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.

Vision:
Our vision is to excel at securing and enhancing the financial wellbeing of people, businesses and communities.

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.

Scale:
• We have established businesses in Australia, New Zealand, Europe and the Asia-Pacific region;

• We have Australia’s largest banking customer base;
• We are one of Australia's leading home loan providers with more than a million home loan customers;
• Our brands include Colonial First State, CommInsure, ASB (New Zealand), Sovereign, FirstChoice, CommSec, and Bankwest;
• We are one of the largest life insurers in Australia, with more than $2,100 million in-force annual premiums;
• Commonwealth Bank/Colonial First State's retail platform, FirstChoice has the largest market share of the retail managed funds market.

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
Mon 01 Jul 2013 - Mon 30 Jun 2014

CC0.3

Country list configuration

Please select the countries for which you will be supplying data. If you are responding to the Electric Utilities module, 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 sub-industries, companies in the oil and gas sub-industries, companies in the information technology and telecommunications sectors and companies in the food, beverage and tobacco industry group should complete supplementary questions in addition to the main questionnaire.
If you are in these sector groupings (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?

Board or 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

Position Title and 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	Comment
Environment/Sustainability managers	Recognition (non-monetary)	Emissions reduction project Energy reduction target Behaviour change related indicator	Corporate Executive Indicators include: 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 high impact/ sensitive sectors which are subject to climate change events, (e.g. Metals & Mining, Oil & Gas, Energy & Utilities, and Agribusiness). •Develop an overarching ESG Lending Framework and ESG Risk assessment tool.
Environment/Sustainability managers	Monetary reward	Emissions reduction project Emissions reduction target Energy reduction project Energy reduction target Efficiency project Efficiency target Behaviour change related indicator	Indicators 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.

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	Board or individual/sub-set of the Board or committee appointed by the Board	The Group's risk management approach is considered on a global scale, i.e. both domestically and internationally. The Group's risk management approach includes the jurisdictions where the Group has assets including its people as well as clients and where the Group ultimately operates.	> 6 years	Monitoring climate change related risks and opportunities is a 'continual process'. Risks and opportunities are reviewed for relevance, accuracy and currency, and are discussed weekly by the Group Executive Committee which is chaired by the Group Managing Director and CEO. The Group 'Risk Appetite Statement' (RAS), as well as individual Business Unit RAS address climate change risks and considerations, and are updated annually before being reviewed and signed off by Board. Recently, the Group developed and publicly disclosed a set of nine ESG Lending Commitments. The Group also developed and executed its in-house ESG risk screening tool to assess and manage the risks and opportunities of individual loans and their associated activities. Loans considered to have an ESG risk level of medium and above, (determined by a calculation of country of

Frequency of monitoring	To whom are results reported?	Geographical areas considered	How far into the future are risks considered?	Comment
				operation/ industry sector and overall client capability) will include details of the key ESG impacts associated with the loan.

CC2.1b

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

Company level Risks:
Planning for risks is embedded into the overall business strategy process. The Group-wide 'Risk Appetite Statement' (RAS), alongside the Group Institutional Banking and Markets (IB&M), Business and Private Banking (B&PB), International Financial Services (IFS) and Bankwest RAS, also includes ESG risk mitigation and identification measures and sets the overarching risk tolerance parameters.
The Group Corporate Responsibility team actively monitors all legislative requirements associated with climate change and builds appropriate findings into the Group and business unit RAS.
The Group's ESG Risk lending framework and screening tool also assesses company level risk. The Group assesses across seven ESG themes including biodiversity, water, climate & energy, pollution, labour & human rights, workplace health & safety, and anti-corruption & bribery are assessed.

Asset level Risks:
Group Property is responsible for assessing and managing the 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, as well as emissions intensity over time.

The Group developed a dedicated asset portfolio assessment 'energy efficiency' schedule. Through this process the Group has identified and implemented energy efficiency initiatives to further mitigate risks to its portfolios whilst significantly reducing its 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?

Company level: Over and above complying with the Equator Principles III, the Group recently developed and executed its in-house Environmental Social and Governance (ESG) risk framework and screening tool to assess, manage and prioritise the risks and opportunities of companies, individual loans and their associated activities.
Loans considered to have an ESG risk level of medium and above, (determined by a calculation of country of operation/ industry sector and overall client/ company capability) will include details of the key ESG impacts associated with the loan. Seven key ESG themes including biodiversity, water, climate & energy, pollution, labour & human rights, workplace health & safety, and anti-corruption & bribery are assessed, assisting in the identification of the level of due diligence required in prioritisation.

Asset level: 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.

Clients are specifically requested to provide evidence of their mitigating strategies to manage risk. In addition, a final assessment summary of risk and client/ company ESG capability is determined and escalated if appropriate. The Group uses the resulting data to monitor the intensity of ESG risk, and provides visibility to senior management and individual teams to manage these risks as required.

The Group Institutional teams have also developed sector specific policies covering project financing of Natural Resources (mining and extraction) and Utilities (including Renewable) and Agriculture sectors. The Group reviews, prioritises and addresses ESG issues as part of this process.

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's Board and CEO.
The internal process for collecting and reporting climate change related information has significantly influenced Group strategy, examples include:
• Development of sector specific policies guiding the assessment of ESG risks, within the natural resources, utilities and Agriculture sectors, further influencing the Group 'Risk Appetite Statement'.
• 'Envizi, a dedicated environmental management platform capturing all GHG emission sources, assisting with the Group's ongoing carbon reduction targets and directly linking to two of the Group strategic priorities – productivity and technology.
• Development of our Environmental Management System (EMS ISO: 14001), to collect 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 (5-10+ 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 continues to assess climate change related aspects, adaptation and implications. This process is embedded into the overarching Group business strategy. Part of this strategy is to continue to set carbon/ emissions reductions targets.

The development of our in-house ESG risk screening tool to assess and manage the risks and opportunities by which seven key ESG themes including biodiversity, water, climate & energy, pollution, labour & human rights, workplace health & safety, and anti-corruption & bribery are assessed and has significantly influenced the Group's strategy.
Clients are specifically requested to provide evidence of their mitigating strategies in place to manage risk.
The Group uses the resulting data to influence strategy, monitor the intensity of ESG risk, and provide visibility to senior management and individual teams to manage these risks as required.

