

# 2024 SUSTAINABILITY REPORTING INDEX





# ABOUT THIS DOCUMENT

## 2024 Sustainability Reporting Index

NBN Co's sustainability disclosures are guided by recognised global sustainability reporting frameworks and standards such as the Global Reporting Initiative (GRI) Standards, Task Force on Climate-related Financial Disclosures (TCFD), and Sustainability Accounting Standards Board (SASB) Telecommunications Services Sustainability Accounting Standard.

This index provides a guide on where to find information on NBN Co's sustainability disclosures, including material sustainability topics, in the Company's 2024 Annual Report or other publicly available documents on the NBN Co website, as related to the GRI Standards, SASB Telecommunications Services Sustainability Accounting Standard reporting disclosures and TCFD recommendations. How NBN Co's actions map to relevant UN SDG targets is also included.

This is the fourth year that NBN Co has referenced GRI Standards and outlined how the SASB Telecommunications Services Sustainability Accounting Standard has been applied in reporting. As part of the Company's approach to maturing sustainability disclosures, NBN Co will evolve future reporting where appropriate.

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Any request or inquiry to so use the Sustainability Reporting Index should be addressed to:

The Chief Financial Officer, NBN Co Limited  
Level 13, 100 Mount Street, North Sydney,  
NSW 2060, Australia.

First published: 12 September 2024

All URLs accurate as at 12 September 2024

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ABN 86 136 533 741.



In the spirit of reconciliation NBN Co acknowledges the Traditional Custodians of country throughout Australia and their connections to land, sea and community. We pay our respect to their Elders past and present and extend that respect to all First Nations peoples today.



# CONTENTS

- 4** GRI Content Index
- 11** SASB Reporting Index
- 12** TCFD Index
- 16** UN SDG Index



# GRI CONTENT INDEX

## Statement of use

NBN Co has reported the information cited in this GRI content index for the period 1 July 2023 to 30 June 2024 with reference to the GRI Standards.

## GRI 1 used

GRI 1: Foundation 2021

GRI Standard	Disclosure	Partial disclosure (indicating specific content applied from the Standard)	Location and details
<b>GRI 2: General Disclosures 2021</b>	2-1 Organizational details		<ul style="list-style-type: none"> <li>• <a href="#">2024 Annual Report</a> - Other information - Corporate information p.109; About this report - p. 2; About NBN Co - pp. 4 - 5</li> </ul>
	2-2 Entities included in the organization’s sustainability reporting		<ul style="list-style-type: none"> <li>• <a href="#">2024 Annual Report</a> - About this report - Annual Report and Integrated Reporting - p. 2</li> </ul>
	2-3 Reporting period, frequency and contact point		<ul style="list-style-type: none"> <li>• <a href="#">2024 Annual Report</a> - About this report - Annual Report and Legal notice - p. 2</li> </ul>
	2-4 Restatements of information		<ul style="list-style-type: none"> <li>• N/A - no restatements in FY24 of sustainability information.</li> </ul>
	2-5 External assurance		<ul style="list-style-type: none"> <li>• <a href="#">2024 Annual Report</a> Corporate Governance Statement - External audit - p. 145; Independent auditor’s report - pp. 210 - 213</li> <li>• <a href="#">2024 Annual Report</a> - Independent assurance report on selected non-financial (sustainability) metrics - pp. 214 - 219</li> </ul>
	2-6 Activities, value chain and other business relationships		<ul style="list-style-type: none"> <li>• <a href="#">2024 Annual Report</a> - About NBN Co - pp. 4 - 5; How we create value - pp. 16-17; Our Company strategy - pp. 18 - 23; Working with RSPs - p. 52; Contributing to a Responsible Supply Chain - p. 61; Financial Report - Our significant contractual arrangements and commitments - pp. 186 -187</li> <li>• <a href="#">2023 Modern Slavery Statement</a> - NBN Co’s value chain - p. 6</li> </ul>
	2-7 Employees	2-7 (a) (b) (i) (ii)	<ul style="list-style-type: none"> <li>• <a href="#">2024 Annual Report</a> - Regulatory Report - Workforce statistics - pp. 228 - 229</li> </ul>
	2-8 Workers who are not employees	2-8 (a)	<ul style="list-style-type: none"> <li>• <a href="#">2023 Modern Slavery Statement</a> - NBN Co’s value chain - p. 6</li> </ul>
	2-9 Governance structure and composition	2-9 (a) (b) (c) (i) (ii) (iii)(iv) (v) (vii)	<ul style="list-style-type: none"> <li>• <a href="#">2024 Annual Report</a> - Sustainability Governance at NBN Co - p. 26; Board of Directors - pp. 97 - 103; Corporate Governance Statement - Board composition- p. 135</li> </ul>
	2-10 Nomination and selection of the highest governance body	2-10 (a)	<ul style="list-style-type: none"> <li>• <a href="#">2024 Annual Report</a> - Corporate Governance Statement - Appointments - p. 133</li> </ul>
	2-11 Chair of the highest governance body		<ul style="list-style-type: none"> <li>• <a href="#">2024 Annual Report</a> - Corporate Governance Statement - Board composition - p. 135</li> </ul>

