# SUNCORP (

Building futures and protecting what matters

United Nations Principles for Responsible Banking Self-Assessment 2022-23

Suncorp Group Limited ABN 66 145 290 124



### Principle 1: Alignment

We will align our business strategy to be consistent with and contribute to individuals' needs and society's goals, as expressed in the Sustainable Development Goals, the Paris Climate Agreement, and relevant national and regional frameworks.

#### **Business** model

Describe (high-level) your bank's business model, including the main customer segments served, types of products and services provided, the main sectors and types of activities across the main geographies in which your bank operates or provides products and services. Please also quantify the information by disclosing e.g., the distribution of your bank's portfolio (%) in terms of geographies, segments (i.e., by balance sheet and/or off-balance sheet) or by disclosing the number of customers and clients served.

#### High-level summary of bank's response

In line with Suncorp Banks (the Bank) three prior United Nations Principles for Responsible Banking (UN PRB) Self-Assessments and the Annual Report 2022-23, Suncorp Group (the Group) continues to offer insurance and banking products and services through some of Australia's and New Zealand's most recognisable brands.

Suncorp-Metway Limited (the Bank) is a wholly owned subsidiary of Suncorp Group Limited (SGL). On 18 July 2022, SGL entered into a share sale and purchase agreement with Australia and New Zealand Banking Group Limited (ANZ)

Since this announcement, on 4 August 2023 the Australian Competition and Consumer Commission (ACCC) denied authorisation of the sale of Suncorp Bank to ANZ. Subsequently, Suncorp Group and ANZ have applied to the Australian Competition Tribunal (Tribunal) for a review of the ACCC's decision. Additional details regarding the process, implications and timelines for the proposed sale are outlined in section 6.3 (Outlook) of this Report.

The Bank is focused on lending, deposit gathering and transaction account services to personal, small, and medium enterprise (SME), commercial and agribusiness customers. The Bank supports families, individuals, businesses, and farmers in realising their dreams, big or small, by helping them plan for the future and providing solutions to help them grow their personal wealth. Housing loans currently represent over 81% of the Bank's total lending assets, followed by commercial, agribusiness and SME lending. Further details on the distribution of the portfolios are 2.1 (b) of this report.

### Reference(s)/Link(s) to bank's full response/relevant information

Suncorp's United Nations Principles for Responsible Banking (UN PRB) Self-Assessment FY20 (p3)

Suncorp's United Nations Principles for Responsible Banking (UN PRB) Self-Assessment FY21 (p3)

Suncorp's United Nations Principles for Responsible Banking (UN PRB) Self-Assessment FY22 (p3)

Suncorp Annual Report FY23 (p117)

**ASX** announcement

Strategy alignment  Does your corporate strategy identify and reflect sustainability as strategic priority/ies for your bank?  Yes  No  Please describe how your bank has aligned and/or is planning to align its strategy to be consistent with the Sustainable Development Goals (SDGs), the Paris Climate Agreement, and relevant national and regional frameworks.  Does your bank also reference any of the following frameworks or sustainability regulatory Reporting requirements in its strategic priorities or policies to implement these?
No     No Please describe how your bank has aligned and/or is planning to align its strategy to be consistent with the Sustainable Development Goals (SDGs), the Paris Climate Agreement, and relevant national and regional frameworks.  Does your bank also reference any of the following frameworks or sustainability regulatory Reporting requirements in its strategic priorities or policies to
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Paris Climate Agreement, and relevant national and regional frameworks.  Does your bank also reference any of the following frameworks or sustainability regulatory Reporting requirements in its strategic priorities or policies to
implement triese:
■ UN Guiding Principles on Business and Human Rights
International Labour Organization fundamental conventions
UN Global Compact
UN Declaration on the Rights of Indigenous Peoples
Any applicable regulatory Reporting requirements on environmental risk assessments, e.g., on climate risk - please specify which ones: TCFD soon to be ISSB's S1 and S2 (in which Suncorp Bank will align to when they become live).
Any applicable regulatory Reporting requirements on social risk assessments, e.g., on modern slavery - please specify which ones: Modern Slavery Statement, Gender Equality Reporting
None of the above

### Principle 1: Alignment

We will align our business strategy to be consistent with and contribute to individuals' needs and society's goals, as expressed in the Sustainable Development Goals, the Paris Climate Agreement, and relevant national and regional frameworks.

### High-level summary of bank's response

The Suncorp Groups Annual Report 2022-23 reaffirms the Group's commitment to building futures and protecting what matters. During FY22 the Bank declared its ambition to Create a Brighter Future through a customer promise of Banking You Can Feel Good About. The Bank's ability to deliver this ambition is built on strategic pillars of sustainability and wellbeing, mirroring the Bank's two priority impact areas of Climate and Inclusive, Healthy Economies respectively.

The Group undertakes regular materiality assessments to identify what matters most to its key stakeholders, its business, and our customers.

A comprehensive, independent assessment of the Group's most material environmental, social, and governance topics was completed and disclosed in the Suncorp Group 2020-21 Annual Report. An independent refresh was completed and disclosed in the FY22 Suncorp Group Annual Report. In FY23, the Group undertook a review to understand how these topics and prioritisation may have changed, based on key developments over the previous year.

The outcomes show that accessibility and affordability of financial services has increased in importance to become the most material topic, followed by climate change response and natural hazard resilience. This reflects economy-wide cost of living increases, as well as a continued societal focus on net-zero transition plans, climate resilience, and event response following natural disasters. Trust and transparency also increased in stakeholder importance above data privacy and security.

