In FY22, we also set out to engage our carbon intensive clients and understand how they were assessing climate-related risks and opportunities as part of their climate transition plan. Our Institutional Bank engaged 82 customers using a structured framework of questions, which was developed based on the Task Force for Climate-Related Financial Disclosures (TCFD) Framework and APRA's Climate Vulnerability Assessment Questionnaire. As outlined in our E&S Framework Commitments, we will continue to pursue opportunities created by climate change and support our customers and people in the transition to a low carbon economy.

C12.3

(C12.3) Does your organization engage in activities that could either directly or indirectly influence policy, law, or regulation that may impact the climate?

Row 1

Direct or indirect engagement that could influence policy, law, or regulation that may impact the climate
  Yes, we engage directly with policy makers
  Yes, we engage indirectly through trade associations
  Yes, we engage indirectly by funding other organizations whose activities may influence policy, law, or regulation that may significantly impact the climate

Does your organization have a public commitment or position statement to conduct your engagement activities in line with the goals of the Paris Agreement?
  Yes

Attach commitment or position statement(s)
  CBA Environment and Social Framework.pdf
  CBA 2021 Annual Report.pdf
Describe the process(es) your organization has in place to ensure that your engagement activities are consistent with your overall climate change strategy

All direct and indirect activities that influence policy are expected to be consistent with the Group overall climate change and ESG related strategy, including the commitments outlined in our Environment and Social Framework. Processes in place to ensure all engagement is consistent with our overall climate change strategy include:

• Group-wide Environmental and Social Policy sets a foundation and creates a framework for understanding and managing the Group’s direct and indirect activities that could influence policy.
• Public disclosure of the Group’s Environmental and Social Framework.
• The development of climate change training, aims to increase capability on climate-related issues and general understanding of the topic. The training includes introducing the Paris Agreement and outlining the net zero imperative.

Primary reason for not engaging in activities that could directly or indirectly influence policy, law, or regulation that may impact the climate

<Not Applicable>

Explain why your organization does not engage in activities that could directly or indirectly influence policy, law, or regulation that may impact the climate

<Not Applicable>

C12.3a

(C12.3a) On what policy, law, or regulation that may impact the climate has your organization been engaging directly with policy makers in the reporting year?

Focus of policy, law, or regulation that may impact the climate

Mandatory climate-related reporting
Country/region the policy, law, or regulation applies to
Australia

Your organization's position on the policy, law, or regulation
Support with no exceptions

Description of engagement with policy makers
CBA was one of 25 Australian corporates to participate in the CERT report pilot. Throughout this engagement we provided feedback and guidance to help strengthen the CERT reporting template and support transparency across sectors on emissions reductions.

Details of exceptions (if applicable) and your organization's proposed alternative approach to the policy, law or regulation
<Not Applicable>

Have you evaluated whether your organization's engagement is aligned with the goals of the Paris Agreement?
No, we have not evaluated

Focus of policy, law, or regulation that may impact the climate
Mandatory climate-related reporting

Specify the policy, law, or regulation on which your organization is engaging with policy makers
Australian Prudential Regulation Authority's (APRA) Climate Vulnerability Assessment (CVA)

Policy, law, or regulation geographic coverage
National
Country/region the policy, law, or regulation applies to
Australia

Your organization's position on the policy, law, or regulation
Support with no exceptions

Description of engagement with policy makers
The CVA was initiated to better understand and quantify the potential financial impact of climate change on banks under different but plausible climate scenarios, and to improve understanding of the potential financial impact of the economic and climate transitions under these scenarios. CBA was an active participant in the development of the assessment.

Details of exceptions (if applicable) and your organization's proposed alternative approach to the policy, law or regulation
<Not Applicable>

Have you evaluated whether your organization's engagement is aligned with the goals of the Paris Agreement?
No, we have not evaluated

C12.3b

(C12.3b) Provide details of the trade associations your organization engages with which are likely to take a position on any policy, law or regulation that may impact the climate.

