Telstra Group Ltd

2025 Corporate Questionnaire Response

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About CDP

CDP is a global non-profit that runs the world's only independent environmental disclosure system. As the founder of environmental reporting, we believe in transparency and the power of data to drive change. Partnering with leaders in enterprise, capital, policy and science, we surface the information needed to enable Earth-positive decisions. We helped more than 22,100 companies and over 1,000 cities, states and regions disclose their environmental impacts in 2025. Financial institutions with more than a quarter of the world's institutional assets use CDP data to help inform investment and lending decisions. Aligned with the ISSB's climate standard, IFRS S2, as its foundational baseline, CDP integrates best-practice reporting standards and frameworks in one place. Our team is truly global, united by our shared desire to build a world where people, planet and profit are truly balanced. Visit cdp.net or follow us @CDP to find out more.

Useful Information

The CDP questionnaire (click here) has been a single, integrated questionnaire since 2024, with a simplified version for SMEs. In 2025 it contained questions on five key environmental issues: climate change, forests, water security, plastics and biodiversity. Questions are aligned to international reporting standards and frameworks (click here). Disclosers see questions and environmental issues that are relevant to them, based on their sector and activities (click here). We recommend referring to CDP's reporting guidance (click here) alongside this response. Dates in this document are formatted as YYYY-MM-DD. Dates reported to CDP are stored as UTC (Coordinated Universal Time). The dates in this document may differ from dates when viewed in the CDP Portal but will never deviate by more than 24 hours. Questions with a single row and a single column may not have row labels.

Discloser Information

CDP Org ID: 18519

Field	Value
Disclosure cycle	2025 Disclosure Cycle
Questionnaire	CDP Corporate Questionnaire 2025
Discloser name	Telstra Group Ltd
CDP Organization Number	18519
CDP Industry classification	Services
CDP activity group	Media, telecommunications & data center services
CDP activity	Telecommunications services
Questionnaire Pathway	Full Version
Privacy status	Public
Environmental Issues Intent to Disclose	Climate Change, Biodiversity, Plastics
Commodities	
Primary Sector	General

Table of Contents

Responses

Q1.1 In which language are you submitting your response?

English

Q1.2 Select the currency used for all financial information disclosed throughout your response.

AUD

Q1.3 Provide an overview and introduction to your organization.

Response 1:

Organization type

Publicly traded organization

Description of organization

Telstra is Australia’ s leading telecommunications company with a proud Australian heritage and a strong international presence, particularly in the Asia-Pacific region. In FY24, we advanced our T25 strategy with a focus on enhancing customer experience, optimising network capabilities, expanding growth in key markets, strengthening employee engagement, demonstrating digital leadership, and conducting business responsibly. We offer a broad suite of connectivity, media, and content services to consumers and businesses in Australia, alongside cloud and other technology solutions for business, enterprise and government customers. Globally, we provide carrier connectivity and data centre services. We are leveraging our core strengths in networks and connectivity to capture new opportunities in emerging areas like eHealth, software and digital media. We are also continuing to assemble innovative technology, capability and talent from around the world to deliver exceptional experiences for our customers. Telstra completed its acquisition of Digicel Pacific during FY23. Digicel Pacific has been excluded from Telstra’ s emissions reporting and targets in FY24, therefore, the information in this CDP submission excludes Digicel Pacific.

Q1.4 State the end date of the year for which you are reporting data. For emissions data, indicate whether you will be providing emissions data for past reporting years.

Response 1:

End date of reporting year

2024-06-29

Alignment of this reporting period with your financial reporting period

Yes

Indicate if you are providing emissions data for past reporting years

Yes

Number of past reporting years you will be providing Scope 1 emissions data for

5 years

Number of past reporting years you will be providing Scope 2 emissions data for

5 years

Number of past reporting years you will be providing Scope 3 emissions data for

5 years

Q1.4.1 What is your organization’s annual revenue for the reporting period?

22928000000

Q1.5 Provide details on your reporting boundary.

Yes

Q1.7 Select the countries/areas in which you operate.

- United States of America
- Japan
- Malaysia
- Indonesia
- Bermuda
- British Virgin Islands
- Taiwan, China
- Thailand
- United Kingdom
- Philippines
- France
- Canada
- Ireland
- China
- New Zealand
- Saudi Arabia
- China, Hong Kong Special Administrative Region
- Cayman Islands
- Germany
- Bahrain
- Korea (The Republic of)
- Australia
- India
- Singapore

Q1.24 Has your organization mapped its value chain?

Response 1:

Value chain mapped

Yes, we have mapped or are currently in the process of mapping our value chain

Value chain stages covered in mapping

- Downstream value chain
- Upstream value chain

Highest supplier tier mapped

Tier 4+ suppliers

Highest supplier tier known but not mapped

Tier 4+ suppliers

Description of mapping process and coverage

In FY24, Telstra engaged directly with more than 6,000 suppliers, with approximately 78% of total spend attributed to our top 100 suppliers. We also reviewed and updated our Supplier Governance Framework to address key learnings and improvement opportunities identified in the 12 months prior. This included restructuring and simplifying the Framework. We also refreshed our guidance on our Supplier Risk Categories and developed additional guidance to support our contract owners with meeting the requirements of the Framework.

Our direct (tier 1) suppliers maintain extensive networks of their own suppliers, known as tier 2, tier 3, and tier 4 suppliers, which collectively contribute substantially to Telstra’ s expansive and intricate supply chain. We use an online Know Your Supplier (KYS) platform to support our due diligence process for domestically contracted suppliers, as they represent more than 80 per cent of our total spend. In addition, for climate we have partnered with CDP through their Supply Chain Program to engage our suppliers to more effectively account for and address their climate change impacts, including their upstream emissions.

The Telstra Smart Modem has been identified as having a material contribution to our scope 3 emissions throughout its end-to-end value chain. To thoroughly evaluate its environmental footprint, a third-party assessment was conducted in collaboration with our supplier, following the Life Cycle Assessment methodology based on ISO 14040-2006 and ISO 14044-2006, examining emissions, materials, site locations, and energy consumption.

From a downstream value chain perspective, we have visibility over the recycling partners and their partners for the end-of-life mobile devices we recycle via our recycling program. The recyclers we contract are required to comply with relevant legislative and regulatory requirements and have certification to relevant standards such as ISO 9001, 14001, 45001, and AS/NZ 5377, R2.

Q1.24.1 Have you mapped where in your direct operations or elsewhere in your value chain plastics are produced, commercialized, used, and/or disposed of?

Response 1:

Plastics mapping

Yes, we have mapped or are currently in the process of mapping plastics in our value chain

Value chain stages covered in mapping

- Direct operations
- Downstream value chain
- Upstream value chain

Q2.1 How does your organization define short-, medium-, and long-term time horizons in relation to the identification, assessment, and management of your environmental dependencies, impacts, risks, and opportunities?

Response 1: Short-term

From (years)

0

To (years)

2

How this time horizon is linked to strategic and/or financial planning

At Telstra, we typically set our corporate strategy in three- to five-year cycles, reflecting the shifting nature of our industry. This approach provides the flexibility we require to respond to the changing needs of our customers, business, and external stakeholders. For the same reasons, this strategic cadence also applies to our consideration of environmental issues. Given our infrastructure assets often have long lifespans, our assessment of the physical impacts of climate change on our assets and longer-term climate transition risks and opportunities covers a longer period than our defined corporate strategy. We therefore consider multiple time horizons: short-term (less than three years), medium-term (three to ten years), and long-term (greater than ten years). We use a double materiality approach to assess material sustainability issues. This process takes into account materiality from both an impact and a financial perspective. The output of our materiality assessment is a key consideration in how we continue to evolve our sustainability ambitions and inform planning and reporting. Our In Focus: Sustainability at Telstra report provides full details of our materiality methodology. You may access the report here: https://www.telstra.com.au/content/dam/tcom/about-us/community-environment/pdf/2025-In-Focus-Sustainability-at-Telstra-Remediated.pdf

Response 2: Medium-term

From (years)

3

To (years)

10

How this time horizon is linked to strategic and/or financial planning

At Telstra, we typically set our corporate strategy in three- to five-year cycles, reflecting the shifting nature of our industry. This approach provides the flexibility we require to respond to the changing needs of our customers, business, and external stakeholders. For the same reasons, this strategic cadence also applies to our consideration of environmental issues. Given our infrastructure assets often have long lifespans, our assessment of the physical impacts of climate change on our assets and longer-term climate transition risks and opportunities covers a longer period than our defined corporate strategy. We therefore consider multiple time horizons: short-term (less than three years), medium-term (three to ten years), and long-term (greater than ten years). We use a double materiality approach to assess material sustainability issues. This process takes into account materiality from both an impact and a financial perspective. The output of our materiality assessment is a key consideration in how we continue to evolve our sustainability ambitions and inform planning and reporting. Our In Focus: Sustainability at Telstra report provides full details of our materiality methodology. You may access the report here: https://www.telstra.com.au/content/dam/tcom/about-us/community-environment/pdf/2025-In-Focus-Sustainability-at-Telstra-Remediated.pdf

Response 3: Long-term

From (years)

11

Is your long-term time horizon open ended?

Yes

How this time horizon is linked to strategic and/or financial planning

At Telstra, we typically set our corporate strategy in three- to five-year cycles, reflecting the shifting nature of our industry. This approach provides the flexibility we require to respond to the changing needs of our customers, business, and external stakeholders. For the same reasons, this strategic cadence also applies to our consideration of environmental issues. Given our infrastructure assets often have long lifespans, our assessment of the physical impacts of climate change on our assets and longer-term climate transition risks and opportunities covers a longer period than our defined corporate strategy. We therefore consider multiple time horizons: short-term (less than three years), medium-term (three to ten years), and long-term (greater than ten years). We use a double materiality approach to assess material sustainability issues. This process takes into account materiality from both an impact and a financial perspective. The output of our materiality assessment is a key consideration in how we continue to evolve our sustainability ambitions and inform planning and reporting. Our In Focus: Sustainability at Telstra report provides full details of our materiality methodology. You may access the report here: https://www.telstra.com.au/content/dam/tcom/about-us/community-environment/pdf/2025-In-Focus-Sustainability-at-Telstra-Remediated.pdf

Q2.2 Does your organization have a process for identifying, assessing, and managing environmental dependencies and/or impacts?

Response 1:

Process in place

Yes

Dependencies and/or impacts evaluated in this process

Both dependencies and impacts

Q2.2.1 Does your organization have a process for identifying, assessing, and managing environmental risks and/or opportunities?

Response 1:

Process in place

Yes

Risks and/or opportunities evaluated in this process

Both risks and opportunities

Is this process informed by the dependencies and/or impacts process?

Yes

Q2.2.2 Provide details of your organization’s process for identifying, assessing, and managing environmental dependencies, impacts, risks, and/or opportunities.

Response 1: Row 1

Environmental issue

Climate change

Indicate which of dependencies, impacts, risks, and opportunities are covered by the process for this environmental issue

- Risks
- Dependencies
- Opportunities
- Impacts

Value chain stages covered

- Direct operations
- Upstream value chain

Coverage

Full

Supplier tiers covered

- Tier 1 suppliers
- Tier 2 suppliers

Type of assessment

Qualitative and quantitative

Frequency of assessment

More than once a year

Time horizons covered

- Medium-term
- Short-term
- Long-term

Integration of risk management process

Integrated into multi-disciplinary organization-wide risk management process

Location-specificity used

- National
- Site-specific
- Local
- Sub-national

Tools and methods used

- International methodologies and standards: IPCC Climate Change Projections
- Other: Materiality assessment
- Other: Internal company methods
- Databases: Nation-specific databases, tools, or standards
- Other: Partner and stakeholder consultation/analysis
- Enterprise Risk Management: ISO 31000 Risk Management Standard
- Other: External consultants
- Other: Desk-based research
- International methodologies and standards: Other international methodologies and standards: AccountAbility's AA1000 Principles Standard (2008), Global Reporting Initiative G4 guidelines, ISSB IFRS S2
- Enterprise Risk Management: Internal company methods
- Databases: Regional government databases
- Enterprise Risk Management: Risk models
- Other: Scenario analysis
- Enterprise Risk Management: Enterprise Risk Management
- Enterprise Risk Management: Stress tests

Risk types and criteria considered

- Market: Other market: Availability of mains power supply (electricity)
- Market: Uncertainty in the market signals
- Reputation: Negative press coverage related to support of projects or activities with negative impacts on the environment (e.g. GHG emissions, deforestation & conversion, water stress)
- Policy: Carbon pricing mechanisms
- Technology: Transition to lower emissions technology and products
- Policy: Changes to national legislation
- Liability: Exposure to litigation
- Reputation: Increased partner and stakeholder concern and partner and stakeholder negative feedback
- Acute physical: Drought
- Chronic physical: Changing precipitation patterns and types (rain, hail, snow/ice)
- Chronic physical: Coastal erosion
- Reputation: Impact on human health
- Market: Changing customer behavior
- Chronic physical: Temperature variability
- Acute physical: Heat waves
- Chronic physical: Changing temperature (air, freshwater, marine water)
- Liability: Non-compliance with regulations
- Policy: Changes to international law and bilateral agreements
- Acute physical: Flood (coastal, fluvial, pluvial, ground water)
- Chronic physical: Sea level rise
- Acute physical: Wildfires
- Chronic physical: Heat stress
- Acute physical: Cyclones, hurricanes, typhoons
- Chronic physical: Increased severity of extreme weather events

Partners and stakeholders considered

- Investors
- Customers
- Employees
- Regulators
- Suppliers
- Local communities
- Indigenous peoples
- NGOs

Has this process changed since the previous reporting year?

Yes

Further details of process

Telstra follows a multi-disciplinary process to identify, assess, and respond to climate-related risks and opportunities across its operations. To improve our understanding of the climate-related risks to our business and supply chain, in 2020 we commenced a program which explored our exposure to physical acute and chronic climate hazards. Each year we have expanded and uplifted our analysis with the findings-this year including dependencies--to help shape targeted climate adaptation and mitigation activities.

Reporting is done at least quarterly to senior management and at least twice a year to the Audit & Risk Committee. Climate and nature-related risk is identified, assessed and managed in accordance with our Enterprise Risk Management Framework, aligned to international standard ISO 31000:2018, consistent with the management of other material risks. We integrate climate risk management into our overall risk management model, incorporating three lines of defence: 1st: Operational Management and business stakeholders are responsible for identifying, assessing, and managing risks. 2nd: Chief Risk Office, risk management teams, and other oversight functions handle frameworks, oversight, and monitoring. 3rd: Group Internal Audit provides independent assurance on governance, risk management, and internal controls. Identification of climate-related risks is undertaken within the 1st line of defence by accountable risk owners. These risks encompass immediate and long-term physical risks and policy, legal, technology, market, and reputation transition risks. The identification process entails monitoring internal and external factors, including key policies, regulatory obligations, supply chain considerations, industry drivers, and stakeholder expectations. Telstra prioritises and assesses climate-related risks using its Enterprise Risk framework, following AccountAbility’s AA1000 Principles Standard (2008) and Global Reporting Initiative G4 guidelines, with additional guidance from the Board, Audit and Risk Committee, CEO Leadership Team, Chief Sustainability Officer, Environment Executives Group and other Executives with relevant accountabilities. Informed by our scenario analysis, Telstra’s Enterprise Risk framework categorizes risks based on likelihood and consequence, creating an overall view of exposure. It identifies treatments or new controls when existing controls are insufficient and assigns risks to an owner responsible for managing them if they materialise. Telstra’s annual materiality assessment informs our assessment of risks and opportunities. We undertake this review in accordance with the guidance provided in the Global Reporting Initiative Standards. We use a double materiality approach, assessing impact materiality through our sustainability materiality assessment process and financial risk materiality through our risk management process. This helps us identify outward impacts on people, society, and the environment, as well as inward impacts that may generate risks or opportunities influencing our enterprise value. We maintain a detailed register of climate-related risks and opportunities in line with ISSB S2 recommendations, updating it at least yearly. Telstra’s adoption of the ISSB S2 framework supports clear oversight, management, and disclosure of these risks and opportunities as part of our ERM. In FY25 we refreshed our climate risk assessment and will report on this in our FY25 disclosures and CDP 2026 response.

Response 2: Row 2

Environmental issue

Biodiversity

Indicate which of dependencies, impacts, risks, and opportunities are covered by the process for this environmental issue

- Opportunities
- Risks
- Dependencies
- Impacts

Value chain stages covered

Direct operations

Coverage

Partial

Type of assessment

Qualitative only

Frequency of assessment

Annually

Time horizons covered

- Long-term
- Short-term
- Medium-term

Integration of risk management process

Integrated into multi-disciplinary organization-wide risk management process

Location-specificity used

National

Tools and methods used

- Other: Desk-based research
- Databases: Nation-specific databases, tools, or standards
- Other: Internal company methods
- International methodologies and standards: Environmental Impact Assessment
- Other: Materiality assessment
- Enterprise Risk Management: Enterprise Risk Management
- Enterprise Risk Management: Internal company methods
- Commercially/publicly available tools: LEAP (Locate, Evaluate, Assess and Prepare) approach, TNFD
- International methodologies and standards: ISO 14001 Environmental Management Standard
- Commercially/publicly available tools: TNFD - Taskforce on Nature-related Financial Disclosures
- Other: External consultants

Risk types and criteria considered

- Reputation: Increased partner and stakeholder concern and partner and stakeholder negative feedback
- Chronic physical: Increased severity of extreme weather events
- Acute physical: Flood (coastal, fluvial, pluvial, ground water)
- Acute physical: Other acute physical risk: Construction in environmentally sensitive areas, Weeds and pests, Pollution
- Market: Availability and/or increased cost of raw materials
- Acute physical: Cyclones, hurricanes, typhoons
- Policy: Changes to national legislation
- Policy: Increased difficulty in obtaining operations permits
- Acute physical: Wildfires
- Reputation: Negative press coverage related to support of projects or activities with negative impacts on

the environment (e.g. GHG emissions, deforestation & conversion, water stress)
- Chronic physical: Coastal erosion
- Chronic physical: Water stress
- Chronic physical: Other chronic physical driver: Stable climate
- Chronic physical: Changing temperature (air, freshwater, marine water)
- Acute physical: Drought
- Acute physical: Heavy precipitation (rain, hail, snow/ice)
- Chronic physical: Change in land-use

Partners and stakeholders considered

- Regulators
- Investors
- Indigenous peoples
- Suppliers
- Local communities
- Employees
- Customers

Has this process changed since the previous reporting year?

No

Further details of process

Environmental risks (including biodiversity) are identified, assessed and managed using our enterprise risk management framework. This is consistent with the way we manage other material risks that may impact delivery of our strategic objectives. This includes from top-level materiality analysis through to the operational environmental risks managed across the business. Biodiversity risks are always considered in land access and environmental management, for instance, when Telstra undertakes new construction or significant maintenance projects. We continue to monitor and assess both current and emerging environmental risks and opportunities and incorporate risk mitigations into our business planning. We continue to investigate our interactions with nature and the risks and opportunities they present so we can better protect it. In FY24, we started work to evaluate the dependencies, impacts, risks and opportunities related to nature across our business operations guided by the recommendations of the TNFD. We will continue to evolve our understanding and assessment of priority locations in our value chain. This assessment enabled us to report on our most significant nature-related risks and opportunities in our disclosures. In addition, we recognise that climate and nature are intrinsically linked, and we aim to protect biodiversity in the environments in which we operate and to harness technology to regenerate nature. We believe it is critical to take a whole-of-business approach to addressing our impact and improving nature-related outcomes in a climate changed world. The nature risk assessment leveraged insights from existing environmental risk artefacts - including Telstra’s aspects & impacts register and environmental compliance program.

In FY25 we undertook a water and supply chain risk assessment and will report on this in our FY25 disclosures and our 2026 CDP response.

Response 3: Row 3

Environmental issue

Plastics

Indicate which of dependencies, impacts, risks, and opportunities are covered by the process for this environmental issue

- Opportunities
- Impacts
- Risks

Value chain stages covered

- Upstream value chain
- Downstream value chain
- Direct operations

Coverage

Partial

Supplier tiers covered

- Tier 3 suppliers
- Tier 1 suppliers
- Tier 4+ suppliers
- Tier 2 suppliers

Type of assessment

Qualitative only

Frequency of assessment

As important matters arise

Time horizons covered

- Long-term
- Medium-term
- Short-term

Integration of risk management process

Integrated into multi-disciplinary organization-wide risk management process

Location-specificity used

Not location specific

Tools and methods used

- Other: Desk-based research
- Other: Internal company methods
- Other: External consultants
- International methodologies and standards: Life Cycle Assessment
- Enterprise Risk Management: Internal company methods
- Enterprise Risk Management: Enterprise Risk Management
- Other: Materiality assessment

Risk types and criteria considered

- Technology: Transition to increasing renewable content
- Market: Availability and/or increased cost of recycled or renewable content
- Market: Changing customer behavior

- Policy: Changes to national legislation
- Technology: Transition to recyclable plastic products
- Technology: Transition to increasing recycled content
- Reputation: Increased partner and stakeholder concern and partner and stakeholder negative feedback
- Reputation: Impact on human health
- Liability: Non-compliance with regulations
- Market: Availability and/or increased cost of raw materials
- Technology: Transition to reusable products
- Policy: Changes to international law and bilateral agreements

Partners and stakeholders considered

- Customers
- Regulators
- Suppliers
- Local communities
- Indigenous peoples
- Employees

Has this process changed since the previous reporting year?

No

Further details of process

Plastic-related risks and opportunities are identified, assessed, and managed using our enterprise risk management (ERM) framework. This is consistent with the way we manage other material risks that may impact the delivery of our strategic objectives. We continue to monitor and assess current and emerging environmental risks and opportunities and incorporate risk mitigations into our business planning.

Q2.2.7 Are the interconnections between environmental dependencies, impacts, risks and/or opportunities assessed?

Response 1:

Interconnections between environmental dependencies, impacts, risks and/or opportunities assessed

Yes

Description of how interconnections are assessed

Telstra regularly reviews our most significant sustainability impacts on the economy, the environment and society as part of our risk and opportunity assessment process. We undertake our review in accordance with guidance provided in the GRI Standards and apply the following methodology: 1. Understand our operating context: Identify megatrends and industry trends with the potential to impact our business and stakeholders. 2. Identify actual and potential impacts: (a) Research the current use of sustainability indicators/disclosures in widely applied reporting standards, and lessons gained from their application in practice, and (b) Research the material topics as identified by peers, external experts and internal assessments. 3. Assess the significance of impacts: (a) Survey key stakeholder groups (or use internal proxies) to determine priority impacts based on risk assessment, and (b) Leverage ongoing multi-stakeholder consultation occurring within Telstra to determine priority impacts. 4. Identify priority impacts for reporting: Validate with senior leaders to undertake independent assurance. We apply a double materiality approach, considering materiality from both an impact materiality perspective as well as a financial materiality perspective. This means assessing the two dimensions of materiality: 1. We assess impact materiality through our sustainability materiality assessment process, which identifies the outward impacts that Telstra creates or has the potential to create on people, society, and the environment. The output of our material impact assessment informs the content of our annual Sustainability Report and is a key consideration in how we continue to evolve our sustainability ambitions. 2. We assess financial risk materiality through our risk management process, where we identify the inward impacts that generate or may generate risks or opportunities influencing Telstra's enterprise value. The output of our material risk assessment, including sustainability-related risks, is provided in the Material Risks and Acting on Climate and Nature sections of our Annual Report as well as our Sustainability Report. Our Sustainability and Risk teams collaborate closely to capture sustainability impacts and risks from a double materiality perspective. This approach ensures that we address topics that have the potential to impact our business, the environment and our stakeholders, risks and opportunities across our business operations, value chain, and assets.

In FY24, to support our management of risks associated with the shift to a low carbon economy, we commenced our analysis of climate-related transition risks in line with a 1.5° C scenario. We also started work to evaluate the risks and opportunities related to nature across our business operations, value chain, and assets in line with the TNFD and will continue to evolve our understanding and assessment of priority locations in our value chain.

Q2.3 Have you identified priority locations across your value chain?

Response 1:

Identification of priority locations

Yes, we are currently in the process of identifying priority locations

Value chain stages where priority locations have been identified

- Direct operations
- Upstream value chain

Types of priority locations identified

- Sensitive locations: Areas of limited water availability, flooding, and/or poor quality of water
- Sensitive locations: Areas important for biodiversity
- Locations with substantive dependencies, impacts, risks, and/or opportunities: Locations with substantive dependencies, impacts, risks, and/or opportunities relating to water
- Locations with substantive dependencies, impacts, risks, and/or opportunities: Locations with substantive dependencies, impacts, risks, and/or opportunities relating to biodiversity
- Sensitive locations: Areas of high ecosystem integrity

Description of process to identify priority locations

Telstra conducts construction and maintenance works in diverse environments, assessing and managing environment and cultural heritage risks under Local, State and Federal legislation. We conduct environmental due diligence surveys and, where required, undertake environment and cultural heritage surveys to identify areas of significance where we are doing construction or major maintenance works. The outcomes of these environmental searches and surveys enable us to determine our priority locations and inform our approach to design, construction and approvals. Environment and cultural heritage protections are captured in design and construct mandates and overseen as part of our environmental management system.

In FY25, we piloted a desktop biodiversity assessment of the 200 operational above ground assets which have an elevated bushfire exposure. This provided a view on not just how climate might increasingly impact our business, but also on the ecosystems and natural environments we operate in. We found that we work within ecoregions with a total of 214 critically endangered species and 542 endangered species at these sites alone. More than 60 per cent of those 200 sites have a high percentage of biologically important land in the surrounding 5 kilometres. More than 90 per cent of those sites on or in proximity to biologically important land also coincide with areas that already experience high human land use pressure.

Will you be disclosing a list/spatial map of priority locations?

No, we have a list/geospatial map of priority locations, but we will not be disclosing it

Q2.4 How does your organization define substantive effects on your organization?

Response 1: Risks

Type of definition

- Qualitative
- Quantitative

Indicator used to define substantive effect

Revenue

Change to indicator

Absolute decrease

Absolute increase/ decrease figure

250000

Metrics considered in definition

- Time horizon over which the effect occurs
- Likelihood of effect occurring
- Frequency of effect occurring

Application of definition

Telstra’s definition of substantive financial impact follows the ASX Corporate Governance Council’s Corporate Governance Principles and Recommendations. “Material exposure” in this context means a real possibility that the risk or opportunity in question could substantively impact our ability to create or preserve value for security holders over the short-, medium-, or long-term. Our infrastructure is a long-term asset, much of it located in remote areas exposed to extreme weather conditions. Increased frequency and severity of extreme weather events can damage and disrupt our operations and service delivery. In addition, we define substantive financial impact when identifying or assessing climate-related risks according to the ratings in our Enterprise Likelihood and Consequence Risk Matrix. According to this matrix, substantive financial impacts are categorised from Minor to Extreme based on a sliding scale of financial values. ’Minor’ substantive financial impact is defined as any negative impact on Telstra between $250k and $2.5 million in revenue loss and/or $100k to $1 million in additional costs; ’Major’ substantive financial impact is any negative impact between $25 million and $255 million in revenue loss and/or $10 million to $100 million in additional costs; and ’Extreme’ ratings are given to impacts of more than $2 billion in revenue loss and more than $800 million in additional costs.

Response 2: Opportunities

Type of definition

- Qualitative
- Quantitative

Indicator used to define substantive effect

Revenue

Change to indicator

Absolute increase

Absolute increase/ decrease figure

250000

Metrics considered in definition

- Likelihood of effect occurring
- Time horizon over which the effect occurs
- Frequency of effect occurring

Application of definition

Telstra defines a substantive financial impact related to opportunities as a real possibility that could significantly enhance our ability to create or preserve value for security holders over the short-, medium-, or long-term. If an opportunity could lead to revenue gains or cost savings, it falls within the scope of substantive financial impact. We assess these impacts using our Enterprise Likelihood and Consequence Risk Matrix, categorizing them from Minor to Extreme based on financial values. ’ Minor’ substantive financial impact represents positive effects between $250k and $2.5 million in revenue gain and/or $100k to $1 million in cost savings; ’ Major’ substantive financial impact corresponds to gains between $25 million and $255 million in revenue and/or $10 million to $100 million in cost savings; and ’ Extreme’ ratings apply to impacts exceeding $2 billion in revenue gain and more than $800 million in cost savings.

Q3.1 Have you identified any environmental risks which have had a substantive effect on your organization in the reporting year, or are anticipated to have a substantive effect on your organization in the future?

Response 1: Climate change

Environmental risks identified

Yes, both in direct operations and upstream/downstream value chain

Response 2: Plastics

Environmental risks identified

No

Primary reason why your organization does not consider itself to have environmental risks in your direct operations and/or upstream/downstream value chain

Environmental risks exist, but none with the potential to have a substantive effect on our organization

Please explain

Our enterprise risk management framework helps us identify, assess, and manage risks and opportunities related to plastics, in line with how we address other significant risks affecting our strategic objectives. We are committed to continuously monitoring and evaluating current and emerging environmental risks and opportunities and integrating risk mitigation measures into our business planning.

Q3.1.1 Provide details of the environmental risks identified which have had a substantive effect on your organization in the reporting year, or are anticipated to have a substantive effect on your organization in the future.

Response 1: Climate change

Risk identifier

Risk1

Risk types and primary environmental risk driver

Liability: Non-compliance with legislation

Value chain stage where the risk occurs

Direct operations

Country/area where the risk occurs

Australia

Organization-specific description of risk

Increased mandatory reporting and disclosure of emission reduction targets creates additional emissions reporting obligations for Telstra. In Australia, we are subject to the reporting requirements of the National Greenhouse and Energy Reporting (NGER) Act 2007. Non-compliance poses potential risks for Telstra, including civil and criminal penalties, infringement notices, and increased operating costs. With energy use (specifically electricity consumption) in our telecommunications networks being our most material environmental impact and accounting for around 96% of our combined scope 1+2 emissions in FY24, maintaining compliance with the NGER Act’s reporting requirements is an important regulatory and legal obligation for Telstra. Our Australian operations, which are subject to compliance with the NGER Act, made up 99% or 32,782 tCO2e of Telstra’s Scope 1 emissions and 97% or 757,963 tCO2e of our Scope 2 emissions in FY24. Note that due to the difference in rounding according to the NGER computation, there is a slight difference in Scope 1 and 2 emissions disclosed to NGER, at 32,771 tCO2e and 757,967 tCO2e, respectively, both of which are still in compliance with the NGER Act and do not change the percentage of total emissions. Furthermore, non-compliance could harm Telstra’s reputation. The company anticipates that its reporting obligations will increase in the short-medium term with the implementation of Australian Sustainability Reporting Standards (ASRS).

Primary financial effect of the risk

Increased indirect [operating] costs

Time horizon over which the risk is anticipated to have a substantive effect on the organization

Short-term

Likelihood of the risk having an effect within the anticipated time horizon

Unlikely

Magnitude

Low

Anticipated effect of the risk on the financial position, financial performance and cash flows of the organization in the selected future time horizons

Telstra has never been subject to any penalty provisions of the NGER Act. However, Telstra might be subject to a financial penalty if we fail to comply with NGER registration and/or reporting requirements in the future. For instance, if Telstra does not meet requirements to report annual GHG emissions to the Australian Government by 31 October each year, our operating costs may increase by $1,650,000 - $1,761,000 in penalties.

Are you able to quantify the financial effect of the risk?

Yes

Anticipated financial effect figure in the short-term - minimum (currency)

1650000

Anticipated financial effect figure in the short-term - maximum (currency)

1761000

Explanation of financial effect figure

Most penalty provisions in the NGER Act impose civil penalties which may lead to financial penalties. Most civil penalty provisions relate to a person's failure to meet registration, reporting, record-keeping or auditing requirements. An executive officer of a company can be held personally liable for their company's contraventions of civil penalty provisions. A civil penalty (up to a maximum of 5,000 penalty units) may apply if a controlling corporation fails to register or report by the due date. In addition, a controlling corporation may be liable for an additional civil penalty of 100 penalty units for each day that it fails to meet registration or reporting requirements. As 1 penalty unit was equivalent to AUD 330 during FY24, Telstra may incur a minimum civil penalty of up to 1,650,000 if it fails to register or report by the due date. This is calculated as follows: Minimum penalty cost per penalty unit x maximum penalty units: 330 x $5,000 = $1,650,000 There is also a risk that Telstra may be liable for an additional civil penalty of AUD 22,200 for each day past the due date. If Telstra were 5 business days overdue in submitting its NGER Report, this would result in additional costs of $111,000. The maximum penalty that Telstra may incur will then be the minimum penalty plus additional penalty for 5 days, calculated as follows: Maximum penalty + minimum penalty (daily additional penalty x number of days past the due date) = $1,650,000 +($22,200 x 5) = $1,761,000

Primary response to risk

Compliance, monitoring and targets : Greater due diligence

Cost of response to risk

800000

Explanation of cost calculation

Cost of Management is based on key actions to minimise the risk of non-compliance with the NGER Act, including the cost of full time employee resources and external consultants allocated to meeting registration, reporting, record-keeping and auditing requirements at a total cost of approximately $800,000 annually.