The top five material topics for the Group are:

- 1. Accessibility and affordability
- 2. Climate change response
- Natural hazard resilience
- Customer experience
- Trust and transparency

The Group remains committed to driving awareness and action in support of the Sustainable Development Goals (SDGs). Through the Groups business activities, we have the greatest impact on the following goals:

















The Group is committed to Responsible Supply Chain practices aligned to the Climate Change Action Plan,  $\underline{\textit{Reconciliation Action Plan}} \text{ and } \underline{\textit{Financial Inclusion Action Plan}}. \text{ In FY23 the Group introduced a Responsible}$ Supply Chain Strategy with aims to:

- Reduce the climate impact of the Groups supply chain
- Diversify suppliers and increase employment
- Increase opportunities, including among Indigenous Australians
- Pay all suppliers on time
- Reduce the risk of modern slavery, and
- Improve measurement and Reporting.

In FY23 the Group published the third Modern Slavery Statement covering FY22, which detailed the potential risks and the actions being taken to address these risks in our operations and supply chains.

- Reference(s)/Link(s) to bank's full response/ relevant information
- 'Our Strategic Plan to FY23' Suncorp Annual Report (p14)
- 'Understanding our most material topics' Suncorp Annual Report (p22-23)
- 'Our Business and Strategy' Annual Report 2021-22 (p12)
- 'Understanding our most material topics' Annual Report 2021-22 (p20-21)
- 'ESG Materiality Assessment' Annual Report 2020-21 (p40)
- FY22 Modern Slavery Statement
- Governance & policies | Suncorp Group | Suncorp Group
- 2023 Suncorp Group WGEA Compliance Submission
- Climate Change Action Plan September 2021
- Financial Inclusion Action Plan 2022-
- 'Climate Strategy' Annual Report 2021-22 (p34)
- Climate Change Action Plan September 2021

<sup>1.</sup> Refer FY22, FY21, and FY20 UN PRB Self-Assessments

<sup>2.</sup> Suncorp-Climate-Change-Action-Plan\_1.PDF (suncorpgroup.com.au) (p4)

### Principle 1: Alignment

We will align our business strategy to be consistent with and contribute to individuals' needs and society's goals, as expressed in the Sustainable Development Goals, the Paris Climate Agreement, and relevant national and regional frameworks.

#### High-level summary of bank's response

Reference(s)/Link(s) to bank's full response/ relevant information

The Group aspires to be one of the most inclusive places to work in Australia and New Zealand by providing an open, inclusive, and accessible work environment for all its people regardless of age, gender, sexuality, ability, or cultural background. The Suncorp Diversity and Inclusion Policy is available in the governance and policies section of our corporate website. The Group has complied with its 2023 Reporting obligations under the Workplace Gender Equality Act.

The Bank undertakes annual UN PRB Self-Assessments which have continuously identified Climate as one of the Bank's two priority impact areas', aligned with the Group's identification of SDG 13 Climate Action as a material SDG. The Suncorp Climate Change Action Plan<sup>2</sup> strategy focuses on:



**Reducing our** climate impact of our own operations and supply chain.



Supporting the net-zero transition for our people, customers and community while helping to strengthen customer and community resilience.



Integrating and lifting capability to better embed and integrate climate considerations across the Group.



**Partnerina** with purpose through broader collaboration with industries, companies, policy makers, regulators and climate change.

The strategy supports the Bank's actions in measuring and reducing physical and transition climate risk through improved climate risk management capabilities and mitigation and adaptation actions.

The Bank is aligned with Australia's Climate Active Carbon Neutral Standards, the Partnership for Carbon Accounting Financials (PCAF), and the Science-Based Targets Initiative (SBTi).

To support the goals of the Paris Accord, by ensuring consistent disclosure, the Group discloses under the Taskforce for Climate-related Financial Disclosures (TCFD) and is preparing to align with the disclosure standards of the International Sustainability Standards Board (ISSB) S2.

Healthy economies is the Bank's other priority impact area3, aligned with the Group's identification of SDG 8 Decent Work and Economic Growth as a material SDG. The Suncorp Financial Inclusion Action Plan 2022-25 strategy focuses on:



The Bank acknowledges its customers base is heavily skewed towards retail customers and small-to-medium enterprises, who are more exposed to financial exclusion and/or vulnerability and has integrated financial health into the Bank's strateau as articulated above.

The strategy supports the Bank's actions in measuring and improving its impact on financial health through awareness and capability initiatives. Recognising the importance of financial health, the Bank is aligned with the PRB Commitment to Financial Health & Inclusion and the UN Guiding Principles on Business and Human Rights. The Bank has aligned with the national Financial Inclusion Action Plan and the National Financial Literacy Strategy. These strategies are supported by federal government agencies including Financial Literacy Australia and the Australian Securities and Investments Commission (ASIC).

1. Refer FY22, FY21, and FY20 UN PRB Self-Assessments

We will continuously increase our positive impacts while reducing the negative impacts on, and managing the risks to, people and environment resulting from our activities, products, and services. To this end, we will set and publish targets where we can have the most significant impacts.

#### 2.1 Impact Analysis (Key Step 1)

Show that your bank has performed an impact analysis of its portfolio/s to identify its most significant impact areas and determine priority areas for target-setting. The impact analysis shall be updated regularly and fulfil the following requirements/elements (a-d)2:

a) Scope: What is the scope of your bank's impact analysis? Please describe which parts of the bank's core business areas, products/services across the main geographies that the bank operates in (as described under 1.1) have been considered in the impact analysis. Please also describe which areas have not yet been included, and why.

#### High-level summary of bank's response

The Bank's three core portfolios include home loans, business loans, and transaction/saving account services. The Bank provides lending, deposit, and transaction account services to personal, SME, commercial and agribusiness customers. All of which are included in our impact analysis.

