to set 2030 and 2050 net-zero targets that align with no/low-overshoot 1.5°C transition pathways as specified by credible science-based climate scenarios. The IPCC defines 'No overshoot' 1.5°C pathway as: those that give at least 50% probability based on current knowledge of limiting global warming to below 1.5°C by 2100. Source: IPCC, 2018: Annex Me Glossary. In: Global Warming of 1.5°C. An IPCC Special Report on the impacts of global warming of 1.5°C above pre-industrial levels and related global greenhouse gas emission pathways, in the context of strengthening the global response to the threat of climate change, sustainable development, and efforts to eradicate poverty.

In line with our NZBA commitment, we are required to use decarbonisation scenarios which to the extent possible, minimise misalignment with other SDGs. As part of our NZBA commitment we select reference scenarios which are consistent with limiting global warming to 1.5°C. Detail on how we have selected our reference scenarios is included on pages 69-73 of our 2023 Climate Report.

In our 2023 Climate report, we published 2030 sector-level targets for nine sectors: thermal coal mining, upstream oil extraction, upstream gas extraction, power generation, Australian home loans and heavy industry (steel, alumina, aluminium, cement). In FY23, we set new 2030 sector-level targets for two sectors: Australian housing and heavy industry (steel, alumina, aluminium, cement).

We have mapped our climate targets as relevant to support the achievement of SDG 7 – Affordable and clean energy, SDG 9 – Industry, Innovation and Infrastructure, SDG 11 – Sustainable cities and communities, and SDG – 13 Climate action.

#### Impact area two: Financial inclusion and wellbeing

## Financial inclusion and wellbeing for victims of domestic violence and financial abuse

Our targets for financial inclusion and wellbeing focus on the number of victims of domestic violence and financial abuse supported using the services provided by the Financial Independence Hub (participants); and the number of interactions with individuals experiencing domestic and family violence and financial abuse have had with our Next Chapter and Community Wellbeing teams.

We have mapped our target as relevant to support the achievement of SDG 5 - Gender equality (our objective is to support financial independence of individuals experiencing domestic violence and financial abuse, and we recognise domestic violence is a gendered issue that disproportionately impacts women) and SDG 10 - Reduced inequality.

Our targets and progress have been published in our 2023 Annual report.

## **Financial inclusion for First Nations people**

Our target is to achieve 3% Aboriginal and/or Torres Strait Islander representation in our domestic workforce, to reflect parity with the Australian population.

We have mapped our target as relevant to support the achievement of SDG 8 - Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all, and SDG 10 - Reduce inequality within and among countries.

Baseline: Have you determined a baseline for selected indicators and assessed the current level of alignment? Please disclose the indicators used as well as the year of the baseline. b. You can build upon the performance measurement undertaken in 2.1 to determine the baseline for your target.

A package of indicators has been developed for climate change mitigation and financial health & inclusion to guide and support banks in their target setting and implementation journey. The overview of indicators can be found in the Annex of this template.

If your bank has prioritized climate mitigation and/or financial health & inclusion as (one of) your most significant impact areas, it is strongly recommended to report on the indicators in the Annex, using an overview table like below including the impact area, all relevant indicators and the corresponding indicator codes:

Impact area	Indicator code	Response
Climate change mitigation		
Impact area	Indicator code	Response
Financial health & inclusion		

## 2023 Annual Report

Supporting our communities pages 34-35

**Elevate Reconciliation Action Plan** FY23-25

In case you have identified other and/or additional indicators as relevant to determine the baseline and assess the level of alignment towards impact driven targets, please disclose these.

Response			Links and references
<i>Impact area one: Climate</i> Please refer to our 2023 Climate Report for all relevant information relating to financed emissions metrics and baselines.			2023 Climate Report
			Strategy – pages 11-27 _ Engaging with selected customers
Impact area	Indicator code	Response	on their transition readiness –
Climate change	A.1.1	Climate Strategy	 pages 50-51
mitigation		Our climate strategy is explained in our 2023 Climate Report.	Financed emissions – pages 54-55
	A.1.2	Paris alignment target	Sector-level methodology – pages 69-7
		Refer to our 2023 Climate Report for our strategy to align our financed emissions with pathways to net zero by 2050, as well as information on the sector targets that have been set to date, including 2020 baseline information.	
	A.2.1	Client engagement process	
		Refer to our 2023 Climate Report for our climate engagement process, included in the Risk section on pages 50-51. In 2023, we engaged 100 of our most carbon intensive customers across our Institutional Bank to form a better understanding of the transition risks and opportunities they face. Refer to our 2023 Climate Report, pages 50-51 for detail.	
	A.2.2	Absolute financed emissions	_
		Refer to page 54-55 of our 2023 Climate Report for our absolute financed emissions of our lending portfolio.	
	A.2.3	Sector specific emissions intensity	
		We have used sector specific emissions intensity metrics to determine glidepaths for power generation, Australian housing and heavy industry sectors (steel, alumina, aluminium and cement). Refer to pages 69-73 of our 2023 Climate Report for our sector-level target methodology.	
	A.2.4	Proportion of financed emissions covered by a decarbonisation target For a breakdown of financed emissions attributable to each sector, including sectors covered by a decarbonisation target, see page 8 of our 2023 Climate Report.	-
	A3.1	Financial volume of green assets/low-carbon technologies	_
		Our Sustainability Funding Target (SFT) of \$70 billion in cumulative funding by 2030 helps us as we seek to support sustainable industries and asset types. As of 30 June 2023, we provided \$44.7 billion in funding towards our cumulative target. Refer to pages 56 – 57 of our 2023 Climate Report.	

#### Impact area two: Financial inclusion and wellbeing

Impact area	Indicator code	Response
Financial health &	N/A	Financial inclusion and wellbeing for victims of domestic violence and financial abuse
inclusion		Supporting of victims of domestic violence and financial abuse

	Financial Independence Hub (participants supported) <sup>10</sup> – Data is obtained from an external source, as the FIH is run in partnership with Good Shepherd. Data is used to measure the number FIH participants <sup>11</sup> .	_
	Baseline: 0 FIH participants at inception of the program (in 2020).	
N/A	Supporting customers in vulnerable circumstances	—
	Next Chapter and Community Wellbeing (customer interactions) <sup>12</sup> – Data is internally sourced. Based on number of interactions between our Next Chapter and Community Wellbeing teams, and customers in vulnerable circumstances. Data is used to measure the number of vulnerable customers supported.	
	Baseline: 0 interactions with customers at inception of the program (in 2020).	_
N/A	<b>Financial inclusion for First Nations people</b> Indigenous workforce (ancestry) percentage <sup>13</sup> – indicator is based on internal data, obtained from a non-compulsory annual employee survey.	
	Data is used to measure percentage of CBA's domestic workforce that identify as First Nations. Baseline: 0.2% in FY16, when the target was set.	
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•	ey performance indicators (KPIs)): Please disclose the targets for your first and your second area of most significant impa- ). Which KPIs are you using to monitor progress towards reaching the target? Please disclose	ct, if already in place (as well as further
impact areas, if in place	ey performance indicators (KPIs)): Please disclose the targets for your first and your second area of most significant impa	ct, if already in place (as well as further Links and references
•	ey performance indicators (KPIs)): Please disclose the targets for your first and your second area of most significant impa	
impact areas, if in place) Response Impact area one: Climate Dur primary reporting for	ey performance indicators (KPIs)): Please disclose the targets for your first and your second area of most significant impar ). Which KPIs are you using to monitor progress towards reaching the target? Please disclose our climate strategy, transition roadmap, metrics and targets, and progress is included in our 2023 Climate d report. The release of which is authorised by the Board. Please refer to the 2023 Climate Report for detailed	Links and references 2023 Climate Report Our transition roadmap – page 4 Metrics and targets – pages 53-55
impact areas, if in place) Response Impact area one: Climate Our primary reporting for Report, our TCFD-aligned isclosures and the limited in line with our NZBA comm	ey performance indicators (KPIs)): Please disclose the targets for your first and your second area of most significant impar ). Which KPIs are you using to monitor progress towards reaching the target? Please disclose our climate strategy, transition roadmap, metrics and targets, and progress is included in our 2023 Climate d report. The release of which is authorised by the Board. Please refer to the 2023 Climate Report for detailed	Links and references <u>2023 Climate Report</u> Our transition roadmap – page 4

#### Impact area two: Financial inclusion and wellbeing

<sup>10</sup> Financial Independence Hub (participants supported) is defined in our Annual Report (page 294): An individual who has received meaningful support, interactions or assistance within the Financial Independence Hub (FIH) program. This might include, but is not limited to, financial coaching, financial counselling, providing advice, information or education on domestic and family violence and/or financial abuse, referrals to other services within Good Shepherd or to external agencies, or support with tasks. A client can receive one or more services.

<sup>11</sup> The FIH is set up in partnership with an external organisation, Good Shepherd who manage and protect the sensitive data collected from interactions with participants of the FIH (in compliance with Privacy obligations).

<sup>12</sup> Next Chapter and Community Wellbeing (customer interactions) is defined in our Annual Report (page 299); The total number of interactions with customers in vulnerable circumstances, supported by the Next Chapter and Community Wellbeing teams. The channels are: calls answered; internal and external vulnerability referrals; and asynchronous chat opened conversations via the CommBank App. Excludes ASB businesses in New Zealand. Note that the metric may include some non-CBA customers who have called into the Next Chapter and Community Wellbeing team.

<sup>13</sup> Indigenous workforce (ancestry) percentage is defined in our 2023 Annual Report (page 297): Represents the proportion of employees who disclosed that they most strongly identify with Australian Aboriginal and/or Torres Strait Islander ancestry in the Group's biannual people and culture survey. Not all questions are surveyed during the survey period. Participation and disclosure in the survey is voluntary and can vary from yearto-year. Bankwest included from September 2020. From September 2022, the data represents the proportion of Australia-based employees only. Aboriginal and Torres Strait Islander representation in Australia is based on the 2021 Australian Census. Accompanying sustainability performance metric assured by PwC.

#### Financial inclusion and wellbeing for victims of domestic violence and financial abuse

Financial Independence Hub (participants supported): We have aspirations to support over 10,000 people impacted by domestic violence and financial abuse by the end of FY24 through the Financial Independence Hub.

To monitor progress toward our target, we track key indicators on a quarterly basis. Program Evaluations are prepared by Good Shepherd's Research & Advisory team, which is separate to the Financial Independence Hub.

Next Chapter and Community Wellbeing (customer interactions): We have a target to support 125,000 customers in vulnerable circumstances over five years (from 2020).

#### Financial inclusion First Nations people

We have a target of achieving 3% Aboriginal and/or Torres Strait Islander representation in our domestic workforce, to reflect parity with the Australian population, by December 2026. We monitor progress toward our target on an annual basis.

Our target has also been disclosed in our public RAP, available online.

Please refer to the 2023 Annual Report for the disclosure of our targets and progress made in these areas.

d. Action plan: which actions including milestones have you defined to meet the set targets? Please describe.

Please also show that your bank has analysed and acknowledged significant (potential) indirect impacts of the set targets within the impact area or on other impact areas and that it has set out relevant actions to avoid, mitigate, or compensate potential negative impacts.