GRI Standard	Disclosure	Partial disclosure (indicating specific content applied from the Standard)	Location and details
	2-12 Role of the highest governance body in overseeing the management of impacts	2-12 (a)	<ul style="list-style-type: none"> <li>• <a href="#">2024 Annual Report</a> - Sustainability Governance at NBN Co - p. 26; Corporate Governance Statement - The role and responsibilities of the NBN Co Board - pp. 131 - 132</li> <li>• <a href="#">NBN Co Board Charter</a> - p. 6</li> </ul>
	2-13 Delegation of responsibility for managing impacts		<ul style="list-style-type: none"> <li>• <a href="#">2024 Annual Report</a> - Sustainability Governance at NBN Co - p. 26; Corporate Governance Statement - The role and responsibilities of the NBN Co Board - pp. 131 - 132</li> </ul>
	2-14 Role of the highest governance body in sustainability reporting		<ul style="list-style-type: none"> <li>• <a href="#">2024 Annual Report</a> - Sustainability Governance at NBN Co - p. 26; Corporate Governance Statement - The role and responsibilities of the NBN Co Board - pp. 131 - 132</li> </ul>
	2-15 Conflicts of interest	2-15 (a)	<ul style="list-style-type: none"> <li>• <a href="#">2024 Annual Report</a> - Corporate Governance Statement - Independence of Directors - p. 140</li> </ul>
	2-16 Communication of critical concerns		<ul style="list-style-type: none"> <li>• <a href="#">2024 Annual Report</a> - Corporate Governance Statement - Whistleblower Protection - p. 143</li> </ul>
	2-17 Collective knowledge of the highest governance body		<ul style="list-style-type: none"> <li>• NBN Co is a corporate member of the Cambridge Institute for Sustainability Leadership (CISL) for the Business &amp; Sustainability Programme (BSP) for NBN Co's senior executives and non-executive directors.</li> </ul>
	2-19 Remuneration policies	2-19 (a) (i) (iii) (v) (b)	<ul style="list-style-type: none"> <li>• <a href="#">2024 Annual Report</a> - Remuneration Report - pp. 111 - 127</li> </ul>
	2-20 Process to determine remuneration		<ul style="list-style-type: none"> <li>• <a href="#">2024 Annual Report</a> - Remuneration Report - pp. 111 - 127</li> </ul>
	2-26 Mechanisms for seeking advice and raising concerns	(a) (ii)	<ul style="list-style-type: none"> <li>• <a href="#">2024 Annual Report</a> - Corporate Governance Statement - Whistleblower Protection - p.143</li> <li>• <a href="#">NBN Co Whistleblower Policy</a></li> </ul>
	2-22 Statement on sustainable development strategy		<ul style="list-style-type: none"> <li>• <a href="#">2024 Annual Report</a> - Chair and Interim Chief Executive Officer's message - pp. 8 - 13</li> </ul>
	2-29 Approach to stakeholder engagement		<ul style="list-style-type: none"> <li>• <a href="#">2024 Annual Report</a> - NBN Co Material Business Risks - Stakeholder trust and social license - p. 94</li> <li>• NBN Co stakeholders include employees, Retail Service Providers, customers, local communities, suppliers, government, regulators, industry groups and investors. Discussion on engagement with stakeholders is throughout the Operating and Financial Review of the 2024 Annual Report - pp. 15 - 96.</li> </ul>
<b>GRI 3: Material Topics 2021</b>	3-1 Process to determine material topics		<ul style="list-style-type: none"> <li>• <a href="#">2024 Annual Report</a> - Materiality Assessment - p. 28</li> </ul>
	3-2 List of material topics		<ul style="list-style-type: none"> <li>• <a href="#">2024 Annual Report</a> - Materiality Assessment - p. 29</li> <li>• Prior year material topics are included in the <a href="#">2023 Annual Report</a> and <a href="#">2023 Sustainability Reporting Index</a>.</li> </ul>

GRI Standard	Disclosure	Partial disclosure (indicating specific content applied from the Standard)	Location and details
<b>Network resilience, reliability and security</b>			
GRI 3: Material Topics 2021	3-3 Management of material topics	3-3 (a) (b) (d)	<ul style="list-style-type: none"> <li>• <a href="#">2024 Annual Report</a> - Upgrade and expand the network - Network Reliability and Resilience - p. 37; Emergency Response Capability - p. 38; Network Security and Privacy - p. 40; Support greater use of the network - Fibre upgrade connections - p. 43; Enhance RSP and customer experience - Customer Experience - pp. 51-52; Protected environment - Climate Mitigation and Resilience Actions - pp. 76-77; Deliver commercial value - p. 85.</li> </ul>
<b>Network investment and innovation</b>			
GRI 3: Material Topics 2021	3-3 Management of material topics	3-3 (d)	<ul style="list-style-type: none"> <li>• <a href="#">2024 Annual Report</a> - Upgrade and expand the network - Supporting network innovation - p. 41; Support greater use of the network - Fibre upgrade connections - p. 43; Enhance RSP and customer experience - Customer Experience - pp. 51-52; Remote First Nations Communities - p. 58; Protected environment - Business Strategy and Climate Change - p. 74; Deliver commercial value - p. 85.</li> </ul>
<b>Customer experience</b>			
GRI 3: Material Topics 2021	3-3 Management of material topics		<ul style="list-style-type: none"> <li>• <a href="#">2024 Annual Report</a> - Upgrade and expand the network - Network Reliability and Resilience - p. 37; Emergency Response Capability - p. 38; Network Security and Privacy - p. 40; Support greater use of the network - Fibre upgrade connections - p. 43; Speed Tier Uplift Program - p. 46; Regional Product Strategy - p. 47; Lifting the Digital Capability of Australian Businesses - p. 48; Enhance RSP and customer experience - Customer Experience - pp. 51 - 52; Deliver commercial value - p. 86.</li> </ul>
<b>Privacy and data security</b>			
GRI 3: Material Topics 2021	3-3 Management of material topics	3-3 (a) (b) (c) (d)	<ul style="list-style-type: none"> <li>• <a href="#">2024 Annual Report</a> - Upgrade and expand the network - Network Security and Privacy - p. 40; Enhance RSP and customer experience - Community Safety - p. 60; Corporate Governance Statement - Privacy; Security Group - p. 142</li> </ul>
<b>Digital inclusion</b>			
GRI 3: Material Topics 2021	3-3 Management of material topics		<ul style="list-style-type: none"> <li>• <a href="#">2024 Annual Report</a> - Upgrade and expand the network - pp. 31 - 41; Support greater use of the network - pp. 43- 49; Enhance RSP and customer experience - Social Impact of Broadband, Accessibility and Inclusion, Digital Inclusion, First Nations Connectivity, Community Safety - pp. 54-60.</li> </ul>
<b>Community safety and wellbeing</b>			
GRI 3: Material Topics 2021	3-3 Management of material topics	3-3 (a) (b) (d)	<ul style="list-style-type: none"> <li>• <a href="#">2024 Annual Report</a> - Upgrade and expand the network - Emergency Response Capability - p. 38; Network Security and Privacy - p. 40; Enhance RSP and customer experience - Social Impact of Broadband pp. 54-55; Community Safety - p. 60</li> </ul>