As previously disclosed, the Bank's limited security brokerage and foreign exchange services were descoped in the FY22 Portfolio Impact Analysis (PIA) due to relatively low volume of customers and an immaterial contribution to the Bank's revenue. During FY21 the Bank announced it would cease to offer personal lending products. Diminishing customer volume as the personal loan portfolio closes drove the decision to descope this portfolio for the FY22.

In FY23 there were no material changes to the sectoral, geographic, or socio-economic composition of the Bank's portfolio as disclosed in the FY23 Investor Pack, which demonstrates consistency between FY22 and FY23. On this basis the Bank chose to carry forward the FY22 PIA results and conduct a deep dive into the emerging priority impact area of Biodiversity & Healthy Ecosystems (Nature), instead of expanding the scope of the PIA to include Business Deposit Accounts and Treasury Debt Issuances. Expanding the scope of the PIA using a more recent version of the Portfolio Impact Analysis Tools for Banks will be the focus in FY24.

The scope of the FY23 Nature Portfolio review was limited to the home and business lending portfolios in Queensland, focused on exposures including lending, overdrafts, and bank guarantees as these are the material sources of revenue for the Bank. In alignment with the updated UNEP FI framework for implementing the PRBs, the review focused on the nature risks, opportunities, and impacts of the portfolios rather than the Bank's direct operations given the relative scale of impact from the portfolio vs operations. Everyday Banking portfolio is currently limited by a lack of methodology connecting deposits and payment services to nature impact and was therefore excluded, however future reviews may explore new methodologies as they emerge.

Reference(s)/Link(s) to bank's full response/relevant information

Suncorp's United Nations Principles for Responsible Banking (UN PRB) Self-Assessment FY22

Investor Pack for the year ended 30 June 2023 page, 51

That means that where the initial impact analysis has been carried out in a previous period, the information should be updated accordingly, the scope expanded as well as the quality of the impact analysis improved over time.

<sup>2.</sup> Further guidance can be found in the Interactive Guidance on impact analysis and target setting.

We will continuously increase our positive impacts while reducing the negative impacts on, and managing the risks to, people and environment resulting from our activities, products, and services. To this end, we will set and publish targets where we can have the most significant impacts.

#### 2.1 Impact Analysis (Key Step 1) (continued)

- b) Portfolio composition: Has your bank considered the composition of its portfolio (in %) in the analysis? Please provide proportional composition of your portfolio globally and per geographical scope
  - i) By sectors & industries¹ for business, corporate and investment banking portfolios (i.e., sector exposure or industry breakdown in %), and/or
  - ii) By products & services and by types of customers for consumer and retail banking portfolios.
  - iii) If your bank has taken another approach to determine the bank's scale of exposure, please elaborate, to show how you have considered where the bank's core business/major activities lie in terms of industries or sectors.

### High-level summary of bank's response

As articulated in the business description, at this time the Bank provides financial services to over one million retail customers and over one-hundred-thousand business banking customers, noting some customers are engaged in both portfolios. All customers are serviced within Australia, with majority in the state of Queensland.

Within retail customers, over 200,000 have homes loans and over 1,000,000 use transaction and deposit accounts, noting most home lending customers are also transaction account customers to facilitate repayments and/or offset accounts. Similarly, within business banking customers, 12,000 have business loans and over 100,000 use business deposit and transaction accounts including merchant facilities.

Climate Impact analysis is conducted on the Bank's lending exposures. As at 30 June 2023 the composition of the portfolio was 81.4% Home Lending, followed by commercial real estate (8%), agribusiness (6.7%), and the remainder across diverse SME industries (3.9%)8. The lending portfolios are 100% domiciled within Australia, with 45.2% concentration in Queensland due to the Bank's history and physical presence in its home state.

Within the Home Lending portfolio, 72% of loans were provided for owner-occupiers, and the remaining 28% for investment purposes. The Bank maintains a strong geographic presence in Queensland, although continued growth through the broker channel has enabled steady geographic diversification of the Home Lending portfolio across other states, particularly New South Wales and Victoria.

Within business lending, property investment was the most material sector for the Commercial portfolio (57%), and beef represented the most material credit exposure for the Agribusiness portfolio (47%).

#### Reference(s)/Link(s) to bank's full response/ relevant information

Investor Pack for the year ended 30 June 2023 page, 51. 1856890 (suncorpgroup.com.au)

Annual-Report-for-2022-23.pdf (suncorpgroup.com.au) page 117

Investor Pack 2023 1856890 (suncorpgroup.com.au) page. 52

Investor Pack 2023 1856890 (suncorpgroup.com.au) page. 54

### 2.1 Impact Analysis (Key Step 1) (continued)

c) Context: What are the main challenges and priorities related to sustainable development in the main countries/ regions in which your bank and/or your clients operate?<sup>2</sup> Please describe how these have been considered, including what stakeholders you have engaged to help inform this element of the impact analysis.

This step aims to put your bank's portfolio impacts into the context of society's needs.

### High-level summary of bank's response

As disclosed in the FY22 PRB Self-Assessment, PIA is conducted as part of the Bank's annual ESG Portfolio Review. In FY22 the Bank adopted UNEP FI's PIA for Banks (v2.0). In FY23, to support consistent execution and to embed the process as a key risk control, an internal ESG Portfolio Review Guideline was developed. The Guideline articulates the process to follow, and the governance requirement for the insights and recommendations from the review to be circulated with relevant business units, and presented to the ESG & Create a Brighter Future Committee (ECO) for discussion before being approved by the responsible business owner. The method for conducting the PIA requires input of the banks cartography, validation of country impact needs, portfolio impacts and finally identification of the significant impact areas. Validation is conducted via engagement with both internal stakeholders and civil society. Outputs from the PIA in FY22 were carried forward for FY23 and were consistent with FY21 and FY20 results which are summarised below.