Further influencing the Group's strategy is our commitment to transparent Scope 3 'Financed Emissions' reporting, i.e. the emissions arising from the Group's loan book exposure.

iii) Short term strategy influenced by CC:
Short term (0-3yrs) material components influenced by climate change include:
• Group-wide development of an in-house Environmental, Social and Governance (ESG) risk framework and risk screening tool to assess and manage the risks and opportunities of individual companies, loans and their associated activities.
• Developed sector specific policies surrounding Natural Resources, Utilities and Agriculture.
• Introduction of a range of carbon risk management and carbon financing solutions to assist institutional customers.
• The Group's carbon reduction targets are 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 (5-10yrs+) strategy has been influenced by the climate change agenda in that resilience is planned for in all aspects of managing the business:
• CBA considers 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's 6 star green star commercial office space, which serves as a benchmark for future tenancies for the Group.
• As part of the Group's recent development of a new and sophisticated 'Stakeholder Engagement Plan, our long term strategy 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.
• The Group's development of an in-house Environmental, Social and Governance (ESG) risk framework and risk screening tool, assesses and manages the on-going risks and opportunities of individual companies, loans and their associated activities.

v) Gaining strategic advantage over competitors:
Carefully considering climate change matters gives the Group a strategic advantage, these include:
• The understanding of climate change risks, opportunities and impacts on our internal operations, client base and loan book has led to the development of the Group's nine public ESG Lending Commitments.
• From these nine Commitments, the Group has developed and executed its group-wide ESG Lending Framework and risk screening tool. The tool assesses and manages the risks and opportunities of individual companies and loans and their associated activities.
• The Group has in addition publicly committed to reporting on its Scope 3 'Finance Emissions' portfolio (i.e. the emissions arising from the Group's loan book exposure). This gives the Group a strategic advantage as we have the broadest scope and level of exposure, increasing our transparency beyond our competitors.
• 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 has been amended 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 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 Group developed its ESG Agriculture Policy
• The Group developed its nine ESG Lending Commitments
• The Group publicly reported on its Scope 3, Financed Emissions (the emissions arising from the Group's loan book exposure)
• The Group developed an integrated ESG Property Strategy
• 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 Group set new carbon reduction targets within the reporting period
These are just a select examples of the substantial business decisions that were directly influenced by the aspects of climate change.

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

CC2.2c

Does your company use an internal price of carbon?

No, but we anticipate doing so in the next 2 years

CC2.2d

Please provide details and examples of how your company uses an internal price of carbon

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: Government's Direct Action Plan	Support with minor exceptions	During this reporting period the Government's Expert Reference Group informed the Emissions Reduction Fund's design and provided the Government with expert and practical advice for consideration. The CBA Group continues to engage	The Expert Reference Group where the CBA Group is represented convened regularly during this reporting period till the finalisation of the Emissions Reduction Fund White Paper. The Emissions Reduction Fund will work together

Focus of legislation	Corporate Position	Details of engagement	Proposed legislative solution
		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 continually and directly engages with policy makers to encourage further action/ mitigation and/ or adaption related to climate change.	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. The CBA Group will continue to work closely with Government to look for positive legislative solutions now and into the future.

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 publicly 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 of risk tolerance. 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 high impact/sensitive sectors so as to ensure ESG risks and opportunities are considered at deal initiation and during the life of a transaction.
• Group-wide Environment policy; sets a foundation and creates a framework for understanding and managing the Group's direct and indirect environmental impacts.
Group Environmental Management System (EMS) ISO: 14001. The system provides a methodical approach to planning, implementing and reviewing the 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.
• Public disclosure of the Group's Environmental, Social and Governance nine (ESG) Lending commitments.
• Development and execution on the Group's ESG Lending Framework and risk screening tool, which assesses our indirect activities across seven ESG themes including biodiversity, water, climate & energy, pollution, labour & human rights, workplace health & safety, and anti-corruption & bribery.

CC2.3i

Please explain why you do not engage with policy makers

CC2.4

Would your organization's board of directors support an international agreement between governments on climate change, which seeks to limit global temperature rise to under two degree Celsius from pre-industrial levels in line with IPCC scenarios such as RCP2.6?

No opinion

CC2.4a

Please describe your board's position on what an effective agreement would mean for your organization and activities that you are undertaking to help deliver this agreement at the 2015 United Nations Climate Change Conference in Paris (COP 21)

The Group is currently working on its boundaries and overall approach to assist with any international agreement between governments on climate change.

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	100%	25%	2009	10931	2015	CBA Scope 1 target. Following on from the Bank's successful 20 per cent reduction target (Scope 1 and 2 full life-cycle emissions from a baseline of 2009) achieved in 2013. The Bank set a new carbon reduction target of its Scope 1 emissions to be achieved by 2015. In order to achieve this, the Bank began implementing a large scale program to reduce its Scope 1 emissions sources. Initiatives include but not limited to: A reduction in the overall number of its tool-of-trade vehicles across the national portfolio, as well as developing a fleet of vehicles that are less carbon-intensive and fuel efficient. At the end of this reporting period (i.e. 12 months out from the reduction target goal), the Bank has achieved a 34.3 per cent reduction, far surpassing its original intent.
Abs2	Scope 2	100%	35%	2009	139303	2015	CBA Scope 2 target. Following on from the Bank's successful 20 per cent reduction target (Scope 1 and 2 full life-cycle emissions from a baseline of 2009) achieved in 2013. The Bank set a new carbon reduction target of its Scope 2 emissions to be achieved by 2015. In order to achieve this far reaching target the Bank implemented a range of initiatives across its retail and commercial portfolios. This programme included initiatives such as extensive lighting and Heating, Ventilation Air-conditioning and Cooling (HVAC) replacements and upgrades. At the end of this reporting period (i.e. 12 months out from the reduction target goal), the Bank has already achieved a 35.1 per cent reduction, therefore achieving its initial target. These initiatives will continue to reduce emissions and a further update will be given within the Bank’s 2015 sustainability report, due out in Aug 2015, as well as the next reporting opportunity to CDP.
Abs3	Scope 1	100%	45%	2009	2126	2015	Bankwest Scope 1 target. Following on from the successful emissions reduction across the Bank’s (CBA brand) operations, i.e. its 20 per cent carbon reduction target. The Bank extended these initiatives to Bankwest to further reduce emissions across the CBA Group’s portfolio. The Bank set a new carbon reduction target for Bankwest’s Scope 1 emissions to be achieved by 2015. In order to achieve this, the Bank began implementing a large scale program across Bankwest to reduce its Scope 1 emissions sources. Initiatives include but not limited to: A reduction in the overall number of its tool-of-trade vehicles across the national portfolio, as well as developing a fleet of vehicles that are less carbon-intensive and fuel efficient. At the end of this reporting period (i.e. 12 months out from the reduction target goal), the Bank has achieved a 65.3 per cent reduction, far surpassing its original intent.