Response	Links and references
Impact area one: Climate	2022 Climate Report
Our primary reporting for our climate strategy, transition roadmap, metrics and targets, and progress is included in our 2023 Climate Report, our TCFD-aligned report. The release of which is authorised by the Board. Please refer to the 2023 Climate Report for detailed	Strategy section – pages 16-27 Performance summary – page 41
disclosures. In our 2022 Climate Report we disclosed our transition roadmap to set targets on a majority of our FY20 financed emissions. These sectors were	2023 Climate Report
also identified by NZBA as priority sectors. We set 2030 financed emissions sector-lever targets on the following sectors: thermal coal mining, upstream oil extraction, upstream gas extraction, power generation.	Strategy – pages 10-16 Performance summary – pages 53
In our 2023 Climate report, on pages 4-5, we published our transition roadmap reconfirming our intention to set 2030 sector-level targets for additional sectors (including Australian agriculture, Australian commercial property, and transport) by 2024 and stating new products, services and engagement to support our customers and commitment to transparently report our progress. On page 13, we also published three key activities at a portfolio level we can take to achieve our sector-level financed emissions targets.	2023 Annual Report Ongoing support for domestic violence and financial abuse – page 34
Impact area two: Financial inclusion and wellbeing	Elevate Reconciliation Action Plan
Financial inclusion and wellbeing for victims of domestic violence and financial abuse	<u>FY23-25</u>
We will continue to work with Good Shepherd and use participant insights from the FIH to improve client access and inform future initiatives which will support progress towards achieving our aspirations.	<u>CareerTrackers</u>
Financial inclusion for First Nations people	
The following summarises our plan to achieve the targets:	

• The objective of our 2023-2025 Indigenous Careers Attraction Strategy is to increase representation of Aboriginal and/or Torres Strait Islander peoples across our domestic workforce to 3% by December 2026.

. . .

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- Providing career pathways into CBA for First Nations People (as disclosed in our RAP, page 22) by:
  - Providing at least 70 school-based traineeship positions annually (35 trainees in their first year of the program and 35 trainees in their second year at any given time), achieving at least 30% conversion to permanent roles or full-time traineeship positions on completion of the traineeships.
  - Providing at least 15 full-time traineeship positions annually, achieving at least 60% conversion to permanent roles on completion of the traineeships.
  - Continuing to partner with CareerTrackers to provide at least 25 Indigenous university internship opportunities across CommBank and Bankwest and achieve at least 60% conversion to permanent roles or graduate program positions on graduation from university.

#### 2.3 Target implementation and monitoring (Key Step 2)

#### For each target separately:

Show that your bank has implemented the actions it had previously defined to meet the set target.

Report on your bank's progress since the last report towards achieving each of the set targets and the impact your progress resulted in, using the indicators and KPIs to monitor progress you have defined under 2.2.

Or, in case of changes to implementation plans (*relevant for 2<sup>nd</sup> and subsequent reports only*): describe the potential changes (changes to priority impact areas, changes to indicators, acceleration/review of targets, introduction of new milestones or revisions of action plans) and explain why those changes have become necessary.

Response				Links and references
Impact area one: Climate	2023 Climate Report			
Our primary reporting for our c Report, our TCFD-aligned repo disclosures along with PwC's li	Strategy – pages 12-27 Metrics and targets – pages 52-61			
In FY23 we made progress in accordance with our transition roadmap as disclosed in our 2022 Climate Report. We set five new sector level targets (Australian housing and heavy industry (i.e. steel, aluminium, alumina, cement). We continued to transparently report our baseline, actual financed emissions as at 30 June 2022 and target for our previously set targets (i.e. thermal coal mining, upstream oil extraction, upstream gas extraction, power generation).				<u>2023 Annual Report</u> Our commitment to sustainability – pages 18-39 Sustainability performance – pages 40-46
CBA's progress is summarised in	our 2023 Climate Report, see sector pages of	on 12-27 and our metric	s and targets on pages 52-61.	
Impact area two: Financial inclu	ision and wellbeing			
	impact identified in the impact analysis using vellbeing included (1) victim-survivors of dom		s explained in section 2.1, our priority impact cial abuse, and (2) First Nations people.	
Metric (per 2.2)	Target	FY22	FY23 (progress)	_
Financial Independence Hub	Support minimum of 10,000 people	1,440	1,598	_
(participants supported) <sup>14,15</sup>	impacted by domestic violence and		(cumulative since inception in	
	financial abuse by the end of FY24		2020: 4,478 participants	

(betroggue

obligations). This limits our ability to access detailed information of the participants. The number of participants supported is as reported to CBA by Good Shepherd for the year.

<sup>15</sup> FY23 includes a broader range of meaningful support provided to participants by the Financial Independence Hub. Prior years have been restated to ensure comparable year-on-year data.

<sup>&</sup>lt;sup>14</sup> The FIH is set up in partnership with an external organisation, Good Shepherd who manage and protect the sensitive data collected from interactions with participants of the FIH (in compliance with Privacy

Next Chapter and Community Wellbeing (customer interactions) <sup>16</sup>	Support 125,000 customers in vulnerable circumstances over five years	17,107 <sup>17</sup>	20,560 <sup>17</sup> (cumulative since inception in 2020: 47,749 participants supported)
CBA Indigenous workforce (ancestry) <sup>18</sup>	3% Aboriginal and/or Torres Strait Islander representation in our domestic workforce by December 2026	In FY22, we had achieved 0.9% representation across our domestic workforce	1.0% representation across our domestic workforce

#### **Principle 3: Clients and Customers**

We will work responsibly with our clients and our customers to encourage sustainable practices and enable economic activities that create shared prosperity for current and future generations.

#### 3.1 Client engagement

Does your bank have a policy or engagement process with clients and customers in place to encourage sustainable practices?

Does your bank have a policy for sectors in which you have identified the highest (potential) negative impacts?

#### ⊠ Yes □ In progress

Describe how your bank has worked with and/or is planning to work with its clients and customers to encourage sustainable practices and enable sustainable economic activities). It should include information on relevant policies, actions planned/implemented to support clients' transition, selected indicators on client engagement and, where possible, the impacts achieved. *This should be based on and in line with the impact analysis, target-setting and action plans put in place by the bank (see P2).* 

Response	Links and references	
Noting we have reduced the Bank's exposures to fossil fuel extraction, many of our remaining largest emitting customers are operating in harder-to- abate sectors including transport, mining and heavy industry.	2023 Climate Report Engaging with selected customers on	
In 2023, we engaged 100 of our most carbon intensive customers across our Institutional Bank to form a better understanding of the transition risks and opportunities they face. See pages 50-51 of our 2023 Climate Report.	their transition readiness – pages 50-51	
We have the ability to engage with our customers to help them understand and improve the resilience of their homes against increasingly frequent extreme weather events such as draughts, floods, bushfires and storms. This year CBA launched the Building Resilience Pilot program with the support of Edge impact. The aim of the program is to provide customers with information and tools to make informed decisions regarding their home's climate resilience, and to identify areas of their homes that may increase their vulnerability to potential climate hazards.		
CBA's Behavioural Science Centre of Excellence is working to understand customer climate-action drivers and intentions. We will use these findings to understand how we can encourage more of our customers to take action on climate change, and educate them on how CBA can customers to take		

to understand how we can encourage more of our customers to take action on climate change, and educate them on how CBA can support them to achieve their personal climate goals. See page 29 of our 2023 Climate Report for more information.

<sup>16</sup> FY23 includes a broader range of meaningful support provided to participants by the Financial Independence Hub. Prior years have been restated to ensure comparable year on year data. Metric is not assured by PwC.

<sup>17</sup> In FY22, 72 interactions covering outbound contacts made for the purpose of supporting customers in receipt of potentially abusive transaction descriptions were also included. This channel was excluded in FY23 due to a change in information handling. Of the total 20,560 interactions, 16,260 were assured by PwC. 875 internal vulnerability referrals received by the Community Wellbeing team were also excluded from the limited assurance engagement due to a change in information handling. 3,425 interactions related to the asynchronous chat channel, were unable to be assured due to the nature of the third party data that was able to be provided as part of the assurance.

<sup>18</sup> Metric can be volatile due to small sample size. Prior to FY23, figure was calculated as a proportion of employees in all included locations. In FY23, we provided localised response options to participants based in India. As such, the methodology changed to reflect the proportion of Australia-based participants who selected any of the Indigenous response options. 2021 Australian Census (Aboriginal or Torres Strait Islander) was 3.2%.

#### 3.2 Business opportunities

Describe what strategic business opportunities in relation to the increase of positive and the reduction of negative impacts your bank has identified and/or how you have worked on these in the reporting period. Provide information on existing products and services, information on sustainable products developed in terms of value (USD or local currency) and/or as a % of your portfolio, and which SDGs or impact areas you are striving to make a positive impact on (e.g. green mortgages – climate, social bonds – financial inclusion, etc.).

#### Response Key areas we worked with customers to achieve our targets under 2.1 and encourage progress toward achieving our impact area targets (and 2023 Climate Report relevant SDGs) during the year include: Strategy - pages 4-5, 15, 24-27 Impact area one: Climate 2023 Annual Report We aim to support our customers with products, services and engagement. Our customers by number are largely Australian households and small Our commitment to sustainability businesses. This year we have expanded our range of lending products to incentivise retail and business customers to reduce their emissions. pages 30-39 We offer our customers a number of products, including our Green Home Offer, Green Loan and Personal Loan Green Offer, to support them in Sustainability performance – page 45 building or renovating their homes to a more energy efficient standard, or with the purchase of solar panels, batteries and solar or heat pump water systems. More information can be found in our 2023 Climate Report on page 4-5. Supplier Code of Conduct Further examples and details are included in our 2023 Climate Report on pages 15, 24-27. Further information on our SFT can be found on pages Social – pages 4-5 56, 78-79. Accessibility and Inclusion Plan 2021-Impact area two: Financial inclusion and wellbeing 2023 Accessible banking – This year, we launched Equal Access Toolkits into all branches to make it easier for our customers with different accessibility requirements to bank with us.

Promoting diversity and inclusion among our suppliers - Our Supplier Code of Conduct requires that our suppliers have in place Equal Employment Opportunity (EEO), anti-discrimination and anti-harassment policies covering their operations and supply chain which meet or exceed requirements of any relevant laws. For more details see our Supplier Code of Conduct pages 4-5.

CBA has a complex and diverse supply chain made up of over 4,300 suppliers. We recognise that diversity in our supply chain drives flexibility, responsiveness and innovation. We seek to engage and support Indigenous-owned businesses and social enterprises though our direct (first tier) and indirect (second tier) suppliers. This year we appointed an Indigenous Supplier Relationship Manager to ensure an Indigenous perspective when engaging with Indigenous suppliers. Through our FY23-FY25 RAP, we have targeted increasing our spend with Indigenous businesses by 10% yearon-year, this year achieving a 19% increase. In the 2023 financial year, we also increased the number of Indigenous suppliers with whom we spend by 18%, including three regional and remote suppliers.

For more, refer to our Accessibility and Inclusion Plan for the period 2021 to 2023 which outlines the actions we are taking to be more accessible.

#### **Principle 4: Stakeholders**

We will proactively and responsibly consult, engage and partner with relevant stakeholders to achieve society's goals.

#### 4.1 Stakeholder identification and consultation

Does your bank have a process to identify and regularly consult, engage, collaborate and partner with stakeholders (or stakeholder groups) you have identified as relevant in relation to the impact analysis and target setting process?