Reference(s)/Link(s) to bank's full response/ relevant information

Suncorp's United Nations Principles for Responsible Banking (UN PRB) Self-Assessment FY20 (p3)

Suncorp's United Nations Principles for Responsible Banking (UN PRB) Self-Assessment FY21 (p3)

Suncorp's United Nations Principles for Responsible Banking (UN PRB) Self-Assessment FY22 (p3)

- 1. 'Key sectors' relative to different impact areas, i.e., those sectors whose positive and negative impacts are particularly strong, are particularly relevant here.
- Global priorities might alternatively be considered for banks with highly diversified and international portfolios.

We will continuously increase our positive impacts while reducing the negative impacts on, and managing the risks to, people and environment resulting from our activities, products, and services. To this end, we will set and publish targets where we can have the most significant impacts.

High-level summary of bank's response

Reference(s)/Link(s) to bank's full response/relevant information





Household Financial Stress and Financial Wellbeing in Australia, Uniting Care Australia 2022

Global Findex 2021 Database, World Bank 2021

### **Priority Impact Area: Climate**

### Justification

The Bank's Home Lending and Business Banking Lending portfolios both have high potential negative exposure to climate through property consumption and customer activity that drive emissions. Climate is currently a priority issue for Australia and therefore a clear priority impact area for the Bank.

In 2022 the Commonwealth Scientific & Industrial Research Organisation (CSIRO) and the Bureau of Meteorology (BOM) released their seventh State of the Climate Report<sup>1</sup>. The report emphasises that the associated changes in extreme weather and climate conditions including heatwaves, floods, fire, and drought, have a large impact on community health and wellbeing, and have been worsening at an increased pace, caused by human induced climate change. The Climate Change Authority, an independent statutory body providing climate change advice to the Australian Government, announced a new legislated net zero by 2050 target and a stronger 2030 target to reduce emissions by 43 percent below 2005 levels.

The Australian Government (at the Commonwealth, State and local levels) have prioritised energy, climate change and adaptation in the National Climate Resilience and Adaptation Strategy 2021-2025. In the Annual Climate Change Statement 2022, the Federal Government outlined that the Powering Australia plan will focus on reducing emissions through the following measures:

- Decarbonisation replacing fossil fuel energy and electricity generation with renewable energy sources such as solar and wind.
- Electrification using vehicles, appliances, and industrial machinery that only require renewable electricity rather
- Energy efficiency reducing energy waste right across our built environment, including in homes, commercial buildings and industry,
- Technology innovation and development investing in technologies, such as hydrogen, that are not yet commercially Available but will be critical to decarbonising our economy, particularly for hard-to-abate sectors

In November 2021 the Australian Prudential Regulatory Authority (APRA) published the Prudential Practice Guide CPG 229 which defined the various ways climate risk impacts financial risk, and the prudent practices regulated Banks should adopt to comply with existing regulatory standards. CPG 229 also outlined that while climate risk management and reporting were not currently regulated, APRA expects that prudent institutions will consider both the financial opportunities and the financial risks of climate change as they set their strategy<sup>2</sup>.

In November 2022 APRA released results from its 'Climate Vulnerability Assessment' which summarised climate scenario analysis from the five largest Australian Banks. While the Bank did not participate in the exercise, the results paper supported the view that climate risk analysis will require the development of new tools, techniques, and data sources, alongside nationally consistent models and assumptions3. In FY23-24 APRA is undertaking a Climate Vulnerability Assessment for general insurers and embedding climate risk in their approach to supervision4.

### Priority Impact Area: Inclusive, healthy economies (referred to in this Report as 'Financial Health')





### Justification

While the PIA tool did not identify Inclusive, Healthy Economies as a high need in Australia, because of high engagement with the Bank's community partner, Financial Basics Foundation, which provided important Australian context considerations, the Bank elected to prioritise this as a relevant impact area for the Bank. The Banks process of validating the outputs of the PIA tool with civil society is important to ensure that emerging and localised factors are considered in identifying impact areas that may not be represented in the tool. In addition, all the Bank's portfolios have inherent positive and negative impacts on Inclusive, Healthy Economies and therefore it was reaffirmed as a priority impact area based on our ability to affect change.

Australian households have among the highest incomes and wealth in the developed world<sup>5</sup>, and high levels of financial inclusion with over 99% of adults having a bank account and access to basic financial services. Despite this, financial wellbeing is a key national focus, evidenced by the National Financial Capability Strategy.

- 1. https://www.csiro.au/-/media/OnA/Files/SOTC22/22-00220\_OA\_REPORT\_StateoftheClimate2022\_WEB\_221115.PDF
- 2. Prudential Practice Guide CPG 229 Climate Change Financial Risks, APRA 2021, Final Prudential Practice Guide CPG 229 Climate Change Financial Risks (apra.gov.au)
- 3. Climate Vulnerability Assessment Results, APRA 2022, Information Paper Climate Vulnerability Assessment Results (apra.gov.au)
- 4. APRA Corporate Plan 2023-24 | APRA
- 5. Househ<u>old Financial Stress and Financial Wellbeing in Australia, Uniting Care Australia 2022</u>
- Global Findex 2021 Database, World Bank 2021

We will continuously increase our positive impacts while reducing the negative impacts on, and managing the risks to, people and environment resulting from our activities, products, and services. To this end, we will set and publish targets where we can have the most significant impacts.