ID	Scope	% of emissions in scope	% reduction from base year	Base year	Base year emissions (metric tonnes CO2e)	Target year	Comment
Abs4	Scope 2	100%	30%	2009	24586	2015	Bankwest Scope 2 target. Following on from the successful emissions reduction across the Bank's (CBA brand) operations, i.e. its 20 per cent carbon reduction target. The Bank extended these initiatives to Bankwest to further reduce emissions across the CBA Group's portfolio. The Bank set a new carbon reduction target for Bankwest's Scope 2 emissions to be achieved by 2015. In order to achieve this target the Bank implemented a range of initiatives across its retail and commercial portfolios. This programme included initiatives such as extensive lighting and Heating, Ventilation Air-conditioning and Cooling (HVAC) replacements and upgrades. At the end of this reporting period (i.e. 12 months out from the reduction target goal), the Bank had already achieved a 29.9 per cent reduction. These initiatives will continue to reduce emissions and as at February 2015, a reduction of 36.4 per cent has been achieved, therefore achieving the initial target. A further update will be given within the Bank's 2015 sustainability report, due out in Aug 2015, as well as the next reporting opportunity to CDP.

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	50%	100%	Following on from the Bank's successful 20 per cent reduction target (Scope 1 and 2 full life-cycle emissions from a baseline of 2009) achieved in 2013. The Bank set a new carbon reduction target of its Scope 1emissions to be achieved by 2015. In order to achieve this, the Bank began implementing a large scale program to reduce its Scope 1 emissions sources. Initiatives include but not limited to: A reduction in the overall number of its tool-of-trade vehicles across the national portfolio, as well as developing of a fleet of vehicles that are less carbon-intensive and fuel efficient. At the end of this reporting period (i.e. 12 months out from the reduction target goal), the Bank has achieved a 34.3 per cent reduction, far surpassing its original intent.
Abs2	50%	100%	Following on from the Bank's successful 20 per cent reduction target (Scope 1 and 2 full life-cycle emissions from a baseline of 2009) achieved in 2013. The Bank set a new carbon reduction target of its Scope 2 emissions to be achieved by 2015. In order to achieve this far reaching target the Bank implemented a range of initiatives across its retail and commercial portfolios. This programme included initiative such as extensive lighting and Heating, Ventilation Air-conditioning and Cooling (HVAC) replacements and upgrades. At the end of this reporting period (i.e. 12 months out from the reduction target goal), the Bank has already achieved a 35.1 per cent reduction, therefore achieving its initial target. These initiatives will continue to reduce emissions and a further update will be given within the Bank’s 2015 sustainability report, due out in Aug 2015, as well as the next reporting opportunity to CDP.
Abs3	50%	100%	Following on from the successful emissions reduction across the Bank’s (CBA brand) operations. i.e. its 20 per cent carbon reduction target. The Bank extended these initiatives to Bankwest to further reduce emissions across the CBA Group’s portfolio. The Bank set a new carbon reduction target for Bankwest’s Scope 1 emissions to be achieved by 2015. In order to achieve this, the Bank began implementing a large scale program across Bankwest to reduce its Scope 1 emissions sources. Initiatives include but not limited to: A reduction in the overall number of its tool-of-trade vehicles across the national portfolio, as well as developing a fleet of vehicles that are less carbon-intensive and fuel efficient. At the end of this reporting period (i.e. 12 months out from the reduction target goal), the Bank has achieved a 65.3 per cent reduction, far surpassing its original intent.
Abs4	50%	99.9%	Following on from the successful emissions reduction across the Bank’s (CBA brand) operations, i.e. its 20 per cent carbon

ID	% complete (time)	% complete (emissions)	Comment
			reduction target. The Bank extended these initiatives to Bankwest to further reduce emissions across the CBA Group's portfolio. The Bank set a new carbon reduction target for Bankwest's Scope 2 emissions to be achieved by 2015. In order to achieve this target the Bank implemented a range of initiatives across its retail and commercial portfolios. This programme included initiative such as extensive lighting and Heating, Ventilation Air-conditioning and Cooling (HVAC) replacements and upgrades. At the end of this reporting period (i.e. 12 months out from the reduction target goal), the Bank had already achieved a 29.9 per cent reduction. These initiatives will continue to reduce emissions and as at February 2015, a reduction of 36.4 per cent has been achieved, therefore achieving the initial target. A further update will be given within the Bank's 2015 sustainability report, due out in Aug 2015, as well as the next reporting opportunity to CDP.

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

i) How the emissions were avoided:
The Bank's continues to increase the use of online banking and electronic communications. Customers are able to view electronic statements and other material/ products 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, more than 23,000,000 statement pages were sent electronically rather than being sent via conventional mail delivery.

ii) 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 travel. It is estimated that approximately 75 tonnes CO2-e per year were saved by the Bank's Australian operations (a further reduction of approximately 6 per cent on the previous reporting period).

iii) 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:
Assumptions included the average postal delivery distances travelled, derived from the Bank'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).

CC3.3

Did you have emissions reduction initiatives that were active within the reporting year (this can include those in the planning and/or 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	150	2250

Stage of development	Number of projects	Total estimated annual CO2e savings in metric tonnes CO2e (only for rows marked *)
To be implemented*	120	2040
Implementation commenced*	120	2040
Implemented*	109	3226
Not to be implemented	30	210

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)	Scope	Voluntary/ Mandatory	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	Comment
Energy efficiency: Building services	CAPEX Projects - Retail Portfolio. HVAC plant upgraded at 10 CBA retail sites (QLD 4, VIC 3, NSW 1, NT 1 and WA 1). Existing plant replaced with energy efficient plant and systems recommissioned and fine tuned.	188	Scope 2	Voluntary	56800	166500	1-3 years	3-5 years	10 Projects
Energy efficiency: Building	Controls Upgrade. Lighting controls and HVAC BMS interface upgrades. Eight	275	Scope 2	Voluntary	40000	87000	1-3 years	3-5 years	8 Projects

Activity type	Description of activity	Estimated annual CO2e savings (metric tonnes CO2e)	Scope	Voluntary/ Mandatory	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	Comment
services	separate projects completed at 4 commercial sites (SOP prescient and 201 Sussex St).								
Energy efficiency: Building services	HVAC Controls Upgrade. Existing HVAC controls upgraded at 1 Bankwest and 21 CBA retail sites across VIC, NSW and TAS. New controls allow 365 day programming and incorporates automated daylight savings feature.	197	Scope 2	Voluntary	80700	260000	1-3 years	3-5 years	22 Projects
Energy efficiency: Building services	HVAC Controls Upgrade. Existing HVAC Controls upgraded at 5 Bankwest sites in WA. New controls allow 365 day programming, incorporates automated daylight savings feature and remote monitoring and access.	490	Scope 2	Voluntary	34500	71500	1-3 years	3-5 years	5 Projects
Energy efficiency: Building services	Lighting Controls Upgrade. Time switches controlling ATM security lighting replaced at 7 CBA sites in QLD. New time clocks have been programmed to turn on the ATM security lights in the evenings.	7	Scope 2	Voluntary	2200	8700	4-10 years	3-5 years	7 Projects
Energy efficiency: Building services	Lighting Upgrade. LED lighting installed at 11 Bankwest Iceberg Stores in NSW. LED lighting has improved the lux levels and reduced heated output to the	67	Scope 2	Voluntary	23500	82000	4-10 years	6-10 years	11 Projects