🖾 Yes □ In progress 

Please describe which stakeholders (or groups/types of stakeholders) you have identified, consulted, engaged, collaborated or partnered with for the purpose of implementing the Principles and improving your bank's impacts. This should include a high-level overview of how your bank has identified relevant stakeholders, what issues were addressed/results achieved and how they fed into the action planning process.

#### Links and references

#### Indigenous business banking

#### Response

#### Links and references

We recognise the importance of building trusted relationships with stakeholders to achieve our purpose. Our diverse stakeholder groups provide valuable insight through their different perspectives. CBA's stakeholder engagement approach ensures our engagement is conducted responsibly when we interact with our key stakeholders employees, customers, communities, government, political parties, industry associations, regulators, investors and suppliers. Key stakeholders are individuals and groups whose interests are affected or could be affected by the Bank's activities.

As included in principle 2.1 in the context of determining our impact areas, we performed an ESG materiality assessment to identify stakeholder priorities to consider in how we conduct business. The results of this assessment will support focused decision making and allow us to deliver on our purpose of building a brighter future for all our stakeholders. It also enables us to better understand how we can align with and positively deliver on the UN Sustainability Development Goals (SDGs). Our material themes have been mapped to relevant SDGs on page 21 of the 2023 Annual Report.

We engage with our customers and the community through feedback channels, surveys and workshops, customer representative bodies, and community visits and programs. This year we sought customer feedback on the development of the refreshed CommBank app, which helped inform a number of improvements and new features. We also used feedback to identify and fix customer service issues.

Our dedicated Customer and Community Advocacy team represents the voice of the customer and community at the Bank, helping us find and fix negative impacts and improve our products and services. We engage with them through our Community Council and regular community visits.

About our Environmental and Social Framework (E&S Framework): The environmental and social considerations outlined in this document reflect the key matters we have identified through feedback and engagement with our customers, people, communities, and shareholders. Our E&S Framework is available online.

Stakeholder engagement is a critical aspect of Board decision-making. Meeting with internal and external stakeholders builds better understanding of diverse views and needs, and helps identify areas of opportunity and risk for the Bank. For a summary of Board stakeholder engagement in the year, refer to page 69 of the 2023 Annual Report.

#### Impact area one: Climate

Climate change is a collective challenge that requires collaboration with a number of stakeholders including our customers, communities, government, industry and academia.

For detail on how we are bringing stakeholders together, sharing insights through partnerships and collaboration, aligning our industry associations and memberships, and participating in the public policy debate, refer to our 2023 Climate Report, page 28 and page 88.

As part of our commitment to NZBA we are required to engage on corporate and industry (financial and real economy) action, as well as public policies, to help support a net-zero transition of economic sectors in line with science and give consideration to associated social impacts.

#### Impact area two: Financial inclusion and wellbeing for victims of domestic violence and financial abuse

#### Financial inclusion and wellbeing for victims of domestic violence and financial abuse

We remain committed to helping victim-survivors of domestic violence and financial abuse by continuing our support for customers, employees and communities through CommBank Next Chapter.

Delivered in partnership with Good Shepherd, the Financial Independence Hub continues to provide services to people impacted by financial abuse, supporting 4,478 participants since inception, by building confidence and financial independence. The Hub is delivering positive outcomes for participants including increased optimism for the future, steps towards financial recovery and independence, and increased financial resilience, no matter who they bank with.

This year we continued to educate our people on how to respond to and prevent financial abuse. The Group Customer Advocate also conducted a review into coercive relationship debt, a highly sensitive form of financial abuse, which often goes unrecognised by customers until acute impacts are

#### 2023 Annual Report

Our approach to ESG – pages 20-21 Expanding support for domestic violence and financial abuse – pages 34-35 Our Board in action – Approach to stakeholder engagement – page 69

#### **Environmental and Social Framework**

#### Webpage: Corporate Governance – Risk Management and Assurance

Webpage – Stakeholder engagement

#### 2023 Climate Report

Climate strategy – page 11 Bringing stakeholders together – page 28 Policy priorities through our industry partners – page 88

#### **Reconciliation Action Plan FY23-FY25**

Focus areas and activities – page 19 Pillar 2: Foundation: Economic Empowerment and Prosperity – page 20

## Human Rights of First Nations Stakeholders Grievance Process Framework

Introduction – page 1

felt. The review produced a number of recommendations that are being implemented throughout the Bank. These include tailored hardship support, employee and customer education, and updates to our processes.

#### **Reconciliation Action Plan:**

Acknowledging the importance of taking a rights-based approach to our reconciliation program and having Aboriginal and Torres Strait Islander voices and perspectives inform our approach and decisions, our Indigenous Advisory Council (IAC) was formed in 2014. The IAC consists of senior CommBank leaders, a First Nations CommBank employee representative, and external Aboriginal and Torres Strait Islander leaders to guide the development and implementation of our reconciliation program.

We recognise and respect the important role our IAC plays in ensuring we appropriately and publicly support issues that affect First Nations peoples. Through the support of our IAC we have developed a better understanding of CommBank's role in reconciliation, including when it is appropriate to take a leading role on issues and when it is more appropriate to support other voices in their advocacy.

One of our focus areas is to deepen our community engagement to support First Nations solutions designed by the community, for the community. Our activities related to this area are listed on page 19 of our RAP.

#### Attracting First Nations people to the Bank:

The enablers and barriers to Indigenous Australians' participation in employment are numerous and intertwined with social, cultural, geographic and economic factors. In early 2022, the Indigenous Careers team conducted a review seeking to understand how we might better attract First Nations peoples to the Bank, while also seeking to understand what, if any, other factors were contributing to slower than expected progress against our 3% target. This included discussions with Indigenous Partner organisations, CommBank leaders and Indigenous Program Managers and listening sessions conducted with First Nations employees. This review provided us with extensive and valuable lessons, including that there are opportunities to better amplify our talent attraction messaging as well as expanding the channels we use to engage candidates. We also found better ways to align workforce plans and demand forecasts to diverse talent supply and identified that across the bank there is inconsistency in First Nations employee experiences.

These insights have supported the Indigenous Careers team to develop a refreshed approach to our Indigenous Careers Attraction Strategy. The strategy builds on our improved understanding of effective approaches to Indigenous careers development, internal engagement, community partnerships and recruitment marketing. While the new Indigenous Careers Attraction Strategy aims to increase the number of First Nations people we employ, we are tracking behind our plans to achieve 3% target by 2026. Further detail is provided in our RAP on page 20.

#### Human Rights of First Nations Stakeholders Grievance Process Framework

In line with our RAP commitments, this Process has been supported by the Bank's IAC and Indigenous Leadership Team (ILT). It seeks to provide an avenue for First Nations Stakeholders to raise directly with CBA genuine concerns regarding human rights impacts connected with CBA's business lending activity to Clients<sup>19</sup>. It is intended that this Process assists in developing positive working relationships with First Nations Stakeholders.

#### Principle 5: Governance & Culture

We will implement our commitment to these Principles through effective governance and a culture of responsible banking			
5.1 Governance Structure for Implementation of the Principles			
Does your bank have a governance system in place that incorporates the PRB?			
□ Yes 🛛 In progress □ No			

<sup>19</sup> Clients is defined in our annual Report (page 291): A customer who is relationship managed by the Group's Institutional or Business Bank with financing transactions \$5 million or greater.

Please describe the relevant governance structures, policies and procedures your bank has in place/is planning to put in place to manage significant positive and negative (potential) impacts and support the effective implementation of the Principles. This includes information about

- which committee has responsibility over the sustainability strategy as well as targets approval and monitoring (including information about the highest level of governance the PRB is subjected to),
- details about the chair of the committee and the process and frequency for the board having oversight of PRB implementation (including remedial action in the event of targets or milestones not being achieved or unexpected negative impacts being detected), as well as
- remuneration practices linked to sustainability targets.

#### Response

Effective governance underpins our approach in ensuring we have the right policies, systems and processes in place to deliver on our E&S obligations. 2023 Annual Report

PRB impact areas, targets and monitoring is governed through existing governance structures for E&S matters, with implementation through the business units.

Our E&S Framework sets out the minimum standards regarding our approach to E&S issues, our E&S targets and goals, and the governance and oversight in place to support our E&S commitments. Our priority impact areas are included in our E&S Framework. The Board holds the CEO and the Executive Leadership Team (ELT) accountable for the delivery of E&S responsibilities outlined in our policies, procedures and in accordance with the risk appetite set by the Board.

In 2022, we established a Commitments Register to track and manage how we comply with our E&S commitments. This year, we integrated the commitments outlined in our E&S Framework from our register into the Bank's risk management system to enhance our risk management framework, and improve reporting and governance. Ahead of publishing our 2023 E&S Framework, relevant business units and support units used the risk management system to complete an attestation to the E&S Policy commitments reflected in the Framework.

The **Executive Leadership Team (ELT) E&S Committee** was established to oversee detailed implementation of our E&S work program and provide governance of E&S risks and opportunities.

The ELT E&S Committee, chaired by the CEO, consists of Group Executives and senior leaders across business and support unit functions. The purpose of this Committee is to oversee E&S strategy, governance, priorities for implementation and disclosures. It is the point of escalation for all matters regarding E&S program direction, and is the approval body for major E&S program strategic decisions. Decisions made by the ELT E&S Committee include setting and monitoring targets and approving key methodologies, which are then reviewed and approved by the Board. Each member is accountable for driving the strategic priorities within their business or support unit. The Bank's CFO has oversight of the environmental-related aspects of the E&S work program across the Bank. Meetings occur monthly.

Updates on E&S performance are provided to the board through the year. For more information on the frequency of selected topics on Board meetings agendas, see the 2023 Annual report, page 68 and pages 70-71.

Providing effective governance of environmental issues enables the Board to oversee the Bank's management of climate- related risks and opportunities – this is explained further in our 2023 Climate Report, on pages 30-35.

#### **Remuneration link to E&S issues**

The current executive performance and remuneration framework considers specific E&S, including climate, deliverables. E&S is included within the Strategy Execution key performance indicator (KPI) for the ELT, including the CEO. Assessment of executive performance includes a review of progress on delivering the Group's strategic priorities.

For more information, refer to the Remuneration Report on pages 88-116 of the 2023 Annual Report and page 32 of the 2023 Climate Report.

#### Links and references

Sustainability – Governance – pages 36-39 Remuneration report – pages 88-116 Corporate governance – pages 66-81

#### Environmental and Social Framework

#### 2023 Climate Report

Governance - pages 30-35

#### 5.2 Promoting a culture of responsible banking

Describe the initiatives and measures of your bank to foster a culture of responsible banking among its employees (e.g., capacity building, e-learning, sustainability trainings for client-facing roles, inclusion in remuneration structures and performance management and leadership communication, amongst others).

#### Response

Our position and scale means we have a key role to play in creating a brighter future for our people, our customers and our communities, particularly during times of economic uncertainty, when many are struggling with cost of living pressures.

We always seek to conduct our business responsibly and uphold a high standard of governance to meet our obligations. Our approach to governance is provided on pages 36-39 of our 2023 Annual Report.

Our materiality assessment enables us to engage with stakeholders and identify topics with the most potential to impact the Australian people, community and environment. It also helps us better understand the Bank's ability to influence these impacts – directly or indirectly.