GRI Standard	Disclosure	Partial disclosure (indicating specific content applied from the Standard)	Location and details
<b>First Nations peoples' reconciliation</b>			
<b>GRI 3: Material Topics 2021</b>	3-3 Management of material topics	3-3 (a) (c) (d) (e) (f)	<ul style="list-style-type: none"> <li>• <a href="#">2024 Annual Report</a> - Upgrade and expand the network - Co-investments - p. 35; Enhance RSP and customer experience - Digital Inclusion - p. 56; First Nations Connectivity - pp. 57-59; A safe, inclusive and engaged workforce - First Nations - p.69</li> </ul>
<b>Enabling economic and social opportunities</b>			
<b>GRI 3: Material Topics 2021</b>	3-3 Management of material topics	3-3 (a) (c) (d) (e) (f)	<ul style="list-style-type: none"> <li>• <a href="#">2024 Annual Report</a> - Our company strategy - pp. 18-23; Sustainability at NBN Co - pp. 24-27; Upgrade and expand the network - pp. 31 - 41; Support greater use of the network - pp. 43- 49; Enhance RSP and customer experience - Social Impact of Broadband - pp. 54-55; Digital Inclusion - p. 56; First Nations Connectivity - pp. 57-59; Deliver commercial value - p. 85</li> </ul>
<b>GRI 201: Economic Performance 2016</b>	201-1 Direct economic value generated and distributed		<ul style="list-style-type: none"> <li>• <a href="#">2024 Annual Report</a> - Financial report - p. 152</li> </ul>
	201-2 Financial implications and other risks and opportunities due to climate change	201-2 (a) (i) (ii) (iii) (iv)	<ul style="list-style-type: none"> <li>• <a href="#">2022 Annual Report</a> - Climate change risk assessment details outlined in 2022 Annual Report - Protected environment pp. 47-54</li> <li>• <a href="#">2024 Annual Report</a> - Understanding and Responding to Climate Change Risks and Opportunities - p. 73</li> </ul>
	201-4 Financial assistance received from government		<ul style="list-style-type: none"> <li>• <a href="#">2024 Annual Report</a> - Deliver commercial value - pp. 85 - 89; Financial report - About this Report - p. 157; Statement of changes in equity - p. 154; Statement of cash flows - p. 155; Our assets and liabilities - pp. 163 - 181; Other income - p. 162; Other liabilities - Recognition and measurement - Government grants - p. 173; Borrowings and other financial liabilities - p. 177; Our equity - p. 184; Related party transactions - pp. 202-203</li> </ul>
<b>GRI 203: Indirect Economic Impacts 2016</b>	203-1 Infrastructure investments and services supported		<ul style="list-style-type: none"> <li>• <a href="#">2024 Annual Report</a> - Upgrade and expand the network - pp. 31-41; Support greater use of the network - GDP benefits of faster, stronger nbn® network - p. 49; Enhance RSP and customer experience - Social Impact of Broadband - pp. 54-55.</li> </ul>
	203-2 Significant indirect economic impacts		<ul style="list-style-type: none"> <li>• <a href="#">2024 Annual Report</a> - Upgrade and expand the network - pp. 31-41; Support greater use of the network - GDP benefits of faster, stronger nbn® network - p. 49; Enhance RSP and customer experience - Social Impact of Broadband - pp. 54-55; Digital Inclusion - p. 56</li> <li>• <a href="#">2023 Modern Slavery Statement</a> - NBN Co's value chain - p. 6</li> </ul>
<b>Responsible supply chain</b>			
<b>GRI 3: Material Topics 2021</b>	3-3 Management of material topics	3-3 (a) (c) (d)	<ul style="list-style-type: none"> <li>• <a href="#">2024 Annual Report</a> - Enhance RSP and customer experience - Contributing to a Responsible Supply Chain; Approach to Modern Slavery - p. 61; A safe, inclusive and engaged workforce - Supporting the Safety and Wellbeing of NBN Co's Workers - pp. 64-65; Protected environment - Climate Mitigation and Resilience Actions - pp. 76-77</li> <li>• <a href="#">2023 Modern Slavery Statement</a></li> </ul>

