Module: Introduction

Page: Introduction

CC0.1

Introduction
Please give a general description and introduction to your organization.

The Commonwealth Bank is Australia's leading provider of integrated financial services including retail banking, premium banking, business banking, institutional banking, funds management, superannuation, insurance, investment and sharebroking products and services. The Group is one of the largest listed companies on the Australian Securities Exchange and is included in the Morgan Stanley Capital Global Index.
The key financial objective of the Group is to have Total Shareholder Return in the top quartile of our Australian listed peers over each rolling five-year period. Total Shareholder Return is calculated as the growth in the value of the investment in the Group's shares, assuming all dividends are reinvested in shares at the point dividends are paid. The strategic strengths of the Commonwealth Bank are its:
• brand
• scale
• diversified business mix.

The Commonwealth Bank brand is the most recognised brand in the Australian financial services industry. Other award-winning brands within the Group include our wealth management business Colonial First State, our online broking service CommSec and Bankwest. In terms of scale, the Group has a strong domestic presence with the largest customer base of any Australian bank and operates the largest financial services distribution network in the country with the most points of access.

Structure:
The Commonwealth Bank has five customer-facing business divisions, designed to align product development and service delivery more fully with customer segments. The businesses are: Retail Banking Services, Business and Private Banking, Institutional Banking and Markets, Wealth Management and International Financial Services. Fully owned subsidiaries of the Bank include:
• The Bank of Western Australia (Bankwest) an award winning bank that is strongly capitalised and funded while being fully regulated by the Australian Prudential Regulatory Authority (APRA). Bankwest is a market leader within Western Australia with approximately one quarter of all bank advances and deposits.
• The Bank's wealth management business, Colonial First State, one of Australia's leading wealth management groups, which provides investment, superannuation and retirement products to individuals as well as to corporate and superannuation fund investors.
• Sovereign Assurance Company Limited (Sovereign) is a New Zealand-based financial services company providing life and health insurance, home loans, investment and superannuation products. It is a member of the ASB Group of companies, which is in turn part of the Commonwealth Bank of Australia (CBA) group.

• The Bank’s New Zealand businesses, Auckland Savings Bank (ASB) a history of more than 150 years of service to New Zealanders, and is one of the New Zealand’s leading financial services companies.
• The Bank’s asset management business, Colonial First State Global Asset Management, which provides asset management services to wholesale and institutional investors across a diverse range of domestic and global asset classes. It should be noted that the Kiwi Income Property Trust (KIP) managed under the Bank’s New Zealand business, Auckland Savings Bank, report separately under the 2012 Carbon Disclosure Project In addition, to better align with Australia’s National Greenhouse and Energy Reporting (NGER) reporting boundaries under the ‘Operational Control’ definition, emissions of the Colonial First State Global Asset Management (CFSGAM) funds under management have not been included in the Bank’s 2013 CDP submission. The Commonwealth Property Office Fund (CPA) and the Retail Property Trust (CFX) managed under CFSGAM, report separately under the 2013 Carbon Disclosure Project.

Sustainability and climate change strategy:
For the Bank, sustainability is an integral part of delivering our strategic priorities and creating long term value for our shareholders. We take a considered, long-term view towards sustainability in everything that we do. We take responsibility for the impact and influence we have on our key stakeholders and the environment. Our activities and achievements are centred around five focus areas:
• Responsible Financial Services,
• Engaged and Talented People,
• Community Contribution and Action,
• Environmental Stewardship, and
• Sustainable Business Practices.

The Bank believes climate change will have a major environmental, economic and social impact and that it presents both risks and opportunities for our business. As a financial intermediary we have a key role to play in addressing climate change. We are committed to measuring and reducing our own greenhouse gas emissions as well as engaging our customers, stakeholders, regulators and communities more broadly to improve the understanding and management of climate change issues.

CC0.2

Reporting Year
Please state the start and end date of the year for which you are reporting data.
The current reporting year is the latest/most recent 12-month period for which data is reported. Enter the dates of this year first.
We request data for more than one reporting period for some emission accounting questions. Please provide data for the three years prior to the current reporting year if you have not provided this information before, or if this is the first time you have answered a CDP information request. (This does not apply if you have been offered and selected the option of answering the shorter questionnaire). If you are going to provide additional years of data, please give the dates of those reporting periods here. Work backwards from the most recent reporting year.
Please enter dates in following format: day(DD)/month(MM)/year(YYYY) (i.e. 31/01/2001).

Enter Periods that will be disclosed
Sun 01 Jul 2012 - Sun 30 Jun 2013

CC0.3

Country list configuration

Please select the countries for which you will be supplying data. This selection will be carried forward to assist you in completing your response.

Select country
Australia
New Zealand
China
India
Japan
Singapore
Indonesia
Vietnam

CC0.4

Currency selection

Please select the currency in which you would like to submit your response. All financial information contained in the response should be in this currency.

AUD ($)

CC0.6

Modules
As part of the request for information on behalf of investors, electric utilities, companies with electric utility activities or assets, companies in the automobile or auto component manufacture sectors, companies in the oil and gas industry, companies in the information technology and telecommunications sectors and companies in the food, beverage and tobacco sectors should complete supplementary questions in addition to the main questionnaire.
If you are in these sectors (according to the Global Industry Classification Standard (GICS)), the corresponding sector modules will not appear below but will automatically appear in the navigation bar when you save this page. If you want to query your classification, please email respond@cdp.net.
If you have not been presented with a sector module that you consider would be appropriate for your company to answer, please select the module below. If you wish to view the questions first, please see https://www.cdp.net/en-US/Programmes/Pages/More-questionnaires.aspx.

Further Information

Module: Management

Page: CC1. Governance

CC1.1

Where is the highest level of direct responsibility for climate change within your organization?

Individual/Sub-set of the Board or other committee appointed by the Board

CC1.1a

Please identify the position of the individual or name of the committee with this responsibility

Job Title or Name:
Managing Director and Chief Executive Officer (CEO) of the Commonwealth Bank – Ian Narev

Description of role:
The CEO is entrusted with the full power and responsibility of the Board. Ultimate responsibility for sustainability policies and programs, to include climate change related activities, rests with the CEO.

CC1.2

Do you provide incentives for the management of climate change issues, including the attainment of targets?

Yes

CC1.2a

Please provide further details on the incentives provided for the management of climate change issues

Who is entitled to benefit from these incentives?	The type of incentives	Incentivized performance indicator
Environment/Sustainability managers	Recognition (non-monetary)	• Incentive in meeting emissions reduction and/or energy reduction targets. • Communicating Climate Change issues to a variety of internal and external stakeholders + developing and implementing programs and initiatives that support the Group and its clients to transition to a low carbon economy • Delivering on the development of Climate Change/ ESG policies within sensitive sectors which are subject to climate change events, (e.g. Metals & Mining, Oil & Gas, Energy & Utilities, and Agribusiness).
Environment/Sustainability managers	Monetary reward	• Incentive in meeting emissions reduction and/or energy reduction targets. As an example, the Bank's New Zealand Sustainability Managers are measured on sustainability goals in the context of their performance review. Specific goals during this reporting period were around reduction of GHG emissions and education of staff. The result of the performance review then feeds directly into bonus calculations.

Further Information

Page: CC2. Strategy

CC2.1

Please select the option that best describes your risk management procedures with regard to climate change risks and opportunities

Integrated into multi-disciplinary company wide risk management processes

CC2.1a

Please provide further details on your risk management procedures with regard to climate change risks and opportunities

Frequency of monitoring	To whom are results reported	Geographical areas considered	How far into the future are risks considered?	Comment
Six-monthly or more frequently	Individual/Sub-set of the Board or committee appointed by the Board	The Group risk management approach is considered on a global scale, i.e. both domestically and internationally. The Group risk management approach includes the jurisdictions where the Group has assets including its people as well as clients and where the Group ultimately operates, to include Australia and New Zealand.	3 to 6 years	The monitoring and management of climate change risks and opportunities is done on a continual basis. Risks and opportunities are reviewed for relevance, accuracy and currency, via a process of continual improvement. Risks and opportunities, to include those associated with climate change, are discussed weekly during the Group Executive Committee meeting. This meeting is chaired by the Group Managing Director and CEO. In addition, the Group 'Risk Appetite Statement', which covers climate change related risks and considerations, is monitored and updated annually before being reviewed and signed off by Board.

CC2.1b

Please describe how your risk and opportunity identification processes are applied at both company and asset level

Assessing Company level Risks:
Planning for risks is done through the overall business strategy process, which enables the detailed procedural controls, planning and implementation of risk management.

The Group-wide 'Risk Appetite Statement' (RAS), alongside the Group Institutional Banking and Markets (IB&M) and Business and Private Banking (B&PB) RAS, also includes ESG risk mitigation and identification measures and sets the overarching risk tolerance parameters.
The Group Corporate Sustainability team actively monitors all legislative requirements associated with climate change and builds appropriate findings into the Group RAS.

Assessing Asset level Risks:
Group Property is responsible for assessing and managing its property portfolio and any consideration of locations, technologies, design and construction, as well as strategic plans to ensure the Group assets are resilient against risks and open to opportunities resulting from climate change. Group Property is also responsible for implementing technologies to monitor, maintain and report on the asset portfolio performance.

The Group developed a dedicated asset portfolio assessment schedule. This schedule assists in conducting an ‘energy efficiency opportunities assessment’ process. Through this process the Group has identified and implemented energy efficiency initiatives to further mitigate the risks to its portfolios whilst significantly reducing its direct carbon footprint.

The Group also developed a dedicated Environmental Management System (EMS) aligned to the international standard of ISO: 14001, to assess specifically the strengths, weaknesses, risks and opportunities of each asset.

CC2.1c

How do you prioritize the risks and opportunities identified?

The Group developed an Environmental Management Systems (EMS) aligned to ISO: 14001. This system is a structured management tool which assists the Group in identifying the additional and material environmental impacts resulting from our business activities so as to improve our environmental performance.

The Group Institutional Banking and Market (IB&M) Risk teams analyse and prioritise climate change related risks as part of the standard client ‘Risk Review’ process. Materiality is assessed through the Group lending policy and requires that climate change risks be considered at deal initiation, risk assessment and annual review stages.
Any direct impacts are taken into account when assessing the client’s ability to service loans, the potential impacts associated with the client’s asset valuations, and in loan covenants.

