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28 February 2024

Dr Keith Kendall

Australian Accounting Standards Board (AASB)

PO Box 204
Collins St West
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Dear Dr Kendall

Re: AASB Sustainability Reporting Exposure Draft ED SR1 Australian Sustainability Reporting Standards - Disclosure of Climate-related Financial Information (ED SR1)

On behalf of National Australia Bank (NAB), I am writing to comment on the aforementioned Exposure Draft issued in October 2023. NAB appreciates this opportunity to provide feedback.

NAB is one of the four major Australian banks, listed on the Australian Securities Exchange, operating primarily within Australia and New Zealand and serving customers in the areas of personal banking, business and private banking, and corporate and institutional banking. In NAB's most recent annual results, we reported net profit after tax of AUD\$7.4 billion and total assets of AUD\$1,059 billion.

NAB is supportive of efforts to create an environment that promotes consistent Australian implementation of climate-related disclosures. There is growing demand from users of reporting for comparable, consistent and reliable sustainability-related information, with an initial focus on climate-related information. NAB acknowledges the role of national disclosures, with consideration of relevant frameworks including the recommendations of the Task Force on Climate-related Financial Disclosures (TCFD), the Global Reporting Initiative (GRI) and more recently, IFRS Sustainability Disclosure Standards and the Taskforce on Nature-related Financial Disclosures (TNFD) Framework.

As a financial institution, NAB currently provides disclosures on climate-related strategy, governance, risk management, and metrics and targets to meet the voluntary commitments we have made, as well as the information needs of key stakeholders. This includes analysing our operational and financed emissions (including setting decarbonisation targets), climate risks and opportunities associated with our lending portfolio. NAB as a user of other entities' climate reporting has experienced the difficulties that arise when climate and nature-related data and information is not readily available. NAB looks forward to the contribution the Standards can make to data availability and quality over time.

NAB would like to highlight the following key areas of feedback identified in our review of the Exposure Draft:

- The AASB should aim to ensure that Australian Sustainability Reporting Standards (ASRS) are closely aligned to equivalent international reporting standards (i.e. IFRS Sustainability Disclosure Standards), to the extent that such Standards are fit-for-purpose in the Australian context. This will assist with the ease of implementation for companies operating across multiple jurisdictions. While acknowledging that

Australia is following a 'climate-first approach', NAB emphasises the need for a generic framework standard which is capable of existing in its own right (i.e. [draft] ASRS 1) and would provide general disclosure requirements for other topics until further specific thematic reporting standards are developed. While NAB acknowledges the scale of the challenges in adopting sustainability reporting, we are also aware that the International Sustainability Standards Board (ISSB) intends to continue developing thematic standards. NAB would like to avoid a situation where the pace of adoption in Australia does not keep up with international developments.

- NAB supports the proposed use of the Australian and New Zealand Standard Industrial Classification (ANZSIC) system for any climate-related disclosures that include industry-based information. This will reduce reporting system changes as Australian entities have already implemented the ANZSIC for certain financial and regulatory reporting. NAB highlights the need for the Australian Bureau of Statistics (ABS) to provide an agreed mapping between ANZSIC and other well-established industry codes such as the Global Industry Classification Standard (GICS). This will reduce the regulatory burden on reporting entities and increase comparability for entities that are required to report across different jurisdictions.
- NAB agrees with the AASB's proposal for an entity to provide their climate-related financial disclosures in a manner that enables users to locate those disclosures, without mandating a specific format, location, or the use of an index table. A sustainability report consistent with the ASRS Standards will contain a substantial amount of information, including technically complex disclosures of scenario analysis and explanations of methodologies for calculating Scope 3 emissions. Entities may elect to use index tables to aid navigating through an extended document and to distinguish between information prepared under ASRS Standards and voluntary reporting frameworks. However, NAB believes it is best to leave the location and presentation of information (i.e. as part of the annual report or a separate sustainability report) up to the judgement of each reporting entity. Where an entity is required to report under different reporting regimes, it would be cost effective to prepare a single set of climate reporting that meets the requirements of all regimes, as opposed to preparing partially duplicated reports.
- NAB agrees with the proposal to permit an entity to disclose its Scope 3 emissions using data for the immediately preceding reporting period. However, NAB requests further clarity on the meaning of 'immediately preceding period'. NAB's emissions reporting under the National Greenhouse and Energy Reporting (NGER) Act does not align to our financial year, but is instead aligned to the NGER reporting period (1 July to 30 June). The use of different reporting periods introduces additional considerations and complexities, which are discussed further in NAB's responses below.

Responses to questions

NAB's detailed responses to questions on the Exposure Draft are contained in the Appendix to this letter.

If you have any questions or require further clarification on our responses, please do not hesitate to contact Matt Rodgers (Head of Group Accounting Policy) at matt.rodgers@nab.com.au.

Yours sincerely



Greg Braddy
Deputy Group Chief Financial Officer

Appendix – ED SR1 Australian Sustainability Reporting Standards – Disclosure of Climate-related Financial Information

Presenting the core content of IFRS S1 in [draft] ASRS Standards

Question 1 – Presenting the core content of IFRS S1 in [draft] ASRS Standards

In respect of presenting the core content disclosure requirements of IFRS S1, do you prefer:

- Option 1 – one ASRS Standard that would combine the relevant contents of IFRS S1 relating to general requirements and judgements, uncertainties and errors (i.e. all relevant requirements other than those relating to the core content that are exactly the same as the requirements in IFRS S2) within an Australian equivalent of IFRS S2;
- Option 2 – two ASRS Standards where the same requirements in respect to disclosures of governance, strategy and risk management would be included in both Standards;
- Option 3 – two ASRS Standards, by including in [draft] ASRS 1 the requirements relating to disclosures of governance, strategy and risk management, and in [draft] ASRS 2, replacing duplicated content with Australian-specific paragraphs cross-referencing to the corresponding paragraphs in [draft] ASRS 1 (which is the option adopted by the AASB in developing the [draft] ASRS 1 and [draft] ASRS 2 in this Exposure Draft); or
- another presentation approach (please provide details of that presentation method)?

NAB believes the AASB should aim to ensure that Australian Sustainability Reporting Standards (ASRS) are closely aligned to equivalent international reporting standards (i.e. IFRS Sustainability Disclosure Standards issued by the ISSB), to the extent that such standards are fit-for-purpose in the Australian context. For this reason, NAB's preference is Option 2 - that is two ASRS Standards where the core content disclosure requirements from IFRS S1 are included in both ASRS 1 and ASRS 2.