Description of response

To minimise the risk of non-compliance with the NGER Act, we have implemented systems and processes for the collection and disclosure of data to the Clean Energy Regulator (CER) annually in accordance with our obligations. Following our annual NGER Compliance Plan developed in FY24 outlining the methodology for fulfilling key NGER Act requirements, including report accuracy, independent verification, regulatory compliance, and timely submission by the last working day in October, a working group compiled the Compliance Plan information from Telstra’s Sustainability, Networks, and Legal teams. We manage non-compliance risk through industry forums and our Sustainability group, which monitors emissions and energy legislation changes. Thanks to our Compliance Plan, we did not incur any penalties or fees in the reporting year. As an example of our actions to manage this risk, Telstra reported total Scope 1 and 2 emissions (790,738 tCO2e) and net energy consumed for Australian operations in FY24, included in the 2023-24 NGER dataset published on CER’s website. Also, we are preparing to comply with the upcoming Australian Sustainability Reporting Standards (ASRS) and have established systems to measure and manage our climate and nature impacts. Since 2020, we have made disclosures guided by the recommendations of the Taskforce on Climate-related Financial Disclosures (TCFD) and have stress-tested our business under three different climate scenarios to guide our strategic goals. In FY24, our disclosures were guided by the climate disclosure standard (IFRS S2) set by the International Sustainability Standards Board (ISSB) and the recommendations of the Taskforce on Nature-related Financial Disclosures (TNFD).

Response 2: Climate change

Risk identifier

Risk2

Risk types and primary environmental risk driver

Acute physical: Wildfires

Value chain stage where the risk occurs

Direct operations

Country/area where the risk occurs

Australia

Organization-specific description of risk

Climate change is causing an increased risk of bushfires in Australia. Bushfires are expected to result in greater exposure for Telstra’s operations, particularly our networks, over the long-term. Bushfires threaten to disrupt and damage Telstra’s network services, resulting in decreased revenues due to interrupted service delivery. It is estimated that bushfires could have a cumulative financial impact on Telstra of between $1,059,916,000 to $1,936,116,000 by 2050. The 2019/2020 “Black Summer” bushfires resulted in substantial main power outages and damage to Telstra’s infrastructure, causing disruption to our customers’ telephone and internet services in New South Wales, Victoria and South Australia. During this time, around 450 of Telstra’s network facilities were impacted by the fires resulting in outages and faults. Five sites were severely or completely damaged. This risk may lead to reduced revenues due to interrupted service delivery. In FY22, Telstra tested the resilience of our physical network assets against five climate hazards. We assessed the potential financial impacts of extreme events from asset loss, asset damage, and service disruption across three scenarios through to 2050 (long-term). We found that, cumulatively over the period to 2050, bushfires are projected to cause the greatest impact to our Australian assets, and that service disruption from physical hazards is projected to be more material than asset damage.

Primary financial effect of the risk

Decreased revenues due to reduced production capacity

Time horizon over which the risk is anticipated to have a substantive effect on the organization

Long-term

Likelihood of the risk having an effect within the anticipated time horizon

Likely

Magnitude

High

Anticipated effect of the risk on the financial position, financial performance and cash flows of the organization in the selected future time horizons

The risk of bushfires is expected to cause disruptions and damage to Telstra’ s network services, resulting in lower revenues due to interrupted service delivery. Our evaluation of potential financial impacts from extreme climate events, such as asset loss, damage, and service disruption, suggests that bushfires are likely to have the most significant influence on our Australian assets up to 2050. We have determined that service disruptions from physical hazards are anticipated to have a more substantial impact than asset damage. It is projected that bushfires could lead to cumulative financial consequences for Telstra ranging from $1,059,916,000 to $1,936,116,000 by 2050.

Are you able to quantify the financial effect of the risk?

Yes

Anticipated financial effect figure in the long-term - minimum (currency)

1059916000

Anticipated financial effect figure in the long-term - maximum (currency)

1936116000

Explanation of financial effect figure

The results of Telstra’ s resilience planning and financial quantification analysis found that, across the three scenarios and five climate hazards analysed, projected costs to Telstra were between $1.4bn to $2.4bn cumulatively to 2050. Bushfires accounted for the majority of these projected costs, specifically 74.8% of the minimum potential cost of $1.4bn and 78.8% of the maximum potential cost of $2.4bn. Min: $1,417,000,000 (minimum cumulative potential cost to Telstra by 2050 across the three scenarios and five climate hazards) / 100 * 74.8% (contribution of bushfires to total minimum financial impact) = $1,059,916,000 Max: $2,457,000,000 (maximum cumulative potential cost to Telstra by 2050 across the three scenarios and five climate hazards) / 100 * 78.8% (contribution of bushfires to total maximum financial impact) = $1,936,116,000

Primary response to risk

Infrastructure, technology and spending : Other infrastructure, technology and spending: Infrastructure upgrades and emergency preparedness

Cost of response to risk

60000000

Explanation of cost calculation

The total cost of addressing this risk amounts to $60 million in FY24. We have an ongoing program to improve battery life at our mobile network sites. The program focuses on battery replacement, power resilience and reliability using disaster risk data to prioritise battery replacement. This is to enable our sites to operate through short term mains power interruptions. In FY24, we have invested nearly $60 million across more than 3,200 battery lifecycle replacement projects. This is in addition to our rollout of automatic transfer units to simplify the process of deploying portable generators at regional sites identified to be at high risk of extreme weather events. Separately from those investments, we will also be making additional decommissioning and energy efficiency investments as we redirect funding from the purchase of carbon credits from FY25 to FY30, to reduce our electricity consumption.

Description of response

We continue to assess the potential impacts of climate change, including physical climate risks on our assets associated with bushfires. In FY22, we started to design the approach to assess physical risk exposure and in FY23 we refined our approach to determining bushfire vulnerability. Building on this in FY24, Telstra responded to the acute physical risk of bushfires, which have the potential to cause substantive financial and strategic impact on our operations, through multiple channels to better mitigate and manage future bushfire impacts on our operations, customers, and revenue. This included several activities: 1. Installation of Automatic Transfer Units (ATUs) to improve how we use portable generators during AC mains power outages. The aim is to reduce costs and improve power resilience. The ATUs will reduce fuel consumption, simplify the generator deployment process, allow for more effective pre-deployment before known events, and improve the visibility of asset performance during events. 2. Battery replacement program, including battery lifecycle replacement, and measures for network efficiency, standalone power systems, and capacity automation for monitoring battery performance and power utilisation. 3. Installation of power ID systems, which support early fire detection. 4. Bushfire preparedness and briefings Telstra coordinated or participated in to educate and prepare for future bushfire events. 5. Upgrade of payphones in disaster prone areas to help keep communities connected when they need it most. Telstra also continues to assess the risk of bushfires in our ISSB IFRS S2 aligned climate-related scenario analyses. This enables us to continue assessing and managing our mitigation and adaptation efforts to minimise disruption and improve power resilience within our network from bushfires in the future.

Response 3: Climate change

Risk identifier

Risk3

Risk types and primary environmental risk driver

Policy: Carbon pricing mechanisms

Value chain stage where the risk occurs

Direct operations

Country/area where the risk occurs

Australia

Organization-specific description of risk

The Australian Government implemented the Emissions Reduction Fund (ERF) Safeguard Mechanism on July 1, 2016, which replaced the former Carbon Pricing Mechanism introduced in 2012. The ERF applies to around 140 large businesses that have facilities with direct (Scope 1) GHG emissions of more than 100k tCO_2e per year, covering around half of Australia's emissions (but currently not including any Telstra facilities). The ERF Safeguard Mechanism requires Australia's largest GHG emitters to keep emissions within determined baseline levels. Facilities that exceed the determined baselined levels may be required to purchase Australian

Carbon Credit Units (ACCUs) to offset additional emissions. Because Telstra's Scope 1 emissions for its Australian operations in FY24 totaled 37,782 metric tonnes CO2e - as reported in our annual NGER report, Telstra is not subject to the ERF Safeguard Mechanism as it does not currently exceed the direct emissions threshold of 100k tCO2e per year. However, there is a risk that if the threshold is lowered in the future, it could result in the ERF Safeguard Mechanism applying to Telstra, impacting us financially via increased operating costs. Some of our key upstream suppliers may be impacted by the ERF Safeguard Mechanism, particularly following its reform in 2023, which means more suppliers may now have to disclose. The increase in operating costs to their organisations poses a risk to Telstra if the cost is passed on through the supply chain.

Primary financial effect of the risk

Increased indirect [operating] costs

Time horizon over which the risk is anticipated to have a substantive effect on the organization

Short-term

Likelihood of the risk having an effect within the anticipated time horizon

About as likely as not

Magnitude

Low

Anticipated effect of the risk on the financial position, financial performance and cash flows of the organization in the selected future time horizons

If the threshold for the ERF Safeguard Mechanism is lowered, Telstra facilities' emissions could exceed the threshold and trigger the Safeguard Mechanism. This might mean that Telstra needs to buy Australian Carbon Credit Units (ACCUs) to balance out emissions above this threshold, leading to increased operating costs.

Are you able to quantify the financial effect of the risk?

Yes

Anticipated financial effect figure in the short-term - minimum (currency)

1673500

Anticipated financial effect figure in the short-term - maximum (currency)

1673500

Explanation of financial effect figure

No Telstra facilities currently exceed the threshold for the ERF Safeguard Mechanism. However, if a Telstra facility were to hypothetically exceed the emissions threshold by 50k tCO2e, the cost of acquiring ACCUs to offset the difference from the threshold of 100k tCO2e could be almost 900k (based on the FY24 average ACCU spot price of 33.47 / tCO2e per year (Refer to CER page at https://cer.gov.au/markets/reports-and-data/quarterly-carbon-market-reports/quarterly-carbon-market-report-june-quarter-2024 Australian carbon credit units (ACCUs) Clean Energy Regulator (cer.gov.au). 50,000 tCO2e x ACCU price 33.47 = 1,673,500 cost to Telstra

Primary response to risk

Infrastructure, technology and spending : Increase environment-related capital expenditure

Cost of response to risk

800000

Explanation of cost calculation

The cost of responding includes internal estimates for third-party audit costs and employee and consultant resources for monitoring changes to the Safeguard Mechanism.

Description of response

While the ERF Safeguard Mechanism does not currently impact Telstra's direct operations, it is being managed by monitoring Telstra's annual GHG emissions and emissions levels through energy reduction projects, setting ambitious targets, calculating Scope 1 GHG emissions for Telstra facilities, assessing against the threshold and gaining limited assurance on the data. Telstra also has an established method to annually collect detailed Scope 1 emissions at a facility level to inform NGER reporting commitments and ensure the threshold is not exceeded. GHG emissions data undergoes external limited assurance to ensure data are robust. In FY24, Telstra's total Scope 1 GHG emissions for all Australian operations were 37,782 tCO2e and, therefore, below the threshold. However, due to the difference in rounding according to the NGER computation, there is a slight difference in Scope 1 emissions disclosed to NGER, at 32,771 tCO2e which is still in compliance with the NGER Act. During the consultation of the ERF Safeguard Mechanism, Telstra attended Australian Government workshops to develop the safeguard requirements. This preliminary involvement in policy development enabled Telstra to contribute to the consideration of potential impacts the Mechanism could have had on its operations.

Q3.1.2 Provide the amount and proportion of your financial metrics from the reporting year that are vulnerable to the substantive effects of environmental risks.

Response 1: Climate change

Financial metric

Assets

Amount of financial metric vulnerable to transition risks for this environmental issue (unit currency as selected in 1.2)

0

% of total financial metric vulnerable to transition risks for this environmental issue

Less than 1%

Amount of financial metric vulnerable to physical risks for this environmental issue (unit currency as selected in 1.2)

86000000

% of total financial metric vulnerable to physical risks for this environmental issue

Less than 1%

Explanation of financial figures

We have assessed our exposure to chronic temperature rise, bushfires, tropical cyclones, coastal inundation, coastal erosion and intense rainfall events at an asset level. We assess Telstra's exposure under three scenarios:
・Accelerated Action - which limits global heating to less than 2o C by 2100 ・ Divided World - which models

global heating to between 2-3o C by 2100 ・Changed Climate - which sees global heating greater than 4o C by 2100.

Our analysis has identified three significant climate-related impacts to our business based on vulnerability, likelihood and consequence of acute and chronic physical hazards: ・ Direct damage to our assets and infrastructure ・ Loss of mains electricity ・ Financial impacts associated with service disruption payments. Direct damage to our assets requires unplanned expenditure to complete repairs. Loss of mains electricity leads to increased expenditure to support the deployment and refuelling of backup power generators and temporary infrastructure. Both direct asset damage and loss of mains electricity can trigger financial impacts associated with service disruption payments. In financial terms, we found the cost of asset loss and service disruption between now and 2030 under all three scenarios would average $44 million per annum, noting exposure will be non-linear. Between FY30 and FY50 the average financial impact ranged from $50 million per annum ($1.4 billion cumulatively) in the Accelerated Action scenario to $86 million per annum ($2.4 billion cumulatively) in the Changed Climate modelling. The $86 million figure represents the maximum amount of our assets that are vulnerable to the substantive effects of climate change in the worst case scenario.

Q3.5 Are any of your operations or activities regulated by a carbon pricing system (i.e. ETS, Cap & Trade or Carbon Tax)?

No, and we do not anticipate being regulated in the next three years

Q3.6 Have you identified any environmental opportunities which have had a substantive effect on your organization in the reporting year, or are anticipated to have a substantive effect on your organization in the future?

Yes, we have identified opportunities, and some/all are being realized

Q3.6.1 Provide details of the environmental opportunities identified which have had a substantive effect on your organization in the reporting year, or are anticipated to have a substantive effect on your organization in the future.

Response 1: Climate change

Opportunity identifier

Opp1

Opportunity type and primary environmental opportunity driver

Resource efficiency: Use of new technologies

Value chain stage where the opportunity occurs

Direct operations

Country/area where the opportunity occurs

Australia

Organization specific description

Telstra’s climate targets include reducing our Scope 1 and 2 absolute emissions by at least 70% by 2030, reducing our scope 3 emissions by at least 50% by 2030 (both from a FY19 baseline) and enabling renewable energy generation equivalent to 100% of our consumption by 2025. In the shift towards a low-carbon economy and as the operator or licensor of 290 Telstra retail stores plus exchanges and data centres across Australia, Telstra has an opportunity to increase energy efficiency within its operations to reduce the company’s consumption of fossil fuel-based energy, our GHG emissions and in turn, our operating costs. Each year, Telstra implements energy efficiency projects and network savings projects to decrease our energy consumption and operating costs progressively. Annual network decommissioning projects also contribute to energy savings and emissions reduction. Thus, our activities to improve energy efficiency are undertaken across five key areas: Audits & optimisation, Upgrading building services assets, Network facilities efficiencies, Network decommissioning, and Monitoring & data analytics.

Primary financial effect of the opportunity

Reduced indirect (operating) costs

Time horizon over which the opportunity is anticipated to have a substantive effect on the organization

The opportunity has already had a substantive effect on our organization in the reporting year

Magnitude

Low

Effect of the opportunity on the financial position, financial performance and cash flows of the organization in the reporting period

As a result of our emissions reduction measures, in FY24, both energy efficiency and decommissioning savings totaled 6,295 and 54,659 tCO2e, respectively, resulting in a total gross annualised saving of 60,954 tCO2e.

Are you able to quantify the financial effects of the opportunity?

Yes

Financial effect figure in the reporting year (currency)

20000000

Explanation of financial effect figures

In FY24, our energy efficiency programs delivered
a collective annualised saving of 6,295 tCO2e and 8,082 MWh electricity. In addition to our energy efficiency projects, we saved a further 54,659 tCO2e and 73,694 MWh annualised through decommissioning legacy network equipment and network energy efficiency enhancements. Combining the electricity savings from energy efficiency and decommissioning (81,776 MWh), with an average energy cost, we estimate a total gross annualised cost savings of around $20,000,000 in FY24.

Cost to realize opportunity

23000000

Explanation of cost calculation

The cost to realise this opportunity include the costs of Telstra’s investments in all energy and network efficiency projects (across the five areas previously outlined) in the reporting year. Cost to realise opportunity ($23 million).

Strategy to realize opportunity

The cost savings from energy efficiency and emissions reduction projects is a key climate-related opportunity for Telstra. To realise the opportunity of reduced operating costs as a result of network and energy efficiency projects, Telstra continues to implement these efficiency projects and identify other areas for optimisation. In FY24, our investment in energy reduction projects, including both energy efficiency and decommissioning, was $23 million. In FY24, our energy efficiency programs delivered a collective annualised saving of 6,295 tCO2e and 8,082 MWh electricity. In addition to our energy efficiency projects, we saved a further 54,659 tCO2e and 73,694 MWh annualised through decommissioning legacy network equipment and network energy efficiency enhancements. Telstra also works to realise this opportunity through our Environment Strategy. As part of our Environment Strategy, we have a strategic priority to manage GHG emissions, continue investments in energy efficiency and increase our support of Australia’ s renewable energy sector. Our climate change strategy includes a target to become net zero by 2050 and reduce Scope 1 and 2 absolute emissions by 70% by 2030 (from an FY19 baseline). By the end of FY24, we were able to reduce our gross global Scope 1 and Scope 2 (location-based) emissions by 37% compared to FY24.

Q3.6.2 Provide the amount and proportion of your financial metrics in the reporting year that are aligned with the substantive effects of environmental opportunities.

Response 1: Climate change

Financial metric

CAPEX

Amount of financial metric aligned with opportunities for this environmental issue (unit currency as selected in 1.2)

60000000

% of total financial metric aligned with opportunities for this environmental issue

Less than 1%

Explanation of financial figures

Since FY19, we have invested over $110 million in emissions reduction programs across our networks and infrastructure, including over $23 million in FY24, which has delivered over 60,000 tCO2e annualised emissions reduction. In FY24, this included $6 million of CAPEX on several energy efficiency and decommissioning initiatives including: - Building upgrades, such as the installation of fresh air cooling systems, high-efficiency air-conditioners, improved cooling control strategies and building management, and electronically commutated fans - HVAC optimisation - LED lighting installation and Rectifier upgrades. In addition to decarbonisation, these projects have also reduced our operational costs by reducing our annual energy, maintenance, and carbon credit expenses. These initiatives only reflect the specific investment in emissions reduction activities and do not include broader investment to upgrade our network, which also delivers emissions reduction benefits.

% figure calculation: Total FY24 CAPEX / $5.064 billion * FY24 CAPEX % = ($6,000,000/$5,064,000,000) x 100 = 0.12%

Response 2: Climate change

Financial metric

OPEX

Amount of financial metric aligned with opportunities for this environmental issue (unit currency as selected in 1.2)

17000000

% of total financial metric aligned with opportunities for this environmental issue

Less than 1%

Explanation of financial figures

Since FY19, we have invested over $110 million in emissions reduction programs across our networks and infrastructure, including over $23 million in FY24, which will deliver over 60,000 tCO2e annualised emissions reduction. In FY24, this investment included $17 million of OPEX on several energy efficiency and decommissioning initiatives including: - Network facility efficiencies - The rationalisation and decommissioning of Telstra’ s legacy network equipment, reducing both direct energy consumption from the equipment and associated energy for cooling. In addition to decarbonisation, these projects have also reduced our operational costs by reducing our annual energy, maintenance, and carbon credit expenses. These initiatives only reflect the specific investment in emissions reduction activities and do not include broader investment to upgrade our network, which also delivers emissions reduction benefits. % figure calculation: Total FY24 OPEX / $15.938 billion * FY24 OPEX % = ($17,000,000/$15,938,000,000) x 100 = 0.11%

Q4.1 Does your organization have a board of directors or an equivalent governing body?

Response 1:

Board of directors or equivalent governing body

Yes

Frequency with which the board or equivalent meets

More frequently than quarterly

Types of directors your board or equivalent is comprised of

- Non-executive directors or equivalent
- Executive directors or equivalent

Board diversity and inclusion policy

Yes, and it is publicly available

Briefly describe what the policy covers

The 2024 Corporate Governance Statement outlines how Telstra considers corporate governance, including board diversity.

The Board considers diversity through a number of lenses to provide fresh thinking and different perspectives on the Board (gender, age, experience, and beyond). In appointing new Directors, the Board aims to have the right balance of skills, knowledge, experience and diversity on the Board to enable it to discharge its responsibilities effectively and add value.

For FY24, the Board’ s diversity objective was to maintain (at least) 40% representation of women, 40% representation of men and 20% representation of any gender among non-executive Directors.

As of 30 June 2024, four of our non-executive Directors were women, equating to 50% representation of women among non-executive Directors. In total there are five Directors who are women on the Board (including our CEO), equating to 55.6% representation of women on the overall Board.

In addition, Telstra’ s Diversity, Equity and Inclusion (DEI) Policy outlines the company commitment to fostering a diverse workforce including specific reference to the Boards’ own mix of diversity, stating that:

\’ The Telstra Board:... • seeks to ensure it has an appropriate mix of diversity, including gender, skills, experience and expertise to discharge its responsibilities effectively and will have at least one measurable objective relating to Board diversity representation...\’ .

Attach the policy (optional)

Telstra diversity-equity-and-inclusion-policy.pdf,Telstra-2024-corporate-governance-statement.pdf

Q4.1.1 Is there board-level oversight of environmental issues within your organization?

	Board-level oversight of this environmental issue
Climate change	Yes
Biodiversity	Yes

Q4.1.2 Identify the positions (do not include any names) of the individuals or committees on the board with accountability for environmental issues and provide details of the board’s oversight of environmental issues.

Response 1: Climate change

Positions of individuals or committees with accountability for this environmental issue

Board-level committee

Positions’ accountability for this environmental issue is outlined in policies applicable to the board

Yes

Policies which outline the positions’ accountability for this environmental issue

Other policy applicable to the board: Board Charter, Audit and Risk Charter [FY24]

Frequency with which this environmental issue is a scheduled agenda item

Scheduled agenda item in some board meetings - at least annually

Governance mechanisms into which this environmental issue is integrated

- Overseeing and guiding major capital expenditures
- Overseeing and guiding the development of a business strategy
- Overseeing the setting of corporate targets
- Reviewing and guiding the assessment process for dependencies, impacts, risks, and opportunities
- Approving and/or overseeing employee incentives
- Monitoring progress towards corporate targets
- Monitoring the implementation of a climate transition plan
- Overseeing and guiding acquisitions, mergers, and divestitures
- Overseeing and guiding the development of a climate transition plan

Please explain

In FY24, the charters for our Board and the Audit & Risk Committee (ARC) specify that both have climate-related responsibilities. The Board is responsible for overseeing Telstra’s approach to sustainability, monitoring its performance, and approving Telstra’s key external environmental targets and select environmental disclosures. . The Board plays a role in identifying our material sustainability topics to inform our strategy and program development, and annual reporting. To assist the Board in its responsibilities, the ARC reviews significant developments in ESG (including climate change) performance. [Audit and Risk Committee Charter, 4.8.1]. The ARC also “reviews reports from management on Telstra’s climate and nature-related risks, risk management plans and makes recommendations to the Board on Telstra’s key external environmental targets and selected environmental disclosures as well as overseeing other selected environmental disclosures” [Audit and Risk Committee Charter, 4.8.2].

As part of the Board’s oversight of climate-related issues, they rely on the following management governance structure: (1) the Chair of the Environment Executives Group (the Chief Sustainability Officer (CSO)) provides regular climate change updates to the broader CEO Leadership Team (CEOLT); (2) the Group Executive of Sustainability, External Affairs, Legal, Risk & Compliance (a member of the CEOLT) and the CSO provide climate change updates regularly to the ARC and the Board. Strategy and major plans of action are reviewed regularly by the Board. These governance mechanisms and structure support the Board’s oversight of our climate-related risks and opportunities, which is one of our sustainability governance priorities. The Board also oversees and provides guidance on the high-level settings in Telstra’s annual budgets, as well as approving external environmental targets. The People & Remuneration Committee of the Board oversees employee incentives. As a result of the committee’s assessment and review of Telstra’s Executive Variable Remuneration Plan (EVP) and Employee Short-Term Incentive (STI) Plan, in FY24, our EVP and Telstra Group STI Plan incorporated our Scope 1+2 and Scope 3 absolute emissions reduction targets as part of their performance measures. This made emissions reduction a component of senior executive (EVP) short-term incentives within our remuneration structure.

Response 2: Biodiversity

Positions of individuals or committees with accountability for this environmental issue

Board-level committee

Positions’ accountability for this environmental issue is outlined in policies applicable to the board

No

Q4.2 Does your organization’s board have competency on environmental issues?

Response 1: Climate change

Board-level competency on this environmental issue

Yes

Mechanisms to maintain an environmentally competent board

- Consulting regularly with an internal, permanent, subject-expert working group
- Engaging regularly with external stakeholders and experts on environmental issues
- Having at least one board member with expertise on this environmental issue
- Regular training for directors on environmental issues, industry best practice, and standards (e.g., TCFD, SBTi)
- Integrating knowledge of environmental issues into board nominating process

Environmental expertise of the board member

・Experience: Active member of an environmental committee or organization
・Experience: Experience in an organization that is exposed to environmental-scrutiny and is going through a sustainability transition

Q4.3 Is there management-level responsibility for environmental issues within your organization?

	Management-level responsibility for this environmental issue
Climate change	Yes
Biodiversity	Yes

Q4.3.1 Provide the highest senior management-level positions or committees with responsibility for environmental issues (do not include the names of individuals).

Response 1: Climate change

Position of individual or committee with responsibility

Executive level: Chief Executive Officer (CEO)

Environmental responsibilities of this position

・Dependencies, impacts, risks and opportunities: Managing environmental dependencies, impacts, risks, and opportunities
・Strategy and financial planning: Developing a business strategy which considers environmental issues
・Other: Providing employee incentives related to environmental performance
・Strategy and financial planning: Managing major capital and/or operational expenditures relating to environmental issues
・Policies, commitments, and targets: Setting corporate environmental targets
・Dependencies, impacts, risks and opportunities: Assessing environmental dependencies, impacts, risks, and opportunities
・Strategy and financial planning: Managing priorities related to innovation/low-environmental impact products or services (including R&D)
・Dependencies, impacts, risks and opportunities: Assessing future trends in environmental dependencies, impacts, risks, and opportunities

Reporting line

Reports to the board directly

Frequency of reporting to the board on environmental issues

Quarterly

Please explain

The CEO leads the team responsible for reporting to the Board on the development and implementation of Telstra’s Sustainability Strategy, Environment Strategy and our comprehensive, company-wide T25 strategy, as well as the overall management and performance of our company. The CEO leads the CEO Leadership Team (CEOLT) which includes the Chief Financial Officer (CFO), Group Executives, and Group General Counsel & Group Executive Sustainability, External Affairs, Legal, Risk & Compliance. The CEO leads management oversight of our T25 Strategy (of which sustainability is an integral part), as well as reviewing and guiding Telstra’s Environment Strategy, our key climate commitments (reducing our scope 1+2 emissions by at least

70% by 2030, reducing our scope 3 emissions by at least 50% by 2030, and enabling renewable energy generation equivalent to 100% of our consumption by 2025, as well as our three resource efficiency commitments (reuse or recycle 650,000 mobile phones, modems and other devices each year to 2025, ensuring 100% of Telstra branded packaging is made of renewable or recycled material and is fully recyclable by 2022 (target was achieved in October 2022), and increasing our network waste recycling rate to 90% by 2025).
The CEO has overall management responsibility for governance, strategy, risk management and performance (including for climate-related issues) within Telstra.

Response 2: Biodiversity

Position of individual or committee with responsibility

Executive level: Chief Executive Officer (CEO)

Environmental responsibilities of this position

・ Policies, commitments, and targets: Setting corporate environmental targets
・ Strategy and financial planning: Managing priorities related to innovation/low-environmental impact products or services (including R&D)
・ Dependencies, impacts, risks and opportunities: Managing environmental dependencies, impacts, risks, and opportunities
・ Strategy and financial planning: Managing major capital and/or operational expenditures relating to environmental issues
・ Dependencies, impacts, risks and opportunities: Assessing future trends in environmental dependencies, impacts, risks, and opportunities
・ Strategy and financial planning: Developing a business strategy which considers environmental issues
・ Dependencies, impacts, risks and opportunities: Assessing environmental dependencies, impacts, risks, and opportunities

Reporting line

Reports to the board directly

Frequency of reporting to the board on environmental issues

Quarterly

Please explain

The CEO leads the team responsible for reporting to the Board on the development and implementation of Telstra’s Sustainability Strategy, Environment Strategy and our comprehensive, company-wide T25 strategy, as well as the overall management and performance of our company. The CEO has overall management responsibility for governance, strategy, risk management and performance (including for biodiversity-related issues) within Telstra.

Response 3: Climate change

Position of individual or committee with responsibility

Committee: Other committee: CEO Leadership Team

Environmental responsibilities of this position

・ Strategy and financial planning: Managing acquisitions, mergers, and divestitures related to environmental issues
・ Policies, commitments, and targets: Setting corporate environmental targets

- Dependencies, impacts, risks and opportunities: Managing environmental dependencies, impacts, risks, and opportunities
- Policies, commitments, and targets: Measuring progress towards environmental corporate targets
- Other: Providing employee incentives related to environmental performance
- Strategy and financial planning: Managing priorities related to innovation/low-environmental impact products or services (including R&D)
- Strategy and financial planning: Managing major capital and/or operational expenditures relating to environmental issues
- Engagement: Managing public policy engagement related to environmental issues
- Strategy and financial planning: Implementing a climate transition plan
- Strategy and financial planning: Developing a business strategy which considers environmental issues

Reporting line

Reports to the Chief Executive Officer (CEO)

Frequency of reporting to the board on environmental issues

More frequently than quarterly

Please explain

The CEO Leadership Team review regular updates (at least quarterly) on climate and nature-related risks from the Sustainability Executive. They deliver management decisions and oversight in relation to Telstra Group's sustainability strategy to effectively manage climate and sustainability risk within risk appetite.

The Group Executive, Sustainability, External Affairs, Legal, Risk and Compliance is a member of CEOLT and also Telstra's Group General Counsel and leads the provision of legal advice to management and the Board. They also lead a function responsible for policy advice, stakeholder management and community programs across government relations, regulatory, risk and compliance, sustainability, First Nations strategy and engagement, and regional affairs. The Group Executive's climate-related responsibility includes overseeing ESG strategy, reporting and disclosures, targets and management of risks and opportunities.

Response 4: Climate change

Position of individual or committee with responsibility

Executive level: Chief Sustainability Officer (CSO)

Environmental responsibilities of this position

- Strategy and financial planning: Managing environmental reporting, audit, and verification processes
- Policies, commitments, and targets: Setting corporate environmental targets
- Engagement: Managing public policy engagement related to environmental issues
- Strategy and financial planning: Implementing a climate transition plan
- Dependencies, impacts, risks and opportunities: Assessing environmental dependencies, impacts, risks, and opportunities
- Policies, commitments, and targets: Measuring progress towards environmental corporate targets
- Engagement: Managing value chain engagement related to environmental issues
- Strategy and financial planning: Conducting environmental scenario analysis
- Dependencies, impacts, risks and opportunities: Managing environmental dependencies, impacts, risks, and opportunities
- Strategy and financial planning: Managing annual budgets related to environmental issues

Reporting line

Other: Group Executive Sustainability, External Affairs, Legal, Risk & Compliance

Frequency of reporting to the board on environmental issues

More frequently than quarterly

Please explain

The CSO is accountable for the design and implementation of Telstra’ s sustainability strategy and leads management governance of ESG targets. The CSO provides regular climate change updates to the CEOLT, Audit and Risk Committee and Board and also chairs the Environment Executives Group. They provide day-to-day leadership on Telstra’ s climate ambition, determines key priorities, and executes senior management decisions on climate-related matters. This includes providing recommendations to the CEOLT on key climate change focus areas, including appropriate targets and our strategic response to climate impacts.

Response 5: Climate change

Position of individual or committee with responsibility

Other: Other: Environment Executives Group

Environmental responsibilities of this position

- Dependencies, impacts, risks and opportunities: Assessing future trends in environmental dependencies, impacts, risks, and opportunities
- Strategy and financial planning: Managing annual budgets related to environmental issues
- Strategy and financial planning: Managing major capital and/or operational expenditures relating to environmental issues
- Engagement: Managing supplier compliance with environmental requirements
- Dependencies, impacts, risks and opportunities: Managing environmental dependencies, impacts, risks, and opportunities
- Engagement: Managing value chain engagement related to environmental issues
- Dependencies, impacts, risks and opportunities: Assessing environmental dependencies, impacts, risks, and opportunities
- Policies, commitments, and targets: Measuring progress towards environmental corporate targets

Reporting line

Other: CEO Leadership Team

Frequency of reporting to the board on environmental issues

More frequently than quarterly

Please explain

The role of the Environment Executives Group (EEG) is to provide directional leadership on Telstra’ s climate ambition, determine key priorities, and execute management decisions on climate-related matters. This includes providing recommendations to the CEOLT on key climate change focus areas, including appropriate targets and our strategic response to climate impacts. The EEG helps to ensure climate change receives the appropriate level of attention in CEOLT discussions when required. The Chief Sustainability Officer chairs the EEG.