GRI Standard	Disclosure	Partial disclosure (indicating specific content applied from the Standard)	Location and details
<b>GRI 408: Child Labor 2016</b>	408-1 Operations and suppliers at significant risk for incidents of child labor		<ul style="list-style-type: none"> <li>• <a href="#">2024 Annual Report</a> - Enhance RSP and customer experience - Contributing to a Responsible Supply Chain; Approach to Modern Slavery - p. 61</li> <li>• <a href="#">2023 Modern Slavery Statement</a> - Modern slavery risks pp. 7-8; Approach to assessing and addressing risks of modern slavery - pp. 9-16</li> </ul>
<b>GRI 409: Forced or Compulsory Labor 2016</b>	409-1 Operations and suppliers at significant risk for incidents of forced or compulsory labor		<ul style="list-style-type: none"> <li>• <a href="#">2024 Annual Report</a> - Enhance RSP and customer experience - Contributing to a Responsible Supply Chain; Approach to Modern Slavery - p. 61</li> <li>• <a href="#">2023 Modern Slavery Statement</a> - Modern slavery risks pp. 7-8; Approach to assessing and addressing risks of modern slavery - pp. 9-16</li> </ul>
<b>Safety, wellbeing and workplace rights</b>			
<b>GRI 3: Material Topics 2021</b>	3-3 Management of material topics		<ul style="list-style-type: none"> <li>• <a href="#">2024 Annual Report</a> - A safe, inclusive and engaged workforce - People Strategy, Preparing NBN Co's Workforce for the Future, Supporting the Safety and Wellbeing of NBN Co's Workers, Promoting a Respectful and Supportive Workplace, Employee Engagement and Employee engagement performance - pp. 63- 67 and p. 71; Enhance RSP and customer experience - Contributing to a Responsible Supply Chain; Approach to Modern Slavery - p. 61</li> </ul>
<b>GRI 403: Occupational Health and Safety 2018</b>	403-1 Occupational health and safety management system	403-1 (a) (ii) (b)	<ul style="list-style-type: none"> <li>• <a href="#">2024 Annual Report</a> - A safe, inclusive and engaged workforce - Supporting the Safety and Wellbeing of NBN Co's Workers - pp. 64-65</li> </ul>
	403-5 Worker training on occupational health and safety		<ul style="list-style-type: none"> <li>• <a href="#">2024 Annual Report</a> - A safe, inclusive and engaged workforce - Promoting a Respectful and Supportive Workplace - pp. 66-67</li> </ul>
	403-6 Promotion of worker health		<ul style="list-style-type: none"> <li>• <a href="#">2024 Annual Report</a> - A safe, inclusive and engaged workforce - Supporting the Safety and Wellbeing of NBN Co's Workers - pp. 64-65</li> </ul>
	403-7 Prevention and mitigation of occupational health and safety impacts directly linked by business relationships		<ul style="list-style-type: none"> <li>• <a href="#">2024 Annual Report</a> - A safe, inclusive and engaged workforce - Supporting the Safety and Wellbeing of NBN Co's Workers - pp. 64-65; NBN Co Material Business Risks - p. 96</li> </ul>
	403-9 Work-related injuries	403-9 (a) (i) The number of fatalities as a result of work-related injury (ii) The number of high-consequence work-related injuries (excluding fatalities); (iii) Rate of recordable work-related injuries (b)(i) The number of fatalities as a result of work-related injury (ii) The number of high-consequence work-related injuries (excluding fatalities); (iii) Rate of recordable work-related injuries (e) (g)	
<b>GRI 404: Training and Education 2016</b>	404-2 Programs for upgrading employee skills and transition assistance programs	404-2 (a)	<ul style="list-style-type: none"> <li>• <a href="#">2024 Annual Report</a> - A safe, inclusive and engaged workforce - Preparing NBN Co's Workforce for the Future - p. 63</li> </ul>



GRI Standard	Disclosure	Partial disclosure (indicating specific content applied from the Standard)	Location and details
<b>Diversity, equity and inclusion</b>			
<b>GRI 3: Material Topics 2021</b>	3-3 Management of material topics		<ul style="list-style-type: none"> <li>• <a href="#">2024 Annual Report</a> - A safe, inclusive and engaged workforce - People Strategy, Promoting a Respectful and Supportive Workplace, Fostering Diversity, Equity and Inclusion, Employee Engagement and Employee engagement performance - p. 63, pp. 66-71; Enhance RSP and customer experience - Accessibility and Inclusion, First Nations Connectivity - pp. 57-59; Contributing to a Responsible Supply Chain - p. 61</li> </ul>
<b>GRI 405: Diversity and Equal Opportunity 2016</b>	405-1 Diversity of governance bodies and employees	405-1 (a) (i) (ii)	<ul style="list-style-type: none"> <li>• <a href="#">2024 Annual Report</a> - Corporate Governance Statement - Board diversity - pp. 135</li> </ul>
<b>Climate change transition</b>			
<b>GRI 3: Material Topics 2021</b>	3-3 Management of material topics		<ul style="list-style-type: none"> <li>• <a href="#">2024 Annual Report</a> - Protected environment - Understanding and Responding to Climate Change Risks and Opportunities, Business Strategy and Climate Change; NBN Co's Climate Transition Plan; Climate Change Governance and Risk Management; FY24 performance - pp. 73-79; Upgrade and expand the network - Network Reliability and Resilience, Emergency Response Capability - pp. 37-39; Enhance RSP and customer experience - Contributing to a Responsible Supply Chain - p. 61; Deliver commercial value - Sustainable Finance - p. 90</li> </ul>
<b>GRI 302: Energy 2016</b>	302-1 Energy consumption within the organization	302-1 (e) (f) (g)	<ul style="list-style-type: none"> <li>• <a href="#">2024 Annual Report</a> - Protected environment - Key climate mitigation metrics performance - p. 79</li> <li>• <a href="#">2024 Sustainability Data Book</a></li> </ul>
	302-3 Energy intensity	302-3 (a) (b) (c)	<ul style="list-style-type: none"> <li>• <a href="#">2024 Annual Report</a> - Protected environment - Key climate mitigation metrics performance - p. 79</li> <li>• <a href="#">2024 Sustainability Data Book</a></li> </ul>
<b>GRI 305: Emissions 2016</b>	305-1 Direct (Scope 1) GHG emissions	305-1 (a) (d) (f) (g)	<ul style="list-style-type: none"> <li>• <a href="#">2024 Annual Report</a> - Protected environment - FY24 performance; Key climate mitigation metrics performance - pp. 78-79</li> <li>• <a href="#">2024 Sustainability Data Book</a></li> </ul>
	305-2 Energy indirect (Scope 2) GHG emissions	305-2 (a) (b) (d) (f) (g)	<ul style="list-style-type: none"> <li>• <a href="#">2024 Annual Report</a> - Protected environment - FY24 performance; Key climate mitigation metrics performance - pp. 78-79</li> <li>• <a href="#">2024 Sustainability Data Book</a></li> </ul>
	305-3 Other indirect (Scope 3) GHG emissions	305-3 (a) (d) (g)	<ul style="list-style-type: none"> <li>• <a href="#">2024 Annual Report</a> - Protected environment - Key climate mitigation metrics performance - p. 79</li> <li>• <a href="#">2024 Sustainability Data Book</a></li> </ul>
	305-4 GHG emissions intensity	305-4 (a) (b) (c)	<ul style="list-style-type: none"> <li>• <a href="#">2024 Annual Report</a> - Protected environment - Key climate mitigation metrics performance - p. 79</li> <li>• <a href="#">2024 Sustainability Data Book</a></li> </ul>
	305-5 Reduction of GHG emissions	305-5 (a) (c) (d)	<ul style="list-style-type: none"> <li>• <a href="#">2024 Annual Report</a> - Protected environment - FY24 performance - pp. 78-79</li> </ul>