NAB acknowledges that this would result in a level of duplication between ASRS 1 and ASRS 2 in the short-term (i.e. while Australia reports under its 'climate-first approach'). However, this would result in ASRS 1 being 'future-proofed', with minimal changes to the Standard being required at the time that the scope of Australia's reporting increases beyond climate.

Furthermore, it is NAB's understanding that the intention of IFRS S1 (and consequently of ASRS 1 in future) is to provide general disclosure requirements for those sustainability-related topics for which a specific thematic reporting standard does not yet exist. In this context, it is appropriate for ASRS 1 to be capable of existing as a reporting standard in its own right, without the need to cross-reference to other standards.

If the AASB elects Option 1, NAB recommends there be a detailed table of concordance with IFRS S1 and IFRS S2 to enable entities to assess the extent to which their disclosures under ASRS comply with the equivalent IFRS Sustainability Disclosure Standards.

Replacing duplicated content with references to the Conceptual Frameworks

Question 2 – Replacing duplicated content with references to the Conceptual Frameworks

The AASB is of the view that since the Conceptual Framework for Financial Reporting (in respect to for-profit entities) and the Framework for the Preparation and Presentation of Financial Statements (in respect to not-for-profit entities) are not legislative instruments and do not form part of the authoritative Australian Accounting Standards, they should not be made enforceable as part of [draft] ASRS Standards. Accordingly, where components of those Frameworks have been duplicated within IFRS S1 and IFRS S2 as requirements with which an entity must comply, the AASB is proposing to replace the relevant IFRS S1 and IFRS S2 paragraphs with Australian-specific paragraphs cross-referencing to those Frameworks.

Do you agree with the AASB's approach to make references to its Conceptual Framework for Financial Reporting (in respect to for-profit entities) and the Framework for the Preparation and Presentation of Financial Statements (in respect to not-for-profit entities) instead of duplicating definitions and contents of those Frameworks in [draft] ASRS 1 and [draft] ASRS 2? Please provide reasons to support your view.

As noted in NAB's response to Question 1, our preference is for ASRS to be closely aligned to IFRS Sustainability Disclosure Standards in so far as these standards are fit-for-purpose in Australia. However, NAB acknowledges that in this instance, the replication of the requirements of IFRS S1 and IFRS S2 by including definitions and content from Frameworks in ASRS 1 and ASRS 2 would not be appropriate in the Australian context. This would have the effect of incorporating existing content in a legislative instrument which would otherwise not be the case.

NAB therefore agrees with the AASB's proposal to replace definitions and content from these Frameworks with references to such Frameworks instead. We note this is consistent with the approach currently followed by the AASB in developing Australian Accounting Standards. The alternative could result in the same definitions and concepts forming part of certain legislative instruments (Australian Sustainability Reporting Standards) but not others (Australian Accounting Standards).

Entities that do not have material climate-related risks and opportunities

Question 3 – Entities that do not have material climate-related risks and opportunities

The AASB is proposing that if an entity determines that there are no material climate-related risks and opportunities that could reasonably be expected to affect the entity's prospects, the entity shall disclose that fact and explain how it came to that conclusion.

Do you agree with the proposed requirements in [draft] ASRS 1 paragraph Aus6.2 and [draft] ASRS 2 paragraph Aus4.2? Please provide reasons to support your view.

NAB agrees with the AASB's proposal to require entities to make a clear statement if they have determined that they have no material climate-related risks and opportunities, and to explain how they came to that conclusion. NAB believes such disclosure would provide useful information to users of general purpose financial reports, as it will allow them to assess the appropriateness of that conclusion and make comparisons against similar reporting entities that may not have reached the same conclusion.

Modifications to the baseline of IFRS S1 for [draft] ASRS 1

Sources of guidance and references to Sustainability Accounting Standards Board (SASB) Standards

Question 4 – Requirement to consider the applicability of SASB Standards for industry based disclosure

The AASB is proposing to remove from IFRS S1 and IFRS S2 the requirement for an entity to consider the applicability of SASB Standards and references to *Industry-based Guidance on Implementing IFRS S2* issued by the ISSB developed based on SASB Standards. This is mainly because:

- (a) the ISSB’s public consultation period was too short for Australian stakeholders to appropriately consider the proposals and for the AASB to appropriately apply its own due process;
- (b) not all of the proposals in IFRS S2 are related to climate-related risks and opportunities; and
- (c) the SASB Standards are US-centric and not representative of the Australian or global market.

Do you agree with the AASB’s views noted in paragraphs BC39–BC41? Please provide reasons to support your view.

NAB agrees with the proposal to not mandate the industry-specific metrics which have been adapted from SASB Standards. The use of SASB industry metrics is appropriate for the US market but is less relevant in other jurisdictions, including Australia. Entities in Australia are required to apply the ANZSIC system issued by the ABS under existing Australian legislation and regulations. ANZSIC and the SASB Sustainable Industry Classification System are not aligned.

NAB acknowledges that the ISSB amended the climate-related content in the SASB Standards to align with IFRS S2 at the time of the issuance of that Standard in June 2023. In December 2023 (subsequent to the release of ED SR1 by the AASB), the ISSB also amended the non-climate-related content of the SASB Standards with the intention of further enhancing its international applicability. Notwithstanding the efforts of the ISSB, NAB agrees with the AASB’s proposal to exclude these requirements from ASRS until the content is further internationalised and has undergone the AASB’s own due process. NAB also agrees with the AASB’s view that an entity that wishes to make additional, voluntary disclosures using SASB Standards (or others) would be able to do so. The proposed removal of the specific requirement to consider the applicability of SASB Standards would not diminish the ability of entities to make such disclosures.

Question 5 – Industry classification systems

The industry classification system used in Australia is the Australian and New Zealand Standard Industrial Classification (ANZSIC) issued by the Australian Bureau of Statistics. To avoid introducing requirements that would require an entity to use another industry classification system, the AASB is proposing to specify that, if an entity elects to make industry-based disclosures, the entity shall consider the applicability of well-established and understood metrics associated with particular business models, activities or other common features that characterise participation in the same industry, as classified in ANZSIC.