Response 6: Biodiversity

Position of individual or committee with responsibility

Committee: Other committee: CEO Leadership Team

Environmental responsibilities of this position

・Strategy and financial planning: Managing annual budgets related to environmental issues
・Dependencies, impacts, risks and opportunities: Managing environmental dependencies, impacts, risks, and opportunities
・Strategy and financial planning: Managing acquisitions, mergers, and divestitures related to environmental issues
・Policies, commitments, and targets: Measuring progress towards environmental corporate targets
・Policies, commitments, and targets: Setting corporate environmental targets
・Strategy and financial planning: Managing priorities related to innovation/low-environmental impact products or services (including R&D)
・Engagement: Managing public policy engagement related to environmental issues
・Strategy and financial planning: Developing a business strategy which considers environmental issues
・Strategy and financial planning: Managing major capital and/or operational expenditures relating to environmental issues

Reporting line

Reports to the Chief Executive Officer (CEO)

Frequency of reporting to the board on environmental issues

Quarterly

Please explain

The CEO Leadership Team membership is made up of the CEO, CFO, Group Executives, and Group General Counsel & Group Executive Sustainability, External Affairs, Legal, Risk & Compliance. With CEO approval, the CEOLT recommends decisions to the Board and approves or endorses Telstra’s approach on key biodiversity areas, including briefing the Board and Audit & Risk Committee on important risks and opportunities that must be considered and/or addressed (i.e., biodiversity-related risks and opportunities that have the potential to affect our business strategy and overall performance).

Response 7: Biodiversity

Position of individual or committee with responsibility

Executive level: General Counsel

Environmental responsibilities of this position

・Dependencies, impacts, risks and opportunities: Managing environmental dependencies, impacts, risks, and opportunities
・Policies, commitments, and targets: Measuring progress towards environmental corporate targets
・Strategy and financial planning: Developing a business strategy which considers environmental issues
・Policies, commitments, and targets: Setting corporate environmental targets
・Engagement: Managing public policy engagement related to environmental issues
・Strategy and financial planning: Managing annual budgets related to environmental issues

Reporting line

Reports to the Chief Executive Officer (CEO)

Frequency of reporting to the board on environmental issues

More frequently than quarterly

Please explain

The Group Executive Sustainability, External Affairs, Legal, Risk & Compliance is also Telstra’s Group General Counsel and leads the provision of legal advice to management and the Board. They also lead a function responsible for policy advice, stakeholder management and community programs across government relations, regulatory, risk and compliance, sustainability, First Nations strategy and engagement, and regional affairs. The Group Executive’s biodiversity-related responsibility includes overseeing ESG strategy, reporting and disclosures, and management of risks and opportunities related to biodiversity.

Response 8: Biodiversity

Position of individual or committee with responsibility

Executive level: Chief Sustainability Officer (CSO)

Environmental responsibilities of this position

・ Strategy and financial planning: Conducting environmental scenario analysis
・ Engagement: Managing value chain engagement related to environmental issues
・ Policies, commitments, and targets: Setting corporate environmental targets
・ Engagement: Managing public policy engagement related to environmental issues
・ Strategy and financial planning: Managing annual budgets related to environmental issues
・ Policies, commitments, and targets: Measuring progress towards environmental corporate targets
・ Strategy and financial planning: Managing environmental reporting, audit, and verification processes
・ Dependencies, impacts, risks and opportunities: Assessing environmental dependencies, impacts, risks, and opportunities
・ Dependencies, impacts, risks and opportunities: Managing environmental dependencies, impacts, risks, and opportunities

Reporting line

Other: Group Executive Sustainability, External Affairs, Legal, Risk & Compliance

Frequency of reporting to the board on environmental issues

Half-yearly

Please explain

The CSO is accountable for the design and implementation of Telstra’s sustainability strategy and leads management governance of ESG targets. The CSO provides regular biodiversity updates to the CEOLT, Audit and Risk Committee and Board and also chairs the Environment Executives Group. They provide day-to-day leadership on Telstra’s biodiversity initiatives, determines key priorities, and executes senior management decisions on biodiversity-related matters. This includes providing recommendations to the CEOLT on key biodiversity focus areas, including appropriate targets and our strategic response to biodiversity impacts.

Response 9: Biodiversity

Position of individual or committee with responsibility

Other: Other: Environment Executive Group

Environmental responsibilities of this position

・ Engagement: Managing supplier compliance with environmental requirements
・ Dependencies, impacts, risks and opportunities: Assessing environmental dependencies, impacts, risks, and opportunities
・ Engagement: Managing value chain engagement related to environmental issues
・ Strategy and financial planning: Managing major capital and/or operational expenditures relating to environmental issues
・ Dependencies, impacts, risks and opportunities: Assessing future trends in environmental dependencies, impacts, risks, and opportunities
・ Strategy and financial planning: Managing annual budgets related to environmental issues
・ Policies, commitments, and targets: Measuring progress towards environmental corporate targets
・ Dependencies, impacts, risks and opportunities: Managing environmental dependencies, impacts, risks, and opportunities

Reporting line

Other: CEO Leadership Team

Frequency of reporting to the board on environmental issues

More frequently than quarterly

Please explain

The role of the Environment Executives Group (EEG) is to provide directional leadership on Telstra’s biodiversity initiatives, determine key priorities, and execute management decisions on biodiversity-related matters. This includes providing recommendations to the CEOLT on key biodiversity focus areas, including our strategic response to biodiversity impacts. The EEG helps to ensure biodiversity receives the appropriate level of attention in CEOLT discussions when required. The Chief Sustainability Officer chairs the EEG.

Response 10: Climate change

Position of individual or committee with responsibility

Executive level: General Counsel

Environmental responsibilities of this position

・ Engagement: Managing public policy engagement related to environmental issues
・ Strategy and financial planning: Developing a business strategy which considers environmental issues
・ Policies, commitments, and targets: Setting corporate environmental targets
・ Strategy and financial planning: Managing annual budgets related to environmental issues
・ Dependencies, impacts, risks and opportunities: Managing environmental dependencies, impacts, risks, and opportunities
・ Policies, commitments, and targets: Measuring progress towards environmental corporate targets

Reporting line

Reports to the Chief Executive Officer (CEO)

Frequency of reporting to the board on environmental issues

More frequently than quarterly

Please explain

The Group Executive Sustainability, External Affairs, Legal, Risk & Compliance is also Telstra’s Group General Counsel and leads the provision of legal advice to management and the Board. They also lead a function responsible for policy advice, stakeholder management and community programs across government relations, regulatory, risk and compliance, sustainability, First Nations strategy and engagement, and regional affairs. The Group Executive’ s climate-related responsibility includes overseeing ESG strategy, reporting and disclosures, targets and management of risks and opportunities.

Q4.5 Do you provide monetary incentives for the management of environmental issues, including the attainment of targets?

Response 1: Climate change

Provision of monetary incentives related to this environmental issue

Yes

% of total C-suite and board-level monetary incentives linked to the management of this environmental issue

5

Please explain

Remuneration for our executives and most of our employees includes a variable component linked to performance against a range of companywide targets and personal objectives. In FY24, the selected company objectives included our absolute scope 1+2 and scope 3 emissions reduction targets. For our senior executives, 5 per cent of the Executive Variable Remuneration Plan (EVP) was linked to performance against our targets. For most other employees 5 per cent (Bands A-1) and 7.5 per cent (Bands 2-4) of their Short-Term Incentive scorecard was also linked to performance against those targets. Some executives and employees with climate-related accountabilities have climate-related outcomes incorporated in their personal objectives and hence variable remuneration is directly tied to those outcomes.

Q4.5.1 Provide further details on the monetary incentives provided for the management of environmental issues (do not include the names of individuals).

Response 1: Climate change

Position entitled to monetary incentive

Board or executive level: Chief Executive Officer (CEO)

Incentives

Bonus - % of salary

Performance metrics

- Strategy and financial planning: Achievement of climate transition plan
- Targets: Achievement of environmental targets
- Targets: Progress towards environmental targets
- Emission reduction: Reduction in absolute emissions

Incentive plan the incentives are linked to

Short-Term Incentive Plan, or equivalent, only (e.g. contractual annual bonus)

Further details of incentives

Our CEO’s remuneration includes financial incentives linked to personal and company performance, as outlined in our 2024 Remuneration Report. Each Senior Executive’s Individual Executive Variable Plan (EVP) remuneration outcome for FY24 was determined having regard to the EVP Scorecard Outcome, their at-target EVP opportunity and their individual performance and was ultimately at the discretion of the Board. The Board determined the EVP Scorecard Outcome following an assessment of Telstra’s performance measures under the FY24 EVP. In FY24 the EVP Scorecard included performance against our Scope 1+2 and scope 3 emissions reduction targets, creating a clearer and stronger link between senior executive variable remuneration and progress towards that target.

How the position’s incentives contribute to the achievement of your environmental commitments and/or climate transition plan

Telstra’s remuneration philosophy is based on linking financial rewards directly to employee contributions and company performance. In FY20, Telstra’s revised climate commitments were endorsed by the CEO Leadership Team and approved by the Board. These commitments formed 6 headline targets focused on climate change, energy and resource efficiency. That target list was subsequently revised. In FY24 our environment targets were enabling renewable energy generation equivalent to 100% of our consumption by 2025, reducing our scope 1+2 emissions by at least 70% by 2030 from a FY19 baseline, reducing our scope 3 emissions by at least 50% by 2030 from a FY19 baseline, reusing or recycling 650,000 mobile phones, modems and other devices each year to 2025, and increasing our network waste recycling rate to 90% by 2025. Doing business responsibly is a key part of our T25 Strategy, which was published in FY22. In FY24, three of our climate targets - to reduce scope 1+2 emissions by at least 70% by 2030 (from a FY19 baseline), to reduce scope 3 emissions by at least 50% by 2030 (from a FY19 baseline) and to enable renewable energy generation equivalent to 100% of our consumption by 2025 - are part of our T25 Scorecard against which management performance towards our T25 Strategy is assessed. In FY24, we incorporated both our scope 1+2 and scope 3 absolute emissions reduction targets into the performance measures for our Executive Variable Remuneration Plan (EVP), making it a component of senior executive short-term incentives under our remuneration structure.

Response 2: Climate change

Position entitled to monetary incentive

Board or executive level: General Counsel

Incentives

Bonus - % of salary

Performance metrics

- Targets: Progress towards environmental targets
- Targets: Achievement of environmental targets
- Strategy and financial planning: Achievement of climate transition plan
- Emission reduction: Reduction in absolute emissions

Incentive plan the incentives are linked to

Short-Term Incentive Plan, or equivalent, only (e.g. contractual annual bonus)

Further details of incentives

The remuneration of the Group Executive, Sustainability, External Affairs, Legal, Risk & Compliance (General Counsel) included short-term financial incentives linked to both personal and company performance. This included having regard to factors including a specified number of financial, strategic, customer and transformation priorities as well as individual performance. In FY24 our variable remunerations plans explicitly include performance against our scope 1+2 and scope 3 emissions reduction targets as one of the specified financial, strategic, customer and transformation priorities, creating a clearer and stronger link between variable remuneration and progress towards that target.

How the position's incentives contribute to the achievement of your environmental commitments and/or climate transition plan

Telstra's remuneration philosophy is based on linking financial rewards directly to employee contributions and company performance. In FY20, Telstra's revised climate commitments were endorsed by the CEO Leadership Team and approved by the Board. These commitments formed 6 headline targets focused on climate change, energy and resource efficiency. That target list was subsequently revised. In FY24 our environment targets were enabling renewable energy generation equivalent to 100% of our consumption by 2025, reducing our scope 1+2 emissions by at least 70% by 2030 from a FY19 baseline, reducing our scope 3 emissions by at least 50% by 2030 from a FY19 baseline, reusing or recycling 650,000 mobile phones, modems and other devices each year to 2025, and increasing our network waste recycling rate to 90% by 2025.

Doing business responsibly is a key part of our T25 Strategy which was published in FY22. In FY24, three of our climate targets - to reduce scope 1+2 emissions by at least 70% by 2030 (from a FY19 baseline), to reduce our scope 3 emissions by at least 50% by 2030 from a FY19 baseline and to enable renewable energy generation equivalent to 100% of our consumption by 2025 - are part of our T25 Scorecard against which management performance towards our T25 Strategy is assessed.

In FY24, we incorporated our scope 1 + 2 and scope 3 emissions reduction targets into the performance measures for our Executive Variable Remuneration Plan (EVP), making it a component of senior executive short-term incentives under our remuneration structure. This recognises the critical nature of this target to our organisation's success and each team member's role to achieve it.

Response 3: Climate change

Position entitled to monetary incentive

Board or executive level: Chief Sustainability Officer (CSO)

Incentives

Bonus - % of salary

Performance metrics

- Strategy and financial planning: Achievement of climate transition plan
- Targets: Progress towards environmental targets
- Targets: Achievement of environmental targets
- Emission reduction: Reduction in absolute emissions

Incentive plan the incentives are linked to

Short-Term Incentive Plan, or equivalent, only (e.g. contractual annual bonus)

Further details of incentives

The remuneration of the CSO included short-term financial incentives linked to both personal and company performance. This included having regard to factors including a specified number of financial, strategic, customer and transformation priorities as well as individual performance. In FY24 our variable remunerations plans have been amended to explicitly include performance against our scope 1+2 and scope 3 emissions reduction target as one of the specified financial, strategic, customer and transformation priorities as well as individual performance.
The remuneration of the Environment team and other staff directly engaged in environment initiatives included short-term financial incentives linked to both personal and company performance. This included

having regard to factors including a specified number of financial, strategic, customer and transformation priorities as well as individual performance. Telstra’s Sustainability function and other staff directly engaged in environment initiatives have individual goals linked to the delivery of environment objectives (including climate change and emissions-related objectives such as Telstra’s headline targets). They receive monetary rewards based on the successful implementation of those goals. In FY24 our variable remunerations plans have been amended to explicitly include performance against our scope 1+2 and 3 emissions reduction targets as one of the specified financial, strategic, customer and transformation priorities, creating a clearer and stronger link between variable remuneration and progress towards that target.

How the position’s incentives contribute to the achievement of your environmental commitments and/or climate transition plan

Telstra’s remuneration philosophy is based on linking financial rewards directly to employee contributions and company performance. In FY20, Telstra’s revised climate commitments were endorsed by the CEO Leadership Team and approved by the Board. These commitments formed 6 headline targets focused on climate change, energy and resource efficiency. That target list was subsequently revised. In FY24 our environment targets were enabling renewable energy generation equivalent to 100% of our consumption by 2025, reducing our scope 1+2 emissions by at least 70% by 2030 from a FY19 baseline, reducing our scope 3 emissions by at least 50% by 2030 from a FY19 baseline, reusing or recycling 650,000 mobile phones, modems and other devices each year to 2025, and increasing our network waste recycling rate to 90% by 2025. Doing business responsibly is a key part of our T25 Strategy. In FY24 three of our climate targets - to reduce scope 1+2 emissions by at least 70 per cent by 2030 (from a FY19 baseline), to reduce scope 3 emissions by at least 50% by 2030 (from a FY19 baseline) and to enable renewable energy generation equivalent to 100 per cent of our consumption by 2025 - are part of our T25 Scorecard against which management performance towards our T25 Strategy is assessed.

Response 4: Climate change

Position entitled to monetary incentive

Sustainability specialist: Other sustainability specialist: Environment team and other environment staff

Incentives

Bonus - % of salary

Performance metrics

- Targets: Progress towards environmental targets
- Strategy and financial planning: Achievement of climate transition plan
- Targets: Achievement of environmental targets
- Emission reduction: Reduction in absolute emissions

Incentive plan the incentives are linked to

Short-Term Incentive Plan, or equivalent, only (e.g. contractual annual bonus)

Further details of incentives

The remuneration of the Environment team and other staff directly engaged in environment initiatives included short-term financial incentives linked to both personal and company performance. This included having regard to factors including a specified number of financial, strategic, customer and transformation priorities as well as individual performance. Telstra’s Sustainability function and other staff directly engaged in environment initiatives have individual goals linked to the delivery of environment objectives (including climate change and emissions-related objectives such as Telstra’s headline targets). They receive monetary rewards based on the successful implementation of those goals. In FY24 our Telstra’s remuneration philosophy is based on linking financial rewards directly to employee contributions and company performance. In FY20, Telstra’s revised climate commitments were endorsed by the CEO Leadership Team and approved by the Board. These commitments formed 6 headline targets focused on climate change, energy use and resource efficiency. In FY24 these targets were enabling renewable energy generation equivalent to 100% of our consumption by 2025, reducing our scope 1+2 emissions by at least 70% by 2030 from a FY19 baseline, reducing our scope 3 emissions by at least 50% by 2030 from a FY19 baseline, reusing or recycling 650,000 mobile phones, modems and other devices each year to 2025, and increasing our network waste recycling rate to 90% by 2025. Doing business responsibly is a key part of our T25 Strategy which was published in FY22. In FY24, three of our climate targets - to reduce scope 1+2 emissions by at least 70 per cent by 2030 (from a FY19 baseline), to reduce scope 3 emissions by at least 50% by 2030 (from a FY19 baseline) and to enable renewable energy generation equivalent to 100 per cent of our consumption by 2025 - are part of our T25 Scorecard against which performance towards our T25 Strategy is assessed. In FY24, we incorporated our Scope 1 and 2 absolute emissions reduction target, as well as our scope 3 emissions reduction target, into the performance measures for our Executive Variable Remuneration Plan (EVP), making it a component of senior executive short-term incentives under our remuneration structure. This recognises the critical nature of this target to our organisation’s success and each team member’s role to achieve it.

How the position’s incentives contribute to the achievement of your environmental commitments and/or climate transition plan

Telstra’s remuneration philosophy is based on linking financial rewards directly to employee contributions and company performance. In FY20, Telstra’s revised climate commitments were endorsed by the CEO Leadership Team and approved by the Board. These commitments formed 6 headline targets focused on climate change, energy and resource efficiency. That target list was subsequently revised. In FY24 our environment targets were enabling renewable energy generation equivalent to 100% of our consumption by 2025, reducing our scope 1+2 emissions by at least 70% by 2030 from a FY19 baseline, reducing our scope 3 emissions by at least 50% by 2030 from a FY19 baseline, reusing or recycling 500,000 mobile phones, modems and other devices each year to 2025, and increasing our network waste recycling rate to 90% by 2025. Doing business responsibly is a key part of our T25 Strategy which was published in FY22. In FY24 three of our climate targets - to reduce absolute emissions by at least 70 per cent by 2030 (from a FY19 baseline), to reduce scope 3 emissions by at least 50% by 2030 from a FY19 baseline and to enable renewable energy generation equivalent to 100 per cent of our consumption by 2025 - are part of our T25 Scorecard against which performance towards our T25 Strategy is assessed.

In FY24 we incorporated our scope 1=2 and scope 3 emissions reduction targets into the performance measures for our Executive Variable Remuneration Plan (EVP), making it a component of senior executive short-term incentives under our remuneration structure. This recognises the critical nature of these targets to our organisation’s success and each team member’s role to achieve it.

Q4.6 Does your organization have an environmental policy that addresses environmental issues?

Yes

Q4.6.1 Provide details of your environmental policies.

Response 1: Row 1

Environmental issues covered

- Biodiversity
- Climate change

Level of coverage

Organization-wide

Value chain stages covered

- Upstream value chain
- Direct operations
- Downstream value chain

Explain the coverage

Telstra’s Environment Policy covers all directors, employees and contractors within the Telstra Group. This policy outlines Telstra’s commitment to addressing environmental issues, fulfilling environmental responsibilities, protecting nature and biodiversity, and empowering people and organisations to enhance their environmental performance. One of the key commitments guided by this policy is our commitment to achieving net zero greenhouse gas (GHG) emissions by 2050, which is aligned with the Paris Agreement. Additionally, our Environmental Policy emphasises efficient resource use, recycling, and minimising waste. The policy supports compliance with environmental laws, encourages stakeholder engagement, and mandates training and proactive measures to protect the environment. Telstra is dedicated to using its resources efficiently, safeguarding the environment, protect nature and biodiversity and continually improving its environmental management systems. By setting clear performance expectations and integrating environmental objectives into its operations, Telstra demonstrates active leadership in striving to achieve its sustainability goals. This policy supports alignment of all members of the Telstra Group in their efforts to address environmental challenges, improve performance, and contribute to sustainable practices.

Environmental policy content

- Environmental commitments: Commitment to avoidance of negative impacts on threatened and protected species
- Environmental commitments: Commitment to implementation of nature-based solutions that support landscape restoration and long-term protection of natural ecosystems
- Environmental commitments: Commitment to a circular economy strategy
- Environmental commitments: Commitment to comply with regulations and mandatory standards
- Climate-specific commitments: Other climate-related commitment: Commitment reducing absolute emissions, and becoming leaders in renewable energy generation
- Environmental commitments: Commitment to stakeholder engagement and capacity building on environmental issues
- Environmental commitments: Commitment to take environmental action beyond regulatory compliance
- Climate-specific commitments: Commitment to net-zero emissions

Indicate whether your environmental policy is in line with global environmental treaties or policy goals

No, but we plan to align in the next two years

Public availability

Publicly available

Attach the policy

Telstra Environment Policy.pdf

Q4.10 Are you a signatory or member of any environmental collaborative frameworks or initiatives?

Response 1:

Are you a signatory or member of any environmental collaborative frameworks or initiatives?

Yes

Collaborative framework or initiative

- Global Reporting Initiative (GRI) Community Member
- Other: Australian Packaging Covenant (APC); CDP; Joint Audit Cooperation; MobileMuster; UN Sustainable Development Goals (SDGs); Business Ambition for 1.5C, Climate Leaders Coalition
- UN Global Compact
- Task Force on Climate-related Financial Disclosures (TCFD)
- Carbon Market Institute
- Science-Based Targets Initiative (SBTi)

Describe your organization's role within each framework or initiative

Telstra's sustainability-related engagement activities take many forms, including participation in industry groups, networks, and forums.

- CDP: Reporting since 2010 and partnering since 2020 on CDP Supply Chain. We've had a 5-year partnership with the CDP, and became their first Supply Chain Program member in Australia. In FY24 295 suppliers disclosed their CDP questionnaire to Telstra.

- Global Reporting Initiative (GRI): Telstra has aligned with GRI since 2012, including our FY24 Bigger Picture Sustainability Report and associated Impact Materiality Assessments undertaken aligned with the GRI standards.

- Task force on Climate-related Financial Disclosures (TCFD): Telstra signed up as an official supporter of the TCFD in 2020 and we have since released four TCFD Reports to communicate our processes for climate change governance, strategy, risk management, and metrics and targets. In FY24, noting the formal disbanding of the TCFD, our reporting was guided by the International Sustainability Standards Board's (ISSB) climate disclosure standard (IFRS S2).

Science-Based Targets initiative (SBTi) Business Ambition for 1.5C: In February 2021 Telstra became a signatory to the United Nations Business Ambition for 1.5C with the goal of setting Science-Based Targets to accelerate action to halve emissions by 2030 and achieve net zero emissions by 2050 in line with the Paris Agreement. In December 2021 Telstra's 2030 emissions reduction targets were verified by the SBTi as aligned to the Paris Agreement.
In FY24, Telstra was in the process of validating our science-based net-zero target to the SBTi Corporate Net-Zero Standard for our increased scope 1+2 target to 70% and this was validated by the SBTi in FY25.

- Taskforce on Nature-related Financial Disclosures (TNFD): In FY24, we signed up as an early adopter of the recommendations of the TNFD. In FY24 we made our first disclosure on nature, guided by the recommendations of the TNFD.

- UN Global Compact: We have been a UNGC signatory since FY12 which has involved releasing annual statements of continued support of the program, its Ten Principles, and commitment to the UN Sustainable Development Goals (SDGs) which Telstra also incorporates to its sustainability and climate change-related strategy and targets.

Other collaborative frameworks and initiatives we participate in include:

Australian Packaging Covenant (APC): We report annually under the Australian Packaging Covenant Organisation (APCO) requirements and apply the APCO-governed Australasian Recycling Label on Telstra-branded and Telstra-owned product packaging to increase consumer awareness of accurate disposal methods. We continue to collaborate with APCO through participation in the National Packaging Targets Implementation (NPTI) working group to provide input on APCO's future Priority Projects.

Carbon Market Institute: The Carbon Market Institute (CMI) is an independent and non-partisan industry body for business and climate in Australia. The CMI mission is to help businesses manage risks and capitalise on opportunities in the transition to a net-zero emissions world by 2050. Telstra engages with and participates in the activities of the CMI, such as through its membership of the CMI' s Corporate Climate Leadership Working Group.

Joint Audit Cooperation (JAC): Telstra joined JAC in 2018, an association of 27 global telecommunications operators that pools results of site audits of common suppliers. JAC' s audits aim to verify that suppliers comply with internationally recognised sustainability standards within global supply chains. The audit scope is based on twelve sustainability criteria, four of which align with our areas of risk. In FY24, 57 sites across 29 Telstra suppliers were selected to complete site audits as part of JAC.

MobileMuster: As a founding member of MobileMuster - Australia' s only voluntary, government-accredited mobile phone recycling scheme - we have supported responsible electronics recycling programs for 27 years.

UN Sustainable Development Goals (SDGs): At Telstra, we consider telecommunications and technology as an enabler of action on the SDGs. This is reflected in our purpose, our T25 strategy and the focus of our sustainability strategy.

Climate Leaders Coalition: In 2024, we joined the Australian Climate Leaders Coalition (CLC), a cross-sectoral group of Australian CEOs supporting the Paris Agreement commitments and the road to decarbonisation.

You may also find our industry association memberships on page 2 of Telstra' s Position on Environment Advocacy here: https://www.telstra.com.au/content/dam/tcom/about-us/community-environment/pdf/2024-08-Telstra-Environment-Advocacy-Position-Final-Remediated.pdf

Q4.11 In the reporting year, did your organization engage in activities that could directly or indirectly influence policy, law, or regulation that may (positively or negatively) impact the environment?

Response 1:

External engagement activities that could directly or indirectly influence policy, law, or regulation that may impact the environment

- Yes, we engaged indirectly through, and/or provided financial or in-kind support to a trade association or other intermediary organization or individual whose activities could influence policy, law, or regulation
- Yes, we engaged directly with policy makers

Indicate whether your organization has a public commitment or position statement to conduct your engagement activities in line with global environmental treaties or policy goals

Yes, we have a public commitment or position statement in line with global environmental treaties or policy goals

Global environmental treaties or policy goals in line with public commitment or position statement

Paris Agreement

Attach commitment or position statement

2024 Telstra-Bigger-Picture-Sustainability-Report.pdf

Indicate whether your organization is registered on a transparency register

Yes

Types of transparency register your organization is registered on

Non-government register

Disclose the transparency registers on which your organization is registered & the relevant ID numbers for your organization

Lobby Map - An Influence map platform

Describe the process your organization has in place to ensure that your external engagement activities are consistent with your environmental commitments and/or transition plan

We work with our key industry associations on environmental matters on a case-by-case basis to contribute to material issues, including climate change. We monitor our memberships with trade associations to understand whether alignment on climate change and energy policy is consistent, enabling us to manage risks and capture opportunities regarding these engagements in line with Telstra's transition plan and climate goals. See https://www.telstra.com.au/sustainability

We may engage with government and regulators directly through ongoing relationships, responding to submissions related to policy development and industry consultation, and by responding to regulatory initiatives, business developments and market practices. We may contribute to the positions of our key industry associations where appropriate.

Many industry associations engage on a broad range of issues and as a result our views on individual issues may differ from other industry association members from time to time. We may or may not agree with each position put by the industry association, or we may not provide a view. From an environment perspective we participate in both general and specialist industry associations. We monitor our industry association memberships to identify whether any significant differences exist between our environment policy and the industry association's position. If a significant difference occurs that is material to our business, we consider a range of steps including discussing the misalignment with the industry association, making a public statement distinguishing our views from those of the industry association, or ceasing to be a member of the industry association, if the impact of the misalignment is greater than the other value provided through the membership.

Additionally, Telstra has processes in place to manage communication and company information, including our direct and indirect activities that influence policy, law, and regulation. These processes have been designed to ensure that information is accurate (i.e., consistent with our Environment Strategy and Environment Policy), authorised, and appropriately managed. In accordance with Company Policy - External Communication and Social Media Policy (Release of Information Externally), written material for external release must be formally approved prior to release. That policy requires a four-stage sign-off from a Function subject matter expert, Investor Relations, Legal, and Communications.

Q4.11.1 On what policies, laws, or regulations that may (positively or negatively) impact the environment has your organization been engaging directly with policy makers in the reporting year?

Response 1: Row 1

Specify the policy, law, or regulation on which your organization is engaging with policy makers

Climate Active's Program Direction Consultation - Options Paper

Environmental issues the policy, law, or regulation relates to

Climate change

Focus area of policy, law, or regulation that may impact the environment

- Financial mechanisms (e.g., taxes, subsidies, etc.): Carbon offsets
- Financial mechanisms (e.g., taxes, subsidies, etc.): Emissions trading schemes

Geographic coverage of policy, law, or regulation

National

Country/area/region the policy, law, or regulation applies to

Australia

Your organization’s position on the policy, law, or regulation

Support with minor exceptions

Details of any exceptions and your organization’s proposed alternative approach to the policy, law, or regulation

Between FY20 and FY23, Telstra was
certified carbon neutral in its operations
under the Australian Government’ s Climate
Active scheme and we have submitted certification materials for FY24. However, from FY25 we are no longer offsetting the emissions from our operations or seeking Climate Active
certification. As we were an active participant at the time of this review, it was important that we provided the Department of Climate Change, Energy, the Environment and Water our input into proposed changes for the Climate Active program. Telstra participated in the consultation and submitted a public response which supported the policy with
minor exceptions. The nature of the consultation was seeking feedback into the program. We suggested an increased focus on communications and brand awareness. Subsequent conversations with the Department indicated that our feedback was seriously considered.

Type of direct engagement with policy makers on this policy, law, or regulation

Submitting written proposals/inquiries

Funding figure your organization provided to policy makers in the reporting year relevant to this policy, law, or regulation (currency)

11000

Explain the relevance of this policy, law, or regulation to the achievement of your environmental commitments and/or transition plan, how this has informed your engagement, and how you measure the success of your engagement

Between FY20 and FY23, Telstra was certified carbon neutral in its operations under the Australian Government’ s Climate
Active scheme and we have submitted certification materials for FY24. However, from FY25 we are no longer offsetting the emissions from our operations or seeking Climate Active certification. As we were an active participant at the time of this review, it was important that we provide the Department of Climate Change, Energy, the Environment and Water our input into proposed changes for the Climate Active program. Telstra participated in the consultation

and submitted a public response
which supported the policy with
minor exceptions. The nature of the consultation was seeking feedback into the program. We suggested an increased focus on communications and brand awareness. Subsequent conversations with the Department indicated that our feedback was seriously considered.

Indicate if you have evaluated whether your organization's engagement on this policy, law, or regulation is aligned with global environmental treaties or policy goals

Yes, we have evaluated, and it is aligned

Global environmental treaties or policy goals aligned with your organization's engagement on this policy, law or regulation

Paris Agreement

Q4.11.2 Provide details of your indirect engagement on policy, law, or regulation that may (positively or negatively) impact the environment through trade associations or other intermediary organizations or individuals in the reporting year.

Response 1: Row 1

Type of indirect engagement

Indirect engagement via a trade association

Trade association

Asia and Pacific: Other trade association in Asia and Pacific: The Australian Mobile and Telecommunications Association (AMTA)

Environmental issues relevant to the policies, laws, or regulations on which the organization or individual has taken a position

Climate change

Indicate whether your organization's position is consistent with the organization or individual you engage with

Consistent

Indicate whether your organization attempted to influence the organization or individual's position in the reporting year

Yes, we publicly promoted their current position

Describe how your organization's position is consistent with or differs from the organization or individual's position, and any actions taken to influence their position

AMTA's vision is to promote an environmentally, socially, and economically responsible, successful and sustainable mobile telecommunications industry in Australia. AMTA's Policy and Strategy Steering Committee (PSSC) identifies climate change and energy (greenhouse gases) as one of three emerging issues that requires a coordinated industry response. AMTA provides a forum for industry members to collaborate on, building a more sustainable and environmentally responsible industry that is well positioned to tackle climate change and build on our voluntary product stewardship program, MobileMuster. Telstra holds a position on AMTA’ s Board of Directors. The role represents AMTA and interfaces with the government and other stakeholders on how best to deliver the productivity, environmental, and social benefits of mobile telecommunications.

Funding figure your organization provided to this organization or individual in the reporting year (currency)

463500

Describe the aim of this funding and how it could influence policy, law or regulation that may impact the environment

The funding figure refers to the AMTA Mobile Muster membership fee. This fee covers our membership fee based on device collection, logistics and recycling costs, policy and advocacy activities, program marketing, communication and consumer education and awareness campaigns.