Activity type	Description of activity	Estimated annual CO2e savings (metric tonnes CO2e)	Scope	Voluntary/ Mandatory	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	Comment
	space.								
Energy efficiency: Building services	Lighting Upgrade. Energy efficient T5 and LED lighting installed at 5 commercial sites (QLD 3, VIC 1 and SA 1).	306	Scope 2	Voluntary	42000	110800	1-3 years	6-10 years	5 Projects
	Lighting Upgrade. Energy efficient T5 lighting installed at 5 CBA retail sites (QLD 4 and WA 1).	46	Scope 2	Voluntary	17800	46200	1-3 years	6-10 years	5 Projects
Energy efficiency: Building services	Lighting Upgrade. Energy efficient T5 lighting installed at 8 Bankwest retail sites in WA.	172	Scope 2	Voluntary	35000	73000	1-3 years	6-10 years	8 Projects
Energy efficiency: Building services	Lighting Upgrade. Energy efficient T5 lighting installed at 9 Bankwest retail sites in WA.	58	Scope 2	Voluntary	20900	102000	4-10 years	6-10 years	9 Projects
Energy efficiency: Building services	Lighting Upgrade. Energy efficient T5 lighting installed at 16 Bankwest retail sites in WA.	13	Scope 2	Voluntary	39400	80000	1-3 years	6-10 years	16 Projects
Energy efficiency: Building services	LED lighting upgrade project	48	Scope 2	Voluntary	70000	212000	4-10 years	6-10 years	This project will be extended to multiple branches in the future.
Energy efficiency: Building services	C:Drive (ASB - NZ Technology Centre) Free Cooling Project	58	Scope 2	Voluntary	153000	382000	1-3 years	6-10 years	1 Project
Energy	Active energy monitoring and	1302	Scope	Voluntary	1420000	83700	<1 year	Ongoing	Savings were

Activity type	Description of activity	Estimated annual CO2e savings (metric tonnes CO2e)	Scope	Voluntary/ Mandatory	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	Comment
efficiency: Building services	targeting		2						obtained through tighter monitoring of electricity use and has resulted in a reduction of 7,892,320 kWh of electricity against a 2009 baseline.

CC3.3c

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

Method	Comment
Dedicated budget for energy efficiency	A dedicated budget is specifically set aside to achieve the Bank’s carbon reduction targets. The Bank’s new carbon reduction targets were established in 2013, following on from the success of its 20 per cent carbon reduction target achieved in 2013. The existing emissions reductions involve identifying and evaluating several potential reduction activities. As an example, during the FY14 reporting period initiatives included: 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	Status	Page/Section reference	Attach the document
In mainstream financial reports but have not used the CDSB Framework	Complete	Pages 34 and 35 - Actual page reference	https://www.cdp.net/sites/2015/49/3649/Climate Change 2015/Shared Documents/Attachments/CC4.1/CBA_2014-annual-report-website.pdf
In voluntary communications	Complete	Entire report	https://www.cdp.net/sites/2015/49/3649/Climate Change 2015/Shared Documents/Attachments/CC4.1/Voluntary Public Commonwealth Bank Sustainability Performance Data 2014.pdf
In other regulatory filings	Complete	Entire Report	https://www.cdp.net/sites/2015/49/3649/Climate Change 2015/Shared Documents/Attachments/CC4.1/2014_10_01 NGERS_EERS Report.pdf

Further Information

Module: Risks and Opportunities

Page: CC5. Climate Change Risks

CC5.1

Have you identified any inherent 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 inherent risks that are 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 Federal Government's 'National Greenhouse and Energy Reporting' (NGER) Scheme. The CBA Group is captured under the NGER legislation. This reporting requirement is likely to tighten. As a result the CBA Group will consider the need for additional resources to collate and report	Increased operational cost	Up to 1 year	Direct	Likely	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 with additional tightening of the reporting requirements we foresee potential additional work in the development of specific collection points and data sources	The Group's responsibility is to ensure complete, robust and accurate data is available. To minimise data risk, the Group curently centralises its emissions data into the one global reporting platform (Envizi). The Group has worked with Envizi to create specific and dedicated reporting suites to conform to the Group's legislative	The Group collects its data through a third party data service provider. The collection and external management of this data is a business as usual operation, however with additional tightening of the reporting requirements we foresee additional work in the development of specific reporting outputs for

Risk driver	Description	Potential impact	Timeframe	Direct/ Indirect	Likelihood	Magnitude of impact	Estimated financial implications	Management method	Cost of management
	via the Federal Governments reporting system. Coupled with this cost is the additional third party assurance needed to ensure completeness and accuracy of data in reporting publicly.						as well as reporting requirements to upload data to the government's reporting tools. Current collection and assurance costs are approximately AU$220,000 per annum. This is not considered material to the Group.	requirements. The Group's emissions data is also verified and assured by a third party (PWC) to further manage this risk and ensure completeness and accuracy. By using a centralised global reporting suite, we are able to identify any gaps in data, identify additional efficiencies in capturing and reporting data, as well as identifying areas to implement energy efficiencies into our portfolios.	uploading to the Government's reporting tool. Current cost are approximately AU$220,000 ensuring data meets regulatory requirements, this may increase to approximately AU$350,000. An increase of AU$130,000.

CC5.1b

Please describe your inherent 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 $200,000 HVAC, (working life 20 years, amortised at $10,000 p.a.). With an increase in temperature extremes, excess strain on an HVAC system causes the working life to reduce to 10yrs, which increases the expense (amortisation) to ($200,000 /10yrs = $20,000pa), therefore increased expense of $150,000 (with 15 Group assets) i.e. $20,000 - $10,000 = $10,000 x 15 assets).	The Group currently uses several methods to manage this risk, examples include: • Reducing other uses of electricity, therefore lower peak use of electricity; • Replacing older HVAC units with newer/ more efficient units. • Continually monitoring of units identifying peaks in use, which can highlight system malfunctions. The Group Property team monitors the Group assets on an ongoing basis and runs 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. An	The project costs for the HVAC Controls noted under the heading of 'Management Method' amounted to $331,500, estimated annual emissions savings of 687tCo2-e, with a payback period of 2.6 years. Additional HVAC upgrades and replacements during this reporting period (FY14) amounted to $253,500, estimated annual emissions savings of 463tCo2-e, with an average payback period of 2.6 years.

Risk driver	Description	Potential impact	Timeframe	Direct/ Indirect	Likelihood	Magnitude of impact	Estimated financial implications	Management method	Cost of management
								example of the continual improvements made during this reporting period are the HVAC Controls which were upgraded at 21 CBA and 1 Bankwest retail sites across VIC, NSW and TAS (FY14).	