Do you agree with the AASB’s view that if an entity elects to make industry-based disclosures, the entity should consider the applicability of well-established and understood metrics associated with particular business models, activities or other common features that characterise participation in the same industry, as classified in ANZSIC? Please provide reasons to support your view.

NAB agrees with the AASB’s view that the use of well-established and understood metrics associated with particular business models or activities would be appropriate for the purpose of industry-based disclosures. ANZSIC is the logical industry classification to be applied in the Australian context, and certain existing financial and regulatory reporting is already prepared using the ANZSIC classification.

NAB notes that the reporting frameworks of other jurisdictions may require industry-based disclosures using industry classifications that are not aligned to ANZSIC. Where an entity is required to report under multiple reporting frameworks across different jurisdictions, this may result in the repetition of industry-based disclosures prepared using different classifications. To reduce the regulatory burden on reporting entities and to increase comparability, NAB recommends the ABS provide an agreed mapping between ANZSIC and other well-established industry codes such as the GICS.

Question 6 – Voluntary disclosures

Do you consider that ASRS Standards should expressly permit an entity to also provide voluntary disclosures based on other relevant frameworks or pronouncements (e.g. the SASB Standards)? Entities are able to provide additional disclosures provided that they do not obscure or conflict with required disclosures. Please provide reasons to support your view.

It is NAB's view that under ASRS Standards, consistent with existing principles under Australian Accounting Standards, entities would be permitted to include voluntary disclosures where such disclosures provide useful information to users of the general purpose financial report and are not in conflict with the disclosure requirements of another Standard. NAB therefore does not consider it necessary for ASRS Standards to expressly permit this. There is risk that the inclusion of an explicit statement in the Standards could result in perceived inconsistencies in the extent to which different reporting entities are complying with the requirements of the Standards.

Furthermore, where an entity is required to report under different reporting regimes, preparing a single set of climate reporting that meets the requirements of different reporting regimes, would be cost effective, and would result in a "single source of truth". As an example, NAB expects that information required under a voluntary commitment such as the Net Zero Banking Alliance (NZBA) could be included in the general purpose financial report prepared in accordance with ASRS Standards (even though not required by ASRS Standards).

Question 7 – Disclosing the location of the entity's climate-related financial disclosures

In its second consultation Treasury proposed to require entities to include an index table in its annual report that displays climate-related financial disclosure requirements and the relevant disclosure section and page number. However, the AASB was concerned that requiring an entity to include a detailed index table in its General Purpose Financial Report (GPFR) could be onerous to prepare. The AASB is of the view that the benefits of having such a detailed index table presented in an entity's GPFR would not outweigh the cost and effort required to prepare the index table.

Instead of requiring a detailed index table to be included in GPFR, the AASB added paragraph Aus60.1 to [draft] ASRS 1 to propose requiring an entity to apply judgement in providing information in a manner that enables users to locate its climate-related financial disclosures. Do you agree with that proposed requirement? Please provide reasons to support your view.

NAB agrees with the AASB's view that a detailed index table should not need to be included in the GPFR. Such a requirement would be akin to a financial statements disclosure checklist being required to be included in the general purpose financial report under Australian Accounting Standards (which is not the case). For these reasons, NAB agrees with the proposed requirement for an entity to provide information in a manner that enables users of general purpose financial reports to locate its disclosures prepared in accordance with ASRS Standards.

NAB acknowledges the conflicting views of Treasury and the AASB in relation to the required location of disclosures. Treasury's Policy Position Statement released in January 2024 (subsequent to the release of ED SR1 by the AASB) states that the sustainability report would form part of an entity's 'annual report'. It also indicates that entities should include an index table in the annual report, however this requirement does not

appear in the draft legislation. It is therefore NAB's understanding that the proposal in ED SR1, if adopted in the final ASRS Standard, would apply.

Question 8 – Interim reporting

There was a significant degree of confusion over whether interim reporting of climate-related financial disclosures would be mandatory in the feedback received on Treasury's second consultation paper. AASB is proposing to omit the IFRS S1 paragraphs which require an entity electing to prepare interim reports to comply with IFRS S1 paragraph B48 which provides guidance on the content of interim disclosures.

Do you agree with the proposed omission of IFRS S1 paragraphs 69 and B48? Please provide reasons to support your view.

NAB agrees with the proposal to not mandate any interim climate-related financial disclosures. Sustainability reporting is currently not as established as financial reporting within organisations' systems, reporting processes, controls and resources and information may not be available for disclosure at interim periods.

Notwithstanding NAB's earlier comments that the AASB should aim to seek alignment of ASRS to IFRS Sustainability Disclosure Standards, we agree that paragraphs 69 and B48 of IFRS S1 could create confusion over whether interim reporting of climate-related financial disclosures are mandatory and consequently it may be appropriate to omit these paragraphs from ASRS 1. However, NAB questions whether the omission of these paragraphs in isolation achieves the AASB's purpose of providing clarity over interim reporting. Even with the omission of paragraph 69 of IFRS S1, it is not explicit in the [draft] Standard that interim disclosures are not required and may be prepared by entities on a voluntary basis.

Furthermore, NAB believes that it would be useful to provide some direction about the extent of the required disclosures to those entities who elect or are otherwise required (not under the requirements of ASRS) to provide climate-related financial disclosures as part of their interim reporting similar to IFRS S1 B48. This guidance should also provide clarity on the ability to report on Scope 3 greenhouse gas (GHG) emissions data from the 'immediately preceding period' – refer to NAB's response to Question 18.

Modifications to the baseline of IFRS S2 for [draft] ASRS 2

Question 9 – Scope of [draft] ASRS 2

IFRS S2 applies to climate-related risks and opportunities within the context of climate change. Previous feedback highlighted that there was a significant degree of confusion on what was meant by "climate" and the boundary of [draft] IFRS S2. Given that IFRS S2 makes no reference to climate-related financial disclosures beyond climate change or other climate-related emissions, the AASB decided to add paragraph Aus3.1 to [draft] ASRS 2 to clarify the scope of the Standard—that [draft] ASRS 2:

- (a) is limited to climate-related risks and opportunities related to climate change; and
- (b) does not apply to other climate-related emissions (e.g. ozone depleting emissions) that are not greenhouse gas (GHG) emissions.

That scope statement would also clarify that [draft] ASRS 2 does not replace existing legislation or pronouncements prescribing reporting requirements related to other sustainability-related topics (e.g. water and biodiversity).