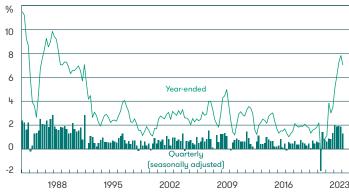
### High-level summary of bank's response

Reference(s)/Link(s) to bank's full response/relevant information

Macroeconomic factors in the Australian context support the Banks decision to reaffirm the impact area. Reserve Bank of Australia (RBA) indicators suggest that Australians are facing into a challenging interim economic environment:

### Consumer Price Inflation (CPI)2

- The RBA expected CPI peaked in Dec'22
- Nonetheless, remains highest since 1990's
- RBA expects mid-2025 until CPI is back between its 2-3% target range



Excludes interest charges prior to the September quarter of 1998; adjusted for the tax changes of 1999–2000. Sources: ABS;RBA

### Household Savings Ratio<sup>1</sup>

- Savings as share of disposable income
- Now below the average pre COVID-19 pandemic
- Savings built in COVID-19 provide some buffer



\*Saving as a share of disposable income; net of depreciation. Sources: ABS;RBA

## Consumer Sentiment<sup>3</sup>

- Consumer's perceptions of personal finances
- Average since 1980 is 100
- Cash rate 3.85% (May'23), 3.75% higher than COVID-19 lows and highest since April 2012



- 1. Reserve Bank of Australia (RBA) May 2023 Statement on Monetary Policy, Graph 2.12, p. 28/84
- RBA May 2023 Statement on Monetary Policy, Graph 4.1, p. 61/84
- RBA May 2023 Household Sector Chart Park. Presented as average of ANZ-Roy Morgan and WBC-Melbourne Institute consumer sentiment measure of respondent's perceptions of their personal finances vs. prior year.

We will continuously increase our positive impacts while reducing the negative impacts on, and managing the risks to, people and environment resulting from our activities, products, and services. To this end, we will set and publish targets where we can have the most significant impacts.

High-level summary of bank's response

Reference(s)/Link(s) to bank's full response/relevant information

### Emerging Impact Area: Biodiversity & Healthy Ecosystems

#### Justification

As outlined above, in FY23 the Bank conducted deeper materiality activities for Biodiversity & Healthy Ecosystems which was identified as an emerging impact area in the FY22 review. In the FY22 ESG Portfolio Review, the ENCORE tool was tested as a possible tool to measure the Bank's impacts and dependencies on nature. This review has further explored the use of ENCORE, mapping the Bank's lending exposure to material nature dependencies and impacts listed in the tool.

The inclusion of this emerging impact area is supported in the national context by <u>Australia's Strategy for Nature 2019-2030</u>. The Strategy is supported by a dedicated website, <u>Australia's Nature Hub</u>. Both the Strategy and the Hub are developed and owned by the Commonwealth, all state and territory governments and the Australian Local Government Association. The Strategy articulates that there are many reasons why Australians care for nature, from the intrinsic belief that nature is beautiful and has a right to exist, through to a recognition of the services nature provides. Known as ecosystem services, these include food, drinking water, fibre, building and manufacturing materials, and other less direct services like carbon storage, air and water filtration, pollination, protection from storms and floods, and places for rest and recreation.

The Bank's Business Banking portfolio has a high proportion of agricultural and development finance loans, two sectors with operations that can both significantly impact nature loss and depend heavily on the goods and services provided by healthy, functioning ecosystems. The Bank's home lending portfolio is also material when assessing nature impacts given Australia's high levels of urban sprawl compared to other developed nations and the contribution of land development to habitat loss¹. Details of the stakeholder engagement conducted to support the impact analysis on nature is outlined in section 4.1 of this Report.

Based on these first 3 elements of an impact analysis, what positive and negative impact areas has your bank identified? Which (at least two) significant impact areas did you prioritize to pursue your target setting strategy (see 2.2)? Please disclose.

#### High-level summary of bank's response

Reference(s)/Link(s) to bank's full response/relevant information

As outlined in 2.1 (a) above, the FY22 impact areas were carried forward, reaffirming the Bank's priority impact areas remain Climate Stability (Climate) and Healthy Economies (Financial Health), enabling the exploration of target setting strategies to be developed in alignment.

### 2.1 Impact Analysis (Key Step 1) (continued)

d) For these (min. two prioritized impact areas): Performance measurement: Has your bank identified which sectors & industries as well as types of customers financed or invested in are causing the strongest actual positive or negative impacts? Please describe how you assessed the performance of these, using appropriate indicators related to significant impact areas that apply to your bank's context. In determining priority areas for target-setting among its areas of most significant impact, you should consider the bank's current performance levels, i.e., qualitative and/or quantitative indicators and/or proxies of the social, economic, and environmental impacts resulting from the bank's activities and provision of products and services. If you have identified climate and/or financial health & inclusion as your most significant impact areas, please also refer to the applicable indicators in the Annex. If your bank has taken another approach to assess the intensity of impact resulting from the bank's activities and provision of products and services, please describe this. The outcome of this step will then also provide the baseline (incl. indicators) you can use for setting targets in two areas of most significant impact.

- 1. SoE 2021; Urban Management
- 2. To prioritize the areas of most significant impact, a qualitative overlay to the quantitative analysis as described in a), b) and c) will be important, e.g., through stakeholder engagement and further geographic contextualisation

We will continuously increase our positive impacts while reducing the negative impacts on, and managing the risks to, people and environment resulting from our activities, products, and services. To this end, we will set and publish targets where we can have the most significant impacts.