Indicate if you have evaluated whether your organization’s engagement is aligned with global environmental treaties or policy goals

Yes, we have evaluated, and it is aligned

Global environmental treaties or policy goals aligned with your organization’s engagement on policy, law or regulation

Paris Agreement

Response 2: Row 2

Type of indirect engagement

Indirect engagement via a trade association

Trade association

Asia and Pacific: Other trade association in Asia and Pacific: Business Council of Australia

Environmental issues relevant to the policies, laws, or regulations on which the organization or individual has taken a position

Climate change

Indicate whether your organization’s position is consistent with the organization or individual you engage with

Mixed

Indicate whether your organization attempted to influence the organization or individual’s position in the reporting year

Yes, we attempted to influence them but they did not change their position

Describe how your organization’s position is consistent with or differs from the organization or individual’s position, and any actions taken to influence their position

The Business Council of Australia (BCA) supports action on climate change, including the following:

- The science of climate change, the Paris Agreement and transitioning to net-zero by 2050

- Meeting emissions reduction targets without carryover credits
- A market-based carbon price to drive the transition and incentivize investment in low and no-emissions technology

- Technology driving the transition, creating new jobs, opportunities and industries.

Telstra engages with the BCA through our association membership, as well as our involvement in their Energy and Climate Working Group which one of our management representatives is a member of. In FY24, we, along with other BCA members, participated in groups where the content of BCA submissions was discussed.

Funding figure your organization provided to this organization or individual in the reporting year (currency)

95000

Describe the aim of this funding and how it could influence policy, law or regulation that may impact the environment

This reflects the standard membership fee.
The Business Council of Australia represents Australia’ s largest employers, advocating for good policy on behalf of the business community and the Australians they employ. The BCA supports a coordinated transition to net-zero by 2050 while supporting Australian industries, driving investment in clean technologies, developing new exports with our international partners and supporting energy security, reliability and affordability.

Indicate if you have evaluated whether your organization’s engagement is aligned with global environmental treaties or policy goals

Yes, we have evaluated, and it is aligned

Global environmental treaties or policy goals aligned with your organization’s engagement on policy, law or regulation

Paris Agreement

Response 3: Row 3

Type of indirect engagement

Indirect engagement via a trade association

Trade association

Global: Other global trade association: Global System for Mobile Association (GSMA)

Environmental issues relevant to the policies, laws, or regulations on which the organization or individual has taken a position

Climate change

Indicate whether your organization’s position is consistent with the organization or individual you engage with

Consistent

Indicate whether your organization attempted to influence the organization or individual's position in the reporting year

Yes, we publicly promoted their current position

Describe how your organization's position is consistent with or differs from the organization or individual's position, and any actions taken to influence their position

The GSMA plays a pivotal role in the development of public policy relating to the mobile industry and its customers. The GSMA's public policy team aims to proactively lead the policy debate, represent the mobile industry to governments and regulators, and deliver a regulatory environment that maximises development opportunities and benefits for mobile users. The GSMA is collaborating with the European Commission, the International Telecommunication Union (ITU) and the European Telecommunications Standards Institute (ETSI) on standardisation to reduce the environmental impact of ICT goods, networks and services. Telstra promotes GSMA's position on climate change through multiple engagement activities. Telstra's CEO was on the GSMA Board from 1 January 2023 to 31 December 2024 and Telstra has a senior management representative participating in GSMA climate working groups including the Climate Action Taskforce and co-leading the Scope 3 Methodology Project Group.

Funding figure your organization provided to this organization or individual in the reporting year (currency)

324213.7

Describe the aim of this funding and how it could influence policy, law or regulation that may impact the environment

The amount (GBP 157,945, equivalent to AUD 324,214) is a standard membership fee and our participation in the climate working groups including the Climate Action Taskforce and co-leading the Scope 3 Methodology Project Group, allow us to work with mobile operators and businesses and our suppliers to advance innovation and supports the mobile industry's commitment to addressing the United Nations Sustainable Development Goals.

Indicate if you have evaluated whether your organization's engagement is aligned with global environmental treaties or policy goals

Yes, we have evaluated, and it is aligned

Global environmental treaties or policy goals aligned with your organization's engagement on policy, law or regulation

Paris Agreement

Q4.12 Have you published information about your organization's response to environmental issues for this reporting year in places other than your CDP response?

Yes

Q4.12.1 Provide details on the information published about your organization's response to environmental issues for this reporting year in places other than your CDP response. Please attach the publication.

Response 1: Row 1

Publication

In mainstream reports, in line with environmental disclosure standards or frameworks

Standard or framework the report is in line with

- IFRS
- TCFD
- TNFD

Environmental issues covered in publication

Climate change

Status of the publication

Complete

Content elements

- Dependencies & Impacts
- Emission targets
- Other: Other metrics
- Governance
- Risks & Opportunities
- Emissions figures
- Strategy
- Value chain engagement

Page/section reference

32-48

Attach the relevant publication

Telstra-annual-report-2024.pdf

Comment

Annual Report 2024

Response 2: Row 2

Publication

In other regulatory filings

Environmental issues covered in publication

Climate change

Status of the publication

Complete

Content elements

Emissions figures

Page/section reference

Row 281

Attach the relevant publication

Greenhouse-and-energy-information-registered-corporation-2023-24.xlsx

Comment

National Greenhouse and Energy Reporting Section 19- Emissions and Energy Report Telstra Group Limited for the Reporting Year 2023-24

Response 3: Row 3

Publication

In voluntary sustainability reports

Environmental issues covered in publication

- Climate change
- Biodiversity

Status of the publication

Complete

Content elements

- Governance
- Content of environmental policies
- Value chain engagement
- Emission targets
- Strategy
- Risks & Opportunities
- Dependencies & Impacts
- Emissions figures
- Biodiversity indicators
- Other: Waste recycled

Page/section reference

1-51 (all pages)

Attach the relevant publication

2024 Telstra-Bigger-Picture-Sustainability-Report-Remediated.pdf

Comment

Bigger Picture 2024 Sustainability Report

Response 4: Row 4

Publication

In voluntary communications

Environmental issues covered in publication

Climate change

Status of the publication

Complete

Content elements

- Strategy
- Risks & Opportunities
- Governance
- Content of environmental policies

Page/section reference

1-2

Attach the relevant publication

Telstra Environment Policy.pdf

Comment

Group Environment Policy

Response 5: Row 5

Publication

In voluntary sustainability reports

Environmental issues covered in publication

Climate change

Status of the publication

Complete

Content elements

- Other: Energy use, water use, circular economy data
- Emissions figures
- Emission targets

Page/section reference

Sustaining our planet tab

Attach the relevant publication

2024 Telstra Bigger-Picture-Sustainability-Report-Data-Pack-Remediated.xlsx

Comment

Telstra-Bigger-Picture-2024-Data-Pack

Q5.1 Does your organization use scenario analysis to identify environmental outcomes?

Response 1: Climate change

Use of scenario analysis

Yes

Frequency of analysis

Not defined

Q5.1.1 Provide details of the scenarios used in your organization’s scenario analysis.

Response 1: Climate change

Scenario used

Climate transition scenarios: Customized publicly available climate transition scenario: ’ Accelerated Action - Less than 2°C’

Approach to scenario

Qualitative and quantitative

Scenario coverage

Organization-wide

Risk types considered in scenario

- Technology
- Market
- Liability
- Acute physical
- Chronic physical
- Reputation
- Policy

Temperature alignment of scenario

1.6°C - 1.9°C

Reference year

2020

Timeframes covered

- 2050
- 2025
- 2040
- 2030

Driving forces in scenario

- Finance and insurance: Other finance and insurance driving forces: Sensitivity to impairment thresholds, impact on operational and capital allocations and expenditure
- Finance and insurance: Sensitivity of capital (to nature impacts and dependencies)
- Relevant technology and science: Granularity of available data (from aggregated to local)
- Direct interaction with climate: On asset values, on the corporate
- Relevant technology and science: Data regime (from closed to open)
- Local ecosystem asset interactions, dependencies and impacts : Climate change (one of five drivers of nature change)
- Direct interaction with climate: Other direct interaction with climate driving forces: Impact on customers

Assumptions, uncertainties and constraints in scenario

Assumptions & Parameters: Utilising RCP2.6 and SSP1 this scenario assumes global co-operation to decarbonise driving low emissions, innovation, and technological solutions. It also assumes that global temperature range is limited by around 2ºC by 2100, with 2% national GDP growth and a population of 36.6 million. It assumes that global emissions peak as soon as possible and decrease to net zero by 2050, with 98% renewable generation by 2050, as well as a high uptake of digitization, automation and energy efficiency measures.

Time Horizons: This scenario utilises the same time frames for 2100, however our analysis is limited to 2030 and 2050, which are consistent with our defined time horizons for climate-related risk assessment for short (up to 3 years), medium (3-10 years) & long (greater than 10 years) term; and are relevant to Telstra’ s existing financial and strategic planning timeframes.

Rationale for choice of scenario

Scenario 1: Accelerated Action - Less than 2ºC

Inputs & Analytical Choices: To support Telstra’ s assessment of this scenario, SSP1 was also used to provide an aligned analysis of the potential transition impacts of a below 2-degree world. The CSIRO Australian National Outlook ’ Green and Gold’ and Australian Energy Market Operator ’ Step Change’ scenarios were also used as part of our analysis, providing a more focused, regional, and sectoral context to our scenarios for Australia, where the majority of our operations are based. Along with transition-centred modelling tools as part of our analytical methods, such as the Global Trade and Environment Model (GTEM-C). We used these publicly available scenarios, customising them to our business model, to identify which sectors are likely to experience growth, which could decline, and how these could impact Telstra. We also qualitatively assessed how the needs and expectations of consumers may change under varying scenarios by assessing shifts in brand attributes and comparing these to current consumer perceptions of brand performance.

Response 2: Climate change

Scenario used

Physical climate scenarios: Customized publicly available climate physical scenario: ’ Divided World - 2-3ºC’

Approach to scenario

Qualitative and quantitative

Scenario coverage

Organization-wide

Risk types considered in scenario

- Technology
- Chronic physical

- Market
- Acute physical
- Policy
- Reputation
- Liability

Temperature alignment of scenario

2.5ºC - 2.9ºC

Reference year

2019

Timeframes covered

- 2050
- 2025
- 2030
- 2040

Driving forces in scenario

- Local ecosystem asset interactions, dependencies and impacts : Climate change (one of five drivers of nature change)
- Relevant technology and science: Granularity of available data (from aggregated to local)
- Finance and insurance: Sensitivity of capital (to nature impacts and dependencies)
- Direct interaction with climate: On asset values, on the corporate
- Relevant technology and science: Data regime (from closed to open)
- Finance and insurance: Other finance and insurance driving forces: Sensitivity to impairment thresholds, impact on operational and capital allocations and expenditure
- Direct interaction with climate: Other direct interaction with climate driving forces: Impact on customers

Assumptions, uncertainties and constraints in scenario

Assumptions and Parameters: Using RCP4.5 and the Shared Socio-economic Pathway - SSP3, this scenario details a fragmented decarbonisation journey and low economic growth with trade barriers and regional conflict. The scenario assumes Global temperature range is limited to 2-3ºC with national GDP growth of 1.3% between 2020 and 2030. Global emissions peak by 2040 and renewable generation sits at 97% by 2050, however innovation is constrained by low economic growth.

Time Horizons: This scenario utilises the same time frames for 2100, however our analysis is limited to 2030 and 2050, with a key milestone assumption including a global peak in emissions in 2040.

Rationale for choice of scenario

Scenario 2: Divided World - 2-3ºC

Inputs & Analytical Choices: To support Telstra’s assessment of this scenario, SSP3 was also used to provide an aligned analysis of the potential transition impacts of a rocky transition involving regional rivalry. The CSIRO Australian National Outlook’Slow Decline’ and Australian Energy Market Operator’Fast Change’ scenarios were also used as part of our analysis, providing a more focused, regional, and sectoral context to our scenarios for Australia, where the majority of our operations are based. Along with transition-centred modelling tools as part of our analytical methods, such as the Global Trade and Environment Model (GTEM-C). We used these publicly available scenarios, customising them to our business model, to identify which sectors are likely to experience growth, which could decline, and how these could impact Telstra. We also qualitatively assessed how the needs and expectations of consumers may change under varying scenarios by assessing shifts in brand attributes and comparing these to current consumer perceptions of brand performance. Note: Only one selection could be made in Column 6 “Temperature alignment of scenario”. This scenario covers both selections ’2.0°C - 2.4°C’ and ’2.5°C - 2.9°C’.

Response 3: Climate change

Scenario used

Physical climate scenarios: Customized publicly available climate physical scenario: ’Changed Climate - More than 4°C’

Approach to scenario

Qualitative and quantitative

Scenario coverage

Organization-wide

Risk types considered in scenario

- Policy
- Reputation
- Market
- Technology
- Chronic physical
- Liability
- Acute physical

Temperature alignment of scenario

4.0°C and above

Reference year

2019

Timeframes covered

- 2050
- 2040
- 2025
- 2030

Driving forces in scenario

- Relevant technology and science: Data regime (from closed to open)
- Direct interaction with climate: On asset values, on the corporate
- Relevant technology and science: Granularity of available data (from aggregated to local)
- Local ecosystem asset interactions, dependencies and impacts : Climate change (one of five drivers of nature change)
- Direct interaction with climate: Other direct interaction with climate driving forces: Impact on customers
- Finance and insurance: Other finance and insurance driving forces: Sensitivity to impairment thresholds, impact on operational and capital allocations and expenditure
- Finance and insurance: Sensitivity of capital (to nature impacts and dependencies)

Assumptions, uncertainties and constraints in scenario

Assumptions and Parameters: Using RCP8.5 and SSP5, this scenario has limited decarbonisation and is the most challenging to adapt to, whilst economic and social development continues to rely heavily on fossil fuel resources. This scenario shows Global temperature range of 4ºC with national GDP growth of greater than 3.6%, and only 65% renewable generation by 2050, as well as innovation being driven by globalization and improvement in the living standards in a digital world.

Time Horizons: This scenario uses the same time frames for 2100, however our analysis is limited to 2030 and 2050. No global emissions peak occurs within this time frame, and emissions are expected to rise beyond 2050.

Rationale for choice of scenario

Scenario 3: Changed Climate - More than 4ºC

Inputs & Analytical Choices To support Telstra' s assessment of this scenario, SSP5 was also used to provide an aligned analysis of the potential transition impacts of continued fossil-fuel development. The CSIRO Australian National Outlook ' Thriving Australia' and Australian Energy Market Operator ' ' Slow Change' scenarios were also used as part of our analysis, providing a more focused, regional, and sectoral context to our scenarios for Australia, where the majority of our operations are based. Along with transition-centred modelling tools as part of our analytical methods, such as the Global Trade and Environment Model (GTEM-C). We used these publicly available scenarios, customising them to our business model, to identify which sectors are likely to experience growth, which could decline, and how these could impact Telstra. We also qualitatively assessed how the needs and expectations of consumers may change under varying scenarios by assessing shifts in brand attributes and comparing these to current consumer perceptions of brand performance.

Response 4: Climate change

Scenario used

Climate transition scenarios: Customized publicly available climate transition scenario: ' Rapid Progress - 1.5ºC aligned'

Approach to scenario

Qualitative and quantitative

Scenario coverage

Organization-wide

Risk types considered in scenario

- Reputation
- Technology
- Policy
- Market
- Liability

Temperature alignment of scenario

1.5°C or lower

Reference year

2020

Timeframes covered

- 2025
- 2030

Driving forces in scenario

Regulators, legal and policy regimes : Other regulators, legal and policy regimes driving forces: Mandatory climate reporting, TNFD expansion, introduction of carbon border adjustment mechanisms, and the formation of carbon trading blocs

Assumptions, uncertainties and constraints in scenario

Assumptions and Parameters: Alignment with a 1.5°C scenario was established based on the domestic targets which would need to be set to align with Australia’ s fair share of the global emissions budget:
- 1.5°C-consistent pathways are defined for key sectors
- Australia sets a 2035 target of 75% reduction on 2005 levels, and a 100% reduction by 2040

Time Horizons: This scenario is characterised by three key time horizons between now and 2030:
-\tPolicy driven pressure for decarbonisation (2024-25)
-\tMarket responses characterised by rapid change and volatility (2026-28)
-\tPolicy, markets and next-generation technologies (2029-30).

Rationale for choice of scenario

Scenario 4: Rapid Progress - 1.5°C aligned

Inputs & Analytical Choices: In FY24, we developed a fourth scenario titled ’ Rapid Progress’ which is aligned to a 1.5°C world. The aim of this new scenario is to stress-test our resilience to short - and mid-term transition risks and identify growth opportunities. Rapid Progress describes a world in which policymakers and markets deploy regulatory reform and funding to support the rapid transition to a low carbon economy. Modelled between now and 2030, the scenario captures key pivot points, such as the introduction of mandatory climate reporting, expansion of TNFD, introduction of carbon border adjustment mechanisms and the formation of carbon trading blocs. The scenario follows the AEMO ’ Step Change’ decarbonisation pathway for electricity grid supply and emissions intensity. This is a key consideration for Telstra as our network is reliant upon a stable, secure and cost-efficient electricity supply. We have also added Telstra specific elements including our climate targets, customer growth projections across our products and services, and anticipated technology reforms or advancements. This scenario has further highlighted the importance of our focus on network decommissioning,
energy efficiency and power resiliency, as well as the opportunities for us to thrive in a low carbon economy given it will be driven by data and connectivity.

Q5.1.2 Provide details of the outcomes of your organization’s scenario analysis.

Response 1: Climate change

Business processes influenced by your analysis of the reported scenarios

- Capacity building
- Strategy and financial planning
- Target setting and transition planning
- Risk and opportunities identification, assessment and management
- Resilience of business model and strategy

Coverage of analysis

Organization-wide

Summarize the outcomes of the scenario analysis and any implications for other environmental issues

Physical risk resilience: We have started work to better understand our exposure to floods, updated our approach to evaluating coastal climate hazards, begun the climate hazard assessment of our fibre network and commenced the climate vulnerability assessment of Digicel Pacific. We have also reviewed and revised previous work on our exposure to chronic temperature rise, bushfires, tropical cyclones, coastal inundation, coastal erosion and intense rainfall events at an asset level.

Of acute physical climate hazards, flooding is anticipated to have the highest economic cost in Australia. Flooding is a location-specific hazard, the extent and subsequent impacts of a flood event are highly variable, and no two flood events (even in the same location) will result in the same outcome. Modelling of flood vulnerability is therefore complex and requires consideration of inputs such as catchment area, topography, geology, land use, soil saturation, rainfall intensity and any mitigation measures. Our previous analysis described as ’urban flash-flooding’ was limited in scope and only explored the change in 24-hour annual exceedance probability (AEP) at a small sample of high priority assets. We now refer to this analysis as ’intense rainfall events’. We recognise that improving our understanding of network flood exposure is vital to building network resilience and supporting service continuity to communities during flood events. In FY24, we partnered with FloodMapp to develop a methodology for incorporating climate change into at-scale flood modelling capability

Coastal climate hazards can be split into two categories: inundation and erosion. Inundation occurs when salt water ingresses an area, while coastal erosion occurs when tides, storm surges and rain events destabilise sand, sediment and shale-based geologies, resulting in landslips and subsidence. Impacts from both hazards are exacerbated by rising sea levels and more frequent storm activity. Our original approach to exploring network exposure to coastal inundation from rising sea levels used high-level assumptions based on an asset’s height above sea level and proximity to the coast and we did not consider coastal erosion. In FY24 we have revised our approach to coastal inundation, narrowing the vulnerability criteria to capture above ground assets within 250m of the coastline and with an elevation of less than 10m above sea level. We have also included fibre assets in this analysis. The analysis found 1.9 per cent of our above ground assets and 1.6 per cent of our fibre network were found to be exposed. Additionally, we identified a dataset from Geoscience Australia which captures the observed average annual rate of coastal growth or retreat. We found a single site and its supporting fibre located in close proximity to an area of the coast experiencing greater than 5m of retreat per year.

Transition risk resilience: In FY24, we developed a fourth scenario titled ’Rapid Progress’ which is aligned to a 1.5°C world. The aim of this new
scenario is to stress-test our resilience to short - and mid-term transition risks and identify growth opportunities. Rapid Progress describes a world in which policymakers and markets deploy regulatory reform and funding to support the rapid transition to a low carbon economy. Modelled between now and 2030, the scenario captures key pivot points, such as the introduction of mandatory climate reporting, expansion of TNFD, introduction of carbon border adjustment mechanisms and the formation of carbon trading blocs. The scenario follows the AEMO ’Step Change’ decarbonisation pathway for electricity grid supply and emissions intensity. This is a key consideration for Telstra as our network is reliant upon a stable, secure and cost-efficient electricity supply. We have also added Telstra specific elements including our climate targets, customer growth projections across our products and services, and anticipated technology reforms or advancements. This scenario has further highlighted the importance of our focus on network decommissioning, energy efficiency and power resiliency, as well as the opportunities for us to thrive in a low carbon economy given it will be driven by data and connectivity.

The outcomes of our physical and transition scenario analysis have informed our efforts in risk and opportunities identification, assessment, and management. These insights have further influenced our strategy and financial planning, enhanced the resilience of our business model and strategy, supported capacity building initiatives, and shaped our target setting and transition planning processes. In FY24, the outcomes assisted us with the prioritisation of vegetation clearance and impacted the design standards for back up battery power at particular sites, and are used in our decision-making processes to increase resilience to climate impacts.

Q5.2 Does your organization's strategy include a climate transition plan?

Response 1:

Transition plan

Yes, we have a climate transition plan which aligns with a 1.5°C world

Publicly available climate transition plan

Yes

Plan explicitly commits to cease all spending on, and revenue generation from, activities that contribute to fossil fuel expansion

No, and we do not plan to add an explicit commitment within the next two years

Explain why your organization does not explicitly commit to cease all spending on and revenue generation from activities that contribute to fossil fuel expansion

Our services are available to all customers, including those in industries related to fossil fuels, as part of our commitment to universal connectivity.

We are committed to achieving net zero GHG emissions by 2050, aligned with the Paris Agreement. To achieve this, we have set an emissions reduction target that has been validated by the Science Based Targets initiative (SBTi) as aligned to a trajectory to limit global warming to 1.5ºC. In FY24, we achieved a 10% reduction in our Scope 1 + 2 GHG emissions compared to the previous year and have achieved a cumulative 37% reduction against our baseline year of FY19.

Mechanism by which feedback is collected from shareholders on your climate transition plan

We have a different feedback mechanism in place

Description of feedback mechanism

Telstra receives feedback from its shareholders through regular engagement and surveys.

Shareholders can also ask questions at the Annual General Meeting (AGM). For example, at the 2024 AGM, there were two questions which praised our emissions reduction progress to date, one of which requested more information about metrics for energy efficiency opportunities. Neither posed concerns about our climate ambition.

These engagements enable Telstra to understand shareholders' key concerns, identify potential gaps in our environment program, and consequently leverage this feedback to review and improve its climate strategy and goals.

Frequency of feedback collection

More frequently than annually

Description of key assumptions and dependencies on which the transition plan relies

Telstra's transition to net zero by 2050 relies on the continued decarbonisation of the energy supply, especially in Australia where the majority of our emissions are created. Our short-term forecast in Australia relies on actual decarbonisation following the Australian Energy Market Operator (AEMO)'s Integrated System Plan. Our ability to transition our equipment relies on the market supplying new and emerging technology - from our vehicle fleet continuing to transition to hybrids and electric vehicles, to off-grid power supply for our exchanges and the infrastructure and network hardware and software equipment.

Description of progress against transition plan disclosed in current or previous reporting period

In FY24, to support our management of risks associated with the shift to a low carbon economy, we commenced our analysis of climate-related transition risks in line with a 1.5°C scenario as part of our transition plan. The initial findings highlight the importance of our continued focus on network decommissioning, energy efficiency and power resiliency, to mitigate availability concerns and market volatility of a rapidly decarbonising electricity grid, as well as the opportunities for us to thrive in a low carbon economy given it will be driven by data and connectivity.

In FY24, Telstra continued to make progress on better understanding, adapting to and preparing for current and future climate risk. Our most significant physical climate-related risk is the loss of mains power during an extreme weather event such as a severe storm or bushfire. Our scenario analysis shows this risk is likely to increase towards 2030 as acute climate events become increasingly frequent and intense. In response, we are focused on enhancing the power resiliency of our network through continued investment in initiatives such as backup battery systems. We are also upgrading payphones in disaster prone areas to keep communities connected when they need it most. In addition, we have taken steps to integrate current and future climate intelligence into our geospatial systems to help embed climate considerations into our network planning activities. We have an ongoing program to improve battery life at our mobile network sites. The program focuses on battery replacement, power resilience and reliability using disaster risk data to prioritise battery replacement. This is to
enable our sites to operate through short term mains power interruptions. In FY24, we have invested nearly $60 million across more than 3,200 battery lifecycle replacement projects. This is in addition to our rollout of automatic transfer units to simplify the process of deploying portable generators at regional sites identified to be at high risk of extreme weather events. Separately from those investments, we will also be making additional decommissioning and energy efficiency investments as we redirect
funding from the purchase of carbon credits from FY25 to FY30, to reduce our electricity consumption. We are also participating in pilots of emerging technology. For example, a hydrogen fuel cell trial we are involved in aims to determine the technical and commercial viability of deploying fuel cell generators using hydrogen produced from renewable energy sources as an alternative backup source during power outages - allowing customers to stay connected.

We are also working to better understand our nature-related risks, dependencies and impacts, and the business risks and opportunities that flow from this.

Attach any relevant documents which detail your climate transition plan (optional)

2024-Telstra-Bigger-Picture-Sustainability-Report-Remediated.pdf,telstra-annual-report-2024-interactive.pdf

Other environmental issues that your climate transition plan considers

No other environmental issue considered

Q5.3 Have environmental risks and opportunities affected your strategy and/or financial planning?

Response 1:

Environmental risks and/or opportunities have affected your strategy and/or financial planning

Yes, both strategy and financial planning

Business areas where environmental risks and/or opportunities have affected your strategy

- Products and services
- Investment in R&D
- Operations
- Upstream/downstream value chain

Q5.3.1 Describe where and how environmental risks and opportunities have affected your strategy.

Response 1: Products and services

Effect type

- Risks
- Opportunities

Environmental issues relevant to the risks and/or opportunities that have affected your strategy in this area

Climate change

Describe how environmental risks and/or opportunities have affected your strategy in this area

Climate change presents both risks and opportunities to Telstra’ s products and services and has influenced our network and ICT solutions and strategy in the short-, medium-, and long-term time horizons. Climate-related weather events, such as bushfires, coastal inundation, coastal erosion, cyclones, chronic increase in average annual temperature and intense rainfall events can damage our infrastructure and cause network disruptions, which impacts our ability to provide services. Our FY22 scenario analysis showed that as atmospheric emissions increase, a greater number of our assets will become exposed to at least one climate hazard and that the number of assets exposed to more than one hazard also increases. The analysis also considered the potential financial impacts of extreme events from asset loss, asset damage and service disruption. We found that, cumulatively over the period to 2050, bushfires are projected to cause the greatest impact to our Australian assets, and that service disruption from physical hazards is projected to be more material than asset damage. The outcome of this financial assessment has guided our implementation of the following strategies:

・ Further enhance our monitoring capability: We are enhancing our business processes to capture more climate-related events and their financial impacts so that we can continually update our financial assessment.
・ Incorporate climate impacts in our financial plans: Our initial assessment will give us a basis to test the resilience of our financial plans to address any climate-related impacts.
・ Network planning: The underlying climate risk assessment gives us a clearer view of climate risk relevant to our physical infrastructure and will inform our network planning in the future. These actions could result in reducing the physical exposure to our assets and to mitigate potential service disruptions to our customers.
・ Asset replacement: With a clearer view of the parts of our network that are more exposed to climate risk we intend to use this information to inform our approach to future technology roadmaps. Given the long legacy of technology in our network, advancements in technology need to be considered should there be a need to replace our impacted assets.
・ Continue to enhance our reporting capability: The progress we have made in our financial assessment so far will enable us to provide relevant and meaningful information in meeting the ISSB IFRS S2 standard recommendations and to address other regulatory and stakeholder expectations.

Response 2: Upstream/downstream value chain

Effect type

Opportunities

Environmental issues relevant to the risks and/or opportunities that have affected your strategy in this area

Climate change

Describe how environmental risks and/or opportunities have affected your strategy in this area

Climate-related opportunities related to technological improvements have influenced Telstra’s strategy to grow our business in a way that helps suppliers and customers manage their carbon emissions in the short- and medium- term. Telstra enables avoided emissions from 11 key uses of technology, including cloud technology, climate smart agriculture, HVAC control systems, and residential building smart meters. Deloitte found that through provision of these technologies, in 2021, Telstra enabled its customers to avoid an estimated 2.4 tonnes of CO2e for every one tonne emitted in Australia. To 2030, Deloitte found the total cumulative avoided emissions that could be enabled by Telstra’s services and products are estimated at 41 MtCO2e. This could be even larger with greater uptake of Telstra’s existing technologies or the implementation of new technologies (Deloitte: Enabling Positive Climate Action - see full report for details, assumptions and qualifications). We also actively work with our suppliers to gain better insights into our emissions and identify reduction opportunities. We have partnered with CDP through their Supply Chain Program to engage our suppliers to more effectively account for and address their climate change impacts. This partnership enables us to deliver training, tools and support on environmental disclosures to over 400 suppliers. We also launched a standard climate clause in our Supplier Agreements to improve emissions data quality and reduce emissions. By the end of FY24, 91 suppliers had signed up to these new clauses which contractually committed them to disclosing and reducing their absolute emissions, an increase of 122 per cent from FY23, representing over $3 billion of our FY24 spend.

Response 3: Investment in R&D

Effect type

Opportunities

Environmental issues relevant to the risks and/or opportunities that have affected your strategy in this area

Climate change

Describe how environmental risks and/or opportunities have affected your strategy in this area

Our business strategy is heavily influenced by technology, and we acknowledge the potential for developing new ICT solutions in the near and medium term through research, development, and innovation. Our scenario analysis indicates that investing in R&D can help create low-carbon goods and services and enhance our business’s sustainability practices.

The Renewable Hydrogen Fuel Cell Generator Pilot at Mobile Sites was supported by the Victorian Government through the Renewable Hydrogen Commercialisation Pathways Funding Agreement. Telstra accessed $1,115,185 towards the trial of renewable hydrogen fuel cells as backup power at five mobile sites in place of diesel generators. The fuel cells use green hydrogen fuel which is generated from renewable energy sources. These renewable hydrogen systems will provide 72 hours of backup power - many times more than current battery backup power at these sites. The project aims to demonstrate the technical and commercial viability of renewable hydrogen as a zero-emissions fuel for generator backup power. The project, completed in June 2024, deployed a 10-kilowatt renewable hydrogen generator at five sites across Victoria.

Response 4: Operations

Effect type

- Opportunities
- Risks

Environmental issues relevant to the risks and/or opportunities that have affected your strategy in this area

Climate change

Describe how environmental risks and/or opportunities have affected your strategy in this area

Climate change poses risks and opportunities to Telstra's operations that have the potential to substantially impact our business in the short-, medium-, and long-term. For example, Telstra's operations face risks such as higher energy usage and costs due to increased temperatures and heat load risk across our networks in Australia. We identified temperature change as being a key risk for our infrastructure and assets in our most recent scenario analysis. Our Environment Strategy commits us to mitigating our climate change impacts and helping our customers and communities to do the same. Our efforts to improve energy and emissions performance covers our operations and broader value chain. Our network sites, including fixed network sites and data centres, are our largest consumers of electricity, so we look for opportunities to invest in and implement energy reduction and efficiency initiatives where possible. In FY24, our investment in energy reduction projects, including both energy efficiency and decommissioning, was $23 million. In that year, our energy efficiency programs delivered a collective annualised saving of 6,295 tCO2e and 8,082 MWh electricity. In addition to our energy efficiency projects, we saved a further 54,659 tCO2e and 73,694 MWh annualised through decommissioning legacy network equipment and network energy efficiency enhancements.

Q5.3.2 Describe where and how environmental risks and opportunities have affected your financial planning.

Response 1: Row 1

Financial planning elements that have been affected

- Revenues
- Capital allocation
- Indirect costs
- Assets
- Direct costs
- Access to capital
- Acquisitions and divestments
- Capital expenditures

Effect type

- Opportunities
- Risks

Environmental issues relevant to the risks and/or opportunities that have affected these financial planning elements

Climate change

Describe how environmental risks and/or opportunities have affected these financial planning elements

The outcomes of Telstra’ s comprehensive process for identifying, evaluating, and addressing climate-related risks and opportunities have influenced nearly all facets of our financial planning. This includes:

CAPEX and OPEX: Telstra expects that rising temperatures in Australia will likely increase energy consumption and direct/indirect costs to operate its telecommunications network infrastructure. To address this, Telstra is considering climate change risks and opportunities in CAPEX and OPEX decisions. We invested $23 million in FY24, to achieve a yearly emissions reduction of over 600,000 tCO2e.

Capital allocation: In FY24, we have undertaken pilots to embed climate considerations into our annual planning, product development and procurement processes. We have developed an emissions forecasting tool which estimates the Scope 2 emissions impacts of proposed major capital investment programs as part of annual financial planning. We can model impacts on an individual project and cumulative basis to provide line-of-sight to potential impacts on our Scope 1+2 emissions trajectory. Through our FY25 annual planning, around $1 billion of proposed capital investment has been screened via this process, and emissions impacts were refined with forecasted electricity consumption for material investments.

Acquisitions: We continue to incorporate a staged screening mechanism into our mergers and acquisitions process to review possible merger/acquisition candidates for impacts to our emissions reduction target and a range of physical and transition climate-related risks. Initial screening and subsequent risk profiling is based on factors including industry type, location, and scale of operations.