Do you agree with the proposal in [draft] ASRS 2 paragraph Aus3.1 to clarify the scope of the [draft] Standard? Please provide reasons to support your view.

As noted in NAB's response to Question 1, our preference is for ASRS Standards to be as closely aligned to IFRS Sustainability Disclosure Standards as possible.

NAB is unclear on the rationale for including paragraph Aus3.1(a) in [draft] ASRS 2. In NAB's view the proposed Standard is clear enough in establishing the boundary of climate-related risks and opportunities, which are defined in Appendix A to ASRS 2. NAB does not believe that there is a difference, perceived or actual, between 'climate-related risks and opportunities' and 'climate-related risks and opportunities related to climate-change'. Such a difference (if it does exist) has not been explained in [draft] ASRS 2 or the accompanying Basis for Conclusions.

NAB also does not agree with the inclusion of paragraph Aus3.1(b). In NAB's view, the proposed scope amendment is confusing given that both the GHG Protocol¹ and the Kyoto Protocol² include synthetic greenhouse gases (i.e. hydrofluorocarbons (HFCs) and perfluorocarbons (PFCs)).

In Australia, reporting on GHG emissions should be aligned to the regulatory framework to prevent data having to be double handled for different reporting. It is not clear why ozone depleting substances (ODS) should be excluded when they are part of the GHG emissions group required for reporting under the *NGER Act*³.

Climate resilience

Question 10 – Scenarios for climate resilience assessments

IFRS S2 does not prescribe the number of scenarios an entity is required to assess to meet the disclosure objective of IFRS S2 paragraph 22 (which requires an entity to disclose information that enables users of GPF to understand the resilience of the entity's strategy and business model to climate related changes, developments and uncertainties, and requires an entity to use climate-related scenario analysis to assess its climate resilience).

The AASB added paragraph Aus22.1 to [draft] ASRS 2 to propose requiring an entity required by the Corporations Act 2001 to prepare climate-related financial disclosures to disclose its climate resilience assessments against at least two possible future states, one of which must be consistent with the most ambitious global temperature goal set out in the Climate Change Act 2022 (i.e. 1.5°C above pre-industrial levels).

Do you agree with the proposal in [draft] ASRS 2 paragraph Aus22.1? Please provide reasons to support your view.

NAB sees benefit in requiring all entities to test their climate resilience against the most ambitious global temperature goal set out in the Climate Change Act 2022. This will enhance comparability across reporting entities. NAB acknowledges that this prescribed scenario will be useful to stress test an entity's transition risk.

However, this scenario would not stress test an entity's resilience to the physical risks of climate change were 1.5°C not achieved. Given that it is possible that warming will not be limited to 1.5°C, and that understanding of the physical impacts of climate change continues to evolve, NAB recommends the AASB also consider requiring entities to examine themselves against a scenario that presents significant high physical risk (without prescribing the precise temperature goal). This could either be in a separate scenario or in a scenario combining elevated transition risk with high physical risks, such as the 'too little, too late' scenario from the Network of Central Banks and Supervisors for Greening the Financial System (NGFS).

¹ The GHG Protocol states: "The standard covers the accounting and reporting of seven greenhouse gases covered by the Kyoto Protocol – carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), sulphur hexafluoride (SF₆) and nitrogen trifluoride (NF₃)."

² The Kyoto Protocol lists seven greenhouse gases in Annex A: carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), sulfur hexafluoride (SF₆), nitrogen trifluoride (NF₃). Nitrogen trifluoride was added for the second compliance period during the Doha Round.

³ The greenhouse gases that are reported under the NGER Scheme include carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), sulphur hexafluoride (SF₆) and specified kinds of hydrofluorocarbons and perfluorocarbons. [Greenhouse gases and energy \(cleanenergyregulator.gov.au\)](https://www.cleanenergyregulator.gov.au/greenhouse-gases-and-energy)

NAB also recommends the AASB provide further guidance on how often it expects the scenario analyses to be performed. For example, NGFS climate change scenarios are updated every five years. NAB expects that, whilst the disclosure should be made annually, the scenarios could be run less frequently.

Question 11 – Upper-temperature scenario

Do you agree with the AASB's view that it should not specify the upper-temperature scenario that an entity must use in its climate-related scenario analysis? Please provide reasons to support your view.

NAB agrees with the AASB's proposal to not specify the upper-temperature scenario that entities use in their climate-related scenario analysis. It is NAB's view that entities should have flexibility to be able to run a range of temperature scenarios to understand the physical risks of climate change. This will help entities better understand how they can adapt and build resilience to manage a range of physical impacts and incorporate this into projects, business continuity planning and disaster recovery planning. As noted in NAB's response to Question 10, we recommend the AASB also considers requiring entities to examine themselves against a scenario that presents high physical risk (without prescribing the precise temperature goal).

NAB further suggests that flexibility is provided for entities to run physical risk scenarios over both short and medium to long-term time horizons to enable the testing of resilience in a range of situations. For the banking sector, short-term scenarios allow entities to examine a physical risk shock and are needed to understand market risks and risks to capital adequacy, whereas medium and longer term scenarios are better suited to understanding mortgage-related credit risk and in considering adaptation and resilience needs for the longer-term.

Question 12 – Cross-industry metric disclosures (paragraphs 29(b)–29(g))

Do you consider the cross-industry metric disclosures set out in paragraphs 29(b)–29(g) of IFRS S2 (and [draft] ASRS 2) would provide useful information to users about an entity's performance in relation to its climate-related risks and opportunities? Please provide reasons to support your view.

The requirements include the amount and percentage of assets or business activities vulnerable to climate-related transition and physical risks; the amount and percentage of assets or business activities aligned with climate-related opportunities; the amount of capital expenditure, financing or investment deployed towards climate-related risks and opportunities; an explanation of whether and how the entity is applying internal carbon prices in decision-making and the price per metric tonne of greenhouse gas emissions the entity uses to assess the cost of such emissions; and a description of whether and how climate-related considerations are factored into executive remuneration and the percentage of executive management remuneration recognised in the current period that is linked to climate-related considerations.

NAB agrees the proposed cross-industry metric disclosures would likely provide useful information to users about an entity's performance in relation to climate-related risks and opportunities. However, it is important to recognise that there will likely be significant differences in preparedness and completeness in how entities report against these metrics, as well as a reliance on other developing guidance.