Trade association
Other, please specify (Australian Banking Association (ABA))

Is your organization's position on climate change consistent with theirs?

State the trade association's position on climate change, explain where your organization's position differs, and how you are attempting to influence their position (if applicable)

The ABA supports the view that climate change is a material, foreseeable, and actionable risk which will present challenges to the Australian economy if action is not taken. Banks have a key role to play in the management of physical and transition risks associated with climate change.

Each ABA member is undertaking specific actions tailored to the individual characteristics of their bank to address climate change. The banking industry in Australia supports the goals of the 2015 Paris Climate Agreement.

Funding figure your organization provided to this trade association in the reporting year, if applicable (currency as selected in C0.4) (optional)

2400000

Describe the aim of your organization's funding

Support the overall work program which includes work on the ABA Climate Roadmap.

Have you evaluated whether your organization's engagement with this trade association is aligned with the goals of the Paris Agreement?

No, we have not evaluated

Trade association

Business Council of Australia

Is your organization's position on climate change consistent with theirs?

Consistent
For over a decade the BCA have supported strong action on climate change, including the following positions:

- The BCA support the science of climate change.
- The BCA support the Paris Agreement and transitioning to net-zero emissions by 2050.
- If Australia can meet our emissions reduction targets without carryover credits then we should.
- The BCA support the need for a market-based carbon price to drive the transition and incentivise investment in low and no-emissions technology.
- Technology needs to drive the transition which will not only get us to a net-zero emissions future but will also create new jobs, opportunities and industries and maintain Australia’s competitiveness.

Today, we continue to advocate for policies that reduce Australia’s carbon emissions and deliver a more carbon efficient economy.

CBA is one of many members from a range of sectors. CBA provides representation in forums facilitated by the BCA related to Australia achieving net zero emissions by 2050

Funding figure your organization provided to this trade association in the reporting year, if applicable (currency as selected in C0.4) (optional)

93000

Describe the aim of your organization’s funding
Support the overall work program across a range of policy areas including climate change.

Have you evaluated whether your organization’s engagement with this trade association is aligned with the goals of the Paris Agreement?
No, we have not evaluated
Has your organization influenced, or is your organization attempting to influence their position?
We have already influenced them to change their position.

State the trade association's position on climate change, explain where your organization's position differs, and how you are attempting to influence their position (if applicable)
In late 2021, AFMA made a submission on the APRA Draft CPG 229 Climate Change Financial Risks detailing support for a strengthened industry approach to understanding and articulating climate change risk.

Funding figure your organization provided to this trade association in the reporting year, if applicable (currency as selected in C0.4) (optional)

Describe the aim of your organization's funding
<Not Applicable>

Have you evaluated whether your organization's engagement with this trade association is aligned with the goals of the Paris Agreement?
No, we have not evaluated

---

C12.3c

(C12.3c) Provide details of the funding you provided to other organizations in the reporting year whose activities could influence policy, law, or regulation that may impact the climate.
Australia’s national science agency, CSIRO, and CBA have launched a joint public-private sector initiative that will examine the potential impacts of climate change to the finance sector.

**Funding figure your organization provided to this organization in the reporting year (currency as selected in C0.4)**

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

The aim of this funding is to deliver publicly-available insights on Australia’s transition, to inform CBA and other organisations’ climate-related objectives and strategies.

CBA is providing funding for the research as well as anonymised data and information from across a broad range of industries that are being impacted or are likely to be increasingly affected by climate change, such as manufacturing, infrastructure, and agriculture.

CSIRO is using the data to develop sectoral analysis and different scenarios. CBA will then overlay economic and financial insights to underscore the varying impacts on the Australian economy.

The insights from the project will be publicly available.


**Have you evaluated whether this funding is aligned with the goals of the Paris Agreement?**

Yes, we have evaluated, and it is aligned