CC5.1c

Please describe your inherent 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	Reduced demand for goods/services	Up to 1 year	Direct	Likely	Medium	Negative stakeholder perceptions of the Group's approach to climate change may negatively impact the Bank's reputation and therefore its brand value. The Group's brand is valued at	The Group manages these reputational risks in a number of ways; 1. Monitoring stakeholder perceptions & holding regular	Group employees involved in managing reputation, brand issues and stakeholder concerns within Bank's Group Corporate Affairs division are the

Risk driver	Description	Potential impact	Timeframe	Direct/ Indirect	Likelihood	Magnitude of impact	Estimated financial implications	Management method	Cost of management
	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 being listed on sustainability rating Indices such as CDP, FTSE4good and DJSI, how we are viewed by rating agencies and investors in general on 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						approximately AU$21 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 AU$1,050,000,000.	strategic reviews identifying reputation related opportunities and risks. 2. Developing a suite of ESG training materials and in developing a standalone ESG Risk Rating tool for all loans, covering biodiversity, water, climate & energy, pollution, labour & human rights, workplace health & safety, and anti-corruption & bribery. 3. Holding external stakeholder roundtable events. 4. Increased transparency, engagements and reporting	major cost driver. This cost is estimated at between AU$800,000 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, equate to approximately AU$900,000p.a.

Risk driver	Description	Potential impact	Timeframe	Direct/ Indirect	Likelihood	Magnitude of impact	Estimated financial implications	Management method	Cost of management
	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 change related 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, as well as a report to the National Greenhouse							on climate change related matters. 5. Maintaining engagement with peers on climate change issues, addressing growing interests and concerns from our clients, shareholders, community, banks, analysts, investors and our employees. 6. Being at the forefront of global change. Group memberships and signatories include: • United Nations Environment Programme for Financial Institutions (UNEPFI) • UN Global Compact • Principles for responsible investment	

Risk driver	Description	Potential impact	Timeframe	Direct/ Indirect	Likelihood	Magnitude of impact	Estimated financial implications	Management method	Cost of management
	and Energy Reporting (NGER) Scheme, which discloses the Group's GHG emissions portfolio. Outside of this reporting period, the Group reported for the first time its 'Financed Emissions', i.e. emissions arising from the Group's project finance exposure to the energy sector. The Group is also committed to ongoing reporting of this nature. In August of 2015 the Group will report the assessed carbon emissions arising from its project finance and business lending exposure to the							(PRI) • Dow Jones Sustainability Index (DJSI) • FTSE4GOOD • Equator Principles • Earth Hour. 7. Developing sector specific ESG policy around sensitive industry sectors.	

Risk driver	Description	Potential impact	Timeframe	Direct/ Indirect	Likelihood	Magnitude of impact	Estimated financial implications	Management method	Cost of management
	energy sector. And in February 2016 the Group will report on the assessed carbon emissions arising from the business lending portfolio, with a focus on larger emitters.								

CC5.1d

Please explain why you do not consider your company to be exposed to inherent 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 inherent 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 inherent 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 inherent 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 inherent 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 number of mandatory emissions reporting	Reduced operational costs	Up to 1 year	Direct	Very likely	Low	The Group collects and stores its GHG data within a	The Collection of data is performed both internally and	To manage this opportunity the costs involve the collection

Opportunity driver	Description	Potential impact	Timeframe	Direct/Indirect	Likelihood	Magnitude of impact	Estimated financial implications	Management method	Cost of management
	obligations e.g. National Greenhouse and Energy Reporting (NGER) scheme 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.						global third party data service provider. Cost for the collection, collation and reporting of data is between AU$100,000 and AU$120,000. Reporting this data has enabled the Group to look deeper into its emissions sources and identify energy efficiency opportunities, as well as any gaps in existing data. As an example, during this reporting period, energy efficiency projects in Australia collectively worth over AU$462,800 in annual savings were implemented. These projects collectively saved the Bank	externally. The Group emissions data submission to the federal government is completed in-house by a dedicated resource. The Group's responsibility is to ensure complete, accurate and timely reportable data. The Group seeks third party expertise in assessing and Assuring its data prior to reporting to the federal government, this task is performed by PWC.	and housing of emissions data, as well as the cost of having this data externally assured, ensuring the Government receives complete, transparent and accurate data. These costs equate to approximately AU$220,000 per year.

Opportunity driver	Description	Potential impact	Timeframe	Direct/Indirect	Likelihood	Magnitude of impact	Estimated financial implications	Management method	Cost of management
							over 1,866 tCo2-e during this reporting period and will continue to save emissions year on year.		

CC6.1b

Please describe the inherent 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 mean (average) temperature	Changes in the temperature mean are likely to put excess demand on the Group's heating, cooling and air-conditioning (HVAC) requirements. The Group sees opportunity in this. There is an advantage in implementing more efficient and/	Reduced operational costs	Up to 1 year	Direct	Virtually certain	Low	Replacing inefficient HVAC systems reduces the Group's overall operational costs. Due to the implementation of HVAC system upgrades and/ or replacements, the estimated financial saving for this reporting period alone is AU$212,000, with an annual	The Group conducted a number of audits on both its retail and commercial portfolios, providing critical information on a HVAC asset size, compared to the heating and cooling needed for a particular facility's footprint size (i.e. m2). The Group also	Costs associated with the HVAC system upgrades and/ or replacement during this reporting period was approximately AU$585,000. The audits conducted are considered business as usual.

Opportunity driver	Description	Potential impact	Timeframe	Direct/ Indirect	Likelihood	Magnitude of impact	Estimated financial implications	Management method	Cost of management
	or more advanced HVAC systems and chillers within the Group’s portfolio. The opportunity is to upgrade and/ or replace inefficient equipment, so as to reduce the ongoing operational costs.						emissions saving of 1,150 tCo2-e.	conducted a study on the life of its (HVAC) assets within its portfolio, this determined when an asset would reduce in efficiency, (e.g. if the expected lifecycle of a HVAC asset is 20 years, and the current life of a particular asset was at 15 years, the Group would confirm the current efficient run cycle of that asset and look to replace if found inefficient). The Group also produces energy intensity reports, confirming which sites were less efficient than others, this allows the Group to target specific sites for ongoing energy efficiency opportunities.	