The Group IB&M teams have developed sector specific policies covering project financing of Natural Resources (mining and extraction) and Utilities (including Renewable) sectors. The Group reviews, prioritises and addresses Environmental Social and Governance (ESG) issues as part of this process. Clients are also expected to consider ESG matters as part of their own due diligence process.

Additionally, the Group dedicated Carbon Solutions Team was formed to understand and prioritise the developments in carbon markets and their implications for the Group and its clients.

Colonial First State Global Asset Management (CFSGAM) systematically considers and prioritises ESG issues that may impact their investments as outlined in their commitments to the PRI. Materiality is considered every time an investment decision is made, with the investment teams holding ultimate responsibility.

CC2.1d

Please explain why you do not have a process in place for assessing and managing risks and opportunities from climate change, and whether you plan to introduce such a process in future

Main reason for not having a process	Do you plan to introduce a process?	Comment

CC2.2

Is climate change integrated into your business strategy?

Yes

CC2.2a

Please describe the process of how climate change is integrated into your business strategy and any outcomes of this process

i) How the strategy has been influenced:
The Group strategy is underpinned by sustainable business practices and supported by the Group Board and CEO.
The internal process for collecting and reporting climate change related information has significantly influenced and shaped Group strategy, examples include:
• Development of sector specific policies guiding the assessment of ESG risks, within the natural resources and utilities sectors, further influencing the Group Risk Appetite Statement.
• ‘Envizi, a dedicated environmental management platform capturing all GHG emission sources, assisting with the Group carbon reduction target and directly linked to two of the Group strategic priorities – productivity and technology.
• Development of our Environmental Management System (EMS ISO: 14001), collecting the appropriate information to directly influence strategy.
Using reliable information the Group Strategy Team considers issues which will shape the direction of the Group over the medium (3-5 years) to longer (10+ years) term. During the reporting period, Group Strategy presented a series of papers to the Board on the matter of climate change.
The overarching mechanism for addressing climate change impacts is the Group Environment Policy which sets out a framework for understanding and managing the Group environmental impacts, risks and opportunities.

ii) Climate change influencing strategy:

The Group Credit Risk Key-Operation manuals address potential impacts relative to a carbon price on a client's capacity to repay i.e. as a result of increased client costs linked to the introduction of recent climate change legislation in Australia.
The Group assesses climate change related aspects, adaptation and implications. This process is embedded into the Group overarching business strategy.
As the Australian Government's legislation surrounding climate change became operational, the Group seized the opportunity to expand its business, e.g. the Group Carbon Solutions Team was formed to manage the carbon exposure of its clients across the carbon and renewable energy markets.

iii) Short term strategy influenced by CC:
Short term (0-3yrs) material components influenced by climate change include:
• Institutional Banking and Markets' (IB&M) division recently developed sector specific policies surrounding natural resources and utilities.
• Carbon Solution Team introduced a range of carbon risk management and carbon financing solutions to assist its institutional customers.
• Risk Management addressed the risks associated with the implementation of a carbon price through its Credit Risk policies.
• The Bank's 20 per cent carbon reduction target was directly influenced by climate change and embedded into the Group's immediate short term strategy while also forming part of its long term mitigation strategy.

iv) Long term strategy influenced by CC:
The Group long term (10yrs+) strategy has been influenced by the climate change agenda in that resilience is planned for in all aspects of managing the business. It is about taking the long term effects such as increased intensity of weather conditions, floods, drought, heat, and cold into strategic planning. It also includes the future buildings we occupy, an example of this is the Group 6 star green star commercial office space, serving as a benchmark for future tenancies within the Group. Our long term strategy also includes directly engaging with internal and external stakeholders regarding climate change related activities as well as the Federal and State Governments in relation to policy development and implementation.

v) Gaining strategic advantage over competitors:
Carefully considering climate change matters gives the Group a strategic advantage. The understanding of climate change risks, opportunities and impacts on our internal operations and our client base has led the Group to develop its dedicated Carbon Solution Team which assists clients in managing their carbon risk and in capturing opportunities as Australia moves to a low-carbon economy. The Bank leverages its core capabilities around financing, trading and distribution as well as working with market-leading companies to deliver innovative and integrated solutions.
This in turn provides investors with greater confidence in our ability to tackle the matter of climate change, putting upward pressure on Group's share price.

vi) Substantial business decisions:
There have been a number of business decisions directly influenced by Climate Change; examples include:
• Our Group-wide Environment Policy was updated during the reporting period to reflect the changes in climate change legislation, to include prevention of pollution, reduction of waste, and minimisation of natural resource use.
• The Group Institutional Banking and Markets (IB&M) business recently created an ESG Lending Policy covering Metals & Mining, Oil & Gas, and Energy & Utilities, ensuring that climate change considerations are factored into the Group's lending processes and practices.
• The introduction of the Group Environmental Management System (EMS) aligned to ISO: 14001, assists in mitigating direct climate change impacts on our business e.g. rising electricity prices.
• The 20 per cent carbon reduction target is also a substantial business decision that was directly influenced by the aspects of climate change, e.g. rising electricity and fuel prices.

CC2.2b

Please explain why climate change is not integrated into your business strategy

CC2.3

Do you engage in activities that could either directly or indirectly influence public policy on climate change through any of the following? (tick all that apply)

Direct engagement with policy makers

CC2.3a

On what issues have you been engaging directly with policy makers?

Focus of legislation	Corporate Position	Details of engagement	Proposed legislative solution
Other: Australian Government's Direct Action Plan	Support with minor exceptions	The Government's Expert Reference Group will inform the Emissions Reduction Fund's design and provide the Government with expert and practical advice for consideration. The Group continues to engage in policy discussions on environmental issues directly and through its industry representatives. Direct policy engagement is undertaken with industry representatives as well as with departmental and Federal Government representatives. An important overall component of the Group's corporate positioning is where the Group directly engages with policy makers to encourage further action/ mitigation and/ or adaption related to climate change.	The Expert Reference Group where the CBA Group is represented will convene regularly until the finalisation of the Emissions Reduction Fund White Paper, due to be released during 2014. The Emissions Reduction Fund will work together with other incentives under the Direct Action Plan and the Renewable Energy Target to help Australia meet its target of reducing emissions by five per cent below 2000 levels by 2020. The Group established the Carbon Solutions Team to prepare for and directly address the issues surrounding climate change and the resulting regulatory environment.

CC2.3b

Are you on the Board of any trade associations or provide funding beyond membership?

CC2.3c

Please enter the details of those trade associations that are likely to take a position on climate change legislation

Trade association	Is your position on climate change consistent with theirs?	Please explain the trade association's position	How have you, or are you attempting to, influence the position?

CC2.3d

Do you publically disclose a list of all the research organizations that you fund?

CC2.3e

Do you fund any research organizations to produce or disseminate public work on climate change?

CC2.3f

Please describe the work and how it aligns with your own strategy on climate change

CC2.3g

Please provide details of the other engagement activities that you undertake

CC2.3h

What processes do you have in place to ensure that all of your direct and indirect activities that influence policy are consistent with your overall climate change strategy?

All direct and indirect activities that influence policy are consistent with the Group overall climate change and ESG related strategy which is integrated into a multi-disciplinary company-wide risk management process.
Processes in place to ensure all engagement is consistent with our overall climate change strategy include:
• The Group overarching Risk Appetite Statement (RAS), which fundamentally guides the Group risk culture and sets out the boundaries for risk-taking activities. Boundaries are defined by the principles and metrics, both quantitative and qualitative, that must be considered collectively and not in isolation.
• Internal sector specific policies; the Group uses a number of ESG policies for sensitive sectors so as to ensure ESG risks are considered at deal initiation and during the life of a transaction.
• Group-wide Environmental policy; sets a foundation and creates a framework for understanding and managing the Group direct and indirect environmental impacts.
• Group Environmental Management System (EMS) ISO: 14001. The system provides a methodical approach to planning, implementing and reviewing our environmental management process. The system incorporates an Environmental Aspects and Impacts register, identifying environmental attributes of products, activities and services and their effects on the environment. This register provides a risk rating for each outcome and therefore provides the Group with relevant information for addressing policy matters.

CC2.3i

Please explain why you do not engage with policy makers

Further Information

Page: CC3. Targets and Initiatives

CC3.1

Did you have an emissions reduction target that was active (ongoing or reached completion) in the reporting year?

Absolute target

CC3.1a

Please provide details of your absolute target

ID	Scope	% of emissions in scope	% reduction from base year	Base year	Base year emissions (metric tonnes CO2e)	Target year	Comment
Abs1	Scope 1+2+3	100%	20%	2009	172752	2013	The Bank set a target for reducing its scope 1 and 2 full fuel cycle emissions by 20% from a 2009 baseline to be achieved by 2013. Progress against the target has been reported in the Annual Sustainability Report to include scope 3 emissions related to scope 1 and 2 emissions (full fuel cycle). In order to achieve its target, in 2010, the Bank began implementing a large scale program to reduce emissions across its domestic operations including the following initiatives: • Energy efficiency projects for commercial and retail properties including but not limited to, lighting and Heating, Ventilation Air-conditioning and Cooling (HVAC) replacements and upgrades. By the end of the reporting period i.e. June 2013, the following achievements were made: • 931 Site Audited • 550 Sites 'Refreshed' • Commercial Consolidation into leading environmental buildings. The transition of employees commenced in June 2011 and completed in April 2012. The vacated sites were progressively “made good” and handed over. • development of a fleet of vehicles that are less carbon-intensive • staff awareness and engagement programs and communication through newsletters and intranet. The Bank achieved its initial reduction target of 34,550 TCo2-e five months ahead of schedule and went onto reducing its emission this by another 10,658 TCo2-e by the due date of June 2013, ultimately achieving a total reduction of 45,208 TCo2-e.
Abs2	Scope 1+2+3	100%	25%	2008	12133	2013	After exceeding their original 20 per cent reduction target ahead of schedule, the Bank’s New Zealand operations (ASB) extended its emissions reduction target to 25 percent from its 2008 levels. The target scope covered all emissions sources reported by the NZ operations including those associated with business travel, full fuel cycle, supplier (courier) and waste. ASB implemented a number of environmental initiatives, to include an effective and pervasive energy program with sound monitoring and clear goals, which was critical to ASB’s strategy as the majority of direct emissions relate to electricity usage. ASB introduced energy monitoring systems, replaced inefficient lighting throughout the NZ branch network, upgraded the heating, ventilation and air conditioning systems in all buildings, and created much greater visibility of energy usage for all staff. ASB also implemented an extensive waste reduction and recycling program, a paper independence program of work, and increased the number of hybrid and fuel

ID	Scope	% of emissions in scope	% reduction from base year	Base year	Base year emissions (metric tonnes CO2e)	Target year	Comment
							efficient vehicles in the ASB vehicle fleet.