The 'amounts and percentages of assets' related metrics are being considered by the Bank for International Settlements (BIS) as part of their current Basel Committee consultation on Pillar 3 disclosure of climate-related financial risks. It is important that the reporting requirements for cross-industry metrics in ASRS Standards are consistent with any guidance or requirements that may be introduced by BIS, central banks or banking regulators.

Similarly, capital deployment is an important measure to understand how entities are investing to respond to climate-related risks and opportunities. However, it is likely that entities' reporting systems would require significant investment to improve accuracy and completeness in this area of reporting. It is also important that this requirement is capable of being interpreted consistently by reporting entities to ensure that

comparable information is being reported where investments have multiple benefits (e.g. investment in a technology platform that both improves customer experience, but may also have the ability to capture broad sustainability-related data). Entities should be given time and guidance to develop reporting on this type of metric, which may require change to reporting systems and internal processes to capture.

NAB currently discloses ‘financing or investment’ deployed towards climate-related opportunities based on its own methodology, which draws on internationally accepted guidance such as the International Capital Market Association Green Loan Principles and the Climate Bonds Initiative Standard. However, it is likely that greater clarity and consistency in this reporting will be supported by the development of the Australian Sustainable Finance Taxonomy. As this develops, there may be additional phase-in time required to adjust existing reporting to align with this taxonomy.

NAB agrees that requiring an explanation of how climate-related matters are incorporated in executive remuneration would be valuable. However, NAB notes executive management remuneration may be determined by factoring in broader sustainability-related considerations (as opposed to climate-related considerations only) which would pose challenges in disclosing the percentage of remuneration that is specifically linked to climate-related considerations. Guidance should be provided to support entities in improving standardisation, where appropriate, as well as how and where climate-related remuneration disclosures are made.

Understanding whether, and how, an organisation considers an internal carbon price in its decision-making would be useful for users of reporting. For example, in calculating return on investment for planned capital expenditure, managing annual operating expenditure, and pricing climate into energy consumption. However, NAB cautions there may be competition law considerations regarding disclosure of an organisation’s internal carbon price in some situations.

NAB sees a role for the AASB (and others) in providing illustrative examples of cross-industry metric disclosures and promoting those to encourage wider adoption.

Question 13 – Cross-industry remuneration disclosure (paragraphs 29(g) and Aus29.1)

AASB members formed two views regarding whether to require Australian entities to disclose the following information as set out in [draft] ASRS 2 paragraph 29(g):

- (a) a description of whether and how climate-related considerations are factored into executive remuneration; and
- (b) the percentage of executive management remuneration recognised in the current period that is linked to climate-related considerations.

One of the concerns noted by a minority of the AASB is that if [draft] ASRS 2 paragraph 29(g) is included in the final Standard, it might be seen as the AASB replicating remuneration reporting requirements outside of Australian legislation.

To avoid potential conflicts with existing regulatory requirements or entities attempting to define which of their key management personnel is considered an “executive”, the AASB decided to clarify that, in the context of [draft] ASRS 2, “executive” and “executive management” has the same meaning as “key management personnel” and “remuneration” has the same meaning as “compensation”, both as defined in AASB 124 Related Party Disclosures.

Do you agree with the proposed requirements in [draft] ASRS 2 paragraphs 29(g) and Aus29.1 to disclose the information described in points (a) and (b) above? In your opinion, will this requirement result in information useful to users? Please provide reasons to support your view.

As stated in NAB’s response to Question 12, identifying the percentage of executive remuneration that is specifically linked to climate-related considerations may be challenging. Notwithstanding these challenges, NAB agrees with the proposed requirements relating to executive remuneration in paragraph 29(g) of [draft]

ASRS 2 as these are aligned to the requirements of IFRS S2. As noted previously, it is NAB's preference for there to be limited departures from IFRS Sustainability Disclosure Standards requirements in developing ASRS Standards. However, NAB agrees with the insertion of paragraph Aus29.1 in [draft] ASRS 2 as it provides helpful clarification in the Australian context and achieves its intended purpose of avoiding potential conflicts with existing remuneration reporting requirements under the *Corporations Act (2001)*.

Greenhouse gas (GHG) emissions (paragraphs Aus31.1 and B19–AusB63.1 and Australian application guidance)

Question 14 – Definition of greenhouse gases

IFRS S2 defines greenhouse gases as the seven greenhouse gases listed in the Kyoto Protocol. However, the AASB noted that one of those gases, nitrogen trifluoride (NF₃), is not listed in the National Greenhouse and Energy Reporting Act 2007 and related regulations (NGER Scheme legislation) as a class of greenhouse gas.

Do you agree with the AASB's proposal to incorporate in [draft] ASRS 2 the definition of greenhouse gases from IFRS S2 without any modification? Please provide reasons to support your view.

NAB supports the proposal to not modify the definition of greenhouse gases. This will keep ASRS Standards consistent with IFRS Sustainability Disclosure Standards and reduce the complexity of reporting if an entity needs to report under different frameworks. Reporting under the NGER Act will follow existing requirements and is already well understood in Australia.

Question 15 – Converting greenhouse gases into a CO2 equivalent value

IFRS S2 requires an entity to convert greenhouse gases into a CO2 equivalent value using global warming potential (GWP) values based on a 100-year time horizon from the latest Intergovernmental Panel on Climate Change (IPCC) assessment available at the reporting date. The IPCC has undertaken its 6th assessment in 2023. Therefore, if an entity is preparing climate-related financial disclosures for the period beginning 1 July 2024, under IFRS S2 the entity would be required to convert greenhouse gases using the GWP values in the IPCC 6th assessment report (AR6).

However, entities reporting under NGER Scheme legislation would be required to use the GWP values in the IPCC 5th assessment report (AR5). To avoid regulatory burden for certain Australian entities, the AASB added paragraphs AusB22.1 and AusB22.2 to [draft] ASRS 2 to require an entity to convert greenhouse gases using the GWP values in AR5, as identified in [draft] ASRS 101.

Do you agree with the AASB's view that an Australian entity should be required to convert greenhouse gases using GWP values in line with the reporting requirements under NGER Scheme legislation? Please provide reasons to support your view.

NAB recommends that, rather than prescribing a specific requirement, reporting entities should have flexibility to apply an appropriate GWP conversion factor, provided the basis for the calculation is clearly disclosed. Where the use of specific GWP conversion factors is already a regulatory requirement (for example, as for NGER) an entity should continue to follow those requirements.