During the year, we reviewed our E&S Framework and refined our approach to assessing certain clients' transition plans against the expectations set out in the E&S Framework. We also clarified how our business units should develop products or services with E&S features. Our Product Development Procedure helps to ensure that products and services we develop and distribute meet our customers' likely objectives, financial situation and needs, and are monitored to identify and address any issues or concerns. This year, we added requirements for business units to govern, manage and monitor products or services that have E&S features, and to escalate any changes to E&S features to E&S subject matter experts within their business units.

CBA's Risk Management Approach sets out the Board and Executive Leadership Team's expectations regarding how we identify, measure, monitor and respond to our risks. Our risk behaviours in particular require us to support constructive debate and challenge of our risks and controls, adhere to the Code of Conduct, including asking 'Should We?', and share our learnings so that we can deliver better customer outcomes. The Board Risk Culture Assessment allows the Board to form a view of the Group's risk culture and identify desirable changes that will instil an appropriate risk culture.

Our Leadership Principles are a key element of our culture plan, describing both what to prioritise and what is required to lead successfully at CBA. Embedded throughout the organisation, the principles are intentionally aspirational and aimed at provoking fundamental shifts to mindsets and behaviours. Further detail is provided on pages 25-26 of our 2023 Annual Report.

Some of the ways we foster a culture of responsible banking among our employees include:

- Mandatory training around our Code of Conduct and other key Risk types ensures that our people clearly understand what it means to do the right thing. There are remuneration consequences for employees who do not meet their training obligations.
- All employees at CBA undertake annual mandatory privacy training. The Bank also maintains an information security training and awareness
  program that involves participation from employees to reinforce the information security roles and responsibilities of our employees and
  contractors. This program includes online training completed when joining the Bank, and thereafter on an annual basis. The mandatory training is
  based on regulatory guidance and best practices to ensure our people know how to prevent, detect and escalate cyber risks appropriately.
  Noncompletion of mandatory training may result in disciplinary action, including termination. This training is further supported through
  information security awareness initiatives including simulated exercises and intranet articles and newsletters, which promote secure practices
  across key topics such as 'phishing' and 'spear phishing' attacks, password security, and secure information transfer and storage.
- Building our people's knowledge of climate and broader environmental risks is an important enabler in our climate strategy and approach to environmental risk management. We have built a range of learning modules and training resources focused on uplifting our front line teams' climate capabilities. For our lenders in the Retail Bank, this includes an eLearning module, outlining the products lenders can offer to help customers navigate the transition, and detailed conversation guides to provide our lenders with additional support. In addition to online training, our Business Banking team members can attend classroom sessions and webinars that discuss the features of our more sophisticated financing options. Throughout the year, we held training sessions for our business bankers outlining the ESG risk assessment tool process. In the

## Links and references

#### 2023 Annual Report

How we create value – pages 4-5 Simpler, better foundations, Sustaining leading risk management – page 17 Our approach to ESG, Engaging with stakeholders – pages 20-21, 25 Supporting our customers – pages 30-33 Strengthening our communities – pages 34-35 Governance – pages 36-39 Remuneration report – pages 88 – 116

#### 2023 Climate Report

Our approach to governance – page 31 Embedding E&S governance into our business – page 34 Building capability in our people – page 35 Institutional Bank, all team members are required to complete ESG fundamentals training. Additional training on the ESG risk assessment tool is required for frontline bankers and credit risk teams who are assessing institutional lending transactions.

- We have also sought to engage our people through access to conferences and knowledge sharing events. More than 200 people attended our second Momentum Sustainability Conference, which brought together discussions from leading experts on how we can accelerate Australia's transition. This was followed by our Banking the Transition Week, attended by over 2,300 people that explored how some of our larger customers are approaching their transition journeys.
- We provided guidance and training for branch and specialist centre employees to respectfully offer Equal Access Toolkits to those who may need them.
- Ensuring fair and equitable outcomes for customers is a key priority, and informs our responsible product design, marketing and communication approach. The Bank's policies and procedures set out our commitment to providing information and marketing materials that are clear, accurate, and when targeted, relevant to the customer. We also embed regular reviews of products, services and communications.
- Board education sessions for the 2023 financial year included cyber-related risks, Respect at Work, director's duties and responsible AI.
- E&S is one of the skills included in the Board Skills Matrix with Directors assessing their prior experience and continuing education relating to a skill. On E&S skill, four directors have been assessed as 'high competency, knowledge and experience' and six have been assessed as 'practised/direct experience'.

The current executive performance and remuneration framework consider specific E&S, including climate, deliverables. E&S is included within the Strategy Execution key performance indicator (KPI) for the ELT, including the CEO. Assessment of executive performance includes a review of progress on delivering the Group's strategic priorities, including advancing our E&S commitments.

#### 5.3 Policies and due diligence processes

Does your bank have policies in place that address environmental and social risks within your portfolio? Please describe.

Please describe what due diligence processes your bank has installed to identify and manage environmental and social risks associated with your portfolio. This can include aspects such as identification of significant/salient risks, environmental and social risks mitigation and definition of action plans, monitoring and reporting on risks and any existing grievance mechanism, as well as the governance structures you have in place to oversee these risks.

Response	Links and references
A key part of our climate strategy is to build leading climate risk management practices. We seek to understand how E&S issues could impact our business, and how our business activities can have an impact on climate, our customers and the community. We have a range of tools and processes to help us identify and assess the risks to our operations and strategy, and will continue to manage and monitor these risks as they evolve.	<u>2023 Climate Report</u> Risk – pages 36-51
The Bank manages risks, including E&S risk, through our Risk Management Framework (RMF). E&S risk includes climate change and nature-related impacts and represents drivers of material strategic, financial and non-financial risks to the Bank. Our approach seeks to measure and monitor the physical and transition risks from climate change that impact our business over different time horizons. We model potential climate scenarios to inform our understanding and guide our future actions.	2023 Annual Report Governance – page 37 Environment and social policies and
For detail on our approach to climate risk, refer to pages 36-51 in our 2023 Climate Report.	practices webpage
With a continued focus on respecting human rights, we support the United Nations Guiding Principles on Business and Human Rights. Addressing modern slavery risk remains a critical focus for the Bank. Our Annual Modern Slavery Statements outline the actions taken by the Bank to identify, assess and mitigate modern slavery and human trafficking risks in our operations and supply chain. In line with the annual reporting requirement under the Modern Slavery Act, we published our latest Modern Slavery and Human Trafficking Statement in December 2022.	
We recognise the importance of engaging with external experts to support appropriate responses to human rights issues, and through our Social Impact Program we continue to engage formal advisory bodies, including our Modern Slavery Advisory Council and IAC.	
Supported by the Bank's IAC and ILT, we launched a Human Rights of First Nations Stakeholders Grievance Process Framework. The process seeks to provide an avenue for First Nations stakeholders to raise directly with us genuine concerns regarding possible human rights impacts connected	

with CBA's business lending activity to Clients. Prior to the launch of the grievance process, we received and responded to one grievance relating to the resources sector.

Our environmental and social policies and practices, including our E&S Framework and our Human Rights of First Nations Stakeholders Grievance Process Framework is available at <u>commbank.com.au/policies</u>.

#### Principle 6: Transparency & Accountability

We will periodically review our individual and collective implementation of these Principles and be transparent about and accountable for our positive and negative impacts and our contribution to society's goals.

6.1 Assurance	
Has this publicly disclosed information on your PRB commitments been assured by an independent assurer?	
$\Box$ Yes $\Box$ Partially $\Box$ No	
If applicable, please include the link or description of the assurance statement.	
Response	Links and references
Our responses to sections 2.1, 2.2, 2.3, 2.4, 5.1 within this PRB reporting and self-assessment template have been subject to PwC independent limited assurance under ASAE3000 as per the attached assurance report on pages 23-26 of this document.	Refer to pages 23-26
6.2 Reporting on other frameworks	
Does your bank disclose sustainability information in any of the listed below standards and frameworks?	
⊠ GRI	
⊠ SASB	
□ IFRS Sustainability Disclosure Standards (to be published)	
X TCFD	
I Other: detailed below	
Response	Links and references
For detail refer to Global principles and policies on page 2 of our 2023 Annual Report.	2023 Annual Report
Our 2023 Sustainability Appendix (this document), contains our disclosures aligned to: Global Reporting Initiative (GRI) Standards Index and the Sustainability Accounting Standards Board (SASB) Index.	About this report – page 2
Our 2023 Climate Reports seeks to align with Task Force on Climate-related Financial Disclosures recommendations. We are also a member of the Taskforce on Nature-related Financial Disclosures Forum.	<u>2023 Climate Report</u> Our Task Force on Climate-related Financial Disclosures content index –
Our E&S Framework also includes detail of guidelines, frameworks and initiatives that we participate in and support, on page 3.	page 89

Our Modern Slavery Statement has been prepared to comply with the reporting requirements of both Section 14 of the *Modern Slavery Act 2018* (Cth) and Section 54 of the *Modern Slavery Act 2015* (UK).

#### Environmental and Social Framework Modern Slavery and Human Trafficking Statement 2022

#### 6.3 Outlook

What are the next steps your bank will undertake in next 12 month-reporting period (particularly on impact analysis, target setting and governance structure for implementing the PRB)? Please describe briefly.

Response		Links and references	
We remain committed to continue implementing the Principles for Respons impact.	<u>2023 Climate Report</u> Our transition roadmap – pages 4-5		
Impact area one: Climate	Strategy – pages 10-29		
As set out in our transition roadmap on pages 4-5 in our 2023 Climate Report, in 2024 we aim to set financed emissions targets for Australian agriculture, Australian commercial property and transport. Refer to our transition roadmap and our climate strategy in our 2023 Climate Report, for detail regarding our next steps.			
Impact area two: Financial inclusion and wellbeing			
We will continue to use the results of the impact analysis pilot to inform our	r areas of focus for financial inclusion and wellbeing.		
Here is a short section to find out about challenges your bank is possibly fac contextualise the collective progress of PRB signatory banks. What challenges have you prioritized to address when implementing the Pri to address in the last 12 months (optional question). If desired, you can elaborate on challenges and how you are tackling these:			
Embedding PRB oversight into governance	Customer engagement		
$\Box$ Gaining or maintaining momentum in the bank	Stakeholder engagement		
$\Box$ Getting started: where to start and what to focus on in the beginning	🗆 Data availability		
🛛 Conducting an impact analysis	🗆 Data quality		
□ Assessing negative environmental and social impacts			
Choosing the right performance measurement methodology/ies	Reporting		
□ Setting targets	⊠ Assurance		
□ Other:	Prioritizing actions internally		
If desired, you can elaborate on challenges and how you are tackling these:			

#### Important information

This report contains certain forward looking statements and metrics. Any such forward looking statements speak only as at the date of this report, and undue reliance should not be placed upon such statements. Although the Group currently believes the forward looking statements have a reasonable basis, they are not certain and involve known and unknown risks and assumptions, many of which are beyond the control of the Group, which may cause actual results, performance, conditions, circumstances or the ability to meet commitments and targets set forth in the Group's forward looking statements to differ materially from those expressed or implied in such statements. While the Group has prepared the information in this report based on its current knowledge and understanding and in good faith, it reserves the right to change its views in the future. To the maximum extent permitted by law, responsibility for the accuracy or completeness of any forward looking statements, whether as a result of new information, future events or results or otherwise, is disclaimed.