CC3.1b

Please provide details of your intensity target

ID	Scope	% of emissions in scope	% reduction from base year	Metric	Base year	Normalized base year emissions	Target year	Comment

CC3.1c

Please also indicate what change in absolute emissions this intensity target reflects

ID	Direction of change anticipated in absolute Scope 1+2 emissions at target completion?	% change anticipated in absolute Scope 1+2 emissions	Direction of change anticipated in absolute Scope 3 emissions at target completion?	% change anticipated in absolute Scope 3 emissions	Comment

CC3.1d

For all of your targets, please provide details on the progress made in the reporting year

ID	% complete (time)	% complete (emissions)	Comment
Abs1	100%	100%	The Bank achieved and exceeded its 20 per cent Carbon Emissions Reduction Target during the reporting period. The Bank's target was reached in January 2013 (5 months ahead of schedule). Total amount of emissions to be reduced over the 4 year target period was 34,550 TCo2-e. Total emissions reduction by June 2013 was 45,208, which represents a reduction of 26 per cent over all. This is a considerable achievement given that the target is an absolute target rather than an intensity target and that the Bank's operations have grown in terms of revenue. These reductions can be attributed to the ongoing successful implementation of the Emission Reduction Program which includes the 'Green Refresh' program, improving building efficiency in both retail branches and commercial premises through lighting upgrades, HVAC improvements and use of tri-generation. Of great significance in the reporting period has been the successful occupation of corporate office space (Sydney, Australia) i.e. Multi award winning Commonwealth Bank Place (CBP). CBP includes best practice environmental design (6 Star Green Star Rating) and energy efficiency (including 5 Star NABERS Energy Rating), which also uses Activity Based Working (ABW), making the use of space 20 per cent more efficient.
Abs2	100%	100%	In 2009 ASB set the goal of reducing carbon emissions by 20% before the end of December 2012. To do so ASB targeted a net reduction of over 2,400 tonnes of carbon (tCO2-e) from 2008 emissions levels, knowing that the business was going to grow during that time. ASB hit that target early and saved 3,657 tonnes for an overall reduction of 30%. To achieve the carbon reduction target ASB implemented a number of environmental initiatives. An effective and pervasive energy program with sound monitoring and clear goals was critical to ASB strategy as the majority of direct emissions relate to electricity usage. ASB introduced energy monitoring systems, replaced inefficient lighting throughout the NZ branch network, upgraded the heating, ventilation and air conditioning systems in all buildings, and created much greater visibility of energy usage for all staff. ASB also implemented an extensive waste reduction and recycling program, a paper independence program of work, and increased the number of hybrid and fuel efficient vehicles in the ASB vehicle fleet.

CC3.1e

Please explain (i) why you do not have a target; and (ii) forecast how your emissions will change over the next five years

CC3.2

Does the use of your goods and/or services directly enable GHG emissions to be avoided by a third party?

Yes

CC3.2a

Please provide details of how the use of your goods and/or services directly enable GHG emissions to be avoided by a third party

a) How the emissions were avoided:
The Group has increased the use of online banking and electronic communications. Customers are able to view electronic statements and other material online in lieu of receiving a traditional paper-based statement by post resulting in a reduction in Scope 1 emissions generated through third party travel via postal delivery. During the reporting period alone, 21,500,000 statement pages were sent electronically rather than being sent via conventional mail delivery.

b) Amount of emissions avoided over time in metric Tonnes Co2-e:
The initiative achieved emissions savings by eliminating printouts and emissions associated with postal delivery. It is estimated that approximately 71 tonnes CO2-e per year were saved by the Group’s Australian operations (a further reduction of approximately 8 per cent on the previous reporting period).

c) Methodology, assumptions, emission factors and global warming potentials:
Methodology:
Using publicly available data from Australia Post on their carbon emission and postal volumes, a typical emissions factor per $1 of postal spend was calculated. This was then applied to the Group’s annual postal spend to estimate the overall emissions associated with the Group's postal services provided by Australia Post.

Assumptions:
Included average postal delivery distances travelled, derived from the Group’s internal data systems, as well as the fuel emissions per km by the individual delivery service vehicles, as supplied by Australia post.

Emission factors and Global warming potentials used:
• National Greenhouse Accounts (NGA) Factors,
• UNFCCC - Global warming potential (CO2 of 1 GWP)

d) Are you considering generating CERs or ERUs Re CDM or JI
No

CC3.3

Did you have emissions reduction initiatives that were active within the reporting year (this can include those in the planning and implementation phases)

Yes

CC3.3a

Please identify the total number of projects at each stage of development, and for those in the implementation stages, the estimated CO2e savings

Stage of development	Number of projects	Total estimated annual CO2e savings in metric tonnes CO2e (only for rows marked *)
Under investigation	73	0
To be implemented*	0	0
Implementation commenced*	0	0
Implemented*	2	325
Not to be implemented	23	0

CC3.3b

For those initiatives implemented in the reporting year, please provide details in the table below

Activity type	Description of activity	Estimated annual CO2e savings (metric tonnes CO2e)	Annual monetary savings (unit currency - as specified in CC0.4)	Investment required (unit currency - as specified in CC0.4)	Payback period	Estimated lifetime of the initiative, years	Comment
Energy efficiency:	* Nature of activity: This opportunity involved the review and adjustment of HVAC schedules to reflect staff hours	231	59075	118150	1-3 years	15 years	

Activity type	Description of activity	Estimated annual CO2e savings (metric tonnes CO2e)	Annual monetary savings (unit currency - as specified in CC0.4)	Investment required (unit currency - as specified in CC0.4)	Payback period	Estimated lifetime of the initiative, years	Comment
Building services	as 'irregular after hours consumption' was noted from a review of daily load profiles. * Scope type: Scope 2. * Voluntary/ mandatory: Voluntary.						
Energy efficiency: Building services	* Nature of activity: Optimisation of the Building Management System at 4 Dawn Fraser Ave, Olympic Park, Sydney Australia, to reduce energy wastage. * Scope type: Scope 2. * Voluntary/ mandatory: Voluntary.	94	21000	42000	1-3 years	10 years	

CC3.3c

What methods do you use to drive investment in emissions reduction activities?

Method	Comment
Dedicated budget for energy efficiency	A dedicated budget, was set aside to achieve the Bank's carbon reduction target. The carbon reduction target was established in 2009 to reduce carbon emissions by 20 per cent of its 2008-09 emissions levels. This target was set to be achieved by June 2013 and represented a reduction of 34,550 tCo2-e. The target was achieved 5 months ahead of schedule (i.e. during this FY13 CDP reporting period). The reduction target project involved identifying and evaluating several potential emission reduction activities. During the FY13 reporting period, an overall reduction in emissions of more than 19,500 tCo2-e was achieved. The Bank's target was achieved by implementing a number of projects including: 1.Energy efficiency projects to commercial and retail portfolio's, including but not limited to, lighting and HVAC replacements and upgrades, 2. Utilising vehicles that are less carbon-intensive, 3. Continuing to increase the use of E10 and biodiesel fuels, 4. Continuing the rollout of driver education programs, 5. The Relocation of employees from inefficient buildings to energy efficient properties, and 6. Continuing staff awareness and engagement programs.

CC3.3d

If you do not have any emissions reduction initiatives, please explain why not

Further Information

Page: CC4. Communication

CC4.1

Have you published information about your organization’s response to climate change and GHG emissions performance for this reporting year in places other than in your CDP response? If so, please attach the publication(s)

Publication	Page/Section reference	Attach the document
In mainstream financial reports (complete)	2013 Annual Report: pg30: (ESG policy), pg32-33 (Carbon reduction target/ emissions performance, Transition to a low carbon economy).	https://www.cdp.net/sites/2014/49/3649/Investor CDP 2014/Shared Documents/Attachments/CC4.1/2013_CBA_Annual_Report.pdf
In mainstream financial reports (complete)	2013 Shareholder Review: pg23 (Carbon reduction target, commitment to renewable energy and carbon markets).	https://www.cdp.net/sites/2014/49/3649/Investor CDP 2014/Shared Documents/Attachments/CC4.1/2013_CBA_Shareholder_review.pdf
In other regulatory filings (complete)	2013 Energy Efficiency Opportunities Act: Entire Report.	https://www.cdp.net/sites/2014/49/3649/Investor CDP 2014/Shared Documents/Attachments/CC4.1/Energy Efficiency Opportunity Report 2013 - Public Report.pdf
In voluntary communications (complete)	2013 'Voluntary' EEO Report: Entire Report.	https://www.cdp.net/sites/2014/49/3649/Investor CDP 2014/Shared Documents/Attachments/CC4.1/2013 Voluntary Energy Efficiency Opportunity Report 2013.pdf

Further Information

Module: Risks and Opportunities

Page: CC5. Climate Change Risks

CC5.1

Have you identified any climate change risks that have the potential to generate a substantive change in your business operations, revenue or expenditure? Tick all that apply

Risks driven by changes in regulation
Risks driven by changes in physical climate parameters
Risks driven by changes in other climate-related developments

CC5.1a

Please describe your risks driven by changes in regulation

Risk driver	Description	Potential impact	Timeframe	Direct/ Indirect	Likelihood	Magnitude of impact	Estimated financial implications	Management method	Cost of management
Emission reporting obligations	Non-compliance with the National Greenhouse and Energy Reporting (NGER) Scheme, and Energy Efficiency Opportunities (EEO) Act. The	Increased operational cost	Up to 1 year	Direct	More likely than not	Low	The Group collects its data via a third party data service provider. The collection and collation of the data is a standard process for the business. However	The Group's responsibility is to ensure robust and accurate data. To minimise this risk, the Group centralises its emissions data into the one global	The Group collects its data through a third party data service provider. The collection and collation of the data is a business as usual operation, however with

Risk driver	Description	Potential impact	Timeframe	Direct/ Indirect	Likelihood	Magnitude of impact	Estimated financial implications	Management method	Cost of management
	Group is captured under both the NGER and EEO legislation. These reporting requirements are likely to tighten. As a result the Group will consider the need for additional resources to collate and report via the federal governments reporting system.						with additional tightening of the reporting requirements we foresee potential additional work in the development of specific collation and reporting requirements to upload data to the government's reporting tools. Current collection and assurance costs are approximately AU$200,000 per annum. This is not considered material to the Group.	reporting platform (Envizi). The Group has worked with Envizi to create specific and dedicated reports to conform to the Group's legislative requirements. The Group's emissions data is also verified and assured by a third party (KPMG) to further manage this risk and ensure accuracy.	additional tightening of the reporting requirements we foresee additional work in the development of specific reporting outputs for uploading to the government's reporting tool. Current cost are approximately AU$200,000 ensuring data meets regulatory requirements, this may increase to approximately AU$300,000. An increase of AU$100,000.