The calculation of greenhouse emissions should be based on conversion factors relevant to each jurisdiction for which emissions are calculated. NAB notes that the rate of adoption of the latest IPCC assessment report varies across jurisdictions. NAB therefore recommends that Australian entities should be using the GWP conversion factors that are required in each relevant reporting jurisdiction's conversion factor guidelines or regulations. This may mean an Australian entity with offshore operations will apply different GWP conversion factors to calculating emissions from different jurisdictions. Where this is the case, the calculation basis should be clearly disclosed. This will enable comparability between international emissions associated with

Australian headquartered entities and other entities in each jurisdiction in which they operate. Where jurisdictional emissions factors are unavailable, GWPs from the most recent IPCC assessment report would be preferable.

Question 16 – Market-based Scope 2 GHG emissions

IFRS S2 paragraph 29(a)(v) requires an entity to disclose its location-based Scope 2 GHG emissions. However, the Treasury's second consultation paper proposed a phased-in approach to requiring an entity to also disclose market-based Scope 2 GHG emissions. The AASB added paragraphs Aus31.1(f) and AusC4.2 to propose requiring an entity that would be required by the Corporations Act 2001 to prepare climate-related financial disclosures to disclose its market-based Scope 2 GHG emissions in addition to its location-based Scope 2 GHG emissions, except for the first three annual reporting periods in which such an entity applies [draft] ASRS 2.

Do you agree with the proposals set out in [draft] ASRS 2 paragraphs Aus31.1(f) and AusC4.2? Please provide reasons to support your view.

NAB is supportive of entities disclosing both location and market-based Scope 2 emissions. It is already common for entities to report on both in disclosures for Climate Active, RE100 and the CDP annual benchmarking survey. This reporting provides an understanding of the impact that buying renewable energy has on an entity's Scope 2 GHG emissions profile. NAB also supports the AASB's proposed phasing in of this requirement to support entities that have not previously reported on market-based emissions. Guidance may be required for the basis of preparation for this metric as there are some differences between requirements across current initiatives which require or request a market-based calculation of Scope 2 GHG emissions. For example, the approach required by Climate Active varies slightly from RE100.

Question 17 – GHG emission measurement methodologies

The AASB added paragraphs Aus31.1(b) and AusB25.1 in [draft] ASRS 2 to specify that an entity would be required to:

- (a) consider the measurement of its Scope 1 GHG emissions, location-based Scope 2 GHG emissions, market-based Scope 2 GHG emissions (when applicable) and Scope 3 GHG emissions separately;
- (b) apply methodologies set out in NGER Scheme legislation, using Australian-specific data sources and factors for the estimation of greenhouse gas emissions, to the extent practicable; and
- (c) when applying a methodology in NGER Scheme legislation is not practicable, apply:
 - (i) a methodology that is consistent with measurement methods otherwise required by a jurisdictional authority or an exchange on which the entity is listed that are relevant to the sources of the greenhouse gas emissions; or
 - (ii) in the absence of such a methodology, a relevant methodology that is consistent with GHG Protocol Standards.

Do you agree with the proposals in [draft] ASRS 2 paragraphs Aus31.1(b) and AusB25.1? Please provide reasons to support your view.

NAB agrees with the AASB's proposals relating to GHG emission measurement methodologies. NAB currently measures and discloses Scope 1, location-based and market-based Scope 2, and Scope 3 GHG emissions separately for its own operations. Australian-specific data sources and factors have been used when they are practicable. NAB's NGER reporting is materially derived from the same source data as our Climate Report and Sustainability Data Pack and the methodology used aligns to that of the NGER Scheme legislation to the extent practicable, for Scope 1 and 2 emissions.

As noted in NAB's response to Question 15, NAB operates globally so methodologies required by other jurisdictions are currently applied for NAB's offshore operations, with sources and methodologies disclosed. NAB supports the use of jurisdictional emissions calculations methodologies that are consistent with the GHG Protocol Standards.

Question 18 – Providing relief relating to Scope 3 GHG emissions

The AASB decided to add paragraph AusB39.1 to [draft] ASRS 2 to propose permitting an entity to disclose in the current reporting period its Scope 3 GHG emissions using data for the immediately preceding reporting period, if reasonable and supportable data related to the current reporting period is unavailable.

Do you agree with the proposal in paragraph AusB39.1 of [draft] ASRS 2? Please provide reasons to support your view.

NAB agrees with the AASB's proposal as it provides necessary relief to address challenges around the timing of Scope 3 emissions data availability. However, NAB requests the AASB provide further clarity on the meaning of 'immediately preceding period'. NAB and other major banks in Australia have a 1 October to 30 September financial year. NAB's current emissions reporting does not align to our financial year, but is instead aligned to the NGER reporting period (1 July to 30 June). This ensures that all NAB's GHG emissions reporting is provided using a consistent timeframe. However, this does result in a significant time lag between the emissions reporting period and the provision of NAB's own reporting. For example, NAB's FY23 Climate Report (released in November 2023) included emissions reporting from the 30 June 2022 reporting period (as data for the 30 June 2023 period was not yet available).

NAB also recommends that further consideration be given to reporting on financed emissions by financial institutions, given the necessary time lag between our customers' reported emissions and our own reporting (which can often occur a year or more later). There may be similar examples for other Scope 3 categories.

It is also important to note that Scope 1 and 2 emissions are often reported on a differing reporting period (i.e. 1 July – 30 June) to align with regulatory requirements. For these reasons, NAB recommends that a degree of flexibility be maintained through the requirements of the ASRS Standards, provided that entities are transparent about the periods to which their reported data relates.

Question 19 – Scope 3 GHG emission categories

IFRS S2 requires an entity to categorise the sources of its Scope 3 GHG emissions based on the 15 categories listed in the IFRS S2 definition, which was taken from the GHG Protocol Standards. However, the AASB observed that those 15 categories of Scope 3 GHG emissions are not referenced in IPCC guidelines or the Paris Agreement. The AASB was unsure whether requiring categorisation of the sources of Scope 3 GHG emissions under the 15 categories listed in the IFRS S2 definition would achieve international alignment if entities in other jurisdictions that are parties to the Paris Agreement are able to disclose different categories.