Climate-related data is underpinned by methodologies containing uncertainties, assumptions and judgments that limit the extent to which they can be relied upon. This applies to all climate-related metrics, including (without limitation) historical metrics relating to emissions and forward-looking climate metrics. The measures in this report reflect best estimates, assumptions and judgements at the date of this report. There is a risk that the estimates or assumptions may subsequently prove to be inaccurate.

The information in this report also references or summarises relevant information in our 2023 reporting suite and any supplementary information that may support this report. Readers are advised to review this supporting information in full along with any associated limitations.

The material in this report is general background information about the Group and its activities current as at the date of the report. It is information given in summary form and does not purport to be complete. Information in this presentation is not intended to be relied upon as advice to investors or potential investors and does not take into account the investment objectives, financial situation or needs of any particular investor. Investors should consider these factors, and consult with their own legal, tax, business and/or financial advisors in connection with any investment decision.



Independent limited assurance report on selected disclosures in the Commonwealth Bank of Australia and its subsidiaries (the Group) 2023 Principles for Responsible Banking Self-Assessment Template

To: The Board of Directors of the Commonwealth Bank of Australia

## Scope

In accordance with the terms of engagement letter dated 08 March 2023, we were engaged by the Commonwealth Bank of Australia ("**the Group**" or "**CBA**") to perform an independent limited assurance engagement in respect of Selected Disclosures (the "**Selected Disclosures**") as presented within the Principles for Responsible Banking Reporting and Self-Assessment Template (the "**UN PRB Template**") on pages 4 to 22 of CBA's Sustainability Reporting Appendix (the "**Report**") for the year ended 30 June 2023 ("**the Period**").

## **Selected Disclosures and Reporting Criteria**

The Selected Disclosures are descriptions of activities undertaken by CBA in the following sections of the UN PRB Template:

- 2.1 Impact Analysis
- 2.2 Target Setting
- 2.3 Target Implementation and Monitoring
- 5.1 Governance Structure for Implementation of the Principles

The Reporting Criteria comprises the descriptions contained within the Selected Disclosures including associated footnotes that describe the bases upon which they have been prepared.

Specifically but without limitation, the scope of our assurance is over the content disclosed in the sections of the UN PRB Template described above and whether it accurately reflects the actions taken by CBA. Our assurance conclusion does not extend to any other information included in or linked to the Report.

We have not performed any work, and do not express any conclusion over:

PricewaterhouseCoopers, ABN 52 780 433 757

One International Towers Sydney, Watermans Quay, Barangaroo NSW 2000, GPO BOX 2650 Sydney NSW 2001

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Liability limited by a scheme approved under Professional Standards Legislation.



- Other sections of the UN PRB Template beyond those described above nor any other information that may be included in the Report or displayed elsewhere on CBA's website for the current or for previous periods unless otherwise indicated;
- The reliability of third-party sources of information and/or research considered by CBA as described in the UN PRB Template as inputs into its Impact Analysis activities;
- The reliability of information provided by Good Shepherd as reported to CBA in relation to the number of people supported through its Financial Independence Hub;
- The design or operating effectiveness of activities described by CBA in relation to: Impact Analysis; Target Setting; Target Implementation and Monitoring; or Governance Structures for Implementation of the Principle;
- Any forward looking statements made by CBA regarding future actions to be undertaken or achievement of commitments; or
- CBA's choice of Impact Areas and Targets.

## Management's responsibilities

The Management of CBA are responsible for:

- Determining matters and relevant activities to be described within the UN PRB Template;
- Selecting or establishing suitable criteria for the preparation and evaluation of the Selected Disclosures;
- The preparation of the Selected Disclosures, in accordance with the Reporting Criteria, including designing, implementing and maintaining systems, processes and internal controls over information relevant to the evaluation of the Selected Disclosures, which are free from material misstatement, whether due to fraud or error, against the Reporting criteria;
- Producing the UN PRB Template, including underlying information which provides an accurate, balanced reflection of CBA's performance in this area and discloses, with supporting rationale, matters relevant to the intended users of the UN PRB Template.

## Our Independence and quality management

We have complied with the ethical requirements of the Accounting Professional and Ethical Standard Board's APES 110 *Code of Ethics for Professional Accountants (including Independence Standards)* relevant to assurance engagements, which are founded on fundamental principles of integrity, objectivity, professional competence and due care, confidentiality and professional behaviour.

Our firm applies Australian Standard on Quality Management ASQM 1, *Quality Management for Firms that Perform Audits or Reviews of Financial Reports and Other Financial Information, or Other Assurance or Related Services Engagements*, which requires the firm to design, implement and operate a system of quality management including policies or procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

## Our responsibilities

Our responsibility is to express a limited assurance conclusion based on the procedures we have performed and the evidence we have obtained.



Our engagement has been conducted in accordance with the Australian Standard on Assurance Engagements (ASAE 3000) Assurance Engagements Other Than Audits or Reviews of Historical Financial Information. That standard requires that we plan and perform this engagement to obtain limited assurance about whether anything has come to our attention to indicate that the Selected Disclosures have not been prepared, in all material respects, in accordance with the Criteria, for the Period.

The procedures we performed were focused on assessing the factual accuracy of the Selected Disclosures. These were based on our professional judgement and included:

- Undertaking enquiries with Management regarding activities described within the Selected Disclosures;
- Reviewing, on a sample basis, documentation supporting claims made with respect to the activities undertaken within the Selected Disclosures;
- Agreeing portfolio composition information reported within the Selected Disclosures to the Group's publicly disclosed Basel III Pillar 3 Report as at 30 June 2022 and its 2022 Annual Report;
- Confirming that responses within the Selected Disclosures that refer to Climate-related Targets, align to the information disclosed within CBA's 2023 Climate Change Report; and
- Reviewing the presentation and disclosure of the Selected Disclosures and Reporting Criteria in the UN PRB Template.

The procedures performed in a limited assurance engagement vary in nature and timing from, and are less in extent than for, a reasonable assurance engagement and consequently the level of assurance obtained in a limited assurance engagement is substantially lower than the assurance that would have been obtained had a reasonable assurance engagement been performed. Accordingly, we do not express a reasonable assurance opinion.

We believe that the evidence we have obtained is sufficient and appropriate to provide a basis for our conclusion.

### Use and distribution of our report

We were engaged by the Board of Directors of CBA to prepare this independent assurance report having regard to the criteria specified by CBA and set out in this report. This report was prepared solely for Board of Directors to provide limited assurance over Selected Disclosures in the UN PRB Template describing activities undertaken by CBA.

We accept no duty, responsibility or liability to anyone other than CBA in connection with this report or to CBA for the consequences of using or relying on it for a purpose other than that referred to above. We make no representation concerning the appropriateness of this report for anyone other than CBA and if anyone other than CBA chooses to use or rely on it they do so at their own risk.

This disclaimer applies to the maximum extent permitted by law and, without limitation, to liability arising in negligence or under statute and even if we consent to anyone other than CBA receiving or using this report.



### **Inherent limitations**

Because of the inherent limitations of any assurance engagement due to the selective testing of the information examined, it is possible that fraud, error or noncompliance may occur and not be detected. A limited assurance engagement is not designed to detect all instances of non-compliance of the Selected Disclosures with the Criteria, as it is limited primarily to making enquiries of management and limited sample testing. The limited assurance conclusion expressed in this report has been formed on the above basis.

### Conclusion

Based on the procedures performed and evidence obtained, nothing has come to our attention that causes us to believe that the Selected Disclosures have not been prepared, in all material respects, in accordance with the Criteria as presented in CBA's UN PRB Template for the year ended 30 June 2023.

Pricewaterhoux Coopers,

PricewaterhouseCoopers

John Tomac

John Tomac Partner Sydney 9 August 2023

## Global Reporting Index (GRI) Disclosures

GRI No.	Title	2023 Report location / other references or information			
Organisati	rganisation & reporting practices				
2-1	Organisational details	Commonwealth Bank of Australia			
		Annual Report			
		Directors report – page 82			
		Notes to the financial statements, Overview – pages 127-128			
		Notes to the financial statements, Financial reporting by segments – page 144			
		Contact Us – page 305			
		CBA Website			
		International locations			
2-2	Entities included in the Organisation's sustainability reporting	Annual Report			
		Sustainability performance – pages 40-46			
		Independent Limited Assurance Report on sustainability performance metrics – pages 47-49			
		Notes to the financial statements, Group Structure – pages 253-260			
		Glossary – page 290-303			
		Climate Report			
		Glossary – pages 90-95			
		Limited assurance letter – 98-101			
		ASB Sustainability Reporting			
2-3	Reporting period, frequency and contact point	Reporting period FY23: 1 July 2022 – 30 June 2023			
20	Reporting period, nequency and contact point	Reporting frequency: Annual			
		Contact point: CbalnvestorRelations@cba.com.au			
		Contact point. Chainvestontelations@cha.com.au			

GRI No.	Title	2023 Report location / other references or information
2-4	Restatements of information	All material restatements are noted within the relevant data sets
		Annual Report
		2023 highlights – page 3
		Sustainability performance – pages 40-46
		Financial performance – pages 50-59
		Financial report – pages 119-289
		Glossary – pages 290-303
		Climate Report
		Financed emissions – pages 54-55
2-5	External assurance	Annual Report
		Independent Limited Assurance Report on sustainability performance metrics – pages 47-49
		Auditor's independence declaration – page 118
		Independent auditor's report – pages 266-275
		Climate Report
		Independent Limited Assurance Report – pages 98-101
		Sustainability reporting appendix
		UNPRB – pages 23-26 of this report
	and workers	
2-6	Activities, value chain and other business relationships	Annual Report
		2023 Highlights – pages 2-3
		How we create value – pages 4-5
		Chair and CEO message – pages 6-7
		Our strategic priorities – pages 8-17
		Governance – page 39
		Financial performance – pages 50-59
		Managing our risks – pages 60-65
		Directors' report – pages 82-84
		Notes to the financial statements, Overview – pages 123-127
		Notes to the financial statements, Financial reporting by segments – pages 144-148
		Notes to the financial statements, Group Structure – pages 253-260
		CBA Website
		Modern Slavery and Human Trafficking Statement
		Supplier Code of Conduct

GRI No.	Title	2023 Report location / other references or information
2-7	Employees	Annual Report
		Engaging our people and evolving our culture – pages 25-29
		Sustainability performance, Social - our people – pages 42-43
		Glossary – pages 290-303
		CBA Website
		2023 Sustainability performance metrics and disclosures – People
2-8	Workers who are not employees	Annual Report
		Governance – page 39
		Sustainability performance, Social - our people – pages 42-43
		Glossary – pages 290-303
		CBA Website
		Modern Slavery and Human Trafficking Statement
<b>C</b>		Modern Slavery and Human Hameking Statement
Governanc		
2-9	Governance structure and composition	Annual Report
2-10	Nomination and selection of the highest governance body	Governance – pages 36-39
2-11 2-12	Chair of the highest governance body Role of the highest governance body in overseeing the	Our approach to corporate governance – pages 66-73
2-12	management of impacts	
2-13	Delegation of responsibility for managing impacts	<u>Climate Report</u>
2-14	Role of the highest governance body in sustainability reporting	Governance – pages 30-35
2-15	Conflicts of interest	
2-16	Communication of critical concerns	CBA Website
		Board Charter
		Corporate governance
		Corporate Governance Statement
2-17	Collective knowledge of the highest governance body	Annual Report
2-18	Evaluation of the performance of the highest governance body	Our approach to corporate governance – pages 68,73
		CBA Website
		Corporate Governance Statement
2-19	Remuneration policies	Annual Report
2-20	Process to determine remuneration	Remuneration report – pages 88-116
		CBA Website
		Board Charter
		Remuneration principles