CC5.1b

Please describe your risks that are driven by change in physical climate parameters

Risk driver	Description	Potential impact	Timeframe	Direct/ Indirect	Likelihood	Magnitude of impact	Estimated financial implications	Management method	Cost of management
Change in temperature extremes	Group assets are exposed to changes in temperature extremes, which may put excess demand on the Group's Heating Cooling and Air Conditioning (HVAC) requirements of these assets. Therefore the efficiency and effective running of these systems may be inadvertently altered. To avert this risk, the Group is ensuring the resilience of the plant and equipment, and capacity flexibility within its assets.	Increased operational cost	Up to 1 year	Direct	Very likely	Low-medium	HVAC systems will be required to work harder & may deteriorate faster with added load spiking, therefore shorter life spans & greater long term replacement costs. Take a $100,000 HVAC, (working life 20 years, amortised at $5kpa). With an increase in temperature extremes, excess strain on HVAC causes working life to reduce to 10yrs, which increases the expense (amortisation) to ($100k /10yrs) $10kpa, therefore increased expense of $50,000 (with 10 Group assets) ie $10k-$5k=$5k x 10 assets).	The Group uses several methods to manage this risk. Reducing other uses of electricity, thus lower peak use of electricity; replacement of older HVAC units with newer/ more efficient units. The Group Property team monitors the Group assets on an ongoing basis and run energy intensity reports by property on a monthly basis. This proactively identifies lower performing assets, where the Group can target and implement energy efficiency activities. As an example at 4 Dawn Fraser Avenue, Sydney Olympic park NSW, Australia we replaced the aging HVAC system with a more efficient model.	The project costs for the HVAC unit upgrade at 4 Dawn Fraser Avenue Sydney Australia was approximately $40k. This upgrade is expected to save 94 TCo2-e (404GJ) per year, and has a payback period of 1-2 years.

CC5.1c

Please describe your risks that are driven by changes in other climate-related developments

Risk driver	Description	Potential impact	Timeframe	Direct/ Indirect	Likelihood	Magnitude of impact	Estimated Financial Implications	Management method	Cost of management
Reputation	Reputation is one of the Group's most valuable assets, and is a key driver to the success of its brand. There is the potential reputational risk associated with the change in stakeholder perceptions of how the Group is responding to climate change. The Group's approach to climate change is directly linked to whether or not it is listed on Sustainability rating Indices such as CDP, FTSE4good and DJSI indices, how we are viewed by rating agencies in general and	Reduced demand for goods/services	Up to 1 year	Direct	More likely than not	Medium	Negative stakeholder perceptions of the Group approach to climate change may negatively impact the Bank's reputation and therefore its brand. The Group brand is valued at approximately AUD$19 Billion as at the end of this reporting period. A 0.5% decrease in the value of the Group's brand due to perceived increase in reputational risks, equates to a possible devaluing of approximately AUD$96,000,000.	The Group manages these reputational risks in a number of ways; 1. Actively monitoring stakeholder perceptions & holding regular strategic reviews to identify reputation related opportunities and risks. 2. Holding external stakeholder roundtable events 3. Greater communications, engagements and reporting on climate change related matters, increasing transparency, e.g. CommBank website, annual dedicated Sustainability Report and microsite, Energy Efficiency	Group employees involved in managing reputation, brand issues and stakeholder concerns within Group Corporate Affairs are the major cost driver. This cost is estimated at between AU$700,000 and AU$1,500,000. Cost associated with data collection and collation, public disclosure and third party voluntary verification and assurance, external stakeholder engagement, domestic and global memberships and signatories,

Risk driver	Description	Potential impact	Timeframe	Direct/ Indirect	Likelihood	Magnitude of impact	Estimated Financial Implications	Management method	Cost of management
	various investors which value the importance of sustainability and associated Environmental Social and Governance (ESG) and climate change related issues. Stakeholders potentially criticising the Group for the provision of financial services to industries that are active in the natural resources and utilities sectors is a clear reputational risk. Protecting and enhancing the Group's strong brand is not only important domestically but also internationally. Failure to address climate							Opportunities (EEO) annual report and NGER reporting program. 4. Maintaining engagement with peers on climate change issues, addressing growing interests and concerns from our clients, shareholders, community, banks, analysts, investors and our employees. 5. Other ways the Group is managing its reputation and brand is being at the forefront of global change. The Group memberships and signatories include: • United Nations Environment Programme for Financial Institutions (UNEPFI) • UN Global Compact • Principles for responsible	equate to approximately AU$800,000pa

Risk driver	Description	Potential impact	Timeframe	Direct/ Indirect	Likelihood	Magnitude of impact	Estimated Financial Implications	Management method	Cost of management
	change issues will affect the Group's existing and future client relationships. To enhance the visibility of the Group's engagement in sustainability and climate change related matters, the Group produces a dedicated Sustainability Report annually, the Energy Efficiency Opportunities (EEO) annual report covering all energy reduction activities throughout the reporting period, as well as a report to the National Greenhouse and Energy Reporting (NGER) Scheme, which discloses the Group's GHG							investment (PRI) • Dow Jones Sustainability Index (DJSI) • FTSE4GOOD • Equator Principles • Earth Hour 6. Developing sector specific ESG policy around sensitive industry sectors. 7. The Group also engaged with the top 100 Australian GHG emitters (covering a wide range of emissions-intensive industries with a total emissions profile of over 250 million tonnes of Co2-e), on their carbon liabilities and how the Group could assist in the management of these, and therefore reduce their risk.	

Risk driver	Description	Potential impact	Timeframe	Direct/ Indirect	Likelihood	Magnitude of impact	Estimated Financial Implications	Management method	Cost of management
	emissions portfolio.								

CC5.1d

Please explain why you do not consider your company to be exposed to risks driven by changes in regulation that have the potential to generate a substantive change in your business operations, revenue or expenditure

CC5.1e

Please explain why you do not consider your company to be exposed to risks driven by physical climate parameters that have the potential to generate a substantive change in your business operations, revenue or expenditure

CC5.1f

Please explain why you do not consider your company to be exposed to risks driven by changes in other climate-related developments that have the potential to generate a substantive change in your business operations, revenue or expenditure

Further Information

Page: CC6. Climate Change Opportunities

CC6.1

Have you identified any climate change opportunities that have the potential to generate a substantive change in your business operations, revenue or expenditure? Tick all that apply

Opportunities driven by changes in regulation
Opportunities driven by changes in physical climate parameters
Opportunities driven by changes in other climate-related developments

CC6.1a

Please describe your opportunities that are driven by changes in regulation

Opportunity driver	Description	Potential impact	Timeframe	Direct/Indirect	Likelihood	Magnitude of impact	Estimated financial implications	Management method	Cost of management
Emission reporting obligations	The growing number of mandatory emissions reporting obligations e.g. National Greenhouse and Energy Reporting (NGER) scheme and Energy Efficiency Opportunities	Reduced operational costs	Up to 1 year	Direct	Virtually certain	Low-medium	The Group collects and houses its GHG data within a third party data service provider. Cost for the collection, collation and reporting of data is between AU$90,000 and AU$100,000. Reporting this data has enabled the Group to look	The Collection of data is performed externally. The Group emissions data submission to the federal government is completed in-house by a dedicated resource. The Group's responsibility is	To manage this opportunity the costs involve the collection and housing of emissions data, and the cost of having this data externally assured for transparent and accurate public reporting equate to

Opportunity driver	Description	Potential impact	Timeframe	Direct/Indirect	Likelihood	Magnitude of impact	Estimated financial implications	Management method	Cost of management
	(EEO) Act in Australia, supports the improvement in quality, reliability and transparency of the Group's Greenhouse Gas (GHG) emissions reporting. This enables cost efficiencies when identifying and managing climate change related risks.						deeper into its emissions sources and identify energy efficiency opportunities. As an example, within the Group's 2013 EEO Report, identified opportunities worth approximately AU$250,000pa of savings, are currently being investigated for implementation.	to ensure correct, accurate and timely reportable data. The Group seeks third party expertise in assessing and assuring its data prior to reporting to the federal government.	approximately AU$200,000 per year.

CC6.1b

Please describe the opportunities that are driven by changes in physical climate parameters

Opportunity driver	Description	Potential impact	Timeframe	Direct/ Indirect	Likelihood	Magnitude of impact	Estimated financial implications	Management method	Cost of management
Change in temperature extremes	Changes in temperature extremes are likely to put excess demand	Reduced operational costs	Up to 1 year	Direct	Virtually certain	Low-medium	Replacing inefficient HVAC systems reduces the Group's overall	The Group conducted audits on 200 sites providing critical information on a	Costs associated with the HVAC systems upgrade during this reporting period

Opportunity driver	Description	Potential impact	Timeframe	Direct/ Indirect	Likelihood	Magnitude of impact	Estimated financial implications	Management method	Cost of management
	on the Group's heating, cooling and air-conditioning (HVAC) requirements. There is an advantage in having more efficient and/ or newer HVAC systems and chillers within the Group portfolio. The opportunity is to upgrade and/ or replace inefficient equipment, so as to reduce operational costs.						operational costs. Due to this project implementation, the estimated financial saving for this reporting period alone is AU$1.4 million.	HVAC asset size, compared to the heating and cooling needed for a particular facility's footprint size (m2). The Group also conducted a study on the life of its (HVAC) assets within its portfolio, this determined when an asset would reduce in its efficiency, (e.g. if the expected lifecycle of a HVAC asset is 25 years, and the current life of a particular asset was at 20 years, the Group would confirm the current efficient run cycle of that asset and look to replace if found inefficient). The Group also produced energy intensity reports, confirming which sites were less efficient than others, this would allow the Group to	under 'Project Green Refresh HVAC', was approximately AU$2.1million The reduction in carbon emissions equates to approximately 6,500 tCo2-e pa for this project within this reporting period.