GRI Standard	Disclosure	Partial disclosure (indicating specific content applied from the Standard)	Location and details
<b>Circularity</b>			
<b>GRI 3: Material Topics 2021</b>	3-3 Management of material topics	3-3 (a) (b) (c) (d) (e)	<ul style="list-style-type: none"> <li>• <a href="#">2024 Annual Report</a> - Protected environment - Circularity and Waste Management - pp. 80-81</li> </ul>
<b>GRI 306: Waste 2020</b>	306-1 Waste generation and significant waste-related impacts		<ul style="list-style-type: none"> <li>• <a href="#">2024 Annual Report</a> - Protected environment - Circularity and Waste Management - pp. 80-81</li> </ul>
	306-2 Management of significant waste-related impacts	306-2 (a)	<ul style="list-style-type: none"> <li>• <a href="#">2024 Annual Report</a> - Protected environment - Circularity and Waste Management - pp. 80-81</li> </ul>
	306-3 Waste generated		<ul style="list-style-type: none"> <li>• <a href="#">2024 Annual Report</a> - Protected environment - Circularity and Waste Management - p. 81</li> </ul>
	306-4 Waste diverted from disposal	306-4 (a) (e)	<ul style="list-style-type: none"> <li>• <a href="#">2024 Annual Report</a> - Protected environment - Circularity and Waste Management - p. 81</li> </ul>
	306-5 Waste directed to disposal	306-5 (a) (e)	<ul style="list-style-type: none"> <li>• <a href="#">2024 Annual Report</a> - Protected environment - Circularity and Waste Management - p. 81</li> </ul>
<b>Operational environmental impacts</b>			
<b>GRI 3: Material Topics 2021</b>	3-3 Management of material topics	3-3 (a) (b) (c) (d) (e)	<ul style="list-style-type: none"> <li>• <a href="#">2024 Annual Report</a> - Protected environment - Environmental and Cultural Heritage Protection - pp. 82-83</li> </ul>