GRI No.	Title	2023 Report location / other references or information
2-21	Annual total compensation ratio	Annual Report
		Sustainability performance, Social -our people - pages 42-43
		Remuneration report – pages 88-116
Strategy, J	policies and practices	
2-22	Statement on sustainable development strategy	Annual Report
		Chair and CEO message – pages 6-7
		Our approach to corporate governance – pages 66-67
		Remuneration report – pages 88-116
		Climate Report
		Message from the Chair and CEO – pages 2-3
		Strategy – pages 10-29
2-23	Policy commitments	Annual Report
		Governance – pages 36-39
		Managing our risks – pages 60-65
		Climate Report
		Governance – page 35
		Risk – pages 36-51
		Appendix, E&S Framework Transition Plan expectations – page 77
		CBA Website
		CBA Code of Conduct
		Corporate Governance Statement
		Environmental and Social Framework
		Modern Slavery and Human Trafficking Statement
		Supplier Code of Conduct

GRI No.	Title	2023 Report location / other references or information
2-24	Embedding policy commitments	Annual Report Governance – pages 36-39 Sustainability performance – pages 40-45 Managing our risks – pages 60-65 Our approach to corporate governance – pages 66-73 Glossary – pages 290-303
		<u>Climate Report</u> Governance – pages 30-35 Risk – pages 36-51
		CBA Website <u>Corporate Governance Statement</u> <u>Environmental and Social Framework</u> <u>Modern Slavery and Human Trafficking Statement</u> <u>Supplier Code of Conduct</u>
2-25 2-26	Processes to remediate negative impacts Mechanisms for seeking advice and raising concerns	Annual Report Governance – page 37 Sustainability performance – page 40-46 Glossary – pages 290-303 Climate Report Listening to First Nations people – page 9 Human Dichts of First Nations Stakeholder Cristenana Processe – page 51
		Human Rights of First Nations Stakeholder Grievance Process – page 51 <b>CBA Website</b> <u>2023 Sustainability performance metrics and disclosures</u> – Governance <u>CBA Code of Conduct</u> <u>Complaints handling principles</u> <u>Environmental and Social Framework</u> <u>Human Rights of First Nations Stakeholder Grievance Process Framework</u> <u>Supplier Code of Conduct</u> <u>Whistleblower policy</u>

GRI No.	Title	2023 Report location / other references or information
2-27	Compliance with laws and regulations	Annual Report About this report– page 2 Governance – pages 36-39 Sustainability performance – pages 40-46 Directors' report, Environmental reporting – page 84 Notes to the financial statements, Other liabilities – page 187-194 Glossary – pages 290-303
		<u>Climate Report</u> Risk – pages 38-39 Managing and monitoring – pages 50-51
		<b>CBA Website</b> <u>2023 Sustainability performance metrics and disclosures</u> – Customers <u>2023 Sustainability performance metrics and disclosures</u> – Governance <u>Modern Slavery and Human Trafficking Statement</u>
2-28	Membership associations	<u>Annual Report</u> About this report – page 2 Governance – pages 36-39
		<u>Climate Report</u> Bringing stakeholders together – page 28 Appendix, Policy priorities through our industry partners – page 88
		CBA Website Corporate Governance Statement
Stakehold	er engagement	

GRI No.	Title	2023 Report location / other references or information
2-29	Approach to stakeholder engagement	Annual Report How we create value – pages 4-5 Our approach to ESG – pages 20-21 Governance – pages 36-39 Our approach to corporate governance - pages 68-70
		<u>Climate Report</u> Listening to First Nations people – page 9 Bringing stakeholders together – page 28 Human Rights of First Nations Stakeholder Grievance Process – page 51 Appendix, Policy priorities through our industry partners – page 88
		<b>CBA Website</b> <u>Corporate Governance Statement</u> <u>Environmental and Social Framework</u> <u>Human Rights of First Nations Stakeholder Grievance Process Framework</u> <u>Stakeholder Engagement Approach</u> <u>Supplier Code of Conduct</u>
2-30	Collective bargaining agreements	As at June 2023, approximately 85% of employees are covered by the Commonwealth Bank Group EA (covers Commonwealth Bank of Australia, Commonwealth Securities, Colonial Services, Commonwealth Insurance) or the Bankwest EA.
		CBA Website Environmental and Social Framework
Disclosure	es on material topics	
3-1 3-2	Process to determine material topics List of material topics	<u>Annual Report</u> Our commitment to sustainability – pages 18-39 Our approach to ESG – pages 20-21
		<u>Climate Report</u> Our transition roadmap – pages 4-5 Strategy – page 10-29
		<b>CBA Website</b> <u>Accessibility and Inclusion Plan</u> <u>Environmental and Social Framework</u> <u>Reconciliation Action Plan</u>

GRI No.	Title	2023 Report location / other references or information
3-3	Management of material topics	Annual Report
	-	Our commitment to sustainability – pages 18-39
		Our approach to ESG – pages 20-21
		Managing our risks - pages 60-65
		Our approach to corporate governance – pages 70-71
		Climate Report
		Strategy – pages 10-29
		Risk – pages 36-51
		Sustainability reporting appendix
		UNPRB – pages 6-13 of this report
		CBA Website
		Accessibility and Inclusion Plan
		Environmental and Social Framework
		Independent Review of the Commonwealth Bank of Australia's Remedial Action Plan- Thirteenth Report
		Our Response To APRA's Prudential Inquiry
		Reconciliation Action Plan

**GRI: Material Topics** 

GRI No.	Title	2023 Annual Report location / other references or information
Economic	Performance	
205-1	Direct economic value generated and distributed	2023 Results Presentation & Investor Discussion Pack Overview – FY23 Result – page 58
		<u>Annual Report</u> 2023 highlights – page 3 Strengthening our communities – pages 34-35 Sustainability performance – pages 40-46 Financial performance – pages 50-59
205-2	Financial implications and other risks and opportunities due to climate change	<u>Annual Report</u> Our strategic priorities 10-11 Our material risks 52-55
		<u>Climate Report</u> Strategy – pages 10-29 Risk – pages 28-39
		CBA Website Environmental & Social Framework
205-3	Defined benefit plan obligations and other retirement plans	<u>Annual Report</u> Notes to the financial statements – Our performance, operating expenses – page 138 Notes to the financial statements – Employee benefits – pages 246 -252
206-1	Financial assistance received from government	We did not receive any financial assistance from government in the 2023 financial year.
Anti-corru	ption	
205-1 205-2	Operations assessed for risks related to corruption Communication and training about anti-corruption policies and procedures	<u>Annual Report</u> Sustainability performance, Group compliance training – page 47 and definition, page 303 Managing our strategic risks – page 54
205-3	Confirmed incidents of corruption and actions taken	Our approach to corporate governance – page 70 Notes to the financial statements – Other liabilities, litigation – pages 187-194 Notes to the financial statements – Risk management, risk management framework – page 205
		<b>CBA Website</b> <u>CBA Anti Bribery and Corruption Policy</u> <u>CBA Code of Conduct</u>
Emissions		

**GRI: Material Topics** 

GRI No.	Title	2023 Annual Report location / other references or information
305-1	Direct (Scope 1) GHG emissions	Annual Report
305-2	Energy indirect (Scope 2) GHG emissions	Environmental – pages 22-23
305-3	Other indirect (Scope 3) GHG emissions	Sustainability performance, Environmental – pages 42-43
305-4	GHG emissions intensity	Glossary – pages 290-303
305-5	Reduction of GHG emissions	
305-7	Nitrogen oxides (NOx), sulfur oxides (SOx), and other significant	<u>Climate Report</u>
	air emissions	Strategy – pages 10-29
		Metrics and targets – pages 52-61
		Appendix, Financed emissions methodology – pages 64-73
		Appendix, Group operational emissions – pages 81-85
		Glossary – pages 90-95
		CBA Website
		2022 CDP submission
		2022 CDP submission 2023 Sustainability performance metrics and disclosures – GHG emissions
		2023 Sustainability performance metrics and disclosures – GHG emissions
Water and		
303-1	Interactions with water as a shared resource	Annual Report
303-2	Management of water discharge-related impacts	Environment – page 23
303-3	Water withdrawal	Sustainability performance, Environmental – pages 42-43
303-4	Water discharge	Glossary – pages 290-303
303-5	Water consumption	Climata Danaut
		<u>Climate Report</u>
		Strategy, Supporting our farmers with sustainable solutions – page 25 Risk, Understanding nature-related issues within sectors – page 49
		Metrics and Targets, Progress on our operational reduction targets – page 61
		Appendix, ESG risk assessment tool – pages 76-77
		Appendix, CBA Sustainability Funding Target - pages 78-80
		Appendix, Group operational emissions - page 84 Appendix, Reviewing TNFD core metrics – pages 86-87
		Appendix, reviewing this D core metrics - pages 00-01
		CBA Website
		2022 CDP submission
		2023 Sustainability performance metrics and disclosures – GHG emissions
		2023 Sustainability performance metrics and disclosures – Water, waste and paper
Waste		

**GRI: Material Topics** 

GRI No.	Title	2023 Annual Report location / other references or information
306-1	Waste generation and significant waste-related impacts	Annual Report
306-2	Management of significant waste-related impacts	Environmental - pages 22-23
306-3	Waste generated	Sustainability performance, Environmental – page 43
306-4	Waste diverted from disposal	Glossary – pages 290-303
306-5	Waste directed to disposal	
		<u>Climate Report</u>
		Strategy – pages 10-29
		Metrics and targets – pages 52-61
		Appendix, Our emissions measurement approach – pages 66-73
		Appendix, Group operational emissions – pages 81-85
		Glossary – pages 90-95
		CBA Website
		2022 CDP submission
		2023 Sustainability performance metrics and disclosures – Water, waste and paper
Employmer	nt	
401-1	New employee hires and employee turnover	Annual Report
		Sustainability performance, people – page 43
		Glossary – pages 290-303
		CBA Website
		2023 Sustainability performance metrics and disclosures – People
401-2	Benefits provided to full-time employees that are not provided to	Annual Report
	temporary or part-time employees	Financial Performance, Operating expenses – page 53
		Notes to the financial statements – Employee benefits – pages 246-252
401-3	Parental leave	Annual Report
		Sustainability performance, people – page 43
		Glossary – pages 290-303
		CBA Website
		2023 Sustainability performance metrics and disclosures – Flexible working
Occupation	al Health & Safety	