Opportunity driver	Description	Potential impact	Timeframe	Direct/ Indirect	Likelihood	Magnitude of impact	Estimated financial implications	Management method	Cost of management
								target specific sites for energy efficiency opportunities.	

CC6.1c

Please describe the opportunities that are driven by changes in other climate-related developments

Opportunity driver	Description	Potential impact	Timeframe	Direct/ Indirect	Likelihood	Magnitude of impact	Estimated financial implications	Management method	Cost of management
Other drivers	Other Driver - Reduce direct carbon emissions: As part of the Group's 20 per cent carbon reduction target, we set out to reduce the Group's direct emissions footprint in a number of ways. One major contributor was the upgrade and/ or replacement of inefficient lighting	Reduced operational costs	Up to 1 year	Direct	Virtually certain	Low-medium	Incorporating more efficient lighting systems within our retail and commercial office portfolios lowers the Group's overall operational costs. Due to this project implementation an overall saving for this reporting period alone is AU$1.1 million.	The Group set out to audit all appropriate retail and commercial buildings, taking into account those sites with pending lease expiries where they were not to be renewed. During the reporting period 87 retail sites were audited and 330 sites were refreshed. Energy intensity reports were then generated to	Costs associated with the 330 retail sites upgraded during this reporting period under Project Green Refresh Lighting was approximately AU$3.6million. The reduction in carbon emissions equates to approximately 5,000 tCo2-e pa.

Opportunity driver	Description	Potential impact	Timeframe	Direct/ Indirect	Likelihood	Magnitude of impact	Estimated financial implications	Management method	Cost of management
	throughout our retail and commercial office portfolios. Project name 'Green Refresh'.							confirm the success of these energy efficiency lighting upgrades, and the resulting reduction in the Group Scope 2 emissions.	

CC6.1d

Please explain why you do not consider your company to be exposed to opportunities driven by changes in regulation that have the potential to generate a substantive change in your business operations, revenue or expenditure

CC6.1e

Please explain why you do not consider your company to be exposed to opportunities driven by physical climate parameters that have the potential to generate a substantive change in your business operations, revenue or expenditure

CC6.1f

Please explain why you do not consider your company to be exposed to opportunities driven by changes in other climate-related developments that have the potential to generate a substantive change in your business operations, revenue or expenditure

Further Information

Module: GHG Emissions Accounting, Energy and Fuel Use, and Trading

Page: CC7. Emissions Methodology

CC7.1

Please provide your base year and base year emissions (Scopes 1 and 2)

Base year	Scope 1 Base year emissions (metric tonnes CO2e)	Scope 2 Base year emissions (metric tonnes CO2e)
Tue 01 Jul 2008 - Tue 30 Jun 2009	14443	170504

CC7.2

Please give the name of the standard, protocol or methodology you have used to collect activity data and calculate Scope 1 and Scope 2 emissions

Please select the published methodologies that you use

Please select the published methodologies that you use
Australia - National Greenhouse and Energy Reporting Act
ISO 14064-1
New Zealand - Guidance for Voluntary, Corporate Greenhouse Gas Reporting
The Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard (Revised Edition)

CC7.2a

If you have selected "Other" in CC7.2 please provide details of the standard, protocol or methodology you have used to collect activity data and calculate Scope 1 and Scope 2 emissions

CC7.3

Please give the source for the global warming potentials you have used

Gas	Reference
CO_2	IPCC Second Assessment Report (SAR - 100 year)
CH_4	IPCC Second Assessment Report (SAR - 100 year)
N_2O	IPCC Second Assessment Report (SAR - 100 year)

CC7.4

Please give the emissions factors you have applied and their origin; alternatively, please attach an Excel spreadsheet with this data at the bottom of this page

Fuel/Material/Energy	Emission Factor	Unit	Reference
			Attached below.

Further Information

In reference to Question 7.4: Please find attached applied emissions Factors and their origin.

Attachments

https://www.cdp.net/sites/2014/49/3649/Investor CDP 2014/Shared Documents/Attachments/InvestorCDP2014/CC7.EmissionsMethodology/Q7_4 worksheet-to-input-of-EF.xlsx

Page: CC8. Emissions Data - (1 Jul 2012 - 30 Jun 2013)

CC8.1

Please select the boundary you are using for your Scope 1 and 2 greenhouse gas inventory

Operational control

CC8.2

Please provide your gross global Scope 1 emissions figures in metric tonnes CO2e

10542

CC8.3

Please provide your gross global Scope 2 emissions figures in metric tonnes CO2e

131956

CC8.4

Are there are any sources (e.g. facilities, specific GHGs, activities, geographies, etc.) of Scope 1 and Scope 2 emissions that are within your selected reporting boundary which are not included in your disclosure?

Yes

CC8.4a

Please provide details of the sources of Scope 1 and Scope 2 emissions that are within your selected reporting boundary which are not included in your disclosure

Source	Relevance of Scope 1 emissions from this source	Relevance of Scope 2 emissions excluded from this source	Explain why the source is excluded
Asia Pacific operations	Emissions are relevant but not yet calculated	No emissions excluded	The Group has had some difficulty in confirming its Asia Pacific Scope 1 emission source accuracy and completeness. This emission source will be reported in future submissions. Asia Pacific Scope 1 emissions are immaterial to the Group's overall emissions.

CC8.5

Please estimate the level of uncertainty of the total gross global Scope 1 and 2 emissions figures that you have supplied and specify the sources of uncertainty in your data gathering, handling and calculations

Scope 1 emissions: Uncertainty range	Scope 1 emissions: Main sources of uncertainty	Scope 1 emissions: Please expand on the uncertainty in your data	Scope 2 emissions: Uncertainty range	Scope 2 emissions: Main sources of uncertainty	Scope 2 emissions: Please expand on the uncertainty in your data
More than 2% but less than or equal to 5%	Assumptions Extrapolation Metering/ Measurement Constraints Data Management	The Group incorporates robust data collection processes for all sources of emissions and therefore uncertainty is minimal for the sources identified. The Group’s energy data is acquired primarily from invoices with limited uncertainty (which is outside the Group's control). A small proportion of energy data is obtained from meters for which uncertainty is minimised by the Group or third party meter maintenance practices and compliance with industry standards. Metering and measurement constraints under the responsibility of third parties (e.g. suppliers who provide invoice based data) and published emission factors are outside the control of the Group. These sources of uncertainty are minimal as they represent the best available information and are constantly being monitored and updated. Invoice-based consumption data is uploaded into ‘Envizi’ (the Group's dedicated energy and greenhouse gas management software). Envizi also houses data relating to energy costs, tariffs and consumption periods to facilitate regular data validation. Data quality is constantly monitored using Envizi's built-in validation tools to identify any data anomalies and	More than 2% but less than or equal to 5%	Assumptions Extrapolation Metering/ Measurement Constraints Data Management	The Group has minimal uncertainty in its Scope 2 electricity data due to its robust data management processes. Invoice-based Scope 2 activity data is uploaded into 'Envizi' (the Group's dedicated energy and greenhouse gas management software). Envizi also houses data relating to energy costs, tariffs and consumption periods to facilitate regular data validation. For some minor retail branches and ATM sites for which data is not available, estimations are made based on electricity consumption per unit of Net Lettable Area (NLA), and extrapolating seasonal data from similar sites. Outside the Group's control there is a small degree of inherent uncertainty in published emissions factors and in the electricity meter data upon which invoices from electricity retailers are based. Scope 2 uncertainty has been calculated using the methodology in the Australian NGER (Measurement) Determination. Although this document does not provide uncertainty factors for Scope 2 emissions, the Australian National Electricity Market (NEM) Rules relating to metering require meters to have an overall error of not more than ± 1.5% (NEM Rules, Version 34, Schedule

Scope 1 emissions: Uncertainty range	Scope 1 emissions: Main sources of uncertainty	Scope 1 emissions: Please expand on the uncertainty in your data	Scope 2 emissions: Uncertainty range	Scope 2 emissions: Main sources of uncertainty	Scope 2 emissions: Please expand on the uncertainty in your data
		gaps. Once identified, these anomalies and gaps are rectified, either with actual data or by extrapolating existing data based on historical and seasonal factors. The Group captures data for all of its Scope 1 emission sources and therefore extrapolation is only ever conducted to fill data gaps, not to estimate complete emission sources. The Group calculates its Scope 1 uncertainty for the purposes of the National Greenhouse and Energy Reporting (NGER) using the methodology set out in the NGER (Measurement) Determination 2008.			7.2.2). This figure was applied to the percentage of data sourced from invoices. The NGER Criterion BBB (simplified consumption measurement) uncertainty percentage was applied to the small amount of electricity data that was estimated or extrapolated. A weighted uncertainty average was then determined.