# SASB REPORTING INDEX

Topic	Code	Reporting Requirements (Accounting Metrics Description)	NBN Co response	Location and page reference
<b>Environmental Footprint of Operations</b>	TC-TL-130a.1	(1) Total energy consumed (2) percentage grid electricity (3) percentage renewable	NBN Co reports: <ul style="list-style-type: none"> <li>Total energy consumed (GJ)</li> <li>Renewable energy purchases (% of total purchases). Renewable Energy purchases are estimates and include Clean Energy Regulator's renewable energy target</li> <li>Contracted renewable energy (associated with renewable Power Purchase Agreements).</li> </ul>	<ul style="list-style-type: none"> <li><a href="#">2024 Annual Report</a> <ul style="list-style-type: none"> <li>Protected Environment - Key climate mitigation metrics performance - p. 79</li> </ul> </li> <li><a href="#">2024 Sustainability Data Book</a></li> </ul>
<b>Data Privacy</b>	TC-TL-220a.1	Description of policies and practices relating to behavioural advertising and customer privacy	NBN Co's Privacy Policy is published on the Company's website.  Further details on the Company's approach to customer privacy is included in the 2024 Annual Report.	<ul style="list-style-type: none"> <li><a href="#">Privacy Policy</a></li> <li><a href="#">2024 Annual Report</a> <ul style="list-style-type: none"> <li>Upgrade and expand the network - Network Security and Privacy - p. 40</li> <li>Enhance RSP and customer experience - Community Safety - p. 60</li> <li>NBN Co Material Business Risks - Security and availability of the active network, corporate systems, data, and information - p. 93</li> <li>Corporate Governance Statement - Privacy - p. 142</li> <li>Privacy and access to personal information - p. 227</li> </ul> </li> </ul>
<b>Data Security</b>	TC-TL-230a.2	Description of approach to identifying and addressing data security risks, including use of third-party cybersecurity standards	NBN Co's approach to security is included in the 2024 Annual Report.	<ul style="list-style-type: none"> <li><a href="#">2024 Annual Report</a> <ul style="list-style-type: none"> <li>Upgrade and expand the network - Network Security and Privacy - p. 40</li> <li>Enhance RSP and customer experience - Community Safety - p. 60</li> <li>NBN Co Material Business Risks - Security and availability of the active network, corporate systems, data, and information - p. 93</li> <li>Corporate Governance Statement - Security Group - p. 142</li> </ul> </li> </ul>
<b>Managing Systemic Risks from Technology Disruptions</b>	TC-TL-550a.1	(1) System average interruption duration (2) system average interruption frequency and (3) customer average interruption duration	NBN Co reports on average monthly network availability.*  * Percentage of time the nbn <sup>®</sup> access network is available and operating. For this measure, the network is considered 'unavailable' during the time NBN Co is restoring services following the raising of a fault. It doesn't include periods where the network is unavailable due to operational outages for network upgrades and improvements or events beyond NBN Co's control.	<ul style="list-style-type: none"> <li><a href="#">2024 Annual Report</a> <ul style="list-style-type: none"> <li>Chair and Interim Chief Executive Officer's Message - p. 8</li> </ul> </li> <li><a href="#">2024 Sustainability Data Book</a></li> </ul>
	TC-TL-550a.2	Discussion of systems to provide unimpeded service during service interruptions	NBN Co provides details on risks associated with service disruptions affecting operations and how these risks are managed in the 2024 Annual Report.	<ul style="list-style-type: none"> <li><a href="#">2024 Annual Report</a> <ul style="list-style-type: none"> <li>Upgrade and expand the network- Network Reliability and Resilience, Emergency Response Capability - pp. 37 - 38</li> <li>Upgrade and expand the network - Network Security and Privacy - p. 40</li> <li>Protected Environment - Climate Mitigation and Resilience Actions - p. 77</li> <li>NBN Co Material Business Risks - Security and availability of the active network, corporate systems, data, and information; Resilience of critical infrastructure - p.93; Climate change transition - p.96</li> </ul> </li> </ul>

# TCFD INDEX

TCFD Recommendation	Summary of approach	2024 Annual Report reference and further details
<p><b>Governance</b></p> <p><b>Describe the board’s oversight of climate-related risks and opportunities.</b></p>	<p>For climate risks and opportunities, NBN Co’s Board is ultimately accountable for setting the risk tolerance thresholds, overseeing the risk management system, and satisfying itself that the system operates effectively. To fulfil its risk management responsibilities, the Board is assisted by the Audit and Risk Committee (ARC). Under the NBN Co Board Charter, specific reference has been made to the role of the Board regarding sustainability. Climate change transition actions are included within the Company’s approach to sustainability.</p> <p>NBN Co’s Board approved NBN Co’s Climate Transition Plan (CTP) and in May 2024, the Board noted the completion of the FY23/24 Sustainability Program inclusive of climate change initiatives.</p> <p>In addition, to further support the management of climate transition risks, a Business Risk (Climate change transition) has been established and is managed through NBN Co’s Enterprise Risk Management Framework. This is in addition to the Material Business Risk, Critical Infrastructure Resilience (Active Network), which includes vulnerability of the nbn® network to physical climate risks. NBN Co’s ARC oversees Material Business Risks.</p>	<ul style="list-style-type: none"> <li>• Climate Change Governance and Risk Management- p. 75 - Outlines role of Board in climate change.</li> <li>• Sustainability Governance at NBN Co - p. 26 - Details on the role of the Board to effectively oversee and monitor the effectiveness of the Company’s sustainability governance, strategy and associated actions, management of material social and environmental risks, issues and opportunities and associated non-financial reporting and disclosure requirements.</li> <li>• Risk Management - pp. 91 - 92 - Describes the role of the Board, Audit and Risk Committee, Executive Committee and Business Units in risk management at NBN Co, and review process for Material Business Risks.</li> </ul>
<p><b>Describe management’s role in assessing and managing climate-related risks and opportunities.</b></p>	<p>To address climate-related risks and opportunities, NBN Co has developed a Climate Transition Plan (CTP).</p> <p>NBN Co’s Sustainability Sub-Committee of the Executive Committee (ExCo) consisting of six ExCo members led and oversaw the implementation of NBN Co’s Sustainability Approach and FY23/24 Sustainability Program on behalf of the whole ExCo and the Board, inclusive of climate change initiatives such as the development of the CTP. The Sustainability Sub-Committee approved NBN Co’s CTP.</p> <p>In FY24, sustainability governance arrangements were amended with executive management governance now provided directly by the ExCo, replacing the Sustainability Sub-Committee of the ExCo. This helps provide broader oversight of NBN Co’s sustainability approach and enterprise-wide actions taken to manage material social and environmental risks, issues and opportunities.</p> <p>NBN Co’s Risk Management Framework is developed in accordance with ISO31000-2018 Risk Management Guidelines and includes guidance and processes to identify, measure and monitor risks regularly. Management and staff play a key role in identifying, assessing and managing business risks, including climate change.</p>	<ul style="list-style-type: none"> <li>• Climate Change Governance and Risk Management- p. 75 - Outlines role of management in climate change.</li> <li>• Risk Management - pp. 91-92 - Describes the processes related to Material Business Risks.</li> </ul>