The AASB considered whether it would be more appropriate to require Australian entities to categorise the sources of their Scope 3 GHG emissions consistent with the categories outlined in IPCC guidelines and National Greenhouse Gas Inventory reporting requirements. However, the AASB rejected that approach because the objective of IFRS S2 paragraphs B32–B33 is to disclose information about the entity's activities that give rise to Scope 3 GHG emissions, and the IPCC sectoral classifications do not appear to be sufficient in identifying the entity's activities.

Do you agree with the AASB's approach in [draft] ASRS 2 paragraph AusB33.1 to include the Scope 3 GHG emission categories in IFRS S2 as examples of categories that an entity could consider when disclosing the sources of its Scope 3 GHG emissions, rather than requiring an entity to categorise the sources of emissions in accordance with the categories of the GHG Protocol Standards? Please provide reasons to support your view.

NAB agrees with the AASB's approach to include GHG Protocol Scope 3 emission categories as guidance rather than as a prescriptive requirement. This would allow entities to maintain flexibility in selecting and adapting the most suitable guidelines. NAB notes that the GHG Protocol provides the world's most widely used GHG accounting standards and the 15 categories in the GHG Protocol have been used by Climate Active and others. NAB therefore believes it is appropriate to reference the Scope 3 categories under the GHG Protocol as an example of categories that an entity could consider.

Question 20 – Financed emissions

IFRS S2 requires an entity that participates in asset management, commercial banking or financial activities associated with insurance provide additional disclosures relating to its financed emissions, e.g. disaggregated Scope 1 and Scope 2 GHG emissions in addition to its Scope 3 GHG emissions. The AASB is of the view that entities applying methodologies of NGER Scheme to measure their scope 1 and Scope 2 GHG emissions may not have the information necessary for those disaggregated disclosures.

Do you agree with the AASB's proposal to require an entity to consider the applicability of those disclosures related to its financed emissions, as set out in [draft] ASRS 2 paragraphs AusB59.1, AusB61.1 and AusB63.1, instead of explicitly requiring an entity to disclose that information? Please provide reasons to support your view.

NAB agrees with the AASB's proposal for entities to consider the applicability of these disclosures, as opposed to making these disclosures a prescriptive requirement. NAB is generally supportive of the requirements set out in paragraphs AusB59.1, AusB61.1 and AusB63.1, with the exception of paragraph AusB63.1(a). This paragraph requires reporting entities to disaggregate financed emissions not only by Scope 1, Scope 2 and Scope 3, but also by industry (based on ANZSIC) and asset class. This could result in a disclosure that includes up to 15 separate disclosure items per industry (i.e. across Scope 1 to 3 and up to five asset classes). This requirement will create unnecessary administrative burden for reporting entities, and the benefits of providing such a detailed disclosure would not outweigh the cost and effort required to prepare it.

Question 21 – Superannuation entities

In your opinion, are there circumstances specific to superannuation entities that would cause challenges for superannuation entities to comply with the proposed requirements in [draft] ASRS 1 and [draft] ASRS 2? If so, please provide details of those circumstances and why they would lead to superannuation entities being unable to comply with the proposed requirements or else able to comply only with undue cost or effort.

NAB has no specific comments on this question.

Question 22 – Carbon credits

IFRS S2 defines a carbon credit as “An emissions unit that is issued by a carbon crediting programme and represents an emission reduction or removal of greenhouse gases. Carbon credits are uniquely serialised, issued, tracked and cancelled by means of an electronic registry.” Non-Kyoto Australian carbon credit units (ACCUs) are not uniquely serialised. The AASB is proposing to modify the definition of carbon credit in [draft] ASRS 2 to specify that carbon credits issued under the Australian Carbon Credits Units Scheme meet the definition of carbon credit, to ensure non-Kyoto ACCUs can also be recognised as carbon credits in the context of the [draft] Standard.

Do you agree with the AASB’s proposal to modify the definition of carbon credit in [draft] ASRS 2? Please provide reasons to support your view.

NAB agrees with the proposed modification of the definition of carbon credits in [draft] ASRS 2. This is a helpful and necessary clarification in the Australian context. In the absence of this modification, reporting entities may exclude Australian Carbon Credit Units (ACCUs) from disclosures relating to the planned use of carbon credits to offset GHG emissions.

Questions specific to not-for-profit entities

Question 23

Do you agree with paragraph Aus3.1(b) of [draft] ASRS 1 and paragraph 2.2(b) of [draft] ASRS 2 that the objective of a not-for-profit entity would be to disclose information about climate-related risks and opportunities that could reasonably be expected to affect the entity’s cash flows, access to finance or cost of capital, and its ability to further its objectives, over the short, medium or long term? Please provide reasons to support your view.

NAB makes the following general statement in response to Questions 23 to 28. As a financial institution NAB is dependent on other entities (including not-for-profit entities) providing adequate disclosures to enable us to accurately report our own risks and opportunities, financed emissions etc. For that reason, NAB would benefit from not-for-profit entities reporting under metrics and standards that are equal to other reporting entities to allow comparability, focusing on the most important metrics including Scope 1, 2 and 3 emissions.

Question 24

Is there additional guidance that you consider would be helpful in explaining the objective of a not-for-profit entity preparing climate-related financial disclosures? If so, please provide details of that guidance and explain why you think it would be helpful.

Refer to NAB’s response to Question 23.

Question 25

Do you agree with the proposal in [draft] ASRS 1 paragraph Aus6.1 and [draft] ASRS 2 paragraph Aus4.1? Please provide reasons to support your view.

Refer to NAB's response to Question 23.

Question 26

Do you agree with the AASB's view noted in paragraphs BC31–BC33 that the proposed clarification in [draft] ASRS 1 paragraph Aus6.1 and [draft] ASRS 2 paragraph Aus4.1, together with the practical expedients already provided through the baseline of IFRS S1 and IFRS S2, would be sufficient to address the cost-benefit and scalability concerns for not-for-profit entities preparing climate-related financial disclosures? Please provide reasons to support your view

Refer to NAB's response to Question 23.

Question 27

If you disagree with the AASB's view in Question 26, what other modifications could be made to the baseline of IFRS S1 and IFRS S2 as included in the [draft] ASRS to assist not-for-profit entities to comply with climate-related financial disclosure requirements without undue cost or effort? Please specify which requirements in [draft] ASRS 1 and [draft] ASRS 2 you would suggest modifying, how those requirements could be modified and why you think the modifications would be helpful

Refer to NAB's response to Question 23.