CC8.6

Please indicate the verification/assurance status that applies to your reported Scope 1 emissions

Third party verification or assurance complete

CC8.6a

Please provide further details of the verification/assurance undertaken for your Scope 1 emissions, and attach the relevant statements

Type of verification or assurance	Attach the statement	Page/section reference	Relevant standard	Proportion of reported Scope 1 emissions verified (%)
Limited assurance	https://www.cdp.net/sites/2014/49/3649/Investor CDP 2014/Shared Documents/Attachments/CC8.6a/FY13_CommonwealthBankSustainabilityPerformanceData2013_KPMG_Limited_Assurance.pdf	Page 1, paragraph 1 'Scope': Limited Assurance over Data Table. Pages 6, 7 and 9: Emissions data.	ASAE3000	95

CC8.6b

Please provide further details of the regulatory regime to which you are complying that specifies the use of Continuous Emissions Monitoring Systems (CEMS)

Regulation	% of emissions covered by the system	Compliance period	Evidence of submission

CC8.7

Please indicate the verification/assurance status that applies to your reported Scope 2 emissions

Third party verification or assurance complete

CC8.7a

Please provide further details of the verification/assurance undertaken for your Scope 2 emissions, and attach the relevant statements

Type of verification or assurance	Attach the statement	Page/Section reference	Relevant standard	Proportion of Scope 2 emissions verified (%)
Limited assurance	https://www.cdp.net/sites/2014/49/3649/Investor CDP 2014/Shared Documents/Attachments/CC8.7a/FY13_CommonwealthBankSustainabilityPerformanceData2013_KPMG_Limited_Assurance.pdf	Page 1, paragraph 1 'Scope': Limited Assurance over Data Table. Pages 6, 7 and 9: Emissions data.	ASAE3000	95

CC8.8

Please identify if any data points other than emissions figures have been verified as part of the third party verification work undertaken

Additional data points verified	Comment
Progress against emission	KPMG conduct third party assurance over the Group's GHG emissions. Part of this verification is the reduction in GHG

Additional data points verified	Comment
reduction target	emissions directly related to the Bank's carbon emissions reduction target.

CC8.9

Are carbon dioxide emissions from biologically sequestered carbon relevant to your organization?

No

CC8.9a

Please provide the emissions from biologically sequestered carbon relevant to your organization in metric tonnes CO2

Further Information

Page: CC9. Scope 1 Emissions Breakdown - (1 Jul 2012 - 30 Jun 2013)

CC9.1

Do you have Scope 1 emissions sources in more than one country?

Yes

CC9.1a

Please break down your total gross global Scope 1 emissions by country/region

Country/Region	Scope 1 metric tonnes CO2e
Australia	9866
New Zealand	676

CC9.2

Please indicate which other Scope 1 emissions breakdowns you are able to provide (tick all that apply)

CC9.2a

Please break down your total gross global Scope 1 emissions by business division

Business division	Scope 1 emissions (metric tonnes CO2e)

CC9.2b

Please break down your total gross global Scope 1 emissions by facility

Facility	Scope 1 emissions (metric tonnes CO2e)	Latitude	Longitude

CC9.2c

Please break down your total gross global Scope 1 emissions by GHG type

GHG type	Scope 1 emissions (metric tonnes CO2e)

CC9.2d

Please break down your total gross global Scope 1 emissions by activity

Activity	Scope 1 emissions (metric tonnes CO2e)

CC9.2e

Please break down your total gross global Scope 1 emissions by legal structure

Legal structure	Scope 1 emissions (metric tonnes CO2e)

Further Information

Page: CC10. Scope 2 Emissions Breakdown - (1 Jul 2012 - 30 Jun 2013)

CC10.1

Do you have Scope 2 emissions sources in more than one country?

Yes

CC10.1a

Please break down your total gross global Scope 2 emissions and energy consumption by country/region

Country/Region	Scope 2 metric tonnes CO2e	Purchased and consumed electricity, heat, steam or cooling (MWh)	Purchased and consumed low carbon electricity, heat, steam or cooling accounted for CC8.3 (MWh)
Australia	121110	134532	
New Zealand	3823	29360	
China	512	675	
India	125	130	
Japan	50	116	
Singapore	237	447	
Indonesia	5982	8237	
Vietnam	117	284	

CC10.2

Please indicate which other Scope 2 emissions breakdowns you are able to provide (tick all that apply)

CC10.2a

Please break down your total gross global Scope 2 emissions by business division

Business division	Scope 2 emissions (metric tonnes CO2e)

CC10.2b

Please break down your total gross global Scope 2 emissions by facility

Facility	Scope 2 emissions (metric tonnes CO2e)

CC10.2c

Please break down your total gross global Scope 2 emissions by activity

Activity	Scope 2 emissions (metric tonnes CO2e)

CC10.2d

Please break down your total gross global Scope 2 emissions by legal structure

Legal structure	Scope 2 emissions (metric tonnes CO2e)

Further Information

Page: CC11. Energy

CC11.1

What percentage of your total operational spend in the reporting year was on energy?

More than 0% but less than or equal to 5%

CC11.2

Please state how much fuel, electricity, heat, steam, and cooling in MWh your organization has purchased and consumed during the reporting year

Energy type	MWh
Fuel	45253
Electricity	173780
Heat	0
Steam	0
Cooling	0

CC11.3

Please complete the table by breaking down the total "Fuel" figure entered above by fuel type

Fuels	MWh
Diesel/Gas oil	6799
Motor gasoline	32315
Biogasoline	584
Natural gas	5556

CC11.4

Please provide details of the electricity, heat, steam or cooling amounts that were accounted at a low carbon emission factor in the Scope 2 figure reported in CC8.3

Basis for applying a low carbon emission factor	MWh associated with low carbon electricity, heat, steam or cooling	Comment
No purchases or generation of low carbon electricity, heat, steam or cooling accounted with a low carbon emissions factor		

Further Information

Page: CC12. Emissions Performance

CC12.1

How do your gross global emissions (Scope 1 and 2 combined) for the reporting year compare to the previous year?

Decreased

CC12.1a

Please identify the reasons for any change in your gross global emissions (Scope 1 and 2 combined) and for each of them specify how your emissions compare to the previous year

Reason	Emissions value (percentage)	Direction of change	Comment
Emissions reduction activities	13.9	Decrease	The Bank set an emissions reduction target and has a dedicated emission reduction activity program. Emission reduction activities include energy efficiency improvements such as lighting and HVAC for commercial properties and retail branches both of which have had significant implementation during this reporting period that are now providing energy reductions. One of the largest emission reduction activities which is now providing energy savings is the strategic consolidation of commercial office space, and the move to offices in sustainable buildings with 6 Star Green Star and 5 Star NABERs ratings.
Divestment	0		There have been no divestments in the reporting period that have had any material impact on emissions.
Acquisitions	0		There have been no mergers in the reporting period that have had any material impact on emissions. The Group recently acquired a significant share of 'Aussie Home Loans', however the Group does not have 'Operational Control' of the business. The emissions associated with this acquisition will be reported when the Group takes 'Operational Control'.
Mergers	0		There have been no mergers in the reporting period that have had any material impact on emissions.
Change in output	0		Due to the nature of the banking and finance sector, changes in output do not directly relate to emission profiles.
Change in methodology	0		There have been no material changes to methodologies used to calculate scope 1 and scope 2 emissions.
Change in boundary	4.5	Increase	During this reporting period Scope 2 emissions from the Group's Asia Pacific operations have been included in the report for the first time. The Group has operations throughout Asia Pacific including China, Vietnam, India, Indonesia, Singapore and Japan.
Change in physical operating conditions	0		Changes in physical operating conditions do not impact materially on the Group's emission’s profile.
Unidentified	0		There have been no unidentified emissions in the reporting period that have had any material impact on emissions.
Other	.2	Increase	A small increase in Scope 1 emissions for the Group's New Zealand operations was noted due to a one off purchase of fuel for back-up diesel generators, as well as improved data collection. (NB. Back-up generators are refuelled every 3-5 years, or when required).

CC12.2

Please describe your gross global combined Scope 1 and 2 emissions for the reporting year in metric tonnes CO2e per unit currency total revenue

Intensity figure	Metric numerator	Metric denominator	% change from previous year	Direction of change from previous year	Reason for change
5.95	metric tonnes CO2e	unit total revenue	8.06	Decrease	The primary reason for this decrease is due to emission reduction activities. Emissions intensity per $million of revenue decreased by 8.06%, despite an increase to the Group's total revenue. This decrease can be attributed to the Bank's carbon reduction Target Program with a number of significant emissions reduction activities being implemented in the reporting period that have significantly improved the Group's energy efficiency, these include the Green Refresh Program which has seen energy efficiency measures implemented in both commercial and retail portfolios and the relocating of a significant number of staff to energy efficient buildings.

CC12.3

Please describe your gross global combined Scope 1 and 2 emissions for the reporting year in metric tonnes CO2e per full time equivalent (FTE) employee

Intensity figure	Metric numerator	Metric denominator	% change from previous year	Direction of change from previous year	Reason for change
3.44	metric tonnes CO2e	FTE employee	14.64	Decrease	The primary reason for the decrease is due to emission reduction activities. Compared to the previous reporting period, this intensity metric has decreased by 14.64%. Over 9% (more than half) can be attributed to the emission reduction activities under the Bank's carbon reduction target program, including the dedicated commercial and retail portfolio Green Refresh programs.

CC12.4

Please provide an additional intensity (normalized) metric that is appropriate to your business operations

Intensity figure	Metric numerator	Metric denominator	% change from previous year	Direction of change from previous year	Reason for change
0.145	metric tonnes CO2e	square meter	9.66	Decrease	The primary reason for the reduction in emissions intensity is due to emission reduction activities. This has been achieved by the Group’s Commercial Office Consolidation activities under its carbon reduction Target Program in Australia. This has seen a move to a 6 Star Green Star (signifying world leadership) and 5 Star NABERS (National Australian Built Environment Rating System) commercial office space. This commercial office consolidation, which incorporates Activity based Working (ABW) has allowed the Group to have 20 per cent more employees occupy Commonwealth Bank Place compared to regular office building configurations. This is coupled with an overall reduction in emissions which has reduced this metric since last reporting period.

Further Information

Page: CC13. Emissions Trading

CC13.1

Do you participate in any emissions trading schemes?

No, and we do not currently anticipate doing so in the next 2 years

CC13.1a

Please complete the following table for each of the emission trading schemes in which you participate

Scheme name	Period for which data is supplied	Allowances allocated	Allowances purchased	Verified emissions in metric tonnes CO2e	Details of ownership

CC13.1b

What is your strategy for complying with the schemes in which you participate or anticipate participating?

CC13.2

Has your organization originated any project-based carbon credits or purchased any within the reporting period?