Access to capital: When engaging with investors, banks, and other capital providers, Telstra includes our publicly available climate action targets and performance as part of a comprehensive strategy. Climate-related risks and opportunities, such as Telstra’ s climate action targets and performance, have the potential to influence the company’ s access to capital from these providers based on their interests. This includes sections on climate risk and our corporate profile in the Offering Circular for our Debt Issuance Program.

Assets: Telstra uses an Enterprise Likelihood and Consequence Table matrix to assess the risks and opportunities associated with the acquisition and development of assets, allowing the company to invest in cost-effective assets.

Q5.4 In your organization’s financial accounting, do you identify spending/revenue that is aligned with your organization’s climate transition?

Response 1:

Identification of spending/revenue that is aligned with your organization’s climate transition

Yes

Methodology or framework used to assess alignment with your organization’s climate transition

Other methodology or framework

Q5.4.1 Quantify the amount and percentage share of your spending/revenue that is aligned with your organization’s climate transition.

Response 1: Row 1

Methodology or framework used to assess alignment

Other: Internal methods

Financial metric

CAPEX

Amount of selected financial metric that is aligned in the reporting year (currency)

6000000

Percentage share of selected financial metric aligned in the reporting year (%)

0.12

Percentage share of selected financial metric planned to align in 2025 (%)

0.12

Percentage share of selected financial metric planned to align in 2030 (%)

0.12

Details of the methodology or framework used to assess alignment with your organization's climate transition

Telstra actively manages and addresses climate-related issues through its central governance procedures. This involves overseeing and tracking progress against Telstra's Sustainability Strategy. As part of this process, we regularly assess our most significant sustainability impacts on the economy, the environment, and society. Our assessments are carried out in compliance with the Global Reporting Initiative (GRI) Standards, using a double materiality methodology that considers both impact materiality and financial materiality perspectives. The results of our material risk assessment, including sustainability-related risks, are provided in the Our material risks and Acting on climate and nature sections of our 2024 Annual Report. This has informed the objectives of the Sustaining Our Planet pillar in our sustainability strategy, which is a consideration in Telstra's capital investment decisions.

Since FY19, we have invested over $110 million in these programs, including in FY24 $23 million across CAPEX and OPEX, with $17 million of OPEX on decommissioning legacy equipment and $6 million on CAPEX on energy efficiency, which will deliver over 60,000 tCO2e annualised emissions reduction. In addition to decarbonisation, these projects have also reduced our operational costs by reducing our annual energy, maintenance, and carbon credit expenses. These initiatives only reflect the specific investment in emissions reduction activities and do not include broader investment to upgrade our network, which also delivers emissions reduction benefits.

We have assumed FY25 and FY30 CAPEX will be consistent with FY24 but this will be subject to future strategic and yearly financial planning decisions.

Response 2: Row 2

Methodology or framework used to assess alignment

Other: Internal methods

Financial metric

OPEX

Amount of selected financial metric that is aligned in the reporting year (currency)

17000000

Percentage share of selected financial metric aligned in the reporting year (%)

0.11

Percentage share of selected financial metric planned to align in 2025 (%)

0.11

Percentage share of selected financial metric planned to align in 2030 (%)

0.11

Details of the methodology or framework used to assess alignment with your organization's climate transition

Telstra actively manages and addresses climate-related issues through its central governance procedures. This involves overseeing and tracking progress against Telstra's Sustainability Strategy. As part of this process, we regularly assess our most significant sustainability impacts on the economy, the environment, and society. Our assessments are carried out in compliance with the Global Reporting Initiative (GRI) Standards, using a double materiality methodology that considers both impact materiality and financial materiality perspectives. The results of our material risk assessment, including sustainability-related risks, are provided in the Our material risks and Acting on climate and nature sections of our 2024 Annual Report. Telstra uses scenario analysis to inform its operational expenditure decisions. This process helps the Operations team understand and prepare for evolving exposure to physical climate-related risks, which are essential for network resilience and adaptation planning.

Since FY19, we have invested over $110 million in these programs, including in FY24 $23 million across CAPEX and OPEX, with $17 million of OPEX on decommissioning legacy equipment and $6 million on CAPEX on energy efficiency, which will deliver over 60,000 tCO2e annualised emissions reduction. In addition to decarbonisation, these projects have also reduced our operational costs by reducing our annual energy, maintenance, and carbon credit expenses. These initiatives only reflect the specific investment in emissions reduction activities and do not include broader investment to upgrade our network, which also delivers emissions reduction benefits.

We have assumed FY25 and FY30 OPEX will be consistent with FY24 but this will be subject to future strategic and yearly financial planning decisions.

Q5.10 Does your organization use an internal price on environmental externalities?

Response 1:

Use of internal pricing of environmental externalities

No, and we do not plan to in the next two years

Primary reason for not pricing environmental externalities

Not an immediate strategic priority

Explain why your organization does not price environmental externalities

Telstra did not use a shadow carbon price for investment decisions during FY24. We are taking emissions impacts into account using annual planning in other ways, through estimating the emissions impact of the proposed plan. We also estimate the emissions impact of other material transactions such as M&A transactions.

Q5.11 Do you engage with your value chain on environmental issues?

Response 1: Suppliers

Engaging with this stakeholder on environmental issues

Yes

Environmental issues covered

- Plastics
- Climate change

Response 2: Customers

Engaging with this stakeholder on environmental issues

Yes

Environmental issues covered

Climate change

Response 3: Investors and shareholders

Engaging with this stakeholder on environmental issues

Yes

Environmental issues covered

Climate change

Response 4: Other value chain stakeholders

Engaging with this stakeholder on environmental issues

Yes

Environmental issues covered

Climate change

Q5.11.1 Does your organization assess and classify suppliers according to their dependencies and/or impacts on the environment?

Response 1: Climate change

Assessment of supplier dependencies and/or impacts on the environment

Yes, we assess the dependencies and/or impacts of our suppliers

Criteria for assessing supplier dependencies and/or impacts on the environment

Contribution to supplier-related Scope 3 emissions

% Tier 1 suppliers assessed

100%

Define a threshold for classifying suppliers as having substantive dependencies and/or impacts on the environment

We focus on our top 200 suppliers by their emissions impact.

% Tier 1 suppliers meeting the threshold for substantive dependencies and/or impacts on the environment

76-99%

Number of Tier 1 suppliers meeting the thresholds for substantive dependencies and/or impacts on the environment

200

Response 2: Plastics

Assessment of supplier dependencies and/or impacts on the environment

Yes, we assess the dependencies and/or impacts of our suppliers

Criteria for assessing supplier dependencies and/or impacts on the environment

Impact on plastic waste and pollution

% Tier 1 suppliers assessed

Less than 1%

Define a threshold for classifying suppliers as having substantive dependencies and/or impacts on the environment

Telstra continues to actively work with device suppliers to ensure that the devices supplied are recyclable in Australia and do not contain hazardous or toxic chemicals that may impact the recyclability of the device.

% Tier 1 suppliers meeting the threshold for substantive dependencies and/or impacts on the environment

Less than 1%

Number of Tier 1 suppliers meeting the thresholds for substantive dependencies and/or impacts on the environment

16

Q5.11.2 Does your organization prioritize which suppliers to engage with on environmental issues?

Response 1: Climate change

Supplier engagement prioritization on this environmental issue

Yes, we prioritize which suppliers to engage with on this environmental issue

Criteria informing which suppliers are prioritized for engagement on this environmental issue

・ In line with the criteria used to classify suppliers as having substantive dependencies and/or impacts relating to climate change
・ Strategic status of suppliers
・ Business risk mitigation
・ Procurement spend
・ Other: Contribution to Scope 3 emissions

Please explain

Telstra prioritises suppliers to engage with on environmental issues through multiple channels. To effectively manage our supplier relationships, Telstra has a Supplier Governance Framework and supporting Playbook which assesses suppliers against 12 categories of risk, including environmental practices. Telstra's Supplier Code of Conduct also sets out minimum standards of behaviour that Telstra Group expects its suppliers to meet in the areas of environment, including those related to climate. In addition to our minimum standards, the climate clauses in our Supplier Agreements contractually commit suppliers who contribute significantly to Telstra's Scope 3 emissions to disclosing and reducing their absolute emissions. By the end of FY24, 91 suppliers had signed up to these clauses, an increase of 122 per cent from FY23, representing over $3 billion of our FY24 spend.

We have continued to partner with CDP through their Supply Chain Program to engage our suppliers to more effectively account for and address their climate change impacts. To identify these suppliers, we screen all of our suppliers to identify those which contribute significantly to Telstra's Scope 3 emissions. This includes suppliers with a high emissions impact, supplier spend or strategic importance to Telstra. Additionally, Telstra applies analytics over our spend data to identify priority suppliers. In FY24, we engaged with over 400 suppliers through the CDP Supply Chain Program.

Response 2: Plastics

Supplier engagement prioritization on this environmental issue

Yes, we prioritize which suppliers to engage with on this environmental issue

Criteria informing which suppliers are prioritized for engagement on this environmental issue

・ Product lifecycle
・ Product safety and compliance
・ Material sourcing
・ Regulatory compliance

Please explain

Telstra is committed to optimising the resources we use, reducing consumption and waste across our business, and investing in circular solutions that are designed to be sustainable across their life cycle. Through our ongoing engagement with suppliers, they are encouraged to adopt circular economy principles and minimise environmental impacts at all stages of the product life cycle - design, manufacturing, distribution, use, and end of life. Through our Supplier Code of Conduct, suppliers are encouraged to embed eco-design in their products and services and to:

・ Use at least 50% recycled materials where possible or select sustainably sourced materials. On request, the supplier will verify claims on recycled content in line with recognised standards (i.e. ISO 14021) and must provide relevant data substantiating the recycled/recyclability products and services supplied;
・ Use non-hazardous materials to ensure safe and efficient recyclability;
・ Design for easy disassembly so all product components are easily repairable and recyclable without causing damage to the product;
・ Design to minimise energy use and reduce emissions across the life cycle;
・ Design for minimum required packaging made from at least 50% renewable or recycled content which is

100% recyclable; and
・ Have a "take-back" program in place for responsible end of life product management, participate in a product stewardship program or work with Telstra for responsible product end of life management.

Q5.11.5 Do your suppliers have to meet environmental requirements as part of your organization's purchasing process?

Response 1: Climate change

Suppliers have to meet specific environmental requirements related to this environmental issue as part of the purchasing process

Yes, environmental requirements related to this environmental issue are included in our supplier contracts

Policy in place for addressing supplier non-compliance

Yes, we have a policy in place for addressing non-compliance

Comment

Telstra's Supplier Code of Conduct sets out the minimum standards we expect from our suppliers to meet (in the areas of labour and human rights, health and safety, environment, business integrity, cyber security and privacy, and supplier diversity) and forms part of our standard purchasing terms. Suppliers must minimise the adverse environmental impacts of their operations, products, and services. We expect suppliers to implement an environmental management system in line with recognised standards such as ISO 14001 or the EU Eco-Management and Audit Scheme (EMAS). Environmental areas include: - Environmental Laws, Permits and Reporting - Product Content - Climate Change and Energy Consumption - Pollution Prevention and Circularity. Through our policies, Supplier Governance Framework, training and audit program, CDP Supply Chain program, we work with our suppliers to assess whether they are meeting our standards.

Q5.11.6 Provide details of the environmental requirements that suppliers have to meet as part of your organization's purchasing process, and the compliance measures in place.

Response 1: Climate change

Environmental requirement

Setting a science-based emissions reduction target

Mechanisms for monitoring compliance with this environmental requirement

- Other: Scope 1, 2, and 3 verification
- On-site third-party audit

% tier 1 suppliers by procurement spend required to comply with this environmental requirement

76-99%

% tier 1 suppliers by procurement spend in compliance with this environmental requirement

76-99%

% tier 1 supplier-related scope 3 emissions attributable to the suppliers required to comply with this environmental requirement

51-75%

% tier 1 supplier-related scope 3 emissions attributable to the suppliers in compliance with this environmental requirement

51-75%

Response to supplier non-compliance with this environmental requirement

Retain and engage

% of non-compliant suppliers engaged

76-99%

Procedures to engage non-compliant suppliers

- Providing information on appropriate actions that can be taken to address non-compliance
- Developing quantifiable, time-bound targets and milestones to bring suppliers back into compliance

Comment

Telstra's Supplier Code of Conduct (SCOC) outlines that suppliers must identify, monitor, and minimise GHG emissions and energy consumption from their own operations and supply chain. Telstra has committed to net-zero by 2050 and we expect our suppliers to help us achieve this. Additionally, we expect suppliers to set emissions reduction targets in line with Telstra's targets, which include science-based targets (SBTs). We obtain this information from suppliers through the CDP Supply Chain disclosure and require that the information is third-party verified and publicly disclosed. On request, suppliers will work with us to set emissions targets, and support Telstra in providing data on Scope 1, 2, and 3 emissions and energy consumption (including energy efficiency ratings and lifecycle carbon footprint), for products and services the supplier provides to Telstra. In addition to the SCOC, we may also include more specific environmental requirements in our contract terms based on the risks and opportunities identified. We have a standard climate clause to improve emissions data quality and reduce emissions. By the end of FY24, 91 suppliers had signed up to these new clauses which contractually committed them to disclosing and reducing their absolute emissions, an increase of 122 per cent from FY23, representing over $3 billion of our FY24 spend.

Response 2: Climate change

Environmental requirement

Other: Complying with regulatory requirements

Mechanisms for monitoring compliance with this environmental requirement

- Supplier self-assessment
- On-site third-party audit

% tier 1 suppliers by procurement spend required to comply with this environmental requirement

100%

% tier 1 suppliers by procurement spend in compliance with this environmental requirement

100%

% tier 1 supplier-related scope 3 emissions attributable to the suppliers required to comply with this environmental requirement

100%

% tier 1 supplier-related scope 3 emissions attributable to the suppliers in compliance with this environmental requirement

100%

Comment

Within Telstra’ s Supplier Agreements, there is a clause related to suppliers’ obligations to comply with all regulatory requirements in their respective region. In Australia, these include obligations under the National Greenhouse and Energy Reporting (NGER) Act (2007), among others. Telstra expects that all suppliers will conduct their activities in line with this clause. We also expect our suppliers to monitor their own, and their suppliers’ , compliance with our Supplier Code of Conduct (SCOC) which requires them to adhere to all laws in the relevant jurisdiction. Suppliers must notify Telstra if they become aware of an actual breach or reasonable likelihood of breaching of the SCOC and ensure timely correction of any identified non-conformance. We work with our suppliers to assess whether they are meeting the SCOC in a number of ways, including conducting governance meetings, reviewing reports and public records, monitoring adverse media alerts, and undertaking questionnaires and audits.

Response 3: Climate change

Environmental requirement

Environmental disclosure through a public platform

Mechanisms for monitoring compliance with this environmental requirement

- Supplier self-assessment
- On-site third-party audit
- Other: Internal dashboard

% tier 1 suppliers by procurement spend required to comply with this environmental requirement

76-99%

% tier 1 suppliers by procurement spend in compliance with this environmental requirement

76-99%

% tier 1 supplier-related scope 3 emissions attributable to the suppliers required to comply with this environmental requirement

51-75%

% tier 1 supplier-related scope 3 emissions attributable to the suppliers in compliance with this environmental requirement

1-25%

Response to supplier non-compliance with this environmental requirement

Retain and engage

% of non-compliant suppliers engaged

1-25%

Procedures to engage non-compliant suppliers

Providing information on appropriate actions that can be taken to address non-compliance

Comment

Telstra encourages our top suppliers to participate in the annual CDP Supply Chain Program to ensure they consider climate-related issues and maintain transparent oversight of their operations. In FY23, we extended our partnership with the CDP for a further three years to continue engaging our suppliers to account for and address their climate change impacts. This partnership enables us to deliver training, tools, and support on environmental disclosures to over 400 suppliers. In FY24, we were recognised in the 2023 CDP Supplier Engagement Leaderboard. This award recognises the procurement function that is significantly reducing the environmental impact of their business through innovative and collaborative approaches across the business and supply base.

Q5.11.7 Provide further details of your organization’s supplier engagement on environmental issues.

Response 1: Climate change

Action driven by supplier engagement

Emissions reduction

Type and details of engagement

- Information collection: Collect targets information at least annually from suppliers
- Information collection: Collect GHG emissions data at least annually from suppliers
- Capacity building: Provide training, support and best practices on how to measure GHG emissions
- Information collection: Collect environmental risk and opportunity information at least annually from suppliers

Upstream value chain coverage

- Tier 2 suppliers
- Tier 1 suppliers

% of tier 1 suppliers by procurement spend covered by engagement

26-50%

% of tier 1 supplier-related scope 3 emissions covered by engagement

51-75%

Number of tier 2+ suppliers engaged

8

Describe the engagement and explain the effect of your engagement on the selected environmental action

In FY24, Telstra directly engaged with more than 6,000 suppliers and approximately 78% of our total procurement spend was with our top 100 suppliers. We chose to engage and prioritise these 100 suppliers because they have the largest impact on our GHG emissions from purchased goods and services. In FY23, we extended our partnership with the CDP for a further three years to continue engaging our suppliers to account for and address their climate change impacts. This partnership enables us to deliver training, tools, and support on environmental disclosures to over 400 suppliers in 2024. This covers over 80% of our spend.

In October 2022, we launched Telstra's standard climate clause and guidance for purchases. This clause requires suppliers to understand, report, verify, reduce and track their climate change impacts in support of our 2030 target. By the end of FY24, 91 suppliers had signed up to these new clauses which contractually committed them to disclosing and reducing their absolute emissions, an increase of 122 per cent from FY23, representing over $3 billion of our FY24 spend.

Measures of Success: We have engaged our top suppliers through CDP to ascertain more accurate levels of GHG emissions and identify opportunities to collaborate on reducing emissions. Our measure of success for our supplier engagement initiatives is to get at least 200 responses. In FY24, we received 295 responses, surpassing our success measure by over 47%. Of these respondents, 58% verified and publicly disclosed their emissions data and 91 total suppliers have validated or are in the process of validating SBTi targets.

Impact of Engagement: The desired impact of engagement through the Supplier Governance Framework is to identify areas of high risk to guide supplier engagement, so we can consistently manage the potential impact to our business. Because supplier operational failures can impact Telstra's ability to operate its telecommunications network and infrastructure, this engagement strategy works to reduce climate-related supplier risk and positively impacts our business through improved business continuity, financials, customer satisfaction, and reputation. In FY24, we incorporated data collected through the CDP Supply Chain Program targeted at Telstra's top suppliers to understand and reduce our Scope 3 emissions and continue working together to maintain our carbon neutral status.

Engagement is helping your tier 1 suppliers meet an environmental requirement related to this environmental issue

Other: Environmental disclosure through a public platform

Engagement is helping your tier 1 suppliers engage with their own suppliers on the selected action

Yes

Response 2: Plastics

Action driven by supplier engagement

Circular economy

Type and details of engagement

Innovation and collaboration: Collaborate with suppliers to develop reuse infrastructure and reuse models

Upstream value chain coverage

- Tier 2 suppliers
- Tier 1 suppliers
- Tier 3 suppliers
- Tier 4+ suppliers

% of tier 1 suppliers by procurement spend covered by engagement

Less than 1%

Number of tier 2+ suppliers engaged

2

Describe the engagement and explain the effect of your engagement on the selected environmental action

Telstra's modem range continues to design solutions based on circular economy principles so we can keep materials in circulation for as long as possible. Our Smart Modem 3, 5G Modem and Smart Wi-Fi Booster enclosures are made from recycled plastics. We're finding innovative ways to make tech more sustainable and build on our environmental commitments - and are excited to pilot making modems from modems. Our Telstra Stores accept e-waste such as end of life modems which not only keeps them out of landfill but also allows us to reclaim the original materials that went into making them in the first place. Our new 5G Modem 2 is made from 95% recycled plastics with the aim to include up to 30% recycled plastics sourced from old modems. By collaborating with suppliers and their recycled plastics suppliers, we undertook a pilot to source recycled plastics from end of life Telstra modems to manufacture new modem enclosures in new Telstra modems. This partnership and collaboration with suppliers foster innovative practices, cultivating a culture of sustainability beyond Telstra.

Engagement is helping your tier 1 suppliers engage with their own suppliers on the selected action

Yes

Response 3: Climate change

Action driven by supplier engagement

Other: Sustainable supply chain management encompassing both social and environmental considerations

Type and details of engagement

- Information collection: Collect environmental risk and opportunity information at least annually from suppliers
- Information collection: Collect GHG emissions data at least annually from suppliers
- Information collection: Other information collection activity: Code of conduct featuring climate KPIs
- Information collection: Collect targets information at least annually from suppliers

Upstream value chain coverage

Tier 1 suppliers

% of tier 1 suppliers by procurement spend covered by engagement

100%

% of tier 1 supplier-related scope 3 emissions covered by engagement

100%

Describe the engagement and explain the effect of your engagement on the selected environmental action

Telstra engages with suppliers on climate-related issues in the onboarding process, and each year through multiple compliance mechanisms. Telstra's Supplier Code of Conduct (SCOC) is the primary guideline for supplier compliance and onboarding. We provide our SCOC to all our Tier 1 suppliers. The Code includes Environmental Considerations, such as Environmental Laws, Permits and Reporting, Product Content, Emissions and Energy Consumption, Climate and Nature Impacts and Pollution Prevention and Circularity.

We use KYS (Know Your Supplier), a secure web-based platform which provides a central repository for suppliers to respond to Telstra's questions on 12 supplier risk categories, as well as upload and maintain information about their compliance with the SCOC and evidence of their accreditations. As of 30 June 2024, we have onboarded 906 suppliers on the KYS platform. Of these, 74% have completed the KYS Questionnaire, up from 53% in FY23. In FY24, we reviewed our supplier list in KYS removing those with no active engagements. For this reason, there are fewer total suppliers showing in FY24, compared to previous years. Success of this engagement is measured through monitoring supplier compliance with the SCOC through audits.

For 5 years, we have worked with the Joint Audit Cooperation (JAC), whose audits aim to verify that suppliers comply with internationally recognised sustainability standards within global supply chains. In FY24, 57 independent third-party audits were conducted across 29 Telstra suppliers, of which Telstra led six audits and 51 were led by peers from the JAC group. We work with suppliers to build their capability to assess and improve environmental, social and ethical performance within their own supply chains. Once trained, these suppliers are able to complete audits of their own. Impact: Telstra’s approach to sustainable supply chain management encompasses both social and environmental considerations. The key principles of our approach are reflected within the SCOC and other key procurement policies and processes. As part of the requirements, suppliers must seek to reduce GHG emissions through energy efficient alternatives which reduce energy consumption and costs. Telstra prefers suppliers who provide products rated in accordance with recognised standards such as Electronic Product Environmental Assessment Tool (EPEAT) and ENERGY STAR. The impact of engagement is a sustainably managed and transparent supply chain.

Engagement is helping your tier 1 suppliers meet an environmental requirement related to this environmental issue

Other: Implementation of emissions reduction initiatives; Complying with regulatory requirements

Engagement is helping your tier 1 suppliers engage with their own suppliers on the selected action

Yes

Q5.11.9 Provide details of any environmental engagement activity with other stakeholders in the value chain.

Response 1: Climate change

Type of stakeholder

Customers

Type and details of engagement

Innovation and collaboration: Collaborate with stakeholders on innovations to reduce environmental impacts in products and services

% of stakeholder type engaged

100%

% stakeholder-associated scope 3 emissions

100%

Rationale for engaging these stakeholders and scope of engagement

Through our eCycle program and our involvement in MobileMuster, a recycling program managed by the Australian Mobile Telecommunications Association (AMTA), we recycle e-waste, communicate the positive impacts with our customers, and encourage customers to reduce e-waste. Australians store an estimated 22 million phones in their homes. We are helping all our customers reduce the number of unwanted devices in their homes and businesses by making it easier for this technology to be reused or recycled. Enabling the valuable precious metals and materials in old technology to re-enter the economy reduces reliance on extracting raw materials, which has a positive and wide-reaching environmental impact. Telstra provides mobile phone and accessory recycling opportunities via our retail stores and postal options for 100% of our customers. This program is accessible to 100% of our customers because responsible management of e-waste is one of our significant sustainability impacts as informed by our materiality assessment. As such, we are committed to embedding circular economy principles in how we design, develop, manage and operate our networks - as well as the products we put out to market.

Effect of engagement and measures of success

Effect of Engagement: As a founding member of MobileMuster - a voluntary, government-accredited mobile phone recycling scheme - we have supported responsible electronics recycling programs for 27 years. This industry-led product stewardship program provides a free mobile phone recycling program in Australia. The program is committed to raising awareness and educating the community on repair, reuse and recycling. Since 2021, the program has expanded to include a larger range of devices in the MobileMuster program (eg landline phones, modems, routers, Telstra TV streaming boxes, wearables and IoT devices).

Measure of Success: At the end of FY21, we announced a target to reuse or recycle 500,000 mobile phones, modems and other devices annually. We exceeded the target in FY23 and increased our target ambition in FY24 to reuse or recycle 650,000 mobile phones, modems and other devices each year to FY25. We met this increased target in FY24, reusing or recycling 710,341 mobile phones, modems and other devices.

Response 2: Climate change

Type of stakeholder

Investors and shareholders

Type and details of engagement

Education/Information sharing: Share information on environmental initiatives, progress and achievements

% of stakeholder type engaged

100%

% stakeholder-associated scope 3 emissions

None

Rationale for engaging these stakeholders and scope of engagement

Telstra's commitment to good governance is exemplified through our corporate governance framework, which supports open, clear, and timely communication with all our shareholders. This framework encompasses reporting on all material aspects of the company's performance, including environmental performance. Telstra transparently shares our climate-related governance, strategy, risks, targets, and activities with our shareholders. This approach not only builds trust and accountability but also allows Telstra to gather and use feedback from shareholders to enhance our climate strategy and goals. We engage with Telstra's shareholders on environmental issues such as climate change and plastics through our Annual General Meeting, which takes place after we release our full-year results, and through regular, periodic market-wide investor updates and institutional and retail investor engagement opportunities throughout the year. All Telstra shareholders are encouraged to attend the Annual General Meeting and Investor Day. The materials from the Investor Day are accessible to all shareholders and are made publicly available after the event on Telstra's website. We welcome questions and feedback from our shareholders at any time, including through individual meetings.

Effect of engagement and measures of success

Effect of Engagement: ESG considerations are fundamental to Telstra and are a core element of our T25 Strategy. Our ESG ambitions and progress are important to Telstra's shareholders and hence our commitment to transparency and reporting. Telstra engages with our shareholders through our communications and Investor Days to ensure they are informed about our T25 Strategy, understand their concerns, identify gaps in our environmental program, and use their feedback to assess and improve the company's environmental strategy and objectives. Measure of Success: We welcome shareholder questions at any time and conduct open Q&A sessions with Telstra's management teams during our Annual General Meeting, results announcements and Investor Day (when held). We also welcome one-on-one engagement with investment market participants on their questions and concerns relating to our ESG strategy and progress. An indicator of success for this engagement includes the absence of significant concerns communicated to us by shareholders about our environment strategy and goals, as well as motions and votes in relation to our climate targets at our Annual General Meeting and Investor Day.

For example, at the 2024 AGM there were two questions which praised our emissions reduction progress to date, one of which requested more information about metrics for energy efficiency opportunities. Neither posed concerns about our climate ambition.

Response 3: Climate change

Type of stakeholder

Other value chain stakeholder: Various stakeholders including customers, employees, investors, and community partners

Type and details of engagement

Innovation and collaboration: Other innovation and collaboration: Collaborate with stakeholders in the identification of material impacts

% of stakeholder type engaged

100%

% stakeholder-associated scope 3 emissions

Less than 1%

Rationale for engaging these stakeholders and scope of engagement

Telstra conducts an annual materiality assessment to pinpoint Telstra's most significant sustainability impacts. As part of this process, we check how our work affects the world around us and what issues are most important to us and our stakeholders. We look at different sources of information, such as our business goals, global trends, best practices, risks, and feedback from different stakeholders who care about what we do. This helps us to improve our sustainability report and our sustainability strategy. It also helps us to see what challenges could impact our business in the future and to report on them in our Annual Report. Our materiality process follows a two-year cycle, alternating between a comprehensive materiality assessment and a desktop review. These assessments include peer reviews, industry and global reporting standard reviews, internal reviews, and survey results, including feedback from customers, regulators, employees, community partners, investors, our CEOLT, and members of the Board.

Effect of engagement and measures of success

Effect of engagement: Employee perspectives are incorporated into our biennial materiality survey, which ranks and sorts Telstra's top priority impacts for reporting (validation). This includes applying weighting and loading methodologies to determine the significance of each impact relative to others identified. In FY23, the result of our employee engagement highlighted the following priority sustainability issues: 1. Privacy, cybersecurity and data protection 2. Network resilience and reliability 3. Customer experience 4. Health, safety and wellbeing 5. Engaging, developing and enabling people These results were then combined in our materiality tool with our additional routes of enquiry to formulate Telstra’ s overall FY24 material sustainability impacts: 1. Privacy, cyber security and data protection 2. Ethical business practices 3. Network resilience and reliability 4. Energy and emissions 5. Customer experience

Q5.13 Has your organization already implemented any mutually beneficial environmental initiatives due to CDP Supply Chain member engagement?

Yes

Q6.1 Provide details on your chosen consolidation approach for the calculation of environmental performance data.

Response 1: Climate change

Consolidation approach used

Operational control

Provide the rationale for the choice of consolidation approach

Telstra uses the operational control approach for our environmental performance data because it allows us to account for 100% of the greenhouse gas emissions from our operations over which we have control to implement and enforce policies. By adopting this approach, we can fully manage and report emissions from these operations. This method is effective because Telstra has the authority to implement and enforce operational policies across our controlled operations. This direct influence enables us to actively manage and reduce emissions, supporting our commitment to sustainability. The operational control approach aligns with best practice approaches as outlined in the GHG Protocol and is consistent with our financial reporting. This allows us to maintain consistency across all reporting frameworks. This alignment simplifies the integration of financial and environmental data, facilitating a clearer understanding of our overall performance and impact.

Response 2: Plastics

Consolidation approach used

Operational control

Provide the rationale for the choice of consolidation approach

Telstra uses operational control for reporting our environmental performance data because this is consistent with our financial reporting, and the consolidation approach that we have employed for years. This method aligns with best practice approaches as outlined in the GHG Protocol, ensuring that our emissions reporting is accurate, reliable, and in harmony with our financial data. By using a consolidation approach that mirrors our financial reporting, we maintain consistency across all reporting frameworks. This alignment simplifies the integration of financial and environmental data, facilitating a clearer understanding of our overall performance and impact.

Response 3: Biodiversity

Consolidation approach used

Operational control

Provide the rationale for the choice of consolidation approach

Telstra uses operational control for reporting our environmental performance data because this is consistent with our financial reporting, and the consolidation approach that we have employed for years. This method aligns with best practice approaches as outlined in the GHG Protocol, ensuring that our emissions reporting is accurate, reliable, and in harmony with our financial data. By using a consolidation approach that mirrors our financial reporting, we maintain consistency across all reporting frameworks. This alignment simplifies the integration of financial and environmental data, facilitating a clearer understanding of our overall performance and impact.

Q7.1 Is this your first year of reporting emissions data to CDP?

No

Q7.1.1 Has your organization undergone any structural changes in the reporting year, or are any previous structural changes being accounted for in this disclosure of emissions data?

No

Q7.1.2 Has your emissions accounting methodology, boundary, and/or reporting year definition changed in the reporting year?

No

Q7.2 Select the name of the standard, protocol, or methodology you have used to collect activity data and calculate emissions.

- Australia - National Greenhouse and Energy Reporting Act
- The Greenhouse Gas Protocol: Scope 2 Guidance
- Defra Environmental Reporting Guidelines: Including streamlined energy and carbon reporting guidance, 2019
- The Greenhouse Gas Protocol: Corporate Value Chain (Scope 3) Standard
- The Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard (Revised Edition)

Q7.3 Describe your organization’s approach to reporting Scope 2 emissions.

Response 1:

Scope 2, location-based

We are reporting a Scope 2, location-based figure

Scope 2, market-based

We have operations where we are able to access electricity supplier emission factors or residual emissions factors, but are unable to report a Scope 2, market-based figure

Comment

Telstra did not disclose market-based scope 2 emissions as part of its FY24 annual reporting. The calculation of scope 2 emissions using the market-based method is something we are considering over the medium term (1-3 years), however at this stage we continue to use the location-based method given this is the method required for our mandatory reporting against the Australian NGER Act.

Q7.4 Are there any sources (e.g. facilities, specific GHGs, activities, geographies, etc.) of Scope 1, Scope 2 or Scope 3 emissions that are within your selected reporting boundary which are not included in your disclosure?

Yes

Q7.4.1 Provide details of the sources of Scope 1, Scope 2, or Scope 3 emissions that are within your selected reporting boundary which are not included in your disclosure.