High-level summary of bank's response

Reference(s)/Link(s) to bank's full response/relevant information

### **Priority Area: Climate**

The Bank's approach to climate impact assessment was informed by the expectations of customers, investors, and regulators, and, for Scope 3 financed emissions, the availability of published Partnership for Carbon Accounting Financials (PCAF) methodology. Consequently, the Bank has measured its Climate impact through greenhouse gas (GHG) emissions, considering both the operational emissions, that is, those emissions created because of operating the Bank, and the financed GHG emissions which the Bank has facilitated through lending to its retail and business lending customers and the purchase of other bank's corporate bonds.

#### **Priority Area: Financial Health**

The indicators chosen to measure Financial Health reflect the Bank's higher exposure to retail transaction customers, with several indicators focusing on specific transaction products aimed at priority/vulnerable groups.

Through engagement with the UN Financial Health Working Group, the Bank participated in the global development of quantitative indicators of financial health for banks. The indicators were crowd-sourced from organizations in the civil society, not just banks, and the working group refined the number of indicators, with the UNEP FI Civil Society Advisory Body providing feedback. These indicators were designed to form an effective baseline for UN Financial Health and Inclusion Commitment signatories and more broadly PRB Banks to measure their impact in the Healthy Economies impact area. Banks setting targets in this area could choose one or more indicators upon which to set targets and measure ongoing performance.

Inspired by the engagement with the UN Financial Health Working Group, the Bank separately engaged its internal teams and determined six further indicators of financial health which address specific issues relevant for Australian customers and specifically the Bank and its products.

wnich of the following componel significant (potential) positive ar		your bank completed, in order to ider	ntify the areas in which your bank has	its most
Scope	× Yes	☐ In Progress	☐ No	
Portfolio composition	× Yes	☐ In Progress	□ No	
Context	× Yes	☐ In Progress	□ No	
Performance Measurement	× Yes	☐ In Progress	□ No	
	reas have you identified fo	r your bank, as a result of the impact	analysis?	

<sup>1.</sup> You can respond "Yes" to a question if you have completed one of the described steps, e.g., the initial impact analysis has been carried out, a pilot has been conducted.

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#### 2.2 Target Setting (Key Step 2)

Show that your bank has set and published a minimum of two targets which address at least two different areas of most significant impact that you identified in your impact analysis.

The targets¹ have to be Specific, Measurable (qualitative or quantitative), Achievable, Relevant and Time-bound (SMART). Please disclose the following elements of target setting (a-d), for each target separately:

a) Alignment: which international, regional or national policy frameworks to align your bank's portfolio<sup>2</sup> with have you identified as relevant? Show that the selected indicators and targets are linked to and drive alignment with and greater contribution to appropriate Sustainable Development Goals, the goals of the Paris Agreement, and other relevant international, national or regional frameworks.

You can build upon the context items under 2.1.

#### High-level summary of bank's response

As outlined in Principle 1 – Operating Model, on 18 July 2022, SGL entered into a share sale and purchase agreement with ANZ to sell the Bank.

As disclosed<sup>3</sup>, while the Bank has undertaken a comprehensive review of its financed emission and financial health baselines, internal approvals of targets including a Financial Health and Climate target (supported by a transition plan for net-zero) are on hold, pending the outcome of the Australian Competition Tribunal review of the ACCC's decision to deny authorisation of the sale of the Bank to ANZ. While the Bank is unable to disclose the quantified results of the baselines or the identified targets, to demonstrate progress towards implementation of the PRB Principles the process undertaken is outlined below.

Given the expected completion period, and to allow sufficient time for ANZ board engagement and disclosure-related governance, an 18-month extension (until 31 March 2025) to implement the Principles has been granted by the Banking Board and the UNEP FI Secretariat.

#### **Priority Area: Climate**

Aligned to SDG 7 and 13, the Bank's approach to measuring climate impact through emissions aligns with the <u>Australia's Nationally Determined Contribution Communication 2022</u>, which measures climate impact through national absolute emissions (tCO2e).

Baselines were measured, and targets were explored in line with the <u>UN EPFI Guidelines for Climate Target Setting for Banks, Science Based Targets Initiative (SBTi)</u>, and <u>PCAF</u>, Part A Financed Emissions standard. The Bank's residential mortgage target was considered using the version 2.1 of the Science-based Target Setting tool, which provides a 1.5C aligned pathway for "Residential Buildings" based on data from the International Energy Agency's (2021) Net Zero by 2050 Emissions scenario. This scenario meets key energy-related (SDGs) and is in line with reductions assessed by the Intergovernmental Panel on Climate Change (IPCC), the Bank recognises these have been superseded by the recent 2023 IEA NZE updates, and as a result this could have an impact on the Bank's initial target setting.

### Priority Area: Financial Health

The Bank measures financial health impact through quantitative scoring of the UN and Suncorp Bank-specific financial health indicators. This approach is aligned with the international consensus achieved through the UN Financial Health Target Setting Working Group; however, the Bank acknowledges that these measures focus on individual financial health rather than financial inclusion, which is the focus of SDG 8. At the time of this Report there were no other national or international frameworks or targets for the Bank to align to.

Reference(s)/Link(s) to bank's full response/relevant information

FY23-Climate-related-Disclosure-Report, PDF (suncorpgroup.com.au) (p33)

Australia's Nationally Determined
Contribution, DCCEEW 2022,
AUSTRALIA'S NATIONALLY DETERMINED
CONTRIBUTION (unfecc.int)

<sup>1.</sup> Operational targets (relating to for example water consumption in office buildings, gender equality on the bank's management board or business-trip related greenhouse gas emissions) are not in scope of the PRB.