Yes

CC13.2a

Please provide details on the project-based carbon credits originated or purchased by your organization in the reporting period

Credit origination or credit purchase	Project type	Project identification	Verified to which standard	Number of credits (metric tonnes of CO2e)	Number of credits (metric tonnes CO2e): Risk adjusted volume	Credits cancelled	Purpose, e.g. compliance

Credit origination or credit purchase	Project type	Project identification	Verified to which standard	Number of credits (metric tonnes of CO2e)	Number of credits (metric tonnes CO2e): Risk adjusted volume	Credits cancelled	Purpose, e.g. compliance
Credit Origination	Energy efficiency: industry	NSW Energy Saving Scheme (ESS). Group Specific: Group IT Equipment shutdown, plus Branch and Commercial office energy efficiency works.	Other: ASAE3000	35215	35215	No	Voluntary Offsetting

Further Information

Page: CC14. Scope 3 Emissions

CC14.1

Please account for your organization's Scope 3 emissions, disclosing and explaining any exclusions

Sources of Scope 3 emissions	Evaluation status	metric tonnes CO2e	Emissions calculation methodology	Percentage of emissions calculated using primary data	Explanation
Purchased goods and services	Relevant, calculated	47321	These emissions relate to the Group's material purchases of goods and services, excluding capital good purchases which are included under the Capital Goods section of this question (below). Data Centres: The Group uses third		Data Centre services and office paper purchasing have been identified as the two most significant products and services procured by the Group and therefore emissions are considered material and have been

Sources of Scope 3 emissions	Evaluation status	metric tonnes CO2e	Emissions calculation methodology	Percentage of emissions calculated using primary data	Explanation
			party data centres which fall outside its operational control. Its two major data centres are located in Norwest and Burwood, both in Sydney. Burwood is a shared data centre, so only 70% of the electricity use was attributed to the Group. The full-fuel cycle emissions factor for electricity in NSW was applied to this extrapolated figure to account for the supplier's direct and indirect emissions (1.06 kg CO2-e/kWh) to determine total Scope 3 emissions for outsourced data centres. Paper Related Emissions: These emissions relate to the embodied emissions in office paper purchased by the Group. Purchasing records for the reporting period were provided by the Group's paper suppliers summarising the quantity of paper purchased and the paper type (i.e. recycled, non-recycled and carbon neutral). This year, actual tonnage was provided by the supplier so calculations were not required to determine total weight. As the Group bought a mixture of recycled and non-recycled paper, a conservative emissions factor for recycled paper of 1.91 tonnes of CO2-e per tonne of paper was applied. The Group's purchases of carbon neutral paper are not included in this calculation, because this paper is considered to be 'zero carbon'.		reported. Since the last reporting period, the Group has worked with its paper suppliers to increase the accuracy of paper tonnage figures to determine reportable emissions. Additionally the Group is working to reduce paper consumption by both employees and customers. Employees working within Commonwealth Bank Place and other major commercial office buildings use 'Follow-You Printing' (technology which only allows printing when a security code is entered into the printer), resulting in a reduction in printing by approximately 50% (against a target of 30%) and saving over AU$1 million per annum for Commonwealth Bank Place. For customers, the Group promotes paperless billing and information which has increased by 29% from last year.
Capital goods	Relevant, calculated	408	The Group reviewed its General Ledger for major capital purchases in the reporting period. The most material capital purchase was the rollout of new multi-function devices (MFDs). An embodied emissions factor for the photocopiers was not available, therefore it was assumed that each		This is the second year the Group has reported on emissions for capital purchases. This year, the Group identified rollouts of IT Hardware (MFDs) for reporting. For future reporting periods, our Procurement team intends to review Tier 1 Suppliers and will seek an

Sources of Scope 3 emissions	Evaluation status	metric tonnes CO2e	Emissions calculation methodology	Percentage of emissions calculated using primary data	Explanation
			MFD was made from 60% plastic and 40% aluminium. This is considered to be a conservative estimate, given the high carbon intensity of aluminium. Emissions were then calculated by applying an 'input/output' emission factors for plastic products (0.02 kgCO2-e/$) and aluminium (1.4 kgCO2-e/$), adjusted for inflation, provided in the Balancing Act study (CSIRO) to the total spend for the new photocopiers.		increased level of detailed data in order to calculate emissions from these sources. This is likely to result in an increase in the emissions from the purchase of capital goods.
Fuel-and-energy-related activities (not included in Scope 1 or 2)	Relevant, calculated	21234	For each fuel type, emissions have been calculated by multiplying the total quantity of fuel consumed by the relevant Scope 3 emissions factors from the current versions of the Australian National Greenhouse Accounts (NGA) Factors (Australian data) and the New Zealand Guidance for Voluntary Corporate Greenhouse Gas Reporting (New Zealand Data).		These emissions relate to indirect emissions of the Group's Australian and New Zealand Scope 1 and 2 emissions, attributable to the extraction, production, processing and transportation of fuels and the electricity lost in the transmission and distribution network. Any reductions in Scope 1 and 2 emissions as part of the Group Targets Program will result in a commensurate reduction in these Scope 3 emissions sources.
Upstream transportation and distribution	Not relevant, explanation provided				Upstream transport and distribution are not considered to be a relevant Scope 3 emissions sources for the Group. Unlike other industries, banking does not procure large quantities of goods requiring freight. However, the Group acknowledges the importance of its influence on its supply chain. One of the Group's current initiatives is to review the emissions of its Tier 1 suppliers and determine whether they meet materiality criteria. If they do, the Group intends to report on these in future submissions.
Waste generated in operations	Relevant, calculated	5623	Reported sources include waste associated with our ASB, Sovereign and Commonwealth Bank businesses, excluding BankWest operations. Emissions are calculated on actual waste data		

Sources of Scope 3 emissions	Evaluation status	metric tonnes CO2e	Emissions calculation methodology	Percentage of emissions calculated using primary data	Explanation
			(weight sent to landfill and weight sent to recycling) for six of the Group's major Australian commercial properties (based on full-time employee (FTE) occupancy of these buildings, this represents 56% of the Commonwealth Bank's portfolio). To determine the percentages attributable to each landfill stream, the findings of a 2010 Waste Audit Report conducted on the Group's operations was used. This audit included both commercial and retail properties. The waste stream splits were then applied to the total waste to landfill data to determine total waste composition per FTE for both retail and commercial properties. National Greenhouse Accounts (Australia) and New Zealand Guide for Voluntary Greenhouse Gas Reporting (NZ) factors were then used to derive emissions factors per FTE for commercial and retail properties. These factors were then applied to the number of FTEs in the Group's remaining commercial properties and the Group's retail portfolio to determine total emissions from waste generation.		
Business travel	Relevant, calculated	36964	These emissions relate to the Group's Australian and New Zealand air travel, taxi use and New Zealand hire car use. Flight emissions are calculated based on data supplied from the Group's travel suppliers AMEX, who provided the Group with data from their Cliqbook System for the reporting period on the number of flights, class and mileage. For New Zealand, data is obtained from General Ledger information. Flight emissions are calculated by multiplying distance travelled x 1.09 (9% uplift) x 1.9 (RFI) x factor		Australian flight distance calculation methodology is based on the UK Department for Environment (Defra) conversion factors.

Sources of Scope 3 emissions	Evaluation status	metric tonnes CO2e	Emissions calculation methodology	Percentage of emissions calculated using primary data	Explanation
			(dependent on distance band) = total emissions. The 9% uplift factor accounts for take-off, circling and non-direct routes. The radiative forcing factor of 1.9 – 2.0 (recommended by IPCC) accounts for emissions at high altitude. Flight emissions data is categorised as domestic, international short-haul and international long-haul and flight miles for each are multiplied by the relevant factor from the New Zealand Guidance for Voluntary Corporate Greenhouse Gas Reporting (Domestic = 0.1728 kgCO2-e/km, International Short-Haul = 0.0946 kgCO2-e/km, International Long-Haul = 0.0827 kgCO2-e/km). Total flight emissions include the sum of Australia and New Zealand emissions. For Australian taxi data, total taxi spend is obtained from the Group's General Ledger. A 'cost per km' factor was applied to determine total distance travelled and then a factor was applied to determine total fuel (assumed to be LPG) used. NGER LPG factors were applied for Australia and for New Zealand. For New Zealand taxis, the taxi factors from the New Zealand Guidance for Voluntary Corporate Greenhouse Gas Reporting were used. For all New Zealand hire, leased and third party vehicle car use, an emissions factor for medium cars was applied from the New Zealand Guidance for Voluntary Corporate Greenhouse Gas Reporting based on distance travelled data provided by log books and hire car suppliers.		
Employee commuting	Relevant, calculated	39371	The emissions associated with employee commuting for the Group's Australian operations were estimated based on FTE numbers at both commercial and retail premises. Our estimation		This is the second year the Group has considered emissions from employee commuting for Australian operations. As Australia's largest commercial bank, we employ

Sources of Scope 3 emissions	Evaluation status	metric tonnes CO2e	Emissions calculation methodology	Percentage of emissions calculated using primary data	Explanation
			was based on the average employee travelling 30km per working day to get to and from work. It was assumed that 90% of all commercial FTEs use public transport to travel to work and that 100% of all retail FTEs and 10% of commercial FTEs drive their car. These were considered to be conservative assumptions. Based on these assumptions, factors for emissions per passenger kilometre were applied from the National Greenhouse Gas Inventory Analysis of Trends and Greenhouse Indicators for car, passenger buses, light rail, rail and passenger water craft. Emissions from employee commuting for New Zealand operations have not been calculated.		a large number of people, including approximately 32,000 in Australia alone. While commercial employees mainly travel by public transport, there will be scope for improvement particularly with retail branch employees. In New Zealand, ASB have conducted two staff transport surveys during the year and have developed goals to reduce the percentage of people choosing to drive to and from work from 44% to less than 30% by the end of 2015. It is anticipated that there will be an increase in the percentage of ASB people choosing sustainable travel options (i.e. public transport, walking, cycling) from 51% to 70% by the end of 2015.
Upstream leased assets	Not relevant, explanation provided				This is not an applicable scope 3 emissions source as all property leased by the Group is also under the Bank's operational control and therefore associated emissions are reported as part of scope 1 and scope 2 emissions.
Downstream transportation and distribution	Relevant, calculated	3000	These emissions relate to the Group's postage emissions and New Zealand's ASB Bank Ltd's postage, courier and Datamail emissions. Australian postage emissions were calculated using actual mail spend by the Commonwealth Bank (~AU$20,000,000) and publicly available data from Australia Post which included total emissions and total revenue to give an emissions factor of 0.00013 kg CO2-e/$ revenue. New Zealand postage emissions were calculated based on the number of packages posted, multiplied by the New Zealand postage emissions factor of 0.01 grams of CO2-e/letter. Where data was not complete for all New		As a financial institution, key downstream transportation and distribution activities relate primarily to postage and couriers.