GRI: Materi	ial Topics	
GRI No.	Title	2023 Annual Report location / other references or information
403-1 403-2 403-3 403-4 403-5	Occupational health and safety management system Hazard identification, risk assessment, and incident investigation Occupational health services Worker participation, consultation, and communication on occupational health and safety Worker training on occupational health and safety	Annual Report Sustainability performance, Social - Our people – page 43 Glossary – pages 290-303 CBA Website 2023 Sustainability performance metrics and disclosures
403-6 403-7	Promotion of worker health Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	<u>Rewards &amp; benefits - Careers</u> Workplace health and safety policy
403-8	Workers covered by an occupational health and safety management system	
403-9 403-10	Work-related injuries Work-related ill health	
Training an	dEducation	
404-1 404-2 404-3	Average hours of training per year per employee Programs for upgrading employee skills and transition assistance programs Percentage of employees receiving regular performance and career development reviews	<u>Annual Report</u> Engaging our people and evolving our culture - pages 25-29 Sustainability performance, training – page 43, 46 Glossary – pages 290-303
		<b>CBA Website</b> <u>2023 Sustainability performance metrics and disclosures</u> – Training, health and safety
Diversity ar	nd Equal Opportunity	
405-1	Diversity of governance bodies and employees	Annual Report Engaging our people and evolving our culture – pages 25-29 Strengthening our communities – page 35 Sustainability performance – pages 44-45 Board of Directors – pages 74-77 Executive Leadership Team – pages 78-81
		CBA Website Inclusion & diversity policy Commitment to diversity, equity and inclusion
405-2	Ratio of basic salary and remuneration of women to men	<u>Annual Report</u> Sustainability performance, gender pay ratio – page 43
		<b>CBA Website</b> <u>2023 Sustainability performance metrics and disclosures</u> – Diversity and inclusion <u>Corporate Governance Statement</u>
Child Labor	r	

#### **GRI: Material Topics**

GRI No.	Title	2023 Annual Report location / other references or information
408-1	Operations and suppliers at significant risk for incidents of child labor	<u>Annual Report</u> Sustainability performance, ESG training – page 43
		CBA Website Environmental and Social Framework Modern Slavery and Human Trafficking Statement Supplier Code of Conduct
Forced or (	Compulsory Labor	
409-1	Operations and suppliers at significant risk for incidents of forced or compulsory labour	<u>Annual Report</u> Sustainability performance, ESG training – page 43
		<b>CBA Website</b> <u>Environmental and Social Framework</u> <u>Modern Slavery and Human Trafficking Statement</u> <u>Supplier Code of Conduct</u>
Rights of l	ndigenous Peoples	
411-1	Incidents of violations involving rights of indigenous peoples	<u>Annual Report</u> Strengthening our communities – page 35 Governance – page 37
		<u>Climate Report</u> Listening to First Nations people – page 9 Human Rights of First Nations Stakeholder Grievance Process – page 51
		Sustainability reporting appendix UNPRB – pages 17, 20-21 of this report
		<b>CBA Website</b> <u>Environmental and Social Framework</u> <u>Human Rights of First Nations Stakeholder Grievance Process Framework</u> <u>Modern Slavery and Human Trafficking Statement</u>

**GRI: Material Topics** 

GRI No.	Title	2023 Annual Report location / other references or information
413-1	Operations with local community engagement, impact	Annual Report
	assessments, and development programs	How we create value – page 5
413-2	Operations with significant actual and potential negative impacts	Chair and CEO's message – page 6-7
	on local communities	Leadership in Australia's transition and recovery – pages 10-11
		Approach to ESG – pages 20-21
		Supporting our customers – pages 30-33
		Strengthening our communities – 34-35
		Managing our risks – pages 60-65
		Approach to corporate governance – page 69
		Sustainability performance – page 45
		Sustainability reporting appendix
		UNPRB – pages 4-7 of this report
		CBA Website
		Next Chapter website
		Role modelling reconciliation
		Accessibility and Inclusion Plan
		Corporate Governance Statement
		Community Investment
Customer p	privacy	
418-1	Substantiated complaints concerning breaches of customer	Annual Report
	privacy and losses of customer data	Sustainability performance, our customers – page 44
		Notes to the financial statements, Other liabilities – pages 187-194
		CBA Website
		2023 Sustainability performance metrics and disclosures – Customers
		2023 Sustainability performance metrics and disclosures – Governance

# Sustainability Accounting Standards Board (SASB) Disclosures

#### SASB Index: Commercial Banks Standards

Accounting Metric	Category	Unit of measure	Code	Response (FY23)	Supporting documents (FY23)
Data Security					
<ol> <li>Number of data breaches</li> <li>percentage involving personally identifiable information (PII),</li> <li>number of account holders affected</li> </ol>	Quantitative	Number, Percentage (%)	FN-CB-230a.1	CBA is required to report notifiable data breaches to the Office of the Australian Information Commissioner (OAIC) when they occur. See the 2023 Annual Report for information on our voluntary Enforceable Undertaking and privacy-related complaints See our 2023 Sustainability performance metrics and disclosures for the definition and number of data breaches reported to the OAIC. See CBA's Group Privacy Statement at <b>commbank.com.au/privacy</b>	Annual Report Sustainability performance – page 44 Notes to the financial statements, Other liabilities – pages 187-194 CBA Website 2023 Sustainability performance metrics and disclosures – Customers 2023 Sustainability performance metrics and disclosures – Governance Availability of Payments Services to Individuals and Businesses Group Privacy Statement
Description of approach to identifying and addressing data security risks	Discussion and Analysis	n/a	FN-CB-230a.2	Cyber security and privacy and data management are listed as material risks for the business. Key actions are detailed in the 2023 Annual Report. See our Privacy Statement and CommBank Safe webpage for detail on the actions we take to protect customers from data breaches and security incidents. See our Code of Conduct for our expectations for staff on customers' privacy.	Annual Report Reimagined banking – page 14 Governance – page 38 Managing our risks – page 60-65 CBA Website CBA Code of Conduct CommBank Safe Information Classification Standards Group Privacy Statement
Financial Inclusion and Capa	acity Building				
<ol> <li>Number and</li> <li>amount of loans outstanding qualified to programs designed to promote small business and community development</li> </ol>	Quantitative	Number, Reporting currency	FN-CB-240a.1	Business Banking provides fee-free or discounted products and services for not-for-profit organisations. In 2023, we accrued \$3,130,406 in forgone revenue. See the 2023 Annual Report and Investor Presentation & Discussion Pack for more information on how we support small businesses and communities, including our Benefits finder tools and community investment.	Annual Report Leadership in Australia's recovery and transition – pages 10-11 Strengthening our communities – pages 34-35 Sustainability performance, community investment – page 45 Financial performance – pages 56-57

### SASB Index: Commercial Banks Standards

Accounting Metric	Category	Unit of measure	Code	Response (FY23)	Supporting documents (FY23)
<ol> <li>Number and</li> <li>amount of past due and nonaccrual loans qualified to programs designed to promote small business and community development</li> </ol>	Quantitative	Number, Reporting currency	FN-CB-240a.2	We provide support through our Financial Assistance Solutions team to customers experiencing hardship for various reasons. In the 12 months to 30 June 2023, 89,219 requests for hardship were approved. These are broken down by category in our 2023 Sustainability performance metrics and disclosures.	Annual Report Supporting our customers – page 30-33 CBA Website 2023 Sustainability performance metrics and disclosures – Customers
Number of no-cost retail checking accounts provided to previously unbanked or underbanked customer	Quantitative	Number	FN-CB-240a.3	Retail banking provides fee-free or discounted products and services for a range of customers such as youth, students, young adults, Government benefit recipients, not-for-profit organisations and older people. In 2023, retail forgone revenue accounted for \$207,411,857.	Annual Report Sustainability performance, Foregone revenue - page 45 Glossary – page 290-303
Number of participants in financial literacy initiatives for unbanked, underbanked, or underserved customers	Quantitative	Number	FN-CB-240a.4	See our 2023 sustainability performance for details on our Indigenous Customer Assistance Line calls, Community Wellbeing team interactions and Financial Independence Hub. These programs, as well as our fraud and scams prevention for customers and support for First Nations customers are also further detailed in the 2023 Annual Report.	Annual Report Sustainability performance, social, Our communities – page 45 Supporting our customers – pages 31,33 Strengthening our communities – page 34 CBA Website 2023 Sustainability performance metrics and disclosures – Communities CommBank Safe Next Chapter
Incorporation of Environmen	tal, Social, and (	Governance Factors	s in Credit Analysis	3	
Description of approach to incorporation of environmental, social, and governance (ESG) factors in credit analysis	Discussion and Analysis	n/a	FN-CB-410a.2	Environmental and Social (E&S) risk is discussed as a material risk in our 2023 Annual Report. The report outlines our position and approach to climate change, as well as our progress and commitments. See our Climate Report for information on our ESG risk assessment tool. Our Environmental and Social Framework provides a reference point for our people and stakeholders on the minimum standards we seek to abide by. As per the Equator Principles, in FY22 we assessed six (6) project finance loans and two (2) project-related refinance transactions for environmental, social and governance risks.	Annual Report Managing our risks – pages 60-65 Climate Report ESG risk assessment tool – pages 76-77 CBA Website Environmental and Social Framework Equator Principles

Accounting Metric	Category	Unit of measure	Code	Response (FY23)	Supporting documents (FY23)
Absolute gross financed emissions, disaggregated by 1. Scope 1, 2. Scope 2 and 3. Scope 3	Quantitative	Metric tons (t) CO2-e	FN-CB-410b.1	See our financed emissions table in the 2023 Climate Report.	<u>Climate Report</u> Financed emissions – pages 54-55
Gross exposure for each industry by asset class	Quantitative	Presentation currency	FN-CB-410b.2	See our financed emissions table in the 2023 Climate Report.	<u>Climate Report</u> Financed emissions – pages 54-55
Percentage of gross exposure included in the financed emissions calculation	Quantitative	Percentage %	FN-CB-410b.3	See our financed emissions information in the 2023 Climate Report.	<u>Climate Report</u> Financed emissions by sector – page 8 Financed emissions – pages 54-55
Description of the methodology used to calculate financed emissions	Discussion and Analysis	n/a	FN-CB-410b.4	See our Appendix in the 2023 Climate Report.	<u>Climate Report</u> Financed emissions – pages 64-73
Business Ethics					
Total amount of monetary losses as a result of legal proceedings associated with fraud, insider trading, anti- trust, anti-competitive behaviour, market manipulation, malpractice, or other related financial industry laws or regulations	Quantitative	Presentation currency	FN-CB-510a.1	The Group's exposure to litigations, investigations and reviews are detailed in pages 187-194 of the 2023 Annual Report. Customer remediation may be required and recognised in provisions, as explained on these pages.	Annual Report Notes to the financial statements, Other liabilities – pages 187-194
Description of whistle- blower policies and procedures	Discussion and Analysis	n/a	FN-CB-510a.2	The Group's Whistleblower policy is publicly available and adheres with ASIC Regulatory Guide 270. Our Annual Report highlights our commitment to fostering a 'speak up' culture. The number of SpeakUP Programs cases was 331 in FY23 of which 81 were Whistleblower cases.	<u>Annual Report</u> Governance – page 37 Metrics – page 46
Systemic Risk Management			•		
Global Systemically Important Bank (G-SIB) score, by category	Quantitative	Basis points (bps)	FN-CB-550a.1	The Group is not classified as a G-SIB, but it publicly discloses (as required under APRA Prudential Standard APS 330 Public Disclosure) against the G-SIB indicators.	CBA Website G-SIB reporting