CC6.1c

Please describe the inherent 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 (via mass Lighting programme): Following on from the Bank's successful 20 per cent carbon reduction target (Scope 1 and 2 full life-cycle emissions from a baseline of 2009) achieved in 2013. The Bank set a new carbon reduction target of its Scope 2 emissions to be achieved by 2015. One major contributor was the upgrade and/ or replacement of inefficient and/ or unnecessary lighting throughout our retail and commercial office portfolios.	Reduced operational costs	Up to 1 year	Direct	Virtually certain	Low	Identifying and implementing energy efficient lighting systems within our retail and commercial office portfolios lowers the Group's overall operational costs. Due to this lighting project implementation, an overall saving for this reporting period is AU$250,800.	The Group embarked on an audit process across its retail and commercial portfolio, taking into account those sites with pending lease expiries where they were not to be renewed. Pilot sites were implemented with energy efficiency lighting. During the reporting period energy intensity reports were generated confirming the success of the lighting pilot site upgrades, as well as the resulting reduction in the Group Scope 2 emissions. Post the successful testing, both retail and commercial portfolios were implemented with the appropriate energy efficiency lighting upgrades.	Costs associated with the retail and commercial lighting upgrades during this reporting period was more than AU$700,000 to implement. The annual reduction in carbon emissions equates to more than 700 tCo2-e. The annual cost savings of these lighting upgrades equates to more than AU$250,000.

CC6.1d

Please explain why you do not consider your company to be exposed to inherent 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 inherent 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 inherent 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)

Scope	Base year	Base year emissions (metric tonnes CO2e)
Scope 1	Tue 01 Jul 2008 - Tue 30 Jun 2009	14443
Scope 2	Tue 01 Jul 2008 - Tue 30 Jun 2009	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
Australia - National Greenhouse and Energy Reporting Act
ISO 14064-1
The Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard (Revised Edition)
New Zealand - Guidance for Voluntary, Corporate Greenhouse Gas Reporting

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
CO2	IPCC Second Assessment Report (SAR - 100 year)
CH4	IPCC Second Assessment Report (SAR - 100 year)
N2O	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
			As per the CDP Guidance material: emissions factors are attached below under 'Further Information". Guidance states: “alternatively, please attach an Excel spreadsheet with this data at the bottom of this page”.

Further Information

As per the CDP Guidance material: emissions factors are attached here under "'Further Information". Guidance states: “alternatively, please attach an Excel spreadsheet with this data at the bottom of this page”.

Attachments

https://www.cdp.net/sites/2015/49/3649/Climate Change 2015/Shared Documents/Attachments/ClimateChange2015/CC7.EmissionsMethodology/Emissions Factors. 2015 CBA Submission. Global Warming Potentials. References used.pdf

Page: CC8. Emissions Data - (1 Jul 2013 - 30 Jun 2014)

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

9361.62

CC8.3

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

119316.57

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
Commonwealth Bank - Asian country operations	Emissions are relevant but not yet calculated	No emissions excluded	The Group is in the process of confirming its Asian country operations Scope 1 emission source accuracy and completeness. This emission source will be reported in future submissions once confirmed and appropriate for public transparency. Asian country operations 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	Uncertainty range	Main sources of uncertainty	Please expand on the uncertainty in your data
Scope	More than 2% but	Assumptions	The Group incorporates a robust data collection process for all sources of emissions and therefore

Scope	Uncertainty range	Main sources of uncertainty	Please expand on the uncertainty in your data
1	less than or equal to 5%	Extrapolation Metering/ Measurement Constraints Data Management	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 emissions factors are outside the control of the Group. These sources of uncertainty are minimal as they represent the most accurate and 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 system). Envizi also houses data relating to energy costs, tariffs and consumption periods to facilitate the ongoing validation of data. Data quality is constantly monitored using Envizi's built-in validation tools to identify any data anomalies and 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 reported Scope 1 emission sources and therefore extrapolation is only ever conducted to fill data gaps, and 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.
Scope 2	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), 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 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/2015/49/3649/Climate Change 2015/Shared Documents/Attachments/CC8.6a/PWC Assurance Report on Sustainability performance metrics (the Metrics) for year ended 30 June 2014.pdf	Pages 1 and 2: Limited Assurance letter from PWC. Page 1 states: * Type - 'Limited assurance'. * Year - 'year ended 30 June 2014'. * Assurance covers the 'Sustainability performance metrics' (the Metrics) which include all Scopes 1, 2 and 3 emission sources. * Work conducted in accordance with ASAE 3000 Australian Standard. Pages 3 - 9: Emissions Data for which the Limited Assurance covers.	ASAE3000	100

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 reported Scope 2 emissions verified (%)
Limited assurance	https://www.cdp.net/sites/2015/49/3649/Climate Change 2015/Shared Documents/Attachments/CC8.7a/PWC Assurance Report on Sustainability performance metrics (the Metrics) for year ended 30 June 2014.pdf	Pages 1 and 2: Limited Assurance letter from PWC. Page 1 states: * Type - 'Limited assurance'. * Year - 'year ended 30 June 2014'. * Assurance covers the 'Sustainability performance metrics' (the Metrics) which include all Scopes 1, 2 and 3 emission sources. * Work conducted in accordance with ASAE 3000 Australian Standard. Pages 3 - 9: Emissions Data for which the Limited Assurance covers.	ASAE3000	100

CC8.8

Please identify if any data points have been verified as part of the third party verification work undertaken, other than the verification of emissions figures reported in CC8.6, CC8.7 and CC14.2

Additional data points verified	Comment
Progress against emission reduction target	PWC conduct third party assurance over the Group's global GHG emissions metrics, data and methodology. Part of this verification is the reduction in GHG emissions directly related to the Bank's carbon emissions reduction targets.

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 CO_2

Further Information

Page: CC9. Scope 1 Emissions Breakdown - (1 Jul 2013 - 30 Jun 2014)

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	8677.99
New Zealand	683.64

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 2013 - 30 Jun 2014)

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 in CC8.3 (MWh)
Australia	108650.15	124136.82	
New Zealand	3946.47	28106.86	
China	526.95	695.72	
India	122.90	126.93	
Japan	46.83	107.29	
Singapore	242.92	457.43	
Indonesia	5668.26	7645.82	
Vietnam	112.08	271.37	

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	40040.13
Electricity	161548.25
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	6043.81
Motor gasoline	24659.53
Biogasoline	1205.70
Natural gas	8131.10

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	0	The Bank does not purchase low carbon electricity.

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	2.3	Decrease	The Bank has undertaken a range of emission reduction activities which accounted for savings of 3226 Tonnes CO2-e in Scope 2 emissions. This is 25% of the reduction in Scope 2 emissions (12,640 Tonnes CO2-e) between the two reporting years. It represents a decrease of 2.3% based on a reduction in emissions of 3226 tonne CO2-e compared with FY2013 total emissions which were 142,499 tonne CO2-e.
Divestment	0		
Acquisitions	0		
Mergers	0		
Change in output	0		
Change in methodology	0		
Change in boundary	0		
Change in physical operating conditions	0		
Unidentified	7.7	Decrease	The Group undertakes a range of business as usual (BAU) activities across all portfolios to reduce costs and to implement efficiencies where possible. These 'unidentified' reductions in emissions are attributed to the Group's ongoing commitment to operational efficiency and overall sustainability. This represents a decrease of 7.7% based on the reduction of emissions from the FY2013 total emissions reported in the previous reporting year.
Other	0		

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
5.72	metric tonnes CO2e	unit total revenue	3.86	Decrease	The primary reason for this decrease is due to emission reduction activities. Emissions intensity per $million of revenue decreased by 3.86%, 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 energy efficiency measures implemented in both commercial and retail portfolios and the relocating of a 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
2.68	metric tonnes CO2e	FTE employee	22.09	Decrease	The primary reason for the decrease is due to the Group's ongoing commitment to its emission reduction activities. Compared to last reporting period, this intensity metric has decreased by 22.09 per cent. A smaller proportion can be attributed to the increased number of Group-wide FTEs, as the Group reports its global emissions, we have included the global FTE number from the regions we report emissions.

