Client Transition Plan Criteria

Our Transition Plan expectations are set out in our Environmental and Social (E&S) Framework and are part of our approach to managing the climate impacts of our financing activities.

Transition Plans are assessed against criteria aligned to the expectations set out in our E&S Framework, prior to the provision of new corporate or trade finance or bond facilitation to an applicable client. The outcomes of these assessments support us to make more informed financing and bond facilitation decisions, and to manage our portfolio over time.

For applicable sectors, clients and defined terms, see our 2025 E&S Framework at commbank.com.au/policies

Our core criteria

Assessments of Client Transition Plans focus on a set of core criteria which are our minimum requirements:

Net zero GHG emissions by 2050 (or sooner) ambition	The client has a qualitative net zero GHG emissions ambition that covers at least 95% of its Scope 1 and 2 emissions and covers the most material Scope 3 GHG emissions categories for its sector.
Medium-term (2027–2035) GHG reduction target(s)	The client has set medium-term targets that are aligned to a well-below 2°C sectoral pathway.
Decarbonisation strategy	The client's Transition Plan identifies the set of actions the client intends to take to achieve its GHG reduction targets over the targeted time frame. If the client chooses to employ offsetting in relation to its GHG reduction targets, they also disclose the quantity and type of offset certification.
Capital allocation	The client discloses the stated value of its capital expenditure that it intends to allocate towards climate solutions in the future. If relevant, the client also discloses the value of its expected capital allocation they expect to deploy, to transition away from carbon-intensive assets.
Climate governance	The client discloses evidence of board or board committee oversight of the management of climate change risks.

The client's most recent Transition Plan, available at the time the new corporate or trade finance or bond facilitation is sought, is assessed by a third party. For clients who are part of a complex corporate structure, the Transition Plan which is available, most applicable and closest to the borrower is assessed. Typically, this will be a Transition Plan at the head entity level.