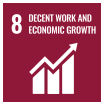


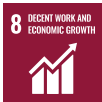








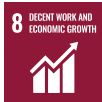




TCFD Recommendation	Summary of approach	2024 Annual Report reference and further details
<b>Strategy</b>		
<p><b>Describe the climate-related risks and opportunities the organization has identified over the short, medium, and long term.</b></p>	<p>The company-wide Climate Change Risk Assessment, conducted in FY22, identified material physical and transition risks and opportunities for NBN Co. Physical climate risks were modelled for two climate change scenarios, across three time horizons (2025, 2030 and 2050). Transition risks were modelled for two low emissions (RCP2.6) scenarios, across three time horizons (2025, 2030 and 2050).</p> <p>Five physical risks, four transition risks and two transition opportunities were identified as being material. These material risks and opportunities are detailed in the NBN Co 2022 Annual Report.</p>	<ul style="list-style-type: none"> <li>• Understanding and Responding to Climate Change Risks and Opportunities - p. 73 - Provides summary of material physical and transition risks and opportunities.</li> <li>• See the 2022 Annual Report - pp. 47 - 51 - Climate change risks and opportunities - for details of the Climate Change Risk Assessment including identified material physical and transition risks and opportunities, scenario analysis and methodology applied.</li> </ul>
<p><b>Describe the impact of climate-related risks and opportunities on the organization's businesses, strategy, and financial planning.</b></p>	<p>NBN Co's network investment strategy to deliver fibre upgrades supports the achievement of the Company's purpose and strategic objectives and helps respond to the Company's climate risks.</p> <p>Building more climate resilient and energy-efficient fibre deeper into communities, helps enable long-term reductions in network power demand and improves network resilience for customers. NBN Co's network investment and upgrade plans are a key action within the Company's Climate Transition Plan (CTP), demonstrating the connection between NBN Co's business strategy and actions on climate risks and opportunities.</p> <p>The CTP aims to align the Company's operations, planning, and capital expenditure, with its decarbonisation goals, whilst managing physical and transition climate risks and opportunities.</p> <p>The CTP outlines how NBN Co's business model supports the achievement of its climate mitigation and climate resilience goals. It also includes the Company's action plan to address physical and transitional climate change risks and opportunities and the metrics and targets used to monitor progress towards its climate change goals.</p> <p>To address climate risks and opportunities the CTP includes actions across three focus areas being network, customer and communities, and partners.</p> <p>Climate-related opportunities also support sustainable finance, with Green Bond issuances occurring in FY24.</p>	<ul style="list-style-type: none"> <li>• Business Strategy and Climate Change - p. 74 - Link between business strategy and climate change.</li> <li>• NBN Co's Climate Transition Plan - pp. 74-75 - Description and overview of CTP.</li> <li>• Sustainable Finance - p. 90 - Details on Green Bonds issued by NBN Co.</li> </ul>
<p><b>Describe the resilience of the organization's strategy, taking into consideration different climate-related scenarios, including a 2°C or lower scenario.</b></p>	<p>The Climate Transition Plan (CTP), informed by the FY22 Climate Change Risk Assessment and scenario analysis, enables strategic planning, implementation and engagement on climate mitigation and adaptation. Progress towards NBN Co's climate resilience commitments is supported by action across the three areas of focus within the CTP; network, customers and communities, and partners. For details on actions see the 2024 Annual Report.</p>	<ul style="list-style-type: none"> <li>• NBN Co's Climate Transition Plan - pp. 74-75 - Description and overview of CTP.</li> <li>• Climate Mitigation and Resilience Actions - pp. 76-77 - Details on actions within CTP.</li> <li>• Network Reliability and Resilience - p. 37 - Details on resilience approach.</li> <li>• Resilience of critical infrastructure Material Business Risk - p. 93.</li> </ul>
<b>Risk Management</b>		
<p><b>Describe the organization's processes for managing climate-related risks.</b></p>	<p>In FY22, the company-wide Climate Change Risk Assessment identified material physical and transition risks and opportunities for NBN Co using scenario analysis over three time horizons (2025, 2030 and 2050):</p> <ul style="list-style-type: none"> <li>• Physical climate risks were modelled for two climate change scenarios RCP (Representative Concentration Pathway) 8.5 and RCP2.6</li> <li>• Transition risks were modelled for two low emissions (RCP2.6) scenarios.</li> </ul> <p>Following the climate change risk assessment, climate change risks and opportunities were integrated into the NBN Co's risk management approach.</p>	<ul style="list-style-type: none"> <li>• Understanding and Responding to Climate Change Risks and Opportunities - p. 73 - Provides summary of material physical and transition risks and opportunities.</li> <li>• Risk Management - pp. 91-96 - Details on NBN Co Risk Management Framework and Material Business Risks.</li> <li>• See the 2022 Annual Report - pp. 47 - 51 - Climate change risks and opportunities - for details of the Climate Change Risk Assessment approach.</li> </ul>