Response 1: Row 1

Source of excluded emissions

Recently acquired business: Digicel Pacific Limited

Scope(s) or Scope 3 category(ies)

- Scope 3: Downstream transportation and distribution
- Scope 3: End-of-life treatment of sold products
- Scope 3: Capital goods
- Scope 3: Use of sold products
- Scope 3: Employee commuting
- Scope 2 (location-based)
- Scope 3: Purchased goods and services
- Scope 3: Processing of sold products
- Scope 3: Business travel
- Scope 3: Fuel and energy-related activities (not included in Scopes 1 or 2)
- Scope 3: Upstream leased assets
- Scope 3: Upstream transportation and distribution
- Scope 3: Downstream leased assets
- Scope 3: Waste generated in operations
- Scope 1

Relevance of Scope 1 emissions from this source

Emissions are not relevant

Relevance of location-based Scope 2 emissions from this source

Emissions are not relevant

Relevance of Scope 3 emissions from this source

Emissions are not relevant

Estimated percentage of total Scope 1+2 emissions this excluded source represents

7

Estimated percentage of total Scope 3 emissions this excluded source represents

7.7

Explain why this source is excluded

Data relating to Digicel Pacific Limited following its acquisition (which closed in FY23) has been excluded from Telstra's targets, climate change and circular economy data in FY24 given the challenges in compiling timely and quality environment data that aligns to the GHG Protocol. In FY25, we conducted a detailed program of work to quantify Digicel Pacific's GHG emissions profile, which was subject to limited assurance for FY25 and the FY19 baseline but will still be reported separately for FY25.

Our data for Digicel Pacific for FY19 (the baseline year of our target period) indicates it represented less than 5% of total Group emissions at that time for scopes 1+2 and scope 3.

Explain how you estimated the percentage of emissions this excluded source represents

We have added data for scope 1+2 and scope 3 emissions for Digicel Pacific to our reported Telstra Group emissions for FY24 to calculate new Telstra Group estimates and used that figure as the denominator in relation to Digicel Pacific emissions to calculate the estimated percentage the excluded source represented.
Scope 1+2 = (20,599 + 40,452)/(20,599+40,452+817,606) = 6.95%
Scope 3 = 133,617/(133,617+1,604,094) = 7.69%

GHG data estimates for Digicel Pacific are based on a mix of consumption and spend data from invoices, underpinned by the GHG Protocol and Telstra internal calculation, estimates and assumptions.

Q7.5 Provide your base year and base year emissions.

Response 1: Scope 1

Base year end

2019-06-29

Base year emissions (metric tons CO2e)

47203.56

Methodological details

Telstra's Scope 1 GHG emissions have been assessed in a robust and detailed way through semi-automated collation of energy consumption data inputs from external and internal suppliers, which are then subject to robust quality assurance and analytical procedures, in line with NGER regulations. Then, NGA emission factors have been applied (in line with NGER Act) and international emission factors (in line with reputable international emission factor sources and agencies).

This includes transport fuel related emissions from Telstra's fleet vehicles and contractors under Telstra's operational control that consume diesel, petrol and ethanol, and stationary energy related emissions from the consumption of natural gas and LPG at Telstra's facilities across all geographies.

Response 2: Scope 2 (location-based)

Base year end

2019-06-30

Base year emissions (metric tons CO2e)

1259291.69

Methodological details

Telstra's scope 2 GHG emissions have been assessed in a robust and detailed way through semi-automated collation of purchased electricity consumption data inputs from suppliers, which are then subject to robust quality assurance and analytical procedures, in line with NGER regulations. Then, NGA emission factors have been applied (in line with NGER Act and International emission factors (in line with reputable international emission factor sources and agencies).

Response 3: Scope 3 category 1: Purchased goods and services

Base year end

2019-06-30

Base year emissions (metric tons CO2e)

1093652

Methodological details

Telstra's scope 3 GHG emissions have been assessed in a robust and detailed way utilising spend-based and material-based data and aligning this data with LCA databases (ecoinvent 3.4, AusLCI and ExioBase 3) and other published sources (e.g. National GHG Accounts Factors) to calculate the GHG emissions. The methodology followed the Greenhouse Gas Protocol Corporate Value Chain (Scope 3) Accounting and Reporting Standard (Greenhouse Gas Protocol, 2013).

Response 4: Scope 3 category 2: Capital goods

Base year end

2019-06-29

Base year emissions (metric tons CO2e)

473719

Methodological details

Telstra's scope 3 GHG emissions have been assessed in a robust and detailed way utilising spend-based and material-based data and aligning this data with LCA databases (ecoinvent 3.4, AusLCI and ExioBase 3) and other published sources (e.g. National GHG Accounts Factors) to calculate the GHG emissions. The methodology followed the Greenhouse Gas Protocol Corporate Value Chain (Scope 3) Accounting and Reporting Standard (Greenhouse Gas Protocol, 2013).

Response 5: Scope 3 category 3: Fuel-and-energy-related activities (not included in Scope 1 or 2)

Base year end

2019-06-29

Base year emissions (metric tons CO2e)

145504

Methodological details

Scope 3 emissions arising from the use of Stationary and Transport fuels directly related to the operation of Telstra's Network and ancillary to it are based on the emission coefficients contained in the National Greenhouse Accounts (NGA) Factors, August 2019 prepared by the Department of the Environment and Energy - https://publications.industry.gov.au/publications/climate-change/climate-change/climate-science-data/gre enhouse-gas-measurement/publications/national-greenhouse-accounts-factors-august-2019.html.

Response 6: Scope 3 category 4: Upstream transportation and distribution

Base year end

2019-06-29

Base year emissions (metric tons CO2e)

36943

Methodological details

Telstra’s scope 3 GHG emissions have been assessed in a robust and detailed way utilising spend-based and material-based data and aligning this data with LCA databases (ecoinvent 3.4, AusLCI and ExioBase 3) and other published sources (e.g. National GHG Accounts Factors) to calculate the GHG emissions. The methodology followed the Greenhouse Gas Protocol Corporate Value Chain (Scope 3) Accounting and Reporting Standard (Greenhouse Gas Protocol, 2013).

Response 7: Scope 3 category 5: Waste generated in operations

Base year end

2019-06-30

Base year emissions (metric tons CO2e)

6239

Methodological details

The emission coefficient for waste is based on National Greenhouse Accounts (NGA) Factors, August 2019 prepared by the Department of Climate Change and Energy Efficiency - https://publications.industry.gov.au/publications/climate-change/climate-change/climate-science-data/greenhouse-gas-measurement/publications/national-greenhouse-accounts-factors-august-2019.html. Refer to Table 47, page 79. Category B has been used, “Commercial and Industrial Waste”. Emission factor (tCO2-e/t waste) = 1.2.

Response 8: Scope 3 category 6: Business travel

Base year end

2019-06-30

Base year emissions (metric tons CO2e)

15629

Methodological details

Employee air travel and rideshare emissions are calculated using the methodology prescribed by the UK Department of Environment, Food and Rural Affairs (DEFRA). The DEFRA method is endorsed by the Australian National Carbon Offset Standard. Translating the DEFRA methodology to the Australian context, short haul (domestic) flights are those taken within States while medium haul flights are to and from capital cities such as between Melbourne and Sydney, Sydney and Brisbane or Melbourne and Brisbane. Long Haul flights are trans-Tasman and other international journeys. http://www.ukconversionfactorscarbonsmart.co.uk/.

Response 9: Scope 3 category 7: Employee commuting

Base year end

2019-06-29

Base year emissions (metric tons CO2e)

85814

Methodological details

Telstra’s scope 3 GHG emissions have been assessed utilising spend-based and material-based data and aligning this data with LCA databases (ecoinvent 3.4, AusLCI and ExioBase 3) and other published sources (e.g. National GHG Accounts Factors) to calculate the GHG emissions. The methodology followed the Greenhouse Gas Protocol Corporate Value Chain (Scope 3) Accounting and Reporting Standard (Greenhouse Gas Protocol, 2013).

Response 10: Scope 3 category 8: Upstream leased assets

Base year end

2019-06-30

Base year emissions (metric tons CO2e)

137620

Methodological details

Telstra’s scope 3 GHG emissions have been assessed in a robust and detailed way utilising spend-based and material-based data and aligning this data with LCA databases (ecoinvent 3.4, AusLCI and ExioBase 3) and other published sources (e.g. National GHG Accounts Factors) to calculate the GHG emissions. The methodology followed the Greenhouse Gas Protocol Corporate Value Chain (Scope 3) Accounting and Reporting Standard (Greenhouse Gas Protocol, 2013).

Response 11: Scope 3 category 9: Downstream transportation and distribution

Base year end

2019-06-30

Base year emissions (metric tons CO2e)

24340

Methodological details

Telstra’s scope 3 GHG emissions have been assessed by utilising spend-based and material-based data and aligning this data with LCA databases (ecoinvent 3.4, AusLCI and ExioBase 3) and other published sources (e.g. National GHG Accounts Factors) to calculate the GHG emissions. The methodology followed the Greenhouse Gas Protocol Corporate Value Chain (Scope 3) Accounting and Reporting Standard (Greenhouse Gas Protocol, 2013).

Response 12: Scope 3 category 11: Use of sold products

Base year end

2019-06-30

Base year emissions (metric tons CO2e)

516344

Methodological details

Telstra’ s scope 3 GHG emissions have been assessed by utilising spend-base and material-based data and aligning this data with LCA databases (ecoinvent 3.4, AusLCI and ExioBase 3) and other published sources (e.g. National GHG Accounts Factors) to calculate the GHG emissions. The methodology followed the Greenhouse Gas Protocol Corporate Value Chain (Scope 3) Accounting and Reporting Standard (Greenhouse Gas Protocol, 2013).

Response 13: Scope 3 category 12: End of life treatment of sold products

Base year end

2019-06-30

Base year emissions (metric tons CO2e)

2156

Methodological details

Telstra’ s scope 3 GHG emissions have been assessed by utilising spend-base and material-based data and aligning this data with LCA databases (ecoinvent 3.4, AusLCI and ExioBase 3) and other published sources (e.g. National GHG Accounts Factors) to calculate the GHG emissions. The methodology followed the Greenhouse Gas Protocol Corporate Value Chain (Scope 3) Accounting and Reporting Standard (Greenhouse Gas Protocol, 2013).

Response 14: Scope 3 category 15: Investments

Base year end

2019-06-30

Base year emissions (metric tons CO2e)

24625

Methodological details

Telstra’ s scope 3 GHG emissions have been assessed in a robust and detailed way utilising spend-base and material-based data and aligning this data with LCA databases (ecoinvent 3.4, AusLCI and ExioBase 3) and other published sources (e.g. National GHG Accounts Factors) to calculate the GHG emissions. The methodology followed the Greenhouse Gas Protocol Corporate Value Chain (Scope 3) Accounting and Reporting Standard (Greenhouse Gas Protocol, 2013).

Q7.6 What were your organization’s gross global Scope 1 emissions in metric tons CO2e?

Response 1: Reporting year

Gross global Scope 1 emissions (metric tons CO2e)

33166.59

Methodological details

Telstra’s scope 1 GHG emissions have been assessed in a robust and detailed way through semi-automated collation of energy consumption data inputs from external and internal suppliers, which are then subject to robust quality assurance and analytical procedures, in line with NGER regulations. Then, NGA emission factors have been applied (in line with NGER Act) and international emission factors (in line with reputable international emission factor sources and agencies). This includes transport fuel related emissions from Telstra’s fleet vehicles and contractors under Telstra’s operational control that consume diesel, petrol and ethanol, and stationary energy related emissions from the consumption of natural gas and LPG at Telstra’s facilities across all geographies.

Response 2: Past year 1

Gross global Scope 1 emissions (metric tons CO2e)

30737.55

End date

2023-06-29

Methodological details

Telstra’s scope 1 GHG emissions have been assessed in a robust and detailed way through semi-automated collation of energy consumption data inputs from external and internal suppliers, which are then subject to robust quality assurance and analytical procedures, in line with NGER regulations. Then, NGA emission factors have been applied (in line with NGER Act) and international emission factors (in line with reputable international emission factor sources and agencies). This includes transport fuel related emissions from Telstra’s fleet vehicles and contractors under Telstra’s operational control that consume diesel, petrol and ethanol, and stationary energy related emissions from the consumption of natural gas and LPG at Telstra’s facilities across all geographies.

Response 3: Past year 2

Gross global Scope 1 emissions (metric tons CO2e)

31868.91

End date

2022-06-29

Methodological details

Telstra’s scope 1 GHG emissions have been assessed in a robust and detailed way through semi-automated collation of energy consumption data inputs from external and internal suppliers, which are then subject to robust quality assurance and analytical procedures, in line with NGER regulations. Then, NGA emission factors have been applied (in line with NGER Act) and international emission factors (in line with reputable international emission factor sources and agencies). This includes transport fuel related emissions from Telstra’s fleet vehicles and contractors under Telstra’s operational control that consume diesel, petrol and ethanol, and stationary energy related emissions from the consumption of natural gas and LPG at Telstra’s facilities across all geographies.

Response 4: Past year 3

Gross global Scope 1 emissions (metric tons CO2e)

33085.44

End date

2021-06-29

Methodological details

Telstra’s scope 1 GHG emissions have been assessed in a robust and detailed way through semi-automated collation of energy consumption data inputs from external and internal suppliers, which are then subject to robust quality assurance and analytical procedures, in line with NGER regulations. Then, NGA emission factors have been applied (in line with NGER Act) and international emission factors (in line with reputable international emission factor sources and agencies). This includes transport fuel related emissions from Telstra’s fleet vehicles and contractors under Telstra’s operational control that consume diesel, petrol and ethanol, and stationary energy related emissions from the consumption of natural gas and LPG at Telstra’s facilities across all geographies.

Response 5: Past year 4

Gross global Scope 1 emissions (metric tons CO2e)

36904.76

End date

2020-06-29

Methodological details

Telstra’s scope 1 GHG emissions have been assessed in a robust and detailed way through semi-automated collation of energy consumption data inputs from external and internal suppliers, which are then subject to robust quality assurance and analytical procedures, in line with NGER regulations. Then, NGA emission factors have been applied (in line with NGER Act) and international emission factors (in line with reputable international emission factor sources and agencies). This includes transport fuel related emissions from Telstra’s fleet vehicles and contractors under Telstra’s operational control that consume diesel, petrol and ethanol, and stationary energy related emissions from the consumption of natural gas and LPG at Telstra’s facilities across all geographies.

Response 6: Past year 5

Gross global Scope 1 emissions (metric tons CO2e)

47203.56

End date

2019-06-29

Methodological details

Telstra’s scope 1 GHG emissions have been assessed in a robust and detailed way through semi-automated collation of energy consumption data inputs from external and internal suppliers, which are then subject to robust quality assurance and analytical procedures, in line with NGER regulations. Then, NGA emission factors have been applied (in line with NGER Act) and international emission factors (in line with reputable international emission factor sources and agencies). This includes transport fuel related emissions from Telstra’s fleet vehicles and contractors under Telstra’s operational control that consume diesel, petrol and ethanol, and stationary energy related emissions from the consumption of natural gas and LPG at Telstra’s facilities across all geographies.

Q7.7 What were your organization’s gross global Scope 2 emissions in metric tons CO2e?

Response 1: Reporting year

Gross global Scope 2, location-based emissions (metric tons CO2e)

784439.1

Methodological details

Telstra’s scope 2 GHG emissions have been assessed in a robust and detailed way through semi-automated collation of purchased electricity consumption data inputs from suppliers, which are then subject to robust quality assurance and analytical procedures, in line with NGER regulations. Then, NGA emission factors have been applied (in line with NGER Act) and international emission factors (in line with reputable international emission factor sources and agencies).

Regarding market-based scope 2 emissions, Telstra does not have any low emissions contractual instruments or specific supplier emissions factors data.

Response 2: Past year 1

Gross global Scope 2, location-based emissions (metric tons CO2e)

879869.9

End date

2023-06-29

Methodological details

Telstra’s scope 2 GHG emissions have been assessed in a robust and detailed way through semi-automated collation of purchased electricity consumption data inputs from suppliers, which are then subject to robust quality assurance and analytical procedures, in line with NGER regulations. Then, NGA emission factors have been applied (in line with NGER Act) and International emission factors (in line with reputable international emission factor sources and agencies).

Regarding market-based scope 2 emissions, Telstra does not have any low emissions contractual instruments or specific supplier emissions factors data.

Response 3: Past year 2

Gross global Scope 2, location-based emissions (metric tons CO2e)

1092010.6

End date

2022-06-29

Methodological details

Telstra’s scope 2 GHG emissions have been assessed in a robust and detailed way through semi-automated collation of purchased electricity consumption data inputs from suppliers, which are then subject to robust quality assurance and analytical procedures, in line with NGER regulations. Then, NGA emission factors have been applied (in line with NGER Act) and International emission factors (in line with reputable international emission factor sources and agencies).

Regarding market-based scope 2 emissions, Telstra does not have any low emissions contractual instruments or specific supplier emissions factors data.

Response 4: Past year 3

Gross global Scope 2, location-based emissions (metric tons CO2e)

1130583.8

End date

2021-06-29

Methodological details

Telstra's scope 2 GHG emissions have been assessed in a robust and detailed way through semi-automated collation of purchased electricity consumption data inputs from suppliers, which are then subject to robust quality assurance and analytical procedures, in line with NGER regulations. Then, NGA emission factors have been applied (in line with NGER Act) and International emission factors (in line with reputable international emission factor sources and agencies).

Regarding market-based scope 2 emissions, Telstra does not have any low emissions contractual instruments or specific supplier emissions factors data.

Response 5: Past year 4

Gross global Scope 2, location-based emissions (metric tons CO2e)

1210145.3

End date

2020-06-29

Methodological details

Telstra's scope 2 GHG emissions have been assessed in a robust and detailed way through semi-automated collation of purchased electricity consumption data inputs from suppliers, which are then subject to robust quality assurance and analytical procedures, in line with NGER regulations. Then, NGA emission factors have been applied (in line with NGER Act) and International emission factors (in line with reputable international emission factor sources and agencies).

Regarding market-based scope 2 emissions, Telstra does not have any low emissions contractual instruments or specific supplier emissions factors data.

Response 6: Past year 5

Gross global Scope 2, location-based emissions (metric tons CO2e)

1259291.7

End date

2019-06-29

Methodological details

Telstra’s scope 2 GHG emissions have been assessed in a robust and detailed way through semi-automated collation of purchased electricity consumption data inputs from suppliers, which are then subject to robust quality assurance and analytical procedures, in line with NGER regulations. Then, NGA emission factors have been applied (in line with NGER Act) and International emission factors (in line with reputable international emission factor sources and agencies).

Regarding market-based scope 2 emissions, Telstra does not have any low emissions contractual instruments or specific supplier emissions factors data.

Q7.8 Account for your organization’s gross global Scope 3 emissions, disclosing and explaining any exclusions.

Response 1: Purchased goods and services

Evaluation status

Relevant, calculated

Emissions in reporting year (metric tons CO2e)

758357.56

Emissions calculation methodology

- Hybrid method
- Spend-based method
- Supplier-specific method

Percentage of emissions calculated using data obtained from suppliers or value chain partners

100

Please explain

Scope 3 emissions associated with Telstra’s purchase of goods and services have been assessed using a hierarchy of calculation methods. The three methods used are: (i) supplier specific method using supplier data where available to develop Telstra specific supplier emissions factors (ii) hybrid method based on supplier emissions and revenue data sourced from the CDP supply chain program to generate Telstra specific supplier emissions intensity factors (iii) supplier spend-based method use an input-output approach whereby suppliers are mapped to spend categories and emission factors (tCO2-e/$ spend) are sourced from Exiobase.

Includes procurement spend categories related to operating expenses. Procurement categories such as regulatory payments, energy and travel have been excluded as they have either been accounted for in scope 1+2, another scope 3 category or does not contribute to emissions. Internal spend such as for staff payments and spend associated with Telstra subsidiaries, joint ventures and associated entities are also excluded.

Response 2: Capital goods

Evaluation status

Relevant, calculated

Emissions in reporting year (metric tons CO2e)

433716.76

Emissions calculation methodology

- Hybrid method
- Spend-based method
- Supplier-specific method

Percentage of emissions calculated using data obtained from suppliers or value chain partners

100

Please explain

Scope 3 emissions associated with Telstra’ s purchase of capital goods have been assessed using a hierarchy of calculation methods. The three methods used are: (i) supplier specific method using supplier data where available to develop Telstra specific supplier emissions factors (ii) hybrid method based on supplier emissions and revenue data sourced from the CDP supply chain program to generate Telstra specific supplier emissions intensity factors (iii) supplier spend-based method use an input-output approach whereby suppliers are mapped to spend categories and emission factors (tCO2-e/$ spend) are sourced from Exiobase.

Includes procurement spend categories. Procurement categories such as regulatory payments, energy and travel have been excluded as they have either been accounted for in scope 1+2, another scope 3 category or does not contribute to emissions. Internal spend such as for staff payments and spend associated with Telstra subsidiaries are also excluded.

Response 3: Fuel-and-energy-related activities (not included in Scope 1 or 2)

Evaluation status

Relevant, calculated

Emissions in reporting year (metric tons CO2e)

96420.37

Emissions calculation methodology

Average data method

Percentage of emissions calculated using data obtained from suppliers or value chain partners

100

Please explain

Scope 3 emissions arising from the use of electricity and fuels directly related to the operation of Telstra’ s network and ancillary, both domestic and internationally. These are based on the emission coefficients contained in the National Greenhouse Accounts (NGA) Factors, August 2023 prepared by the Department of Climate Change, Energy, the Environment and Water and other relevant regional electricity emission factors for international sites.

Includes electricity and energy use related to the operation of Telstra’ s network and its ancillaries.

Response 4: Upstream transportation and distribution

Evaluation status

Relevant, calculated

Emissions in reporting year (metric tons CO2e)

29975.05

Emissions calculation methodology

- Spend-based method
- Supplier-specific method
- Hybrid method

Percentage of emissions calculated using data obtained from suppliers or value chain partners

100

Please explain

Scope 3 emissions associated with Telstra’s purchase of upstream transportation and distribution services have been assessed using a hierarchy of calculation methods. The three methods used are: (i) supplier specific method using supplier data where available to develop Telstra specific supplier emissions factors (ii) hybrid method based on supplier emissions and revenue data sourced from the CDP supply chain program to generate Telstra specific supplier emissions intensity factors (iii) supplier spend-based method use an input-output approach whereby suppliers are mapped to spend categories and emission factors (tCO2-e/$ spend) are sourced from Exiobase.

Includes transportation and distribution of products purchased from suppliers and products shipped to customers.

Response 5: Waste generated in operations

Evaluation status

Relevant, calculated

Emissions in reporting year (metric tons CO2e)

2363.57

Emissions calculation methodology

Waste-type-specific method

Percentage of emissions calculated using data obtained from suppliers or value chain partners

100

Please explain

Scope 3 emissions associated with the waste generated in Telstra’s operations is calculated by using tonnes of waste by destination (general landfill, recycling etc.) applied to the relevant emissions factor for the various waste streams. The waste specific emission factors are sourced from Climate Active (tCO2-e/tonne). Includes total waste generated from Telstra’s operations (network and non-network waste).

Response 6: Business travel

Evaluation status

Relevant, calculated

Emissions in reporting year (metric tons CO2e)

5418.07

Emissions calculation methodology

Distance-based method

Percentage of emissions calculated using data obtained from suppliers or value chain partners

100

Please explain

Scope 3 emissions associated with employee air travel are calculated using the methodology prescribed by the UK Department of Environment, Food and Rural Affairs (DEFRA). The DEFRA method is endorsed by the Climate Active Carbon Neutral Standard, where flights are categorised by haul type (short, medium or long) and emission factors are sourced from Climate Active(tCO2-e/pax.km). Emissions associated with fuel type activity (taxi/ride share) calculated using total distance travelled and multiplied by Climate Active emission factors (tCO2-e/km). Includes Telstra’ s employees’ business-related air travel and fuel type activity.

Response 7: Employee commuting

Evaluation status

Relevant, calculated

Emissions in reporting year (metric tons CO2e)

48803.79

Emissions calculation methodology

Distance-based method

Percentage of emissions calculated using data obtained from suppliers or value chain partners

0

Please explain

Scope 3 emissions associated with employee commute has been calculated using the average-data method and based on staff numbers and location. Assumptions are applied to staff numbers including average distance travelled, commuter mode (car, public transport, walk etc.) and work from home (WFH). These assumptions are derived from actual Telstra data collected via the FY24 Q4 Pulse Survey, Telstra assumptions (WFH only) and Telstra emission factors (tCO2-e/km or tCO2-e/pax.km).

Includes Telstra’ s employees commute per city and region and working from home emissions.

Response 8: Upstream leased assets

Evaluation status

Relevant, calculated

Emissions in reporting year (metric tons CO2e)

50204.42

Emissions calculation methodology

- Average data method
- Asset-specific method

Percentage of emissions calculated using data obtained from suppliers or value chain partners

100

Please explain

Scope 3 emissions associated with Telstra's leased assets not under Telstra's operational control (not included in scope 1 and scope 2 emissions) have been assessed using a hierarchy of calculation methods. The two methods are:
(i) asset-specific method using asset-specific fuel and energy use data from individual leased assets.

(ii) average data method using estimations for individual leased assets based on average data (e.g. average emissions per asset type or floor space).
These methods utilise the National Greenhouse Accounts (NGA) Factors for Australian assets and relevant regional electricity emission factors for international leased assets.

Response 9: Downstream transportation and distribution

Evaluation status

Relevant, calculated

Emissions in reporting year (metric tons CO2e)

10526.27

Emissions calculation methodology

Distance-based method

Percentage of emissions calculated using data obtained from suppliers or value chain partners

0

Please explain

Scope 3 emissions associated with the downstream transportation and distribution of Telstra's products has been calculated using product shipment data. Assumptions derived from Victoria Integrated Survey of Travel and Activity (VISTA) travel data and the % split between online vs instore sales, the distance products travel and the mode of transport. Telstra emission factors (tCO2-e/km or tCO2-e/pax.km) are then applied to km travelled by transport mode.

Includes transport and distribution of Telstra products purchased in store, as shipped products are captured in Category 4.

Response 10: Processing of sold products

Evaluation status

Not relevant, explanation provided

Please explain

Not applicable for Telstra as Telstra does not sell products for the purposes of further processing.

Response 11: Use of sold products

Evaluation status

Relevant, calculated

Emissions in reporting year (metric tons CO2e)

130852.44

Emissions calculation methodology

Methodology for indirect use phase emissions: Life Cycle Assessment data used where available; key inputs are product life and kWh/annum consumption. Australia grid emission factor is applied to kWh/annum consumption commencing the year of purchase to the end of the expected product life.

Percentage of emissions calculated using data obtained from suppliers or value chain partners

20

Please explain

Scope 3 emissions associated with the use of our products are calculated for products that directly consume energy during use. Telstra leverages Life Cycle Assessment data and information where available. Key inputs include expected product life (years) and electricity consumption (kWh/annum). Lifetime emissions are estimated by applying a rolling Australia wide grid emission factor to the annual electricity consumption commencing in the year of purchase to the end of the expected product life. The entire lifetime emissions are accounted for in the year of purchase.

Includes electricity use of electronic devices.

Response 12: End of life treatment of sold products

Evaluation status

Relevant, calculated

Emissions in reporting year (metric tons CO2e)

644.51

Emissions calculation methodology

Waste-type-specific method

Percentage of emissions calculated using data obtained from suppliers or value chain partners

0

Please explain

Scope 3 emissions associated with the disposal of Telstra products is estimated using product shipment data and assumptions around mode of disposal within different product categories. Telstra emission factors for recycling and landfill are then applied to the tonnes of waste within each disposal category.

Recycling and landfill of electronic devices and accessories.

Response 13: Downstream leased assets

Evaluation status

Not relevant, explanation provided

Please explain

Not applicable for Telstra as Telstra does not lease downstream assets.

Response 14: Franchises

Evaluation status

Not relevant, explanation provided

Please explain

Not applicable for Telstra as Telstra does not own franchise stores.

Response 15: Investments

Evaluation status

Relevant, calculated

Emissions in reporting year (metric tons CO2e)

36810.99

Emissions calculation methodology

- Investment-specific method
- Average data method

Percentage of emissions calculated using data obtained from suppliers or value chain partners

0

Please explain

Scope 3 emissions associated with Telstra’ s investments have been assessed using a hierarchy of calculation methods. The two methods used are: (i) average-data method which leverages the investee’ s total revenue (ii) investment-specific method which is based on Telstra’ s proportional share of the investee’ s scope 1+2 emissions. For the average - data method emission factors are sourced from the input-output data base Exiobase.

Includes current Telstra portfolio of equity investments.

Q7.8.1 Disclose or restate your Scope 3 emissions data for previous years.

Response 1: Past year 1

End date

2023-06-29

Scope 3: Purchased goods and services (metric tons CO2e)

858073

Scope 3: Capital goods (metric tons CO2e)

481440

Scope 3: Fuel and energy-related activities (not included in Scopes 1 or 2) (metric tons CO2e)

105465

Scope 3: Upstream transportation and distribution (metric tons CO2e)

29079

Scope 3: Waste generated in operations (metric tons CO2e)

2621

Scope 3: Business travel (metric tons CO2e)

4576

Scope 3: Employee commuting (metric tons CO2e)

56781

Scope 3: Upstream leased assets (metric tons CO2e)

87280

Scope 3: Downstream transportation and distribution (metric tons CO2e)

15978

Scope 3: Processing of sold products (metric tons CO2e)

0

Scope 3: Use of sold products (metric tons CO2e)

146973

Scope 3: End of life treatment of sold products (metric tons CO2e)

835

Scope 3: Downstream leased assets (metric tons CO2e)

0

Scope 3: Franchises (metric tons CO2e)

0

Scope 3: Investments (metric tons CO2e)

34846

Scope 3: Other (upstream) (metric tons CO2e)

0

Scope 3: Other (downstream) (metric tons CO2e)

0

Comment

In FY24, improved and more granular data allowed us to identify that one entity' s emissions were duplicated in our scope 3 emissions reporting. As a result, category 15 emissions were restated in FY24 for FY23 from 54,245 to 34,846.

In FY24, we identified and corrected an overstatement in the FY23 category 8 emissions total and in FY24 we restated FY23 category 8 emissions from 109,743 to 87,820. An additional control has been implemented to mitigate the risk of this occurring again in future reporting periods.

Response 2: Past year 2

End date

2022-06-29

Scope 3: Purchased goods and services (metric tons CO2e)

864238

Scope 3: Capital goods (metric tons CO2e)

434938

Scope 3: Fuel and energy-related activities (not included in Scopes 1 or 2) (metric tons CO2e)

110634

Scope 3: Upstream transportation and distribution (metric tons CO2e)

24659

Scope 3: Waste generated in operations (metric tons CO2e)

2290

Scope 3: Business travel (metric tons CO2e)

1572

Scope 3: Employee commuting (metric tons CO2e)

44751

Scope 3: Upstream leased assets (metric tons CO2e)

102082

Scope 3: Downstream transportation and distribution (metric tons CO2e)

13388

Scope 3: Processing of sold products (metric tons CO2e)

0

Scope 3: Use of sold products (metric tons CO2e)

144197

Scope 3: End of life treatment of sold products (metric tons CO2e)

1399

Scope 3: Downstream leased assets (metric tons CO2e)

0

Scope 3: Franchises (metric tons CO2e)

0

Scope 3: Investments (metric tons CO2e)

31890

Scope 3: Other (upstream) (metric tons CO2e)

0

Scope 3: Other (downstream) (metric tons CO2e)

0

Comment

In FY24, improved and more granular investment data allowed us to identify that one entity’ s emissions were duplicated in our scope 3 emissions reporting. As a result, category 15 emissions were restated in FY24 for FY22.

Response 3: Past year 3

End date

2021-06-29

Scope 3: Purchased goods and services (metric tons CO2e)

851667

Scope 3: Capital goods (metric tons CO2e)

391566

Scope 3: Fuel and energy-related activities (not included in Scopes 1 or 2) (metric tons CO2e)

127722

Scope 3: Upstream transportation and distribution (metric tons CO2e)

35167

Scope 3: Waste generated in operations (metric tons CO2e)

2468

Scope 3: Business travel (metric tons CO2e)

1017

Scope 3: Employee commuting (metric tons CO2e)

42829

Scope 3: Upstream leased assets (metric tons CO2e)

100662

Scope 3: Downstream transportation and distribution (metric tons CO2e)

11270

Scope 3: Processing of sold products (metric tons CO2e)

0

Scope 3: Use of sold products (metric tons CO2e)

194965

Scope 3: End of life treatment of sold products (metric tons CO2e)

1730

Scope 3: Downstream leased assets (metric tons CO2e)

0

Scope 3: Franchises (metric tons CO2e)

0

Scope 3: Investments (metric tons CO2e)

23970

Scope 3: Other (upstream) (metric tons CO2e)

0

Scope 3: Other (downstream) (metric tons CO2e)

0

Comment

No further comment.