<sup>2.</sup> Your bank should consider the main challenges and priorities in terms of sustainable development in your main country/ies of operation for the purpose of setting targets. These can be found in National Development Plans and strategies, international goals such as the SDGs or the Paris Climate Agreement, and regional frameworks. Aligning means there should be a clear link between the bank's targets and these frameworks and priorities, therefore showing how the target supports and drives contributions to the national and global goals.

<sup>3.</sup> FY23 Climate-related Disclosure Report

We will continuously increase our positive impacts while reducing the negative impacts on, and managing the risks to, people and environment resulting from our activities, products, and services. To this end, we will set and publish targets where we can have the most significant impacts.

### 2.2 Target Setting (Key Step 2) (continued)

b) Baseline: Have you determined a baseline for selected indicators and assessed the current level of alignment? Please disclose the indicators used as well as the year of the baseline.

You can build upon the performance measurement undertaken in 2.1 to determine the baseline for your target.

A package of indicators has been developed for climate change mitigation and financial health & inclusion to guide and support banks in their target setting and implementation journey. The overview of indicators can be found in the Annex of this template.

If your bank has prioritized climate mitigation and/or financial health & inclusion as (one of) your most significant impact areas, it is strongly recommended to Report on the indicators in the Annex, using an overview table like below including the impact area, all relevant indicators and the corresponding indicator codes:

Impact area Climate change mitigation		
Indicator code	Response	
	Scope 3 Financed Emissions - PCAF "Mortgages" category	
	Scope 3 Financed Emissions - PCAF "Business Loans & Unlisted Equity" category	
	Scope 3 Financed Emissions – PCAF "Project Finance" category	
	Scope 3 Financed Emissions - PCAF "Commercial Real Estate" category	
	Scope 3 Financed Emissions – PCAF "Listed Equity & Corporate Bonds" category	
	Scope 3 Financed Emissions - PCAF "Motor Vehicle Loans" category	
	Scope 1, Controlled Operations Emissions (Vehicle fuels, stationary gas/liquids)	
	Scope 2, Controlled Operations Emissions (Electricity)	
	Scope 3, Controlled Operations (Supply chain, assessed as relevant for the Australian Government's "Climate Active" carbon neutral certification)	

Impact area Find	ancial health & inclusion				
Indicator code	Response				
CS012	% of customers actively using the online/mobile banking platform/tools				
CS033	% of customers supported with dedicated customer journey/advisory services				
CS036	# of new customers per month				
CS038	% of customers with effective access to a basic banking product				
CS024	# of individuals supported with dedicated and effective financial and/or digital education initiatives				
CS010	% of products connected to long-term saving and investment plans				
CS005	% of customers that would struggle to raise emergency funds or cover with insurance a major unexpected expense				
CS009	% of customers showing an increase or stable amounts in savings, deposit and/or investment account balances, quarter on quarter.				
CS016	CS016 % of customers with a non-performing loan				
CS017	% of customers using overdraft regularly				
CS013	% of reported cases of financial fraud or scam within last year (self-reported and transactional)				
CS003	% of customers with over-indebtedness per year				
SML-specific #1	% of customer accounts receiving bonus interest – Growth Saver Account				
SML-specific #2	% of customer accounts receiving bonus interest – Kids Savings Account				
SML-specific #3	# of unique customers using the Gambling Block feature on the SunApp				
SML-specific #4	% of home loan customers ahead on home loan repayments - 3 months				
SML-specific #5	# of Translating $&$ Interpreter Services calls and interactions with customers				
SML-specific #6	# of Bank @ Post Transactions				

In case you have identified other and/or additional indicators as relevant to determine the baseline and assess the level of alignment towards impact driven targets, please disclose these.

We will continuously increase our positive impacts while reducing the negative impacts on, and managing the risks to, people and environment resulting from our activities, products, and services. To this end, we will set and publish targets where we can have the most significant impacts.

High-level summary of bank's response

Reference(s)/Link(s) to bank's full response/relevant information

# Priority Area: Climate Operational Emissions

While operational emissions and targets are out of scope for PRB, the Bank has prioritised taking action on our operational emissions while we worked through measurement of our financed emissions. As noted in 2.1 (b) of this Report, the Bank has over 1 million transaction and deposit customers, connecting the emissions associated with providing those services (our operational emissions) with the Banks commitment to neutralise and reduce them over time was important to demonstrate genuine commitment to our customers that we too are taking action on our climate impacts.

On 11 July 2022, Climate Active certified the Bank as a Carbon Neutral organisation (Certified Organisation) together with its personal transaction deposit services (Certified Service). Climate Active is administered by the Australian Government's Department of Climate Change, Energy, the Environment and Water (DCCEEW) and is the national certifier of carbon neutrality. Climate Active publish and enforce the Carbon Neutral Standards which provide a clear methodology for determining operational emissions.

The Bank engaged Pangolin Associates to support the preparation of the inventory and submission to Climate Active, with assurance provided by Walker Wayland. Certification is performed on an annual basis in retrospect. Given the Bank's certification was conducted before the end of the FY22 financial year, the original inventory was based on 6 months of actuals, and 6 months of forecast data. In November 2022, the Bank completed a 'true up' for FY22 based on actuals for the full financial year. The below table illustrates the Bank's operational emissions calculated as part of Climate Active Carbon Neutral Organisation Certification for FY22.