TCFD Recommendation	Summary of approach	2024 Annual Report reference and further details
<p><b>Describe the organization's processes for managing climate-related risks.</b></p>	<p>To address the risks and opportunities from climate change, the Company has developed a Climate Transition Plan (CTP). The CTP aims to align the Company's operations, planning, and capital expenditure, with its decarbonisation goals, whilst managing physical and transition climate risks and opportunities.</p> <p>The CTP outlines how NBN Co's business model supports the achievement of its climate mitigation and climate resilience goals. It also includes the Company's action plan to address physical and transitional climate change risks and opportunities and the metrics and targets used to monitor progress towards its climate change goals.</p> <p>To address climate risks and opportunities the CTP includes actions across three focus areas being network, customer and communities, and partners. Actions include implementing 100 per cent renewable electricity and energy efficiency programs, deployment of energy efficient Network Termination Devices, engaging the supply chain on science-based targets, implementing NBN Co's Network Investment Plan, deploying and maintaining Temporary Network Infrastructure, performing regular climate scenario analysis to inform network resilience decision making to improve customer experience and developing and maintaining climate and natural disaster crisis management plans with Governments and Retail Service Providers (RSPs).</p>	<ul style="list-style-type: none"> <li>• NBN Co's Climate Transition Plan - pp. 74-75 - Description and overview of CTP.</li> </ul>
<p><b>Describe how processes for identifying, assessing, and managing climate-related risks are integrated into the organization's overall risk management</b></p>	<p>To support the management of climate transition risks, a Material Business Risk (Climate change transition) has been established and is managed through NBN Co's Enterprise Risk Management Framework. This is in addition to the Material Business Risk, Critical Infrastructure Resilience (Active Network), which includes vulnerability of the nbn<sup>®</sup> network to physical climate risks. NBN Co's Audit and Risk Committee oversee Material Business Risks.</p>	<ul style="list-style-type: none"> <li>• Climate Change Governance and Risk Management - p. 75.</li> <li>• Risk Management - pp. 91-96 - Details on NBN Co Risk Management Framework and Material Business Risks.</li> </ul>
<p><b>Metrics and Targets</b></p>		
<p><b>Disclose the metrics used by the organization to assess climate-related risks and opportunities in line with its strategy and risk management process</b></p>	<p>The Climate Transition Plan (CTP) includes metrics to track performance against the Company's climate-related goals. Progress against key actions within the CTP is included in the 2024 Annual Report.</p> <p>FY24 performance metrics are included in the 2024 Annual Report and 2024 Sustainability Data Book.</p> <p>NBN Co has committed to long-term greenhouse gas emissions (GHG) reduction targets and achieving Net Zero emissions by 2050, or sooner, via the Science Based Targets Initiative (SBTi). The Company's long-term greenhouse gas emissions reduction targets will be consistent with meeting and exceeding the Government's commitment to Net Zero emissions by 2050.</p> <p>As mitigating the effects of climate change requires action now, NBN Co has already set near-term science-based emissions reduction targets, which have been validated by the SBTi.</p>	<ul style="list-style-type: none"> <li>• Climate Mitigation and Resilience Actions - pp. 76-77 - Includes FY24 progress against key actions.</li> <li>• FY24 performance - pp. 78-79.</li> </ul>
<p><b>Disclose Scope 1, Scope 2 and, if appropriate, Scope 3 greenhouse gas (GHG) emissions and the related risks</b></p>	<p>Climate mitigation metrics include scope 1, 2 and 3 emissions, emissions and energy intensity, and measures related to renewable energy. For details see the 2024 Annual Report and 2024 Sustainability Data Book.</p>	<ul style="list-style-type: none"> <li>• FY24 performance - pp. 78-79.</li> </ul>

TCFD Recommendation	Summary of approach	2024 Annual Report reference and further details
<p><b>Describe the targets used by the organization to manage climate-related risks and opportunities and performance against targets</b></p>	<p>The Climate Transition Plan (CTP) includes climate mitigation and resilience goals, interim commitments to FY30 and Key Actions FY24 to FY27.</p> <p>Targets include near-term science-based emissions reduction targets across Scopes 1, 2 and 3.</p> <p>For details see the 2024 Annual Report.</p>	<ul style="list-style-type: none"> <li>NBN Co's Climate Transition Plan - pp. 74-75 - Description and overview of CTP.</li> </ul>

# UN SDG INDEX

How NBN Co's actions align to eight relevant UN SDGs and related targets is outlined below.

Annual Report Section	Sustainability at NBN Co	Upgrade and expand the network	Support greater use of the network	Enhance RSP and Customer Experience	A safe, inclusive and engaged workforce	Protected environment
<p><b>Related UN SDGs and targets</b></p>	<ul style="list-style-type: none"> <li>SDG 12 – Responsible consumption and production 12.6</li> </ul> 	<ul style="list-style-type: none"> <li>SDG 8 – Decent work and economic growth 8.1, 8.2</li> <li>SDG 9 – Industry, innovation and infrastructure 9.1, 9.4</li> <li>SDG 13 – Climate action 13.1</li> </ul>   	<ul style="list-style-type: none"> <li>SDG 8 – Decent work and economic growth 8.1, 8.2</li> </ul> 	<ul style="list-style-type: none"> <li>SDG 4 – Quality Education 4.1, 4.3, 4.4, 4.5</li> <li>SDG 5 – Gender equality 5.b</li> <li>SDG 8 – Decent work and economic growth 8.1, 8.7, 8.6, 8.8</li> <li>SDG 12 – Responsible consumption and production 12.7</li> </ul>    	<ul style="list-style-type: none"> <li>SDG 4 – Quality Education 4.3, 4.4</li> <li>SDG 5 – Gender equality 5.1, 5.2, 5.5, 5c</li> <li>SDG 8 – Decent work and economic growth 8.8</li> </ul>   	<ul style="list-style-type: none"> <li>SDG 7 – Affordable and Clean Energy 7.2, 7.3</li> <li>SDG 8 – Decent work and economic growth 8.4</li> <li>SDG 9 – Industry, innovation and infrastructure 9.4</li> <li>SDG 11 – Sustainable cities and communities 11.4</li> <li>SDG 12 – Responsible consumption and production 12.2, 12.5</li> <li>SDG 13 Climate action 13.1, 13.2</li> </ul>      





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