Response 4: Past year 4

End date

2020-06-29

Scope 3: Purchased goods and services (metric tons CO2e)

1033272.64

Scope 3: Capital goods (metric tons CO2e)

471558

Scope 3: Fuel and energy-related activities (not included in Scopes 1 or 2) (metric tons CO2e)

132883

Scope 3: Upstream transportation and distribution (metric tons CO2e)

34873

Scope 3: Waste generated in operations (metric tons CO2e)

4309

Scope 3: Business travel (metric tons CO2e)

9697

Scope 3: Employee commuting (metric tons CO2e)

40634

Scope 3: Upstream leased assets (metric tons CO2e)

115561

Scope 3: Downstream transportation and distribution (metric tons CO2e)

23765

Scope 3: Processing of sold products (metric tons CO2e)

0

Scope 3: Use of sold products (metric tons CO2e)

378242

Scope 3: End of life treatment of sold products (metric tons CO2e)

2243

Scope 3: Downstream leased assets (metric tons CO2e)

0

Scope 3: Franchises (metric tons CO2e)

0

Scope 3: Investments (metric tons CO2e)

26109

Scope 3: Other (upstream) (metric tons CO2e)

0

Scope 3: Other (downstream) (metric tons CO2e)

0

Comment

No further comment.

Response 5: Past year 5

End date

2019-06-29

Scope 3: Purchased goods and services (metric tons CO2e)

1093652

Scope 3: Capital goods (metric tons CO2e)

473719

Scope 3: Fuel and energy-related activities (not included in Scopes 1 or 2) (metric tons CO2e)

145504

Scope 3: Upstream transportation and distribution (metric tons CO2e)

36943

Scope 3: Waste generated in operations (metric tons CO2e)

6239

Scope 3: Business travel (metric tons CO2e)

15629

Scope 3: Employee commuting (metric tons CO2e)

85814

Scope 3: Upstream leased assets (metric tons CO2e)

137620

Scope 3: Downstream transportation and distribution (metric tons CO2e)

24340

Scope 3: Processing of sold products (metric tons CO2e)

0

Scope 3: Use of sold products (metric tons CO2e)

516344

Scope 3: End of life treatment of sold products (metric tons CO2e)

2156

Scope 3: Downstream leased assets (metric tons CO2e)

0

Scope 3: Franchises (metric tons CO2e)

0

Scope 3: Investments (metric tons CO2e)

24625

Scope 3: Other (upstream) (metric tons CO2e)

0

Scope 3: Other (downstream) (metric tons CO2e)

0

Comment

In FY24, improved and more granular investment data allowed us to identify that one entity’ s emissions were duplicated in our scope 3 emissions reporting. As a result, category 15 emissions were restated in FY24 for FY19.

Q7.9 Indicate the verification/assurance status that applies to your reported emissions.

	Verification/assurance status
Scope 1	Third-party verification or assurance process in place
Scope 2 (location-based or market-based)	Third-party verification or assurance process in place
Scope 3	Third-party verification or assurance process in place

Q7.9.1 Provide further details of the verification/assurance undertaken for your Scope 1 emissions, and attach the relevant statements.

Response 1: Row 1

Verification or assurance cycle in place

Annual process

Status in the current reporting year

Complete

Type of verification or assurance

Limited assurance

Attach the statement

2024 Telstra Bigger Picture Sustainability Report Assurance Statement.pdf

Page/section reference

1-2

Relevant standard

ISAE 3000

Proportion of reported emissions verified (%)

100

Q7.9.2 Provide further details of the verification/assurance undertaken for your Scope 2 emissions and attach the relevant statements.

Response 1: Row 1

Scope 2 approach

Scope 2 location-based

Verification or assurance cycle in place

Annual process

Status in the current reporting year

Complete

Type of verification or assurance

Limited assurance

Attach the statement

2024 Telstra Bigger Picture Sustainability Report Assurance Statement.pdf

Page/ section reference

1-2

Relevant standard

ISAE 3000

Proportion of reported emissions verified (%)

100

Q7.9.3 Provide further details of the verification/assurance undertaken for your Scope 3 emissions and attach the relevant statements.

Response 1: Row 1

Scope 3 category

- Scope 3: Purchased goods and services
- Scope 3: Upstream leased assets
- Scope 3: Downstream transportation and distribution
- Scope 3: Use of sold products
- Scope 3: Waste generated in operations
- Scope 3: Employee commuting
- Scope 3: Investments
- Scope 3: End-of-life treatment of sold products
- Scope 3: Business travel
- Scope 3: Capital goods
- Scope 3: Upstream transportation and distribution
- Scope 3: Fuel and energy-related activities (not included in Scopes 1 or 2)

Verification or assurance cycle in place

Annual process

Status in the current reporting year

Complete

Type of verification or assurance

Limited assurance

Attach the statement

2024 Telstra Bigger Picture Sustainability Report Assurance Statement.pdf

Page/section reference

1-2

Relevant standard

ISAE 3000

Proportion of reported emissions verified (%)

100

Q7.10 How do your gross global emissions (Scope 1 and 2 combined) for the reporting year compare to those of the previous reporting year?

Decreased

Q7.10.1 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.

Response 1: Change in renewable energy consumption

Change in emissions (metric tons CO2e)

866.23

Direction of change in emissions

Decreased

Emissions value (percentage)

0.11

Please explain calculation

・ We applied the FY24 national emission factor to both FY24 solar consumption and FY23 solar consumption to report the emissions avoided through our use of solar energy. An increase in avoided emissions shows as a decrease in the direction of emissions in this table. The difference = (FY24 Estimated avoided Emissions - FY23 Estimated avoided Emissions)/FY23 scope 1 and 2 Emissions.
= (7,142.39- 6,276.16)
・ /81,7606)
= 0.11%

Note: Renewable energy doesn’ t use NGA emission factors (as there are no emissions), they were just applied for calculative purposes.

Response 2: Other emissions reduction activities

Change in emissions (metric tons CO2e)

41936.57

Direction of change in emissions

Decreased

Emissions value (percentage)

5.3

Please explain calculation

This figure was arrived at by taking the energy efficiency and decommissioning annualized savings in AUS in FY24 and subtracting it against the FY23 figure.

= (FY24 Emissions savings - FY23 Emissions savings)/FY24 scope 1 and 2 Emissions)
= (60,954 - 102,981)/790,745
= -5.30%

Response 3: Divestment

Change in emissions (metric tons CO2e)

0

Direction of change in emissions

No change

Emissions value (percentage)

0

Please explain calculation

N/A

Response 4: Acquisitions

Change in emissions (metric tons CO2e)

0

Direction of change in emissions

No change

Emissions value (percentage)

0

Please explain calculation

N/A

Response 5: Mergers

Change in emissions (metric tons CO2e)

0

Direction of change in emissions

No change

Emissions value (percentage)

0

Please explain calculation

N/A

Response 6: Change in output

Change in emissions (metric tons CO2e)

0

Direction of change in emissions

No change

Emissions value (percentage)

0

Please explain calculation

N/A

Response 7: Change in methodology

Change in emissions (metric tons CO2e)

35093.2

Direction of change in emissions

Decreased

Emissions value (percentage)

4.29

Please explain calculation

In FY24, Telstra utilized emission factors by government sources which are updated on an annual basis. This figure was arrived at by taking the difference of sum of scope 1+2 in FY24, and sum of scope 1+2 FY24 with FY23 EF’ s from FY24 calculation sheet.
Change in methodology percentage refers to sum of scope 1+2 in FY24, and sum of scope 1+2 FY24 with FY23 EF’ s/ Total emissions of scope 1+2 emissions.

= (35,093.2022/817,605.69800397) = 4.29%

Response 8: Change in boundary

Change in emissions (metric tons CO2e)

0

Direction of change in emissions

No change

Emissions value (percentage)

0

Please explain calculation

N/A

Response 9: Change in physical operating conditions

Change in emissions (metric tons CO2e)

0

Direction of change in emissions

No change

Emissions value (percentage)

0

Please explain calculation

N/A

Response 10: Unidentified

Change in emissions (metric tons CO2e)

0

Direction of change in emissions

No change

Emissions value (percentage)

0

Please explain calculation

N/A

Response 11: Other

Change in emissions (metric tons CO2e)

0

Direction of change in emissions

No change

Emissions value (percentage)

0

Please explain calculation

N/A

Q7.12 Are carbon dioxide emissions from biogenic carbon relevant to your organization?

No

Q7.15 Does your organization break down its Scope 1 emissions by greenhouse gas type?

Yes

Q7.15.1 Break down your total gross global Scope 1 emissions by greenhouse gas type and provide the source of each used global warming potential (GWP).

	Greenhouse gas	Scope 1 emissions (metric tons of CO2e)	GWP Reference
Row 1	CO2	32956.52	IPCC Fifth Assessment Report (AR5 - 100 year)
Row 2	CH4	19.77	IPCC Fifth Assessment Report (AR5 - 100 year)
Row 3	N2O	181.55	IPCC Fifth Assessment Report (AR5 - 100 year)

Q7.16 Break down your total gross global Scope 1 and 2 emissions by country/area.

	Scope 1 emissions (metric tons CO2e)	Scope 2, location-based (metric tons CO2e)
Australia	32782.08	757962.93
Bahrain	0	0
Bermuda	0	0
British Virgin Islands	0	0
Canada	0	0
Cayman Islands	0	0
China	0.04	4.87
France	0	0
Germany	0	0
Hong Kong SAR, China	56.72	9073.48
India	194.89	6415.22
Indonesia	0	0
Ireland	0	0
Japan	0	0
Malaysia	0	0
New Zealand	0	0
Philippines	10.19	2010.22
Republic of Korea	0	0
Saudi Arabia	0	0
Singapore	22.66	2480.59
Taiwan, China	9.67	1362.6
Thailand	0	0
United Kingdom of Great Britain and Northern Ireland	90.32	5125.82
United States of America	0.02	3.38

Q7.17 Indicate which gross global Scope 1 emissions breakdowns you are able to provide.

By business division

Q7.17.1 Break down your total gross global Scope 1 emissions by business division.

Response 1: Row 1

Business division

Telstra Domestic

Scope 1 emissions (metric ton CO2e)

32782.08

Response 2: Row 2

Business division

Telstra International

Scope 1 emissions (metric ton CO2e)

384.51

Q7.20 Indicate which gross global Scope 2 emissions breakdowns you are able to provide.

By business division

Q7.20.1 Break down your total gross global Scope 2 emissions by business division.

Response 1: Row 1

Business division

Telstra Domestic

Scope 2, location-based (metric tons CO2e)

757962.92

Response 2: Row 2

Business division

Telstra International

Scope 2, location-based (metric tons CO2e)

26476.17

Q7.22 Break down your gross Scope 1 and Scope 2 emissions between your consolidated accounting group and other entities included in your response.

Response 1: Consolidated accounting group

Scope 1 emissions (metric tons CO2e)

33166.59

Scope 2, location-based emissions (metric tons CO2e)

784439.11

Please explain

Telstra adopts GHG Protocol’s operational control approach, accounting for all emissions from operations over which it has control. This aligns with the consolidated accounting group, as the same Group Structure document that underpins financial reporting is utilised for emissions reporting to determine operational control for scope 1+2.
Those entities that are deemed not in operational control (i.e. scope 1+2), are captured in our scope 3 emissions (i.e. joint ventures, and associated entities and other investment entities are captured in category 15).
The calculation of scope 2 emissions using market based is something we are considering over the medium term 1-3 years, however at this stage the approach is to continue with location based given this is the method required for our mandatory reporting against the Australian NGER Act.

Response 2: All other entities

Scope 1 emissions (metric tons CO2e)

0

Scope 2, location-based emissions (metric tons CO2e)

0

Please explain

All Scope 1 and 2 emissions are reported under Telstra Group Limited’s consolidated accounting group.

Q7.23 Is your organization able to break down your emissions data for any of the subsidiaries included in your CDP response?

No

Q7.27 What are the challenges in allocating emissions to different customers, and what would help you to overcome these challenges?

Response 1: Row 1

Allocation challenges

Diversity of product lines makes accurately accounting for each product/product line cost ineffective

Please explain what would help you overcome these challenges

Allocating the energy use (and associated carbon footprint) to different customers is challenging to measure due to the complexity of Telstra’s telecommunications network, and because some parts of the network are shared between different products and services. Most network buildings house multiple equipment/product types which are not individually metered. Some energy is also used by the customer to power equipment on their own site, such as handsets, routers and switches. We are currently working with suppliers to obtain data, as well as reviewing public LCAs for equipment provided by certain suppliers. We have begun including this requirement into Telstra’s Supplier Code of Conduct.

Response 2: Row 2

Allocation challenges

Customer base is too large and diverse to accurately track emissions to the customer level

Please explain what would help you overcome these challenges

Allocating the energy use (and associated carbon footprint) to different customers is challenging to measure due to the complexity of Telstra's telecommunications network, and because some parts of the network are shared between different products and services. Most network buildings house multiple equipment/product types which are not individually metered. Some energy is also used by the customer to power equipment on their own site, such as handsets, routers and switches. We are currently working with suppliers to obtain data, as well as reviewing public LCAs for equipment provided by certain suppliers. We have begun including this requirement into Telstra's Supplier Code of Conduct.

Q7.28 Do you plan to develop your capabilities to allocate emissions to your customers in the future?

Response 1:

Do you plan to develop your capabilities to allocate emissions to your customers in the future?

Yes

Describe how you plan to develop your capabilities

We are in the process of developing a pilot product emissions calculator to potentially help our Enterprise clients estimate the emissions associated with the products and services we offer.

Q7.29 What percentage of your total operational spend in the reporting year was on energy?

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

Q7.30 Select which energy-related activities your organization has undertaken.

	Indicate whether your organization undertook this energy-related activity in the reporting year
Consumption of fuel (excluding feedstocks)	Yes
Consumption of purchased or acquired electricity	Yes
Consumption of purchased or acquired heat	No
Consumption of purchased or acquired steam	No
Consumption of purchased or acquired cooling	No
Generation of electricity, heat, steam, or cooling	Yes

Q7.30.1 Report your organization’s energy consumption totals (excluding feedstocks) in MWh.

	Heating value	MWh from renewable sources	MWh from non-renewable sources	Total (renewable + non-renewable) MWh
Consumption of fuel (excluding feedstock)	HHV (higher heating value)	0	132298	132298.00
Consumption of purchased or acquired electricity	Unable to confirm heating value	0	1212360	1212360.00
Consumption of self-generated non-fuel renewable energy	Unable to confirm heating value	12246.55		12246.55
Total energy consumption	Unable to confirm heating value	12246.55	1344658	1356904.55

Q7.30.6 Select the applications of your organization’s consumption of fuel.

	Indicate whether your organization undertakes this fuel application
Consumption of fuel for the generation of electricity	Yes
Consumption of fuel for the generation of heat	No
Consumption of fuel for the generation of steam	No
Consumption of fuel for the generation of cooling	No
Consumption of fuel for co-generation or tri-generation	No

Q7.30.7 State how much fuel in MWh your organization has consumed (excluding feedstocks) by fuel type.

Response 1: Sustainable biomass

Heating value

Unable to confirm heating value

Total fuel MWh consumed by the organization

0

MWh fuel consumed for self-generation of electricity

0

MWh fuel consumed for self-generation of heat

0

Comment

We don’ t currently consume sustainable biomass.

Response 2: Other biomass

Heating value

HHV

Total fuel MWh consumed by the organization

110.4

MWh fuel consumed for self-generation of electricity

0

MWh fuel consumed for self-generation of heat

110.4

Comment

Use of Ethanol fuels for transport

Response 3: Other renewable fuels (e.g. renewable hydrogen)

Heating value

Unable to confirm heating value

Total fuel MWh consumed by the organization

0

MWh fuel consumed for self-generation of electricity

0

MWh fuel consumed for self-generation of heat

0

Comment

We did not consume any renewable hydrogen in FY24 as our pilot sites were completed in June 2024.

Response 4: Coal

Heating value

Unable to confirm heating value

Total fuel MWh consumed by the organization

0

MWh fuel consumed for self-generation of electricity

0

MWh fuel consumed for self-generation of heat

0

Comment

We don’t currently consume coal directly.

Response 5: Oil

Heating value

HHV

Total fuel MWh consumed by the organization

128953.2

MWh fuel consumed for self-generation of electricity

14728.18

MWh fuel consumed for self-generation of heat

114225.02

Comment

Use of gasoline and diesel fuels for transport and stationary purposes.

Response 6: Gas

Heating value

HHV

Total fuel MWh consumed by the organization

3234.69

MWh fuel consumed for self-generation of electricity

52.53

MWh fuel consumed for self-generation of heat

3182.16

Comment

Use of Natural Gas and Liquified Petroleum Gas for stationary purposes.

Response 7: Other non-renewable fuels (e.g. non-renewable hydrogen)

Heating value

Unable to confirm heating value

Total fuel MWh consumed by the organization

0

MWh fuel consumed for self-generation of electricity

0

MWh fuel consumed for self-generation of heat

0

Comment

We don' t currently consume any other non-renewable fuels.

Response 8: Total fuel

Heating value

HHV

Total fuel MWh consumed by the organization

132298.29

MWh fuel consumed for self-generation of electricity

14780.71

MWh fuel consumed for self-generation of heat

117517.58

Comment

No further comment.

Q7.30.9 Provide details on the electricity, heat, steam, and cooling your organization has generated and consumed in the reporting year.

	Total Gross generation (MWh)	Generation that is consumed by the organization (MWh)	Gross generation from renewable sources (MWh)	Generation from renewable sources that is consumed by the organization (MWh)
Electricity	27027.27	27027.27	12246.55	12246.55
Heat	0	0	0	0
Steam	0	0	0	0
Cooling	0	0	0	0

Q7.30.16 Provide a breakdown by country/area of your electricity/heat/steam/cooling consumption in the reporting year.

	Consumption of purchased electricity (MWh)	Consumption of self-generated electricity (MWh)	Consumption of purchased heat, steam, and cooling (MWh)	Consumption of self-generated heat, steam, and cooling (MWh)	Total electricity/ heat/steam/cooling energy consumption (MWh)
Australia	1150838.61	12246.55	0	0	1163085.16
Bahrain	0	0	0	0	0.00
Bermuda	0	0	0	0	0.00
British Virgin Islands	0	0	0	0	0.00
Canada	0	0	0	0	0.00
Cayman Islands	0	0	0	0	0.00
China	10.06	0	0	0	10.06
France	0	0	0	0	0.00
Germany	0	0	0	0	0.00
Hong Kong SAR, China	15704.18	0	0	0	15704.18
India	9018.34	0	0	0	9018.34
Indonesia	0	0	0	0	0.00
Ireland	0	0	0	0	0.00
Japan	0	0	0	0	0.00
Malaysia	0	0	0	0	0.00
New Zealand	0	0	0	0	0.00
Philippines	2822.55	0	0	0	2822.55
Republic of Korea	0	0	0	0	0.00
Saudi Arabia	0	0	0	0	0.00
Singapore	6274.17	0	0	0	6274.17
Taiwan, China	2677.01	0	0	0	2677.01
Thailand	0	0	0	0	0.00
United Kingdom of Great Britain and Northern Ireland	25008.88	0	0	0	25008.88
United States of America	6.34	0	0	0	6.34

Q7.45 Describe your gross global combined Scope 1 and 2 emissions for the reporting year in metric tons CO2e per unit currency total revenue and provide any additional intensity metrics that are appropriate to your business operations.

Response 1: Row 1

Intensity figure

0.0000356597

Metric numerator (Gross global combined Scope 1 and 2 emissions, metric tons CO2e)

817606

Metric denominator

unit total revenue

Metric denominator: Unit total

22928000000

Scope 2 figure used

Location-based

% change from previous year

11.1

Direction of change

Decreased

Reasons for change

Other emissions reduction activities

Please explain

Drivers of our emissions intensity performance include changes to state-based emissions factors for electricity published by the Commonwealth Government; improving our infrastructure and network energy efficiency, accelerating the decommissioning of legacy technology and leveraging the reduced emissions intensity of the electricity grid as the use of renewable energy increases.

Response 2: Row 2

Intensity figure

34.91

Metric numerator (Gross global combined Scope 1 and 2 emissions, metric tons CO2e)

790745

Metric denominator

Other: Petabytes

Metric denominator: Unit total

22653.61

Scope 2 figure used

Location-based

% change from previous year

16.67

Direction of change

Decreased

Reasons for change

Other emissions reduction activities

Please explain

Drivers of our emissions intensity performance include changes to state-based emissions factors for electricity published by the Commonwealth Government; improving our infrastructure and network energy efficiency, accelerating the decommissioning of legacy technology and leveraging the reduced emissions intensity of the electricity grid as the use of renewable energy increases.

Q7.52 Provide any additional climate-related metrics relevant to your business.

Response 1: Row 1

Description

Energy usage

Metric value

4884854.12

Metric numerator

Gigajoules

% change from previous year

5

Direction of change

Decreased

Please explain

Reductions were observed in both our major data centres where we completed decommissioning works in FY24. Additionally, energy efficiency and decommissioning projects at various major exchanges contributed to the reductions.

Response 2: Row 2

Description

Waste

Metric value

25808.65

Metric numerator

Tonnes

% change from previous year

33

Direction of change

Increased

Please explain

Telstra generated 25,809 tonnes of waste in FY24, a 33% increase from FY23 (19,463 tonnes) including waste to landfill and waste diverted to recyclers. This rise in total waste is largely due to the initiation of new recycling projects. The Total Waste Directed to Disposal decreased by 11%.

Response 3: Row 3

Description

Other: Total Waste Diverted to Recyclers

Metric value

23980.98

Metric numerator

Tonnes

% change from previous year

38

Direction of change

Increased

Please explain

Total Waste Diverted to Recyclers increased by 38% due to an increase in operational waste volumes from largely due the initiation of new recycling projects taking Total Waste Diverted to Recyclers to 23,981 in FY24 compared with 17,417 tonnes in FY23.

Response 4: Row 4

Description

Other: Device reuse/recycling

Metric value

710341

Metric numerator

Units

% change from previous year

12

Direction of change

Increased

Please explain

Re-use/recycling of devices increased from FY23 due to the design and implementation of more circular solutions of Telstra’ s products and lifespan increases through repair, refurbish, re-use and trade initiatives.

Response 5: Row 5

Description

Other: Water consumption

Metric value

897.73

Metric numerator

Megalitres

% change from previous year

22

Direction of change

Decreased

Please explain

Telstra consumed 898 megalitres of water in FY24, a 22% decrease from FY23 (1,158 megalitres). This metric does not include water consumption from sites where water is paid for by third parties. This metric value includes Australia operations only.

Q7.53 Did you have an emissions target that was active in the reporting year?

Absolute target

Q7.53.1 Provide details of your absolute emissions targets and progress made against those targets.

Response 1: Row 1

Target reference number

Abs 1

Is this a science-based target?

Yes, and this target has been approved by the Science Based Targets initiative

Science Based Targets initiative official validation letter

Telstra Group Limited - Near-Term Approval Letter - Monday_ 9 December 2024.pdf

Target ambition

1.5°C aligned

Date target was set

2020-06-30

Target coverage

Organization-wide

Greenhouse gases covered by target

- Methane (CH4)
- Sulphur hexafluoride (SF6)
- Carbon dioxide (CO2)
- Nitrous oxide (N2O)
- Nitrogen trifluoride (NF3)
- Perfluorocarbons (PFCs)
- Hydrofluorocarbons (HFCs)

Scopes

- Scope 1
- Scope 2

Scope 2 accounting method

Location-based

End date of base year

2019-06-29

Base year Scope 1 emissions covered by target (metric tons CO2e)

47204

Base year Scope 2 emissions covered by target (metric tons CO2e)

1259292

Base year total Scope 3 emissions covered by target (metric tons CO2e)

0.000

Total base year emissions covered by target in all selected Scopes (metric tons CO2e)

1306496.000

Base year Scope 1 emissions covered by target as % of total base year emissions in Scope 1

100

Base year Scope 2 emissions covered by target as % of total base year emissions in Scope 2

100

Base year emissions covered by target in all selected Scopes as % of total base year emissions in all selected Scopes

100

End date of target

2030-06-29

Targeted reduction from base year (%)

70

Total emissions at end date of target covered by target in all selected Scopes (metric tons CO2e)

391948.800

Scope 1 emissions in reporting year covered by target (metric tons CO2e)

33166.59

Scope 2 emissions in reporting year covered by target (metric tons CO2e)

784439.11

Total emissions in reporting year covered by target in all selected scopes (metric tons CO2e)

817605.700

Land-related emissions covered by target

No, it does not cover any land-related emissions (e.g. non-FLAG SBT)

% of target achieved relative to base year

53.46

Target status in reporting year

Revised

Explain the reasons for the revision, replacement, or retirement of the target

In FY24 we increased our scope 1+2 carbon emission reduction target from 50% to 70% by 2030. We increased this target by re-prioritising our climate investments to take more direct action, focusing on decarbonisation projects that will reduce our footprint overall.

Explain target coverage and identify any exclusions

This target covers Telstra's scope 1+2 emissions profile but in FY24 excluded Digicel Pacific, which Telstra acquired in FY23.

Our former scope 1,2 and 3 target was validated by the SBTi. In FY24 we were undergoing validation with SBTi for our increased scope 1+2 target to 70% and this was validated by the SBTi in FY25. The target is based on a 1.5-degree trajectory. All of Telstra's emissions sources reported in FY24 are included within the target, other than Digicel Pacific, which Telstra acquired in FY23.

Target objective

We are committed to achieving net-zero emissions by 2050, through the Business Ambition for 1.5°C campaign. Towards this, we have set near-term emissions reduction targets aligned to a trajectory to limit global warming to 1.5°C.

Plan for achieving target, and progress made to the end of the reporting year

We have plans in place to achieve our climate targets and continue to make good progress towards them. As part of our long-term commitment to net-zero emissions by 2050, as at the end of FY24 we have already reduced our absolute scope 1+2 emissions by 37 percent and our absolute scope 3 emissions by 37 per cent since FY19. Of these, our scope 3 emissions reduction target is likely to be more challenging to meet due to product growth, dependence on supplier decarbonisation and complexity of measurement.

Target derived using a sectoral decarbonization approach

No

Response 2: Row 2

Target reference number

Abs 2

Is this a science-based target?

Yes, and this target has been approved by the Science Based Targets initiative

Science Based Targets initiative official validation letter

Telstra Group Limited - Net-Zero Approval Letter - Monday_ 9 December 2024.pdf

Target ambition

1.5°C aligned

Date target was set

2021-06-30

Target coverage

Organization-wide

Greenhouse gases covered by target

- Methane (CH_4)
- Sulphur hexafluoride (SF_6)

- Nitrogen trifluoride (NF3)
- Carbon dioxide (CO2)
- Hydrofluorocarbons (HFCs)
- Perfluorocarbons (PFCs)
- Nitrous oxide (N2O)

Scopes

Scope 3

Scope 3 categories

- Scope 3, Category 4 - Upstream transportation and distribution
- Scope 3, Category 7 - Employee commuting
- Scope 3, Category 3 - Fuel- and energy- related activities (not included in Scope 1 or 2)
- Scope 3, Category 1 - Purchased goods and services
- Scope 3, Category 8 - Upstream leased assets
- Scope 3, Category 12 - End-of-life treatment of sold products
- Scope 3, Category 9 - Downstream transportation and distribution
- Scope 3, Category 2 - Capital goods
- Scope 3, Category 5 - Waste generated in operations
- Scope 3, Category 15 - Investments
- Scope 3, Category 6 - Business travel
- Scope 3, Category 11 - Use of sold products

End date of base year

2019-06-29

Base year Scope 3, Category 1: Purchased goods and services emissions covered by target (metric tons CO2e)

1093652

Base year Scope 3, Category 2: Capital goods emissions covered by target (metric tons CO2e)

473719.0

Base year Scope 3, Category 3: Fuel-and-energy-related activities (not included in Scopes 1 or 2) emissions covered by target (metric tons CO2e)

145504

Base year Scope 3, Category 4: Upstream transportation and distribution emissions covered by target (metric tons CO2e)

36943

Base year Scope 3, Category 5: Waste generated in operations emissions covered by target (metric tons CO2e)

6239.0

Base year Scope 3, Category 6: Business travel emissions covered by target (metric tons CO2e)

15629.0

Base year Scope 3, Category 7: Employee commuting emissions covered by target (metric tons CO2e)

85814.0

Base year Scope 3, Category 8: Upstream leased assets emissions covered by target (metric tons CO2e)

137620.0

Base year Scope 3, Category 9: Downstream transportation and distribution emissions covered by target (metric tons CO2e)

24340.0

Base year Scope 3, Category 11: Use of sold products emissions covered by target (metric tons CO2e)

516344.0

Base year Scope 3, Category 12: End-of-life treatment of sold products emissions covered by target (metric tons CO2e)

2156.0

Base year Scope 3, Category 15: Investments emissions covered by target (metric tons CO2e)

24625

Base year total Scope 3 emissions covered by target (metric tons CO2e)

2562585.000

Total base year emissions covered by target in all selected Scopes (metric tons CO2e)

2562585.000

Base year Scope 3, Category 1: Purchased goods and services emissions covered by target as % of total base year emissions in Scope 3, Category 1: Purchased goods and services (metric tons CO2e)

43

Base year Scope 3, Category 2: Capital goods emissions covered by target as % of total base year emissions in Scope 3, Category 2: Capital goods (metric tons CO2e)

18

Base year Scope 3, Category 3: Fuel-and-energy-related activities (not included in Scopes 1 or 2) emissions covered by target as % of total base year emissions in Scope 3, Category 3: Fuel-and-energy-related activities (not included in Scopes 1 or 2) (metric tons CO2e)

6

Base year Scope 3, Category 4: Upstream transportation and distribution covered by target as % of total base year emissions in Scope 3, Category 4: Upstream transportation and distribution (metric tons CO2e)

1

Base year Scope 3, Category 5: Waste generated in operations emissions covered by target as % of total base year emissions in Scope 3, Category 5: Waste generated in operations (metric tons CO2e)

0

Base year Scope 3, Category 6: Business travel emissions covered by target as % of total base year emissions in Scope 3, Category 6: Business travel (metric tons CO2e)

1

Base year Scope 3, Category 7: Employee commuting covered by target as % of total base year emissions in Scope 3, Category 7: Employee commuting (metric tons CO2e)

3

Base year Scope 3, Category 8: Upstream leased assets emissions covered by target as % of total base year emissions in Scope 3, Category 8: Upstream leased assets (metric tons CO2e)

5

Base year Scope 3, Category 9: Downstream transportation and distribution emissions covered by target as % of total base year emissions in Scope 3, Category 9: Downstream transportation and distribution (metric tons CO2e)

1

Base year Scope 3, Category 11: Use of sold products emissions covered by target as % of total base year emissions in Scope 3, Category 11: Use of sold products (metric tons CO2e)

20

Base year Scope 3, Category 12: End-of-life treatment of sold products emissions covered by target as % of total base year emissions in Scope 3, Category 12: End-of-life treatment of sold products (metric tons CO2e)

0

Base year Scope 3, Category 15: Investments emissions covered by target as % of total base year emissions in Scope 3, Category 15: Investments (metric tons CO2e)

1

Base year total Scope 3 emissions covered by target as % of total base year emissions in Scope 3 (in all Scope 3 categories)

100

Base year emissions covered by target in all selected Scopes as % of total base year emissions in all selected Scopes

100

End date of target

2030-06-29

Targeted reduction from base year (%)

50

Total emissions at end date of target covered by target in all selected Scopes (metric tons CO2e)

1281292.500

Scope 3, Category 1: Purchased goods and services emissions in reporting year covered by target (metric tons CO2e)

758358

Scope 3, Category 2: Capital goods emissions in reporting year covered by target (metric tons CO2e)

433717

Scope 3, Category 3: Fuel-and-energy-related activities (not included in Scopes 1 or 2) emissions in reporting year covered by target (metric tons CO2e)

96420

Scope 3, Category 4: Upstream transportation and distribution emissions in reporting year covered by target (metric tons CO2e)

29975

Scope 3, Category 5: Waste generated in operations emissions in reporting year covered by target (metric tons CO2e)

2364

Scope 3, Category 6: Business travel emissions in reporting year covered by target (metric tons CO2e)

5418

Scope 3, Category 7: Employee commuting emissions in reporting year covered by target (metric tons CO2e)

48804

Scope 3, Category 8: Upstream leased assets emissions in reporting year covered by target (metric tons CO2e)

50204

Scope 3, Category 9: Downstream transportation and distribution emissions in reporting year covered by target (metric tons CO2e)

10526

Scope 3, Category 11: Use of sold products emissions in reporting year covered by target (metric tons CO2e)

130852

Scope 3, Category 12: End-of-life treatment of sold products emissions in reporting year covered by target (metric tons CO2e)

645

Scope 3, Category 15: Investments emissions in reporting year covered by target (metric tons CO2e)

36811

Total Scope 3 emissions in reporting year covered by target (metric tons CO2e)

1604094.000

Total emissions in reporting year covered by target in all selected scopes (metric tons CO2e)

1604094.000

Land-related emissions covered by target

No, it does not cover any land-related emissions (e.g. non-FLAG SBT)

% of target achieved relative to base year

74.81

Target status in reporting year

Revised

Explain the reasons for the revision, replacement, or retirement of the target

In FY24 we separated our scope 3 target from our scope 1+2 carbon emission reduction target. We maintained our scope 3 target at 50% and increased our scope 1+2 target.

Explain target coverage and identify any exclusions

This target covers Telstra’ s scope 3 emissions profile but in FY24 excluded Digicel Pacific, which Telstra acquired in FY23.

Our former scope 1,2 and 3 target was validated by the SBTi. In FY24 we were undergoing validation with SBTi for our separate scope 3 and scope 1+2 targets and our maintained scope 3 target was validated by the SBTi in FY25.