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
0.13	metric tonnes CO2e	square meter	10.34	Decrease	The primary reason for the reduction in emissions intensity has been through emissions reduction activities. The Group's ongoing commitment to its carbon reduction targets has seen the Group's office portfolio (Retail and Commercial) become more energy efficient and reduced in size. As part of the Group's carbon reduction target, Bankwest was incorporated into the emissions reduction activities. The Scope 2 emissions reduction targets, which are directly related to this intensity figure due to its reduction on square meter occupiable space are: 1. Commonwealth Bank - Scope 2 emissions reduction of 35% by June 2015, from a baseline of FY09 emissions. 2. Bankwest - Scope 2 emissions reduction of 30% by June 2015, from a baseline of FY09 emissions.

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?

No

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

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 data obtained from suppliers or value chain partners	Explanation
Purchased goods and services	Relevant, calculated	57643.88	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: In Australia the Group uses third party data centres which fall outside its operational control. Its two major data centres are located in Sydney. One is a shared data centre, therefore 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. This reporting year we also included Bankwest's data centre. The emissions from electricity use in two data centres have also been reported for operations in New Zealand (ASB). Paper Related Emissions: These emissions relate to the embodied emissions in office paper purchased by the Group in both Australia and New Zealand. Purchasing records		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 reported. 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 our major commercial offices use Activity Based Working which supports ‘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 $1 million per annum. For customers, the Bank promotes paperless billing and information. In the NZ operations of the Group, ASB's paper usage is declining steadily driven by a range of initiatives to change working behaviour. Total paper consumption for

Sources of Scope 3 emissions	Evaluation status	metric tonnes CO2e	Emissions calculation methodology	Percentage of emissions calculated using data obtained from suppliers or value chain partners	Explanation
			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 neural). This year, actual tonnage was provided by the supplier therefore 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'.		all ASB sites has been reduced by 55 tonnes or 15.8% throught this reporting period, with photocopy paper down by 30% also. ASB actively encourage the use of digital devices to view and store documents rather than print and have also enhanced online communication functions within the bank and are continuing to shift internal reporting to electronic channels. Emissions in this category increased in FY14 as the electricity use within data centres for ASB have been reported for the first time this year.
Capital goods	Relevant, calculated	984.55	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 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		This is the third year the Group has reported on emissions for capital purchases. This year, the Bank identified rollouts of IT Hardware (MFDs) for reporting. This year accounted for an increase in the number of MFDs purchased, almost double that of FY13 which has lead to a significant increase in Scope 3 emissions.

Sources of Scope 3 emissions	Evaluation status	metric tonnes CO2e	Emissions calculation methodology	Percentage of emissions calculated using data obtained from suppliers or value chain partners	Explanation
			new photocopiers. During this reporting period, prices of MFDs were unavailable, so an average was created based on the previous costs of MFDs.		
Fuel-and-energy-related activities (not included in Scope 1 or 2)	Relevant, calculated	19672.62	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's 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 source for the Group. Unlike other industries, banking does not procure large quantities of goods requiring freight. Despite this, 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 them in the next reporting period.
Waste generated in operations	Relevant, calculated	4941.95	Reported sources include waste associated with the Group's ASB, Sovereign and Commonwealth Bank businesses, but excluding BankWest operations. Emissions are calculated on actual waste data (weight sent to landfill and		

Sources of Scope 3 emissions	Evaluation status	metric tonnes CO2e	Emissions calculation methodology	Percentage of emissions calculated using data obtained from suppliers or value chain partners	Explanation
			weight sent to recycling) for six of the Group's major commercial properties (based on full-time employee (FTE) occupancy of these buildings, this represents 56% of the Bank's portfolio). To determine the percentages attributable to each landfill stream, the findings of a 2010 Waste Audit Report conducted on the Bank'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 Bank's remaining commercial properties and the Bank's retail portfolio to determine total emissions from waste generation. This reporting period, retail waste data was not available, an assumption was made that last year's data would account for the same amount (or to within an immaterial amount).		
Business travel	Relevant, calculated	33768.42	These emissions relate to the Group's Australian and New Zealand air travel, taxi use and New Zealand hire car use and third party		Australian flight distance calculation methodology is based on the UK Department for Environment, Food and Rural Affairs

Sources of Scope 3 emissions	Evaluation status	metric tonnes CO2e	Emissions calculation methodology	Percentage of emissions calculated using data obtained from suppliers or value chain partners	Explanation
			vehicles. Flight emissions are calculated based on data provided by the Group's internal 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 (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		(DEFRA) conversion factors.

Sources of Scope 3 emissions	Evaluation status	metric tonnes CO2e	Emissions calculation methodology	Percentage of emissions calculated using data obtained from suppliers or value chain partners	Explanation
			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	54871.89	The emissions associated with employee commuting for the Group's Australian operations were estimated based on total FTE numbers in Australia, NZ and Asia. Our estimation was based on the average employee travelling 30km per working day to and from work. It was assumed that 90% of all FTEs use public transport and 10% drive. Based on these assumptions, factors for emissions per passenger kilometre were applied from DEFRA average of bus and national rail, and the UK Department of Enviroment, food and Rural Affairs (DEFRA) average for cars. This methodology was applied to all employees and is considered to be conservative assumptions.		The emissions associated with employee commuting for the Group's operations were estimated based on total FTE numbers in Australia, NZ and Asia. Our estimation was based on the average employee travelling 30km per working day to and from work. It was assumed that 90% of all FTEs use public transport and 10% drive. Based on these assumptions, factors for emissions per passenger kilometre were applied from DEFRA average of bus and national rail, and the UK Department of Environment, food and Rural Affairs (DEFRA) average for cars. This methodology was applied to all employees and is considered to be conservative assumptions.
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	Relevant,	2722.19	These emissions relate to the Bank's postage		As a financial institution, key downstream