Sources of Scope 3 emissions	Evaluation status	metric tonnes CO2e	Emissions calculation methodology	Percentage of emissions calculated using primary data	Explanation
			Zealand operations, it was extrapolated. Courier emissions have been calculated using data provided by courier companies on distance travelled by car and by air travel. The emissions factors from the New Zealand Guidance for Voluntary Corporate Greenhouse Gas Reporting were applied for a medium car (0.231 kg CO2-e/km) for courier vehicles and 0.601 kg CO2-e/km for long distance travel. Datamail provides electronic mailing services to ASB Ltd. Energy consumption data was provided by Datamail and emissions were calculated using the New Zealand Guidance for Voluntary Corporate Greenhouse Gas Reporting Scope 2 emissions factor of 0.2 kg CO2 -e/kWh.		
Processing of sold products	Not relevant, explanation provided				This is not a relevant emission source for the Group. The Group's products are financial instruments that are intangible and do not have any processing requirements.
Use of sold products	Not relevant, explanation provided				This is not a relevant emission source for the Group. The Group's products are financial instruments that are intangible and whose usage does not give rise to any emissions.
End of life treatment of sold products	Not relevant, explanation provided				This is not a relevant emission source for the Group. The Group's products are financial instruments that are intangible and do not have any end-of-life treatment requirements.
Downstream leased assets	Relevant, calculated	8997	The Group has a portfolio of commercial and retail properties (49,981m2) which are leased to other parties. To determine emissions associated with these properties and their use, emissions were calculated using an assumed emissions intensity of 180kg CO2-e/m2.		This data represents properties leased out by the Group.
Franchises	Not relevant,				This is not a relevant emission source for the

Sources of Scope 3 emissions	Evaluation status	metric tonnes CO2e	Emissions calculation methodology	Percentage of emissions calculated using primary data	Explanation
	explanation provided				Group as the Group does not have franchises.
Investments	Relevant, calculated	1578795	These emissions equate to one 25th of the total lifetime project emissions (25 years) attributable to the Group. This project is the refinancing of a power station. Emissions attributable to the Group were adjusted based on the Group's financing as a percentage of total financing.		As Australia's largest bank, we play a major role in financing a number of regionally significant projects, including those which have high emission profiles such as power stations. As such, this year, the Group has begun to determine thresholds for reporting of emissions associated with projects. This includes all projects that meet the Australian Government definition of 'emissions intensive' (used for determining emissions intensive trade exposed industries) but limited reporting to deals closed within this reporting period. This year only one refinancing project met this criteria however in future the Group will limit reporting to financing of new projects closed within the reporting year. The Group undertakes responsible lending assessments for all project financing. Before deciding whether to fund a project, the Institutional Banking and Markets team undertakes due diligence on all projects and uses a dedicated Risk Appetite Statement that includes environment, social and governance (ESG) risk mitigation and the impact of carbon on the project. In 2012 the Bank also developed sector specific policies guiding the assessment of environmental and social risk, for use when financing in the natural resources (metals & mining and oil & gas extraction) and utilities (including renewables) sectors. The Group is also a senior lender in renewable energy projects. As at 30 June 2013, our loan facilities to single asset clean and renewable

Sources of Scope 3 emissions	Evaluation status	metric tonnes CO2e	Emissions calculation methodology	Percentage of emissions calculated using primary data	Explanation
					energy generation companies covered 1,952 GWh of generation annually and significant financing had been provided to companies with a focus on renewable energy projects. In New Zealand, ASB supplies financial services to all of the major New Zealand electricity generation companies, supporting a significant proportion of the country's renewable energy generation, including hydropower and wind farms. Group loan facilities in New Zealand to clean/renewable generation sources represent approximately 80 percent of total exposures (measured by installed Megawatt capacity by customer and generation type). ASB's total energy exposure equals 9,215 MW, of which clean/renewable exposure represents 7,340 MW.
Other (upstream)	Not relevant, explanation provided				The Group has no other relevant emissions sources.
Other (downstream)	Not relevant, explanation provided				The Group has no other relevant emissions sources.

CC14.2

Please indicate the verification/assurance status that applies to your reported Scope 3 emissions

Third party verification or assurance complete

CC14.2a

Please provide further details of the verification/assurance undertaken, and attach the relevant statements

Type of verification or assurance	Attach the statement	Page/Section reference	Relevant standard	Proportion of Scope 3 emissions verified (%)
Limited assurance	https://www.cdp.net/sites/2014/49/3649/Investor CDP 2014/Shared Documents/Attachments/CC14.2a/FY13_CommonwealthBankSustainabilityPerformanceData2013_KPMG_Limited_Assurance.pdf	Page 1, paragraph 1 'Scope': Limited Assurance over Data Table. Pages 6, 7 and 9: Emissions data.	ASAE3000	80

CC14.3

Are you able to compare your Scope 3 emissions for the reporting year with those for the previous year for any sources?

Yes

CC14.3a

Please identify the reasons for any change in your Scope 3 emissions and for each of them specify how your emissions compare to the previous year

Sources of Scope 3 emissions	Reason for change	Emissions value (percentage)	Direction of change	Comment
Purchased goods & services	Change in output	8	Increase	Increased use of data centres
Capital goods	Other: Decrease in purchase	35	Decrease	Decrease in purchase of capital goods which is variable year on year.
Fuel- and energy-related activities (not included in Scopes 1 or 2)	Emissions reduction activities	13	Decrease	Decrease in Scope 1 and 2 emissions due to the Group's actively pursuing emissions reductions as part of its Targets Program, for example by implementing energy efficiency measures through the Green Refresh initiatives. Scope 2 emissions reductions will also result in Scope 3 energy emissions reductions. These reductions occurred despite the increase in reporting scope to include Asia Pacific operations.
Waste generated in operations	Emissions reduction activities	10	Decrease	Improved waste management.
Business travel	Change in output	8	Increase	Annual variation in the need for business travel.
Investments	Change in methodology	96	Decrease	Last year's submission reported the lifetime emissions of the project rather than annual emissions. This year's report only includes 1/25th of total project emissions.
Downstream transportation and distribution	Change in methodology	142	Increase	An updated and more robust methodology was adopted for the calculation of emissions from postage.
Downstream leased assets	Change in output	38	Decrease	Reduction in leased space.
Employee commuting	Other: No change in methodology	0	No change	Same estimations and methodologies used as last year.

CC14.4

Do you engage with any of the elements of your value chain on GHG emissions and climate change strategies? (Tick all that apply)

Yes, our suppliers

CC14.4a

Please give details of methods of engagement, your strategy for prioritizing engagements and measures of success

i) Methods:
Group Procurement uses a 'Code of Conduct' to articulate sustainability expectations to potential suppliers and a consistent set of sustainability questions to identify sustainability risks in the Group's supply chain. This forms part of the competitive tendering process.

Sustainability information requested of suppliers through a dedicated Sustainability Schedule and self-declare Questionnaire include a commitment to managing their environmental impacts through a certified environmental management system, environment policy and monitoring use of resources including energy and emissions. To further understand suppliers key environmental risks, whilst supporting suppliers who are socially and environmentally responsible, the sustainability questions cover:

- suppliers' employees, its customers, how it operates in the community, its governance structure and its impact on the environment; and
- WH&S, risk management, human rights, corporate governance, community investment and environmental performance.

The Group's NZ business Sovereign has a sustainability evaluation process that is sent to suppliers at various touch points: e.g.
a. New supplier (including request for proposal (RFP) scenario);
b. Existing supplier, renewal of contract;
c. Existing supplier with no contract; and
d. New business.
Suppliers are required to fill out an annual evaluation which covers all aspects of sustainability including emissions and targets. The sustainability team reviews each submission and request updates or progress where required.

ii) Prioritising engagements and how success is measured:
To prioritise the engagement process, during the FY13 reporting period, the Group engaged external consultant Net Balance to review the Group's supply chain management and engagement process. The resulting report and a significant internal review of key tender documentation and process, allows the Group to better identify gaps and mitigate social, ethical and environmental risks in its wider supply chain through a prioritised approach.

The sustainability questions in the Sustainability Schedule and Questionnaire are applicable to all 'requests for proposals' via market engagement undertaken by Group Procurement across the Master Categories; Business Services, Property Services, Professional Services, and Marketing, Media and Communications. Supplier responses are weighted and feed into the overall evaluation process.

The measure of success for this engagement process will be a reduction in Scope 3 emissions as a function of production associated with IT (Data centres and equipment) as well as property management as a function of FTE. The engagement process will also be used to identify data gaps within the Group's supply chain and help the Group work with suppliers to improve both the supplier and the Group's overall sustainability.

CC14.4b

To give a sense of scale of this engagement, please give the number of suppliers with whom you are engaging and the proportion of your total spend that they represent

Number of suppliers	% of total spend	Comment
14	2%	The Group continues to engage and review its paper and print suppliers including paper accreditation and sustainability factors, which represents approximately 2% of the 2012-13 total spend with suppliers. More engagement of this kind will continue as the Group looks to influence an increasing number of its suppliers, encouraging greater environmental stewardship.

CC14.4c

If you have data on your suppliers' GHG emissions and climate change strategies, please explain how you make use of that data

How you make use of the data	Please give details
Use in supplier scorecards	i) Description of use: All potential suppliers are subject to the Group's dedicated Procurement Sustainability Schedule and Questionnaires. These responses are weighted dependant on the level of performance, granularity and disclosure and ultimately feed into the overall evaluation process of each potential supplier. ii) Further detail: The Group's dedicated Procurement Sustainability Schedule and Questionnaire are applicable to all 'requests for proposals' across the 'Master Categories' to include; Business Services, Property Services, Professional Services, and Marketing, Media and Communications. It is here that the applicable data is collected and analysed.

CC14.4d

Please explain why you do not engage with any elements of your value chain on GHG emissions and climate change strategies, and any plans you have to develop an engagement strategy in the future

Further Information

Module: Sign Off

Page: CC15. Sign Off

CC15.1

Please provide the following information for the person that has signed off (approved) your CDP climate change response

Name	Job title	Corresponding job category
Trent Moy	General Manager Community and Sustainability	Business unit manager

Further Information

CDP 2014 Investor CDP 2014 Information Request