The target is based on a 1.5-degree trajectory. All of Telstra’ s reported emissions sources are included within the target, other than Digicel Pacific, which Telstra acquired in FY23.

Target objective

We are committed to achieving net-zero emissions by 2050, through the Business Ambition for 1.5°C campaign. Towards this, we have set near-term emissions reduction targets aligned to a trajectory to limit global warming to 1.5°C.

Plan for achieving target, and progress made to the end of the reporting year

We have a responsibility to contribute to reducing the emissions produced by our supply chain when providing us with goods and services and by our customers when using our products. We are committed to reducing our scope 3 emissions by at least 50 per cent by 2030 (from a FY19 baseline). We continued to make significant progress in reducing scope 3 emissions during FY24. However, there is still some risk to our 2030 scope 3 target, including the expansion of low earth orbit satellite services and other product growth. In addition, key suppliers may not decarbonise as quickly as expected.

Scope 3 represents Telstra's largest emissions source, making up 66 per cent of our total footprint. Our scope 3 emissions have already decreased by 37 per cent since FY19.
Scope 3 emissions, particularly in the Information Communication and Technology sector where there are complex supply chains, is an area that requires cross-sector collaboration. Of our total scope 3 emissions, approximately 76 per cent comes from our supply chain (categories 1, 2 and 4).

Target derived using a sectoral decarbonization approach

No

Q7.54 Did you have any other climate-related targets that were active in the reporting year?

Net-zero targets

Q7.54.3 Provide details of your net-zero target(s).

Response 1: Row 1

Target reference number

NZ1

Date target was set

2019-12-18

Target Coverage

Organization-wide

Targets linked to this net zero target

Abs1

End date of target for achieving net zero

2050-06-29

Is this a science-based target?

Yes, and this target has been approved by the Science Based Targets initiative

Science Based Targets initiative official validation letter

Telstra Group Limited - Net-Zero Approval Letter - Monday_ 9 December 2024.pdf

Scopes

- Scope 1
- Scope 3
- Scope 2

Greenhouse gases covered by target

- Carbon dioxide (CO2)
- Sulphur hexafluoride (SF6)
- Nitrogen trifluoride (NF3)
- Perfluorocarbons (PFCs)
- Nitrous oxide (N2O)
- Methane (CH4)
- Hydrofluorocarbons (HFCs)

Explain target coverage and identify any exclusions

In December 2019, Telstra announced our commitment to achieve net zero GHG emissions by 2050 in line with the Paris Agreement.
This target was therefore set in 2019 and covers Telstra's entire scope 1, 2 & 3 emissions profile as at that time. In FY24 it excluded Digicel Pacific, which Telstra acquired in FY23. As per SBTi's definition of Net Zero, Telstra's target aims to reduce emissions by at least 90% across scope 1, 2 and 3 by 2050, with any residual emissions offset using reputable carbon credits. In FY24 we were in the process of validating our science-based net-zero target to the Science Based Targets initiative (SBTi) Corporate Net-Zero Standard, this was approved in FY25.

Target objective

Climate forms a key part of our T25 scorecard, and both climate and nature are pillars in our sustainability strategy.

Do you intend to neutralize any residual emissions with permanent carbon removals at the end of the target?

Yes

Do you plan to mitigate emissions beyond your value chain?

No, and we do not plan to within the next two years

Do you intend to purchase and cancel carbon credits for neutralization and/or beyond value chain mitigation?

Yes, we plan to purchase and cancel carbon credits for neutralization at the end of the target

Planned milestones and/or near-term investments for neutralization at the end of the target

We are not planning to use carbon credits to achieve our 2030 emissions reduction targets. However, we may revisit our use of carbon credits for hard-to-abate emissions as we approach our 2050 net-zero target. If we do use carbon credits at the end of the target, it will be in accordance with the SBTi net-zero standard and we will provide guidance on carbon credit verification and certification arrangements, the type(s) of carbon credit used, and other information to enable users of financial reports to understand the credibility and integrity of those carbon credits.

Target status in reporting year

Underway

Process for reviewing target

The Board reviews our environment strategy annually, including climate related issues, risks, opportunities and progress against our targets and metrics, including our long-term net-zero by 2050 commitment. In FY24 our Audit and Risk Committee (ARC) also received twice yearly environment risk updates, including summaries of performance against our environment strategy targets. Members of our Environment Executives Group provide leadership on Telstra’ s environmental ambition and execute management decisions on environment-related matters, including assessing progress on our climate targets.

Q7.55 Did you have emissions reduction initiatives that were active within the reporting year? Note that this can include those in the planning and/or implementation phases.

Yes

Q7.55.1 Identify the total number of initiatives at each stage of development, and for those in the implementation stages, the estimated CO2e savings.

	Number of initiatives	Total estimated annual CO2e savings in metric tonnes CO2e
Under investigation	6	
To be implemented	0	0
Implementation commenced	1	84000
Implemented	3406	51847
Not to be implemented	5	

Q7.55.2 Provide details on the initiatives implemented in the reporting year in the table below.

Response 1: Row 1

Initiative category & Initiative type

Waste reduction and material circularity: Other: Demand Flow Chilled Water Optimisation

Estimated annual CO2e savings (metric tonnes CO2e)

693

Scope(s) or Scope 3 category(ies) where emissions savings occur

- Scope 3 category 3: Fuel-and-energy-related activities (not included in Scopes 1 or 2)
- Scope 2 (location-based)

Voluntary/Mandatory

Voluntary

Annual monetary savings (unit currency - as specified in 1.2)

393548

Investment required (unit currency - as specified in 1.2)

1883122

Payback period

4-10 years

Estimated lifetime of the initiative

6-10 years

Comment

We conduct physical inspections for our network sites to identify faults affecting power consumption and review equipment performance to identify optimisation opportunities.

Response 2: Row 2

Initiative category & Initiative type

Energy efficiency in buildings: Heating, Ventilation and Air Conditioning (HVAC)

Estimated annual CO2e savings (metric tonnes CO2e)

315

Scope(s) or Scope 3 category(ies) where emissions savings occur

- Scope 3 category 3: Fuel-and-energy-related activities (not included in Scopes 1 or 2)
- Scope 2 (location-based)

Voluntary/Mandatory

Voluntary

Annual monetary savings (unit currency - as specified in 1.2)

88659

Investment required (unit currency - as specified in 1.2)

49012

Payback period

4-10 years

Estimated lifetime of the initiative

6-10 years

Comment

We conduct physical inspections for our network sites to identify faults affecting power consumption and review equipment performance to identify optimisation opportunities.

Response 3: Row 3

Initiative category & Initiative type

Energy efficiency in buildings: Heating, Ventilation and Air Conditioning (HVAC)

Estimated annual CO2e savings (metric tonnes CO2e)

1203

Scope(s) or Scope 3 category(ies) where emissions savings occur

- Scope 3 category 3: Fuel-and-energy-related activities (not included in Scopes 1 or 2)
- Scope 2 (location-based)

Voluntary/Mandatory

Voluntary

Annual monetary savings (unit currency - as specified in 1.2)

477262

Investment required (unit currency - as specified in 1.2)

2718502

Payback period

11-15 years

Estimated lifetime of the initiative

6-10 years

Comment

We conduct physical inspections for our network sites to identify faults affecting power consumption and review equipment performance to identify optimisation opportunities.

Response 4: Row 4

Initiative category & Initiative type

Energy efficiency in buildings: Lighting

Estimated annual CO2e savings (metric tonnes CO2e)

2878

Scope(s) or Scope 3 category(ies) where emissions savings occur

- Scope 2 (location-based)
- Scope 3 category 3: Fuel-and-energy-related activities (not included in Scopes 1 or 2)

Voluntary/Mandatory

Voluntary

Annual monetary savings (unit currency - as specified in 1.2)

813028

Investment required (unit currency - as specified in 1.2)

2932387

Payback period

4-10 years

Estimated lifetime of the initiative

6-10 years

Comment

We conduct physical inspections for our network sites to analyse power consumption and performance to identify lighting optimisation opportunities.

Response 5: Row 5

Initiative category & Initiative type

Energy efficiency in buildings: Other: Small Site Cooling Manager (SSCM)

Estimated annual CO2e savings (metric tonnes CO2e)

11

Scope(s) or Scope 3 category(ies) where emissions savings occur

- Scope 2 (location-based)
- Scope 3 category 3: Fuel-and-energy-related activities (not included in Scopes 1 or 2)

Voluntary/Mandatory

Voluntary

Annual monetary savings (unit currency - as specified in 1.2)

5434

Investment required (unit currency - as specified in 1.2)

67754

Payback period

11-15 years

Estimated lifetime of the initiative

6-10 years

Comment

We conduct physical inspections for our network sites to identify faults affecting power consumption and review equipment performance to identify optimisation opportunities.

Response 6: Row 6

Initiative category & Initiative type

Energy efficiency in buildings: Other: Decommissioning legacy technology

Estimated annual CO2e savings (metric tonnes CO2e)

46747

Scope(s) or Scope 3 category(ies) where emissions savings occur

- Scope 3 category 3: Fuel-and-energy-related activities (not included in Scopes 1 or 2)
- Scope 2 (location-based)

Voluntary/Mandatory

Voluntary

Annual monetary savings (unit currency - as specified in 1.2)

25550000

Investment required (unit currency - as specified in 1.2)

17300000

Payback period

<1 year

Estimated lifetime of the initiative

3-5 years

Comment

We are actively rationalising and decommissioning our legacy network equipment, reducing both direct energy consumption from the equipment as well as associated energy for cooling.

Q7.55.3 What methods do you use to drive investment in emissions reduction activities?

Response 1: Row 1

Method

Compliance with regulatory requirements/standards

Comment

Telstra complies with regulatory requirements, such as those associated with NGER reporting.

With energy use (specifically electricity consumption) in our telecommunications networks being our most material environmental impact and accounting for around 96% of our total carbon emissions (Scope 1+2) in FY24, maintaining compliance with the NGER Act's reporting requirements is an important regulatory and legal obligation for Telstra. Based on our FY24 GHG emissions, Australian operations, which are subject to compliance with the NGER Act, make up 99% or 32,782 tCO2e of Telstra's scope 1 emissions and 96.6% or 757,963 tCO2e of our scope 2 emissions. To minimise the risk of non-compliance with the NGER Act, Telstra has implemented systems and processes for the collection and disclosure of data and has, in accordance with our obligations, reported to the Clean Energy Regulator (CER) on an annual basis.

In addition, energy cost and carbon emissions are considered in several key processes that impact the way that Telstra designs and deploys technology and assesses financial investments, including Guidelines for Financial Investment and Technology Delivery Processes.

Response 2: Row 2

Method

Dedicated budget for energy efficiency

Comment

Since 2019, we have invested over $110 million in improving the energy efficiency of our facilities. This year, we invested $23 million in energy reduction projects that delivered collective savings of 6,295 tCO2e and 8,082MWh electricity.

Response 3: Row 3

Method

Employee engagement

Comment

Telstra engages its workforce to save energy in the workplace through environmental induction training, campaigns and communications. Communication channels include the sustainability newsletter, VivaEngage, Telstra Today employee news articles, briefings at company "All in" livestream events, and environmental inductions which are built into Telstra's Business Essentials program.

Response 4: Row 4

Method

Internal incentives/recognition programs

Comment

Remuneration for our executives and the majority of our global employees includes a variable component linked to performance against a range of personal and company objectives. These company objectives are aligned to selected T25 Strategy objectives and in FY24 included absolute scope 1+2 emissions and scope 3 emissions reduction. In addition to this, executives and staff with climate-related accountabilities have their personal objectives and hence variable remuneration tied to climate-related outcomes.

Response 5: Row 6

Method

Partnering with governments on technology development

Comment

We have partnered with the Victorian Government's Renewable Hydrogen Commercialisation Pathways Fund program to trial the use of renewable hydrogen fuel cells as backup power at selective sites in place of diesel generators. The fuel cells use green hydrogen fuel, which is generated from renewable energy sources.

The trial will enable us to test the suitability of renewable hydrogen fuel cells to provide additional site power, and assess their technical and commercial viability to provide reliable extended back up power should mains power fail. If successful, this technology could enable emissions reductions by avoiding the need for less efficient diesel-generated power, and reduce the associated risk of environmental harm should a generator leak or fail. Five sites in regional Victoria are participating in the trial to demonstrate the reliability of renewable hydrogen as a zero-emissions fuel for generator backup power.

This trial forms part of the Victorian Government’ s aim to help kick-start investment in the renewable hydrogen sector, working to meet ambitious climate change ambitions to reach its net-zero emissions target by 2045.

Response 6: Row 7

Method

Dedicated budget for other emissions reduction activities

Comment

In FY24, Telstra had supported investment in renewable energy projects worth more than $1.4 billion under long term PPAs. which are expected to be completed between 2020 and 2030. This is part of Telstra’ s investment in a number of climate-related projects including energy efficiency and decommissioning initiatives, disaster response, power resilience, adaptation and other initiatives.

Response 7: Row 8

Method

Other: Building Design specifications

Comment

Energy efficiency considerations are integrated into all building services capital works projects. This mandatory step reviews each capital works project for its impact on energy and water consumption. Inherent energy efficiency gains are captured through this process.

Q7.73 Are you providing product level data for your organization’s goods or services?

Yes, I will provide data through the CDP questionnaire

Q7.73.1 Give the overall percentage of total emissions, for all Scopes, that are covered by these products.

2

Q7.73.4 Please detail emissions reduction initiatives completed or planned for this product.

Response 1: Row 1

Name of good/ service

TSM3-Telstra Smart Modem 3

Initiative ID

Initiative 1

Description of initiative

Installed energy efficient chipsets

Completed or planned

Completed

Response 2: Row 2

Name of good/ service

TSM3-Telstra Smart Modem 3

Initiative ID

Initiative 2

Description of initiative

Provided efficient power supply unit

Response 3: Row 3

Name of good/ service

TSM3-Telstra Smart Modem 3

Initiative ID

Initiative 3

Description of initiative

Removed the Digital enhanced Cordless Telecommunications (DECT)

Q7.73.5 Have any of the initiatives described in 7.73.4 been driven by requesting CDP Supply Chain members?

No

Q7.74 Do you classify any of your existing goods and/or services as low-carbon products?

No

Q7.79 Has your organization retired any project-based carbon credits within the reporting year?

Yes

Q7.79.1 Provide details of the project-based carbon credits retired by your organization in the reporting year.

Response 1: Row 1

Project type

Agriculture

Type of mitigation activity

Emissions reduction

Project description

Batavia Savanna Burning Project - ERF102099
This project involves strategic and planned burning of savanna areas in the high rainfall zone during the early dry season to reduce the risk of late dry season wildfires.

Credits retired by your organization from this project in the reporting year (metric tons CO2e)

41

Purpose of retirement

Voluntary offsetting

Are you able to report the vintage of the credits at retirement?

Yes

Vintage of credits at retirement

2022

Were these credits issued to or purchased by your organization?

Purchased

Carbon-crediting program by which the credits were issued

Emissions Reduction Fund of the Australian Government

Method the program uses to assess additionality for this project

Consideration of legal requirements

Approaches by which the selected program requires this project to address reversal risk

No risk of reversal

Potential sources of leakage the selected program requires this project to have assessed

Other: Under the ACCU Scheme, leakage is deemed not relevant for this project type.

Provide details of other issues the selected program requires projects to address

Under the ACCU Scheme, leakage is deemed not relevant for this project type.

Please explain

The project is registered under the Carbon Credits (Carbon Farming Initiative—Emissions Abatement through Savanna Fire Management) Methodology Determination 2015. This method sets out the rules for running and earning credits for the project. Division 2 of the method sets out the newness and additionality requirements.

For a savanna fire management project under the Determination, the only abatement that is credited is abatement that is additional to what was achieved during the baseline period. That is, if the project proponent had begun early dry season fire management before project commencement, they would only generate credits for abatement over and above the abatement that was achieved in the baseline period. Regarding reversal risk, the project operates under an emissions avoidance only method. As such, there is no permanence period and no reversal risk. The savanna fire management emissions avoidance method credits activities that reduce the emission of greenhouse gases from fire in savannas in northern Australia, through a reduction in the frequency and extent of late dry season fires. Further, leakage is not of concern for land-based emission avoidance methodologies as the ACCUs generated are directly attributed to permanent reductions of emissions compared to the baseline period inside of a defined project area.

Q10.1 Do you have plastics-related targets, and if so what type?

Response 1:

Targets in place

Yes

Target type and metric

- Plastic packaging: Increase the proportion of post-consumer recycled content in plastic packaging
- Plastic packaging: Reduce or eliminate the use of hazardous substances
- Plastic packaging: Increase the proportion of plastic packaging that is recyclable in practice and at scale
- Plastic packaging: Eliminate single-use plastic packaging
- Plastic packaging: Eliminate problematic and unnecessary plastic packaging

Please explain

Telstra’s packaging targets are aligned with the 2025 Australian National Packaging Targets. We chose to adopt an accelerated timeframe to achieve these targets by end of calendar year 2022. Telstra is committed to being proactive in our industry, to support and influence our supply chain partners. To do this, we set a specific packaging target that 100% of Telstra branded packaging is made of renewable or recycled material and is fully recyclable in the consumer’s kerbside bin with zero plastics, by the end of 2022. We successfully achieved this goal by October 2022 and continue to meet the target in FY24. We have a governance framework with regular bi-monthly reporting to track and manage progress against plastics targets. Telstra’s sustainable packaging strategy is nested under the broader Sustainable Strategy. The Board reviews and refreshes the strategy on a regular basis.

Q10.2 Indicate whether your organization engages in the following activities.

Response 1: Production/commercialization of plastic polymers (including plastic converters)

Activity applies

No

Comment

N/A

Response 2: Production/commercialization of durable plastic goods and/or components (including mixed materials)

Activity applies

Yes

Comment

We use 95% recycled plastic and recyclable plastic in our Smart Modem 3.

Response 3: Usage of durable plastics goods and/or components (including mixed materials)

Activity applies

No

Comment

N/A

Response 4: Production/commercialization of plastic packaging

Activity applies

No

Comment

N/A

Response 5: Production/commercialization of goods/products packaged in plastics

Activity applies

Yes

Comment

100% of Telstra-branded packaging is recyclable and is made of at least 50% renewable or recycled material.

Response 6: Provision/commercialization of services that use plastic packaging (e.g., food services)

Activity applies

No

Comment

N/A

Response 7: Provision of waste management and/or water management services

Activity applies

No

Comment

N/A

Response 8: Provision of financial products and/or services for plastics-related activities

Activity applies

No

Comment

N/A

Response 9: Other activities not specified

Activity applies

No

Comment

N/A

Q10.4 Provide the total weight of plastic durable goods and durable components produced, sold and/or used, and indicate the raw material content.

Response 1: Durable goods and durable components sold

Total weight during the reporting year (Metric tons)

431

Raw material content percentages available to report

- % post-consumer recycled content
- % virgin fossil-based content

% virgin fossil-based content

60

% post-consumer recycled content

40

Please explain

To take tangible action on circular economy we have focused on both the resources we use and the waste generated by our operations, as well as the waste we generate from the manufacturing, distribution and use of our products. By improving our use of natural resources across our organisation, we can also help our customers, suppliers, contractors and partners do the same. In FY24, we started a program to embed sustainability across our planning, procurement and product design processes, including a focus on eco-design. One of the key eco-design criteria is to include and increase the use of recycled material in our products. Our modem range and Wi-Fi booster enclosures are made from at least 85% recycled plastics.

Q10.5 Provide the total weight of plastic packaging sold and/or used and indicate the raw material content.

Response 1: Plastic packaging used

Total weight during the reporting year (Metric tons)

0.1

Raw material content percentages available to report

% virgin fossil-based content

% virgin fossil-based content

100

Please explain

In October 2022, we met our commitment for 100 per cent of Telstra branded packaging to be made of renewable or recycled material and be fully recyclable. We have continued to meet that commitment on 100 per cent of Telstra branded packaging for all new products released in FY24. We continue to research, investigate and evaluate new sustainable packaging technologies and innovative materials. We have successfully redesigned packaging that had components previously made from soft plastics. These were replaced using recyclable fibre-based materials. We continue to work with suppliers and manufacturers to drive innovation and sustainable solutions.

Q10.5.1 Indicate the circularity potential of the plastic packaging you sold and/or used.

Response 1: Plastic packaging used

Percentages available to report for circularity potential

% technically recyclable

% of plastic packaging that is technically recyclable

100

Please explain

Although the immaterial amount of soft plastics we have in our packaging is technically recyclable, we acknowledge that recycling options are not currently available in Australia. Recognising this challenge, we have redesigned Telstra-branded packaging that had components previously made from soft plastics replacing them with recyclable fibre-based materials.

Q11.2 What actions has your organization taken in the reporting year to progress your biodiversity-related commitments?

Response 1:

Actions taken in the reporting period to progress your biodiversity-related commitments

Yes, we are taking actions to progress our biodiversity-related commitments

Type of action taken to progress biodiversity- related commitments

- Law & policy
- Land/water management
- Land/water protection
- Education & awareness

Q11.3 Does your organization use biodiversity indicators to monitor performance across its activities?

Response 1:

Does your organization use indicators to monitor biodiversity performance?

Yes, we use indicators

Indicators used to monitor biodiversity performance

Other: Fauna strikes, # compliance breaches, # high potential incidents, # environmental incidents that require statutory notification

Q11.4 Does your organization have activities located in or near to areas important for biodiversity in the reporting year?

Response 1: Legally protected areas

Indicate whether any of your organization's activities are located in or near to this type of area important for biodiversity

Yes (partial assessment)

Comment

We found 1.3% of our Australian fibre network and 2.5% of our above ground assets are in protected land areas such as National Parks or Indigenous Protected Areas. In FY25, we trialled a platform to assess our asset portfolio to identify priority and material locations as defined by the TNFD.

Response 2: UNESCO World Heritage sites

Indicate whether any of your organization's activities are located in or near to this type of area important for biodiversity

Yes (partial assessment)

Comment

We found 1.3% of our Australian fibre network and 2.5% of our above ground assets are in protected land areas such as National Parks or Indigenous Protected Areas. In FY25, we trialled a platform to assess our asset portfolio to identify priority and material locations as defined by the TNFD.

Response 3: UNESCO Man and the Biosphere Reserves

Indicate whether any of your organization's activities are located in or near to this type of area important for biodiversity

Yes (partial assessment)

Comment

We found 1.3% of our Australian fibre network and 2.5% of our above ground assets are in protected land areas such as National Parks or Indigenous Protected Areas. In FY25, we trialled a platform to assess our asset portfolio to identify priority and material locations as defined by the TNFD.

Response 4: Ramsar sites

Indicate whether any of your organization’s activities are located in or near to this type of area important for biodiversity

Yes (partial assessment)

Comment

We found 1.3% of our Australian fibre network and 2.5% of our above ground assets are in protected land areas such as National Parks or Indigenous Protected Areas. In FY25, we trialled a platform to assess our asset portfolio to identify priority and material locations as defined by the TNFD.

Response 5: Key Biodiversity Areas

Indicate whether any of your organization’s activities are located in or near to this type of area important for biodiversity

Yes (partial assessment)

Comment

We found 1.3% of our Australian fibre network and 2.5% of our above ground assets are in protected land areas such as National Parks or Indigenous Protected Areas. In FY25, we trialled a platform to assess our asset portfolio to identify priority and material locations as defined by the TNFD.

Response 6: Other areas important for biodiversity

Indicate whether any of your organization’s activities are located in or near to this type of area important for biodiversity

Yes (partial assessment)

Comment

We found 1.3% of our Australian fibre network and 2.5% of our above ground assets are in protected land areas such as National Parks or Indigenous Protected Areas. In FY25, we trialled a platform to assess our asset portfolio to identify priority and material locations as defined by the TNFD.

Q11.4.1 Provide details of your organization’s activities in the reporting year located in or near to areas important for biodiversity.

Response 1: Row 1

Types of area important for biodiversity

Other areas important for biodiversity

Country/area

Australia

Name of the area important for biodiversity

One example is our network site in the Daintree National Park, Northern Queensland. Direct proximity to the Wet Tropics World Heritage Area (Indigenous Values) and Great Barrier Reef Marine Park protected area.

Proximity

Adjacent

Briefly describe your organization’s activities in the reporting year located in or near to the selected area

We operate in areas important for biodiversity across the country. We have over 20,000 above ground assets connected by 250,000 km of underground fibre cable, with a potential further 14,000 km in progress as part of the Inter City Fibre Network project . These assets provide connectivity across a land area of 2.6M km2. Over 22 per cent of Australia’ s landmass is protected under the National Reserve System46 (NRS). Made up of more than 14,000 individual areas, the NRS defines protected land under seven categories including Strict Nature Reserves, Wilderness Areas, National Parks, Natural Monuments, and Protected Landscape or Seascape. To start to understand our network’ s interactions with protected lands we have identified where our network assets meet NRS areas. We found 1.3 per cent of our Australian fibre network and 2.5 per cent of our above ground assets are in protected land areas such as National Parks or Indigenous Protected Areas. In addition, we have ownership in international subsea cable networks which span more than 400,000 km, interacting with deep and shallow water ocean ecosystems. Telstra’ s assets cross many of the TNFD-aligned biomes, including tropical-subtropical forests, savannas and grasslands and deep seas. In FY25, we will continue to assess our asset portfolio to identify priority and material locations as defined by the TNFD.

Indicate whether any of your organization’s activities located in or near to the selected area could negatively affect biodiversity

Yes, but mitigation measures have been implemented

Mitigation measures implemented within the selected area

- Operational controls
- Project design
- Physical controls

Explain how your organization’s activities located in or near to the selected area could negatively affect biodiversity, how this was assessed, and describe any mitigation measures implemented

A diesel spill has the potential to affect biodiversity in the area. Mitigation measures include network and infrastructure maintenance, inspections, site design standards. Our work spans diverse environments across Australia, including the desert, the Daintree, remote National Parks, the islands of the Torres Strait, and even under the sea with our subsea cable network. As a result, there are many sites located in or near areas important for biodiversity where we have ongoing activities. However, reporting on all these individual sites would be too extensive, so we have chosen to highlight only one site in this report. Connectivity solutions are a powerful enabler of nature-positive outcomes, but they require significant infrastructure and network equipment, which can present risks to nature and biodiversity. Therefore, our approach to considering, planning for, and working with nature is tailored to each stage of our infrastructure lifecycle. When we plan for new or major upgrades to existing infrastructure, we consider the need to work in environmentally sensitive locations. This means employing the best appropriate methods for design and construction to reduce the risk of harm to habitats, flora and fauna as well as areas of cultural significance. We also consider how we can help regenerate nature by managing soil and erosion risk and remediating and revegetating land as we go.

Q13.1 Indicate if any environmental information included in your CDP response (not already reported in 7.9.1/2/3, 8.9.1/2/3/4, and 9.3.2) is verified and/or assured by a third party?

Yes

Q13.1.1 Which data points within your CDP response are verified and/or assured by a third party, and which standards were used?

Response 1: Row 1

Environmental issue for which data has been verified and/or assured

Climate change

Disclosure module and data verified and/or assured

Environmental performance - Climate change: Progress against targets

Verification/assurance standard

- Climate change-related standards: ASAE 3410
- General standards: ISAE 3000

Further details of the third-party verification/assurance process

The verification standards used are ISAE 3000 and ASAE 3410 Assurance Engagements on Greenhouse Gas Statements, in accordance with the National Greenhouse and Energy Reporting (Audit) Determination 2009. Verified data includes, progress towards the target to reduce absolute scope 1 and scope 2 GHG emissions (tCO_2e) by at least 70% by 2030 (%), progress towards the target to reduce absolute Scope 3 GHG emissions (tCO_2e) by at least 50% by 2030 (%), progress towards enabling renewable energy generation equivalent to 100% of consumption by 2025, and the target to ensure 100% packaging is made from renewable or recycled material and is fully recyclable by 2022.

Attach verification/assurance evidence/report (optional)

2024-Telstra-Bigger-Picture-Sustainability-Report-Assurance-Statement.pdf

Response 2: Row 2

Environmental issue for which data has been verified and/or assured

Climate change

Disclosure module and data verified and/or assured

Environmental performance - Climate change: Other data point in module 7: Total energy consumed

Verification/assurance standard

- General standards: ISAE 3000
- Climate change-related standards: ASAE 3410

Further details of the third-party verification/assurance process

The verification standards used are ISAE 3000 and ASAE 3410 Assurance Engagements on Greenhouse Gas Statements, in accordance with the National Greenhouse and Energy Reporting (Audit) Determination 2009. Verified data includes total energy consumed (GJ).

Attach verification/assurance evidence/report (optional)

2024-Telstra-Bigger-Picture-Sustainability-Report-Assurance-Statement.pdf

Q13.2 Use this field to provide any additional information or context that you feel is relevant to your organization's response. Please note that this field is optional and is not scored.

In FY23 we acquired Digicel Pacific. We are working to determine the necessary actions to incorporate Digicel Pacific in its existing climate scenario analysis, climate risk financial quantification and adaptation planning. The disclosures in this report in relation to the matters noted above do not include Digicel Pacific unless otherwise stated. We continue to develop a deeper understanding of the physical climate characteristics which drive network exposure in the region and identify the vulnerabilities which are unique to our Digicel Pacific operations.

Q13.3 Provide the following information for the person that has signed off (approved) your CDP response.

Response 1:

Job title

Chief Sustainability Officer, Telstra Group Limited

Corresponding job category

Chief Sustainability Officer (CSO)

Question Number	Question	Subquestion	Attachment
Q13.1.1	Which data points within your CDP response are verified and/or assured by a third party, and which standards were used?	Attach verification/assurance evidence/report (optional)	2024-Telstra-Bigger-Picture-Sustainability-Report-Assurance-Statement.pdf
Q4.6.1	Provide details of your environmental policies.	Attach the policy	Telstra Environment Policy.pdf
Q7.9.3	Provide further details of the verification/assurance undertaken for your Scope 3 emissions and attach the relevant statements.	Attach the statement	2024 Telstra Bigger Picture Sustainability Report Assurance Statement.pdf
Q13.1.1	Which data points within your CDP response are verified and/or assured by a third party, and which standards were used?	Attach verification/assurance evidence/report (optional)	2024-Telstra-Bigger-Picture-Sustainability-Report-Assurance-Statement.pdf
Q4.12.1	Provide details on the information published about your organization's response to environmental issues for this reporting year in places other than your CDP response. Please attach the publication.	Attach the relevant publication	2024 Telstra-Bigger-Picture-Sustainability-Report-Remediated.pdf
Q4.12.1	Provide details on the information published about your organization's response to environmental issues for this reporting year in places other than your CDP response. Please attach the publication.	Attach the relevant publication	Greenhouse-and-energy-information-registered-corporation-2023-24.xlsx
Q4.12.1	Provide details on the information published about your organization's response to environmental issues for this reporting year in places other than your CDP response. Please attach the publication.	Attach the relevant publication	2024 Telstra Bigger-Picture-Sustainability-Report-Data-Pack-Remediated.xlsx
Q4.12.1	Provide details on the information published about your organization's response to environmental issues for this reporting year in places other than your CDP response. Please attach the publication.	Attach the relevant publication	Telstra Environment Policy.pdf
Q7.53.1	Provide details of your absolute emissions targets and progress made against those targets.	Science Based Targets initiative official validation letter	Telstra Group Limited - Net-Zero Approval Letter - Monday_ 9 December 2024.pdf

Question Number	Question	Subquestion	Attachment
Q4.11	In the reporting year, did your organization engage in activities that could directly or indirectly influence policy, law, or regulation that may (positively or negatively) impact the environment?	Attach commitment or position statement	2024 Telstra-Bigger-Picture-Sustainability-Report.pdf
Q7.54.3	Provide details of your net-zero target(s).	Science Based Targets initiative official validation letter	Telstra Group Limited - Net-Zero Approval Letter - Monday_ 9 December 2024.pdf
Q4.1	Does your organization have a board of directors or an equivalent governing body?	Attach the policy (optional)	Telstra diversity-equity-and-inclusion-policy.pdf,Telstra-2024-corporate-governance-statement.pdf
Q7.9.2	Provide further details of the verification/assurance undertaken for your Scope 2 emissions and attach the relevant statements.	Attach the statement	2024 Telstra Bigger Picture Sustainability Report Assurance Statement.pdf
Q5.2	Does your organization's strategy include a climate transition plan?	Attach any relevant documents which detail your climate transition plan (optional)	2024-Telstra-Bigger-Picture-Sustainability-Report-Remediated.pdf,telstra-annual-report-2024-interactive.pdf
Q4.12.1	Provide details on the information published about your organization's response to environmental issues for this reporting year in places other than your CDP response. Please attach the publication.	Attach the relevant publication	Telstra-annual-report-2024.pdf
Q7.9.1	Provide further details of the verification/assurance undertaken for your Scope 1 emissions, and attach the relevant statements.	Attach the statement	2024 Telstra Bigger Picture Sustainability Report Assurance Statement.pdf
Q7.53.1	Provide details of your absolute emissions targets and progress made against those targets.	Science Based Targets initiative official validation letter	Telstra Group Limited - Near-Term Approval Letter - Monday_ 9 December 2024.pdf