Questions specific to not-for-profit public sector entities

Question 28

Unless already provided in response to Question 27, are there any other modifications or additions that could be made to the baseline of IFRS S1 and IFRS S2 as included in the [draft] ASRS to:

- (a) assist not-for-profit public sector entities to apply the concept of value chain and other climate-related financial disclosure requirements; and
- (b) better support alignment with public sector projects related to climate-related matters, such as the Australian Government's Australian Public Service (APS) Net Zero 2030 policy, which is a policy for the APS to reduce its greenhouse gas emissions to net zero by 2030?

Refer to NAB's response to Question 23.

Question 29

Do you agree with the AASB's proposed approach of deferring consideration of whether to undertake a domestic standard-setting project to address Australian public sector climate-related impact reporting? Please provide reasons to support your view.

Deferring the requirement for Australian public sector climate-related impact reporting will delay the ability of bank reporting entities to report their government-related financed emissions. Therefore, it is NAB's preference that the public sector also have the same timeframes for mandatory disclosure.

General matters for comment

Question 30 – AASB Sustainability Reporting Standard-Setting Framework

Has the AASB Sustainability Reporting Standard-Setting Framework (September 2023) been applied appropriately in developing the proposals in this Exposure Draft?

NAB agrees with the principles set out in the AASB Sustainability Reporting Standard-Setting Framework (the Framework). Paragraph 10 of the Framework notes that the underpinning assumption is that IFRS Sustainability Disclosure Standards (and guidance) issued by the ISSB present a suitable foundation for developing Australian Sustainability Reporting Standards, and that international alignment should be prioritised, with amendments to the baseline of IFRS Sustainability Disclosure Standards made only where it is necessary to do so to meet the needs of Australian stakeholders. NAB appreciates the efforts of the AASB to develop ASRS Standards that are fit-for-purpose in the Australian context. In NAB's responses to previous questions, we have noted instances where we either support or do not support the proposed divergence from IFRS Sustainability Disclosure Standards.

NAB understands the rationale for Australia adopting a 'climate-first approach' to mandatory sustainability reporting. However, NAB also notes that for entities captured by more onerous climate reporting requirements in other jurisdictions, the approach taken by the AASB in [draft] ASRS 1 creates greater complexity, and does not achieve the intended purpose of international alignment.

An alternative approach the AASB could consider in setting ASRS Standards would be for Australia to adopt IFRS Sustainability Disclosure Standards in full, together with appropriate additional requirements or amendments as required in an Australian context. For entities only subject to Australian reporting requirements, the 'climate-first approach' could be achieved by shading the relevant paragraphs from IFRS Sustainability Disclosure Standards that are not climate-related, and initially not requiring that entities comply with these requirements.

Question 31 – Regulatory issues

Are there any regulatory issues or other issues arising in the Australian environment that may affect the implementation of the proposals, including any issues relating to:

- (a) not-for-profit entities; and
- (b) public sector entities?

Refer to NAB's responses to previous questions where we have noted existing regulatory reporting requirements and how these would interact with the proposed requirements under the draft ASRS Standards. Refer to NAB's response to Question 23 for comments related to not-for-profit entities.

Question 32 – Auditing or assurance challenges

Do the proposals create any auditing or assurance challenges and, if so, please explain those challenges?

NAB anticipates there will be initial challenges related to the availability of skills and expertise to provide the required assurance, and is conscious of the consequential cost to preparers in an environment of limited resources of the audit firms. NAB also notes that global standards for sustainability assurance are not anticipated until late 2024. A reporting entity's ability to receive reasonable assurance over many aspects of climate-related disclosures will depend on developments outside of its control. This is particularly true for disclosure areas that are subject to inherent uncertainties, such as forward-looking statements and Scope 3 emissions.

Another challenge is that an entity's sustainability report is expected to include both disclosures required under ASRS Standards as well as those made under voluntary frameworks which may require different levels of assurance.

NAB is supportive of Treasury's proposal for assurance requirements to be phased in over time. However, during the phase-in period, it may be difficult for the users of the sustainability report to distinguish between disclosures that have been subject to differing levels of assurance.

Question 33 – Information usefulness

Would the proposals result overall in climate-related financial information that is useful to users?

NAB believes the proposals will result overall in climate-related financial information that is useful to users of the sustainability report, including in relation to physical risks arising from climate change, risks associated with the transition to a low carbon economy, as well as climate-related opportunities. NAB acknowledges that entities are at different stages of reporting maturity and that climate science continues to evolve. NAB expects that the best practice of sustainability reporting will continue to develop over time to better meet users' information needs.

Question 34 – Best interests of the Australian economy

Are the proposals in the best interests of the Australian economy?

NAB believes that proposals to enhance transparency and comparability of information on how entities are managing climate-related risks and opportunities are overall in the best interests of the Australian economy. Having an improved understanding of emissions and climate-related risks and opportunities should enable informed action that can help Australia meet its international UN Framework Convention on Climate Change obligations; mitigate, adapt and build resilience to climate risk; and maintain quality of life and competitiveness in the global trade environment.

However, it is important that the introduction of ASRS Standards is managed with consideration for less mature reporting entities within the economy; the reliance on entities large and small across the value chain to prepare disclosures; and the evolving nature of climate-related scenarios and climate science.

Question 35 – Costs and benefits

Unless already provided in response to specific matters for comment above, what are the costs and benefits of the proposals, whether quantitative (financial or non-financial) or qualitative? In relation to quantitative financial costs, the AASB is particularly seeking to know the nature(s) and estimated amount(s) of any expected incremental costs of the proposals.

Due to the increase in disclosure requirements, reporting entities will face additional costs for internal and external resources; financial and other system changes to support data collation and reporting; and increased assurance. This increase in cost will be significant and is expected to grow over time as reporting requirements continue to increase. NAB expects that a skills shortage will exist for several years, with limited availability of individuals who possess the relevant knowledge and expertise to assist in the implementation of the proposals as well as their ongoing application, all of which increases the cost to reporting entities.

Notwithstanding these costs, NAB sees a number of benefits associated with mandatory sustainability reporting that, particularly once reporting matures and becomes widespread, will deliver worthwhile benefits. Specifically, for financial institutions these include:

- Improved accessibility to information required for decision-making and to manage climate mitigation and adapt and build resilience to climate change.

- Improved accessibility to good quality data to assist with calculating of bottom-up financed emissions.