#### SASB Index: Commercial Banks Standards

Accounting Metric	Category	Unit of measure	Code	Response (FY23)	Supporting documents (FY23)
Description of approach to incorporation of results of mandatory and voluntary stress tests into capital adequacy planning, long- term corporate strategy, and other business activities	Discussion and Analysis	n/a	FN-CB-550a.2	The Group submits results of stress testing to the regulator as required. We disclose how we are addressing the risks associated with climate change in our 2023 Climate Report. This year, we used climate scenario analysis to identify and assess our exposure to financial; risks arising from climate change, incorporating both physical and transition risk. We have tested 89% and 45% of our lending portfolio to potential climate-related transition and physical risks respectively. See our 2023 Climate Report for more information.	Climate Report Our climate scenario analysis – pages 42-43 2023 Results Presentation and Investor Discussion Pack Liquidity – page 107
Activity Metrics 1. Number and 2. value of checking and savings accounts by segment: a. personal and b. small business	Quantitative	Number, Presentation currency	FN-CB-000.A	Transaction balances for FY23 were \$317 billion. As at 30 June 2023, our total number of retail transaction accounts was 10.7 million, and business transaction accounts was 1.1 million. The total customer deposits for FY23 were \$819 billion.	2023 Results Presentation and Investor Discussion Pack Volumes – page 15 Deposit funding – page 106
<ol> <li>Number and</li> <li>value of loans by segment:         <ul> <li>a. personal,</li> <li>b. small business, and</li> <li>c. corporate</li> </ul> </li> </ol>	Quantitative	Number, Presentation currency	FN-CB-000.B	Our loan value by category for FY23 is: Home loans = \$652.2 billion Consumer finance = \$17.0 billion Business loans = \$165.4 billion Institutional Loans = \$96.2 billion	<b>2023 Results Presentation and Investor</b> <b>Discussion Pack</b> Balance sheet – page 60

Accounting Metric	Category	Unit of measure	Code	Response (FY23)	Supporting documents (FY23)
Lending practices					
<ol> <li>Number and</li> <li>value of residential mortgages of the following types:         <ol> <li>Hybrid or Option Adjustable-rate Mortgages (ARM),</li> <li>Prepayment Penalty,</li> <li>Higher Rate,</li> <li>Total, by FICO scores above or below 660</li> </ol> </li> </ol>	Quantitative	Number, reporting currency	FN-MF-270a.1	The Australian lending system does not use FICO scores to assess home loan applications. During the application process, savings, borrowing and repayments histories are also considered along with the credit score. See the Home and Consumer Lending overview of our FY23 Results for detail on serviceability assessments, borrowing capacity, portfolio quality and interest only home loans.	2023 Results Presentation and Investor Discussion Pack Home & Consumer lending – pages 79-95
<ol> <li>Number and</li> <li>value of         <ul> <li>residential mortgage modifications,</li> <li>foreclosures, and</li> <li>short sales or deeds in lieu of foreclosure, by FICO scores above and below 660</li> </ul> </li> </ol>	Quantitative	Number, reporting currency	FN-MF-270a.2	The Australian lending system does not use FICO scores to assess home loan applications. CBA defines modifications as internal refinancing, payments and customers in advance. We provide detail on these categories in our FY23 Results presentation. CBA discloses mortgagee in possession and negative equity at a portfolio level. This information is disclosed in the FY23 Results Presentation.	2023 Results Presentation and Investor Discussion Pack Home loans – page 80

## SASB Index: Mortgage Finance Standards

## SASB Index: Mortgage Finance Standards

Accounting Metric	Category	Unit of measure	Code	Response (FY23)	Supporting documents (FY23)
Total amount of monetary losses as a result of legal proceedings associated with communications to customers or remuneration of loan originators	Quantitative	Reporting currency	FN-MF-270a.3	CBA is committed to managing disputes and litigation with its retail and small business customers in a fair, timely and transparent way. See our Model Litigant Principles for commitments in relation to our conduct of claims brought by or against retail and small business customers. We made significant progress under CBA's Australian Prudential Regulation Authority (APRA) Prudential Inquiry Remedial Action Plan, focused on improving our governance, culture and accountability. Importantly, we reset our cultural foundations including the Bank's purpose and values. The changes represent an evolution in the way we want to deliver outcomes for our customers, communities, our people and shareholders. In recognition of this progress, the remaining operational risk capital overlay of \$500 million imposed on the Bank was released by APRA in September 2022. We are focused on sustaining this progress and continuously improving and strengthening the changes made to live our purpose and values, in particular instilling a strong culture that encourages the right mindsets and behaviours. Further information about the Remedial Action plan can be found in our FY18-22 Annual Reports, our Response to APRA's Prudential Inquiry and our CEO Customer Forum webpages.	Annual Report Chair and CEO's message – page 7 Notes to the financial statements, Other liabilities – pages 187-194 CBA Website Independent Review of the Commonwealth Bank of Australia's Remedial Action Plan- Thirteenth Report Our Response To APRA's Prudential Inquiry The Model Litigant Principles Update on Prudential Inquiry Remedial Action Plan Annual Reports CBA CEO Customer Forums
	Discussion and Analysis	n/a	FN-MF-270a.4	Our remuneration principles are available on our policies webpage. We report on our senior leader and Board remuneration for FY23 in the Annual Report. CBA has fully implemented the Sedgwick recommendations for frontline teams and leaders in the branch network in relation to variable remuneration recommendations, with exception of variable remuneration potential for some leaders.	Annual Report Remuneration Report – pages 88- 116 CBA Website <u>CBA Remuneration Principles</u> <u>CBA Royal Commission implementation update</u> <u>Independent Review of the Commonwealth Bank</u> <u>of Australia's Remedial Action Plan- Thirteenth</u> <u>Report</u> Update on Prudential Inquiry Remedial Action Plan

SASB Index: Mortgage Fina	nce Standards
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Accounting Metric	Category	Unit of measure	Code	Response (FY23)	Supporting documents (FY23)
<ol> <li>Number,</li> <li>value, and</li> <li>weighted average Loan- to-Value (LTV) ratio of mortgages issued to         <ol> <li>minority and</li> <li>all other borrowers, by FICO scores above and below 660</li> </ol> </li> </ol>	Quantitative	Number, reporting currency, percentage (%)	FN-MF-270b.1	CBA does not currently report the number of home loans, balances or LVRs by race, ethnicity or minority groups. Total home loan numbers, balances and LVRs are disclosed in our FY23 Results presentation. See the CommBank website for Information on the dedicated indigenous and migrant banking resources we provide to meet the specific needs of these customer groups.	2023 Results Presentation and Investor Discussion Pack Home loans- CBA- page 80-93
Total amount of monetary losses as a result of legal proceedings associated with discriminatory mortgage lending	Quantitative	Presentation currency	FN-MF-270b.2	CBA is committed to managing disputes and litigation with its retail and small business customers in a fair, timely and transparent way. See our Model Litigant Principles for commitments in relation to our conduct of claims brought by or against retail and small business customers. Our 2023 Annual Report details our current customer remediation and litigation, investigations and reviews and our progress to complete our Remedial Action Plan. Further information about the Remedial Action plan can be found in our FY18-22 Annual Reports, our Response to APRA's Prudential Inquiry and our CEO Customer Forum webpages.	Annual Report Chair and CEO's message – page 7 Notes to the financial statements, Other liabilities – pages 187-194 CBA Website The Model Litigant Principles Independent Review of the Commonwealth Bank of Australia's Remedial Action Plan- Thirteenth Report Our Response To APRA's Prudential Inquiry CBA CEO Customer Forums
Description of policies and procedures for ensuring non-discriminatory mortgage origination	Discussion and analysis	n/a	FN-MF-270b.3	The Bank has a number of policies, practices and processes in place to ensure our customers receive the right outcome. There are currently minimal regulatory requirements in relation to climate risk in Australia and internationally. This is expected to increase when climate-related reporting for large institutions in Australia becomes mandatory, expected from 2025 for the Bank. We also adhere to industry standards for service and customer protection. See our website for information on our Code of Conduct the Baking Code of Practice, our Reconciliation Action Plan, Financial Inclusion Action Plan, Accessibility and our Environmental and Social Framework.	Climate Report Risk, Climate impacts on our risks – page 39 CBA Website Accessibility and Inclusion Plan Banking Code of Practice CBA Code of Conduct Environmental and Social Framework Financial Inclusion Action Plan Reconciliation Action Plan

SASB Index: Mortgage Finance Standards
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Accounting Metric	Category	Unit of measure	Code	Response (FY23)	Supporting documents (FY23)
<ol> <li>Number and</li> <li>value of mortgage loans in 100-year flood zones</li> </ol>	Quantitative	Number, presentation currency	FN-MF-450a.1	As at 30 June 2023, CBA's exposure to increased flood risk was \$16.7 billion or 39,000 properties. High peril risk for flood includes properties within 1 in 50-year return period flood zones. See page 46 of the 2023 Climate Report for more information. Environmental and social risks including more frequent and severe weather events are considered a material risk for the Bank, and our response actions including the use of our Customer Engagement Engine to these risks are detailed in the 2023 Annual Report.	Annual Report Leadership in Australia's recovery and transition – page 10-11 Managing our risks – pages 60-65 Climate Report Risk, Acute physical risk in Australian home loans - page 46
<ol> <li>Total expected loss and</li> <li>Loss Given Default (LGD) attributable to mortgage loan default and delinquency due to weather-related natural catastrophes, by geographic region</li> </ol>	Quantitative	Presentation currency, percentage (%)	FN-MF-450a.2	We report the value of total regulatory one year expected losses and LGD (by PD band) for the total residential mortgage book. We currently do not report losses based on extreme weather events, natural catastrophes or by geographic location. Refer to the 2023 Climate Report for more information on our climate scenario analysis.	<u>Climate Report</u> Our climate scenario analysis – page 42-47. <u>2023 Results Presentation and Investor</u> <u>Discussion Pack</u> Home and Consumer Lending – pages 79-95
Description of how climate change and other environmental risks are incorporated into mortgage origination and underwriting	Discussion and analysis	n/a	FN-MF-450a.3	The E&S Framework applies across the Bank, and provides a reference point for our people and stakeholders on standards, ambition, and the governance and oversight in place. We have developed innovative products for home loan customers to address and consider environmental risks. See our website for information about or Green Loan and Green Home Offer.	Climate Report Strategy, Australian housing – pages 14-15 CBA Website Environmental and Social Framework Sustainable solutions
Activity Metric			-		
<ol> <li>Number and</li> <li>value of mortgages originated by category:         <ul> <li>a. residential and</li> <li>b. commercial</li> </ul> </li> </ol>	Quantitative	Number, reporting currency	FN-MF-000.A	For the Australian home loan portfolio, we report balances, new funding and total accounts in our FY23 Results Presentation: Value: \$584 billion (spot); \$577 billion (average) New funding: \$77 billion Number of accounts: 2.0 million For the Australian commercial property portfolio, we report TCE and a number of other metrics to assess the performance of the portfolio.	2023 Results Presentation and Investor Discussion Pack Home loans- CBA- page 80-93 Total committed exposure and sector summary – pages 98-103

## SASB Index: Mortgage Finance Standards

Accounting Metric	Category	Unit of measure	Code	Response (FY23)	Supporting documents (FY23)
<ol> <li>Number and</li> <li>value of mortgages purchased by category:         <ul> <li>residential and</li> <li>commercial</li> </ul> </li> </ol>	Quantitative	Number, reporting currency	FN-MF-000.B	CBA does not provide purchased mortgage products to customers. We do have a Residential Mortgage Back Security (RMBS) program that is used as part of the Group's funding program. However, the purchase of RMBS products are only available to institutional investors and large wholesale clients. Details of our RMBS program can be found on our website,	CBA Website Securitisation