Sources of Scope 3 emissions	Evaluation status	metric tonnes CO2e	Emissions calculation methodology	Percentage of emissions calculated using data obtained from suppliers or value chain partners	Explanation
transportation and distribution	calculated		emissions and ASB's postage, courier and Datamail emissions. Australian postage emissions were calculated using actual mail spend by the Commonwealth Bank (~$20,000,000) and publicly available data from Australia Post which included total emissions and total revenue to give an emissions factor of 0.00013 kg CO2-e/$ spend). 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 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 ABS 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.		transportation and distribution activities relate primarily to postage and couriers.
Processing of	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 data obtained from suppliers or value chain partners	Explanation
sold products	explanation provided				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	15229.13	The Group has a portfolio of commercial and retail properties (approximately 87,000m2, 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 Commonwealth Bank, Bankwest and ASB (NZ). Scope 3 emissions for leased properties have increased this year as the area of floor space leased has increased from approximate 60,000 to 87,000 square meters which includes floor space leased by Bankwest and ASB which has not been reported in the past.
Franchises	Not relevant, explanation provided				This is not a relevant emission source for the Group, as the Group does not have franchises.
Investments	Relevant, calculated	1242000	In 2014 the Group commissioned an analysis of their financed emissions following the principles set out in the GHG Protocol's Corporate Value Chain (Scope 3) Accounting and Reporting Standard. This approach draws on the emerging protocols being discussed through the Greenhouse Gas Protocol and UNEP FI		As Australia’s largest bank the CBA Group plays a major role in financing a number of regionally significant projects, including those which have high emission profiles such as power stations and coal mines. As such, this year, the Group commissioned an analysis of financed emissions following the principles set

Sources of Scope 3 emissions	Evaluation status	metric tonnes CO2e	Emissions calculation methodology	Percentage of emissions calculated using data obtained from suppliers or value chain partners	Explanation
			working group, of which the Group participates. For each asset class (electricity generation, oil & gas extraction, and coal mining), project emissions and energy production were allocated to the Bank in proportion to the original committed debt provided by the Bank as a percentage of total syndicate debt, under the assumption that the ratio of the Bank's debt share remains constant over the life of the loan. A consistent 70/30 debt-to-equity ratio was assumed for all projects. The calculation included Scope 1 and 2 emissions for each project as reported by the company or published data plus Scope 3 emissions from the combustion of coal assuming standard thermal coal combustion. Scope 3 emissions from the oil and gas projects were not included as these projects were in construction phase at the time of reporting for FY14, and hadn't generated oil or gas which could be combusted.		out in the GHG Protocol's Corporate Value Chain (Scope 3) Accounting and Reporting Standard. The assessment covered project finance for coal mines, electricity generation and oil and gas production projects. The new methodology has allowed the Bank to take a more sophisticated approach to calculating Scope 3 emissions which takes into account the Bank's debt equity ratio to total syndicate debt. As such, the total Scope 3 emissions are lower than reported in past years. In addition, it should be noted that the Group undertakes environmental, social and governance (ESG) responsible lending assessments for all project financing. Before deciding whether to fund a project, the Group undertakes due diligence on all projects and uses a dedicated Risk Appetite Statement that includes ESG risk mitigation and the impact of carbon on a 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 (mining and oil & gas extraction) and utilities (including renewables) sectors. The Group is also a senior lender in renewable energy projects with exposure to more than 170 renewable projects globally.
Other (upstream)	Not relevant, explanation				The Group has no other relevant emissions sources.

Sources of Scope 3 emissions	Evaluation status	metric tonnes CO2e	Emissions calculation methodology	Percentage of emissions calculated using data obtained from suppliers or value chain partners	Explanation
	provided				
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/2015/49/3649/Climate Change 2015/Shared Documents/Attachments/CC14.2a/PWC Assurance Report on Sustainability performance metrics (the Metrics) for year ended 30 June 2014.pdf	Pages 1 and 2: Limited Assurance letter from PWC. Page 1 states: * Types - 'Limited assurance'. * Year - 'year ended 30 June 2014'. * Assurance covers the 'Sustainability performance metrics' (the Metrics) which include all Scopes 1, 2 and 3 emission sources. * Work conducted in accordance with ASAE 3000 Australian Standard. Pages 3 - 9: Emissions Data for which the Limited Assurance covers.	ASAE3000	100

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 boundary	22	Increase	The Group includes for the first time the electricity generated from data centres for ASB.
Capital goods	Change in boundary	141	Increase	There was an increase in the volume of capital goods purchased in FY14.
Fuel- and energy-related activities (not included in Scopes 1 or 2)	Emissions reduction activities	7	Decrease	Electricity use across the Group decreased in FY14 due to emission reduction measures outlined in Q3.3a which included a range of lighting and building management upgrade projects to reduce electricity use.
Waste generated in operations	Emissions reduction activities	12	Decrease	Less waste has been generated in the business for FY14. No standalone reduction target attached to waste but the Group continues to demonstrate and implement emission reduction activities as business as usual within its day to day operations.
Business travel	Emissions reduction activities	9	Decrease	Less travel was undertaken during FY14. No standalone reduction target attached to Business Travel but the Group has a strategy to reduce the amount of travel undertaken by staff. The Group continues to demonstrate and implement emission reduction activities in its business as usual activities and day to day operations.
Employee commuting	Change in boundary	39	Increase	The employee calculation included data for the entire Group. In past years, only Australian employees were included in the calculation, therefore an increase in transparency and disclosure, enabling the Group to manage its portfolio better and identify emission reduction activities.
Investments	Change in methodology	21	Decrease	A new methodology for the calculation of emissions from investments was applied to this reporting year's data which has taken a more sophisticated approach and reduced the calculated emissions.
Downstream transportation and distribution	Emissions reduction activities	9	Decrease	Reduction in downstream transportation for the Group's New Zealand business. Although the Downstream transportation and distribution was not a stand alone emissions reduction target. The Group continues to demonstrate and implement emission reduction activities as business as usual activities and day to day operations.
Downstream leased assets	Change in boundary	69	Increase	Data from the Group's NZ operations have been included for the first time this year, therefore expanding the reporting boundaries.

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 of engagement:
Group Procurement uses a 'Code of Conduct' to articulate sustainability expectations 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 from 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 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 complete an annual evaluation which covers all aspects of sustainability including emissions and targets. The sustainability team reviews each submission and request updates and progress where required.

ii) Prioritising engagements and measure of success:
To prioritise the engagement process, the Group engaged external expertise to review the Group's supply chain management and engagement process. From this resulting report, a significant internal review of key tender documentation and process, allowed 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 result in 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
20	3%	The Group continues to engage and review its paper and print suppliers including paper accreditation and sustainability factors, which represents approximately 3% of the 2013-14 total spend with suppliers. Increased 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 data 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

Question 14.2a: Letter of Limited Assurance (PWC) covers 100% of Scope 3 emissions that are disclosed via the Group's 'Sustainability performance metrics' for the year ended 30 June 2014.

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
Kylie Macfarlane	General Manager - Corporate Responsibility	Business unit manager

Further Information

CDP 2015 Climate Change 2015 Information Request