FY23-Climate-related-Disclosure-Report. PDF (suncorpgroup.com.au) (p33)

Climate Active Carbon Neutral Standard for Organisations | Climate Active

Climate Active Carbon Neutral Standard for Products and Services | Climate Active

Suncorp Metway Limited | Climate Active

Emission category	Projected emissions (tCO2-e)	Sum of total emissions (tCO2-e)
Accommodation and facilities	42.914	73.664
Cleaning and Chemicals	35.377	17.027
Climate Active Carbon Neutral Products and Services	0.000	0.000
Debit Cards	1,000.307	7.720
Electricity	5,297.543	4,908.069
Food	173.690	166.480
ICT services and equipment	2,369.009	1,925.539
Office equipment & supplies	681.628	405.916
Postage, courier and freight	3,813.292	839.817
Products	0.000	119.585
Professional Services	1,790.946	3,836.709
Stationary Energy (gaseous fuels)	0.090	0.466
Stationary Energy (liquid fuels)	2.317	2.253
Transport (Air)	162.460	190.328
Transport (Land and Sea)	2,072.900	1,868.388
Waste	42.713	38.727
Water	33.967	86.196
Working from home	467.622	495.861
Total net emissions	17,986.775	14,982.743

\*The total of 14,982.743 tCO2-e includes 5,379 tCO2-e from the Bank's Simple Service certification. To see a breakdown of the service emissions, please see the Suncorp-Metway Limited Service Certification Public Disclosure Statement.

An uplift factor is an upwards adjustment to the total carbon inventory to account for relevant emissions, which can't be reasonably quantified or estimated. This conservative accounting approach helps ensure the integrity of the carbon neutral claim. The Bank currently does not quantify refrigerant gases (used in cooling systems); therefore a 1% uplift [149.8 tC02-e] was added to quantified emissions [14,982.7 t/C02-e]

Reason for uplift factor	(tCO2-e)
Refrigerants	149.827
Total of all uplift factors	149.827
Total footprint to offset (total net emissions from summary table + total uplifts)	15,132.571

 $The full \ emissions \ breakdown \ FY22 \ is \ available \ via \ the \ Public \ Disclosure \ Statements \ available \ on \ \underline{Climate \ Active's \ website.}$ 

We will continuously increase our positive impacts while reducing the negative impacts on, and managing the risks to, people and environment resulting from our activities, products, and services. To this end, we will set and publish targets where we can have the most significant impacts.

High-level summary of bank's response

Reference(s)/Link(s) to bank's full response/relevant information

### **Priority Area: Climate**

#### **Financed Emissions**

The Bank worked with external carbon consultants NDEVR Environmental to measure the Bank's financed emissions. This activity was conducted with leads from each lending portfolio and approved by accountable business owners.

The Bank calculated its financed emissions based on absolute emissions (tCO2e) and emissions intensity (tCO2e/\$M) for lending (retail and business) and corporate bonds portfolios, with specific breakdown of the business banking portfolio into ANZSIC Level 4 sector codes.

The Bank measured its financed emissions using six categories of financed emissions under the Partnership for Carbon Accounting Financials' (PCAF) Global GHG Accounting & Reporting Standard Part A. It is noted that since completion of the financed emissions baseline, PCAF have released a seventh category to cover sovereign debt, which will be incorporated into future year's emissions measurement and reporting.

Cumulatively this represents 100% of the lending portfolio. At the time of baselining the PCAF methodology, sovereign debt was in draft, and consequently these investments (11% of all assets) were not in scope for this impact measurement.

The table below illustrates the total absolute emissions of each portfolio measured during the baseline activity, which is being disclosed qualitatively to contextualise the Bank's actions and engagement in relation to materiality:

Asset Class (PCAF)	FY22 Balance Sheet \$ (% of Total)	Total Absolute Emissions tCO2e <sup>1</sup>
Mortgages	78.5%	
Business loans and unlisted equity	11.6%	
Commercial real estate	6.6%	
Listed equity and corporate bonds	1.0%	
Project finance	1.9%	
Motor vehicle loans	0.4%	
Total	100%	

Lowest Absolute tCO2e Highest Absolute tCO2e

### **Priority Area: Financial Health**

To set targets and establish action plans, the Bank undertook baseline measurement of portfolio level impact aligned to <u>Guidance on Financial Health & Inclusion Target Setting 2.0 (UN Guideline</u>). This activity was conducted with leads from each portfolio, approved by accountable business owners.

In August 2022, the UN working group established 20 core indicators in total and a number of 'optional' indicators. In December 2022, the internal Suncorp Bank Working Group confirmed six further indicators relevant for our national context guided by the Global Findex Database [2021] and the Australian Government's "National Financial Capability Strategy 2022". Indicator selection for baseline measurement (scope) was influenced by available data and agreed to by the internal Working Group members.

Aligned with the <u>UN Guideline</u>, the <u>Indicator Library</u> and UN template including definitions were used to determine the methodology for measuring the baseline for FY19-FY22.

The <u>UN Guideline</u> recommends that indicators be disaggregated for vulnerable groups based on national context (priority groups). Available data was a limitation in segmenting based on income level, disability, education, or ethnicity. Where possible baseline indicators were segmented based on age, gender, and financial resilience.

<sup>1.</sup> Total Absolute Emissions tCO2e include Scopes 1-3 for the relevant PCAF asset class.

We will continuously increase our positive impacts while reducing the negative impacts on, and managing the risks to, people and environment resulting from our activities, products, and services. To this end, we will set and publish targets where we can have the most significant impacts.

#### 2.2 Target Setting (Key Step 2) (continued)

c) SMART targets (incl. key performance indicators (KPIs)1: Please disclose the targets for your first and your second area of most significant impact, if already in place (as well as further impact areas, if in place). Which KPIs are you using to monitor progress towards reaching the target? Please disclose.

#### High-level summary of bank's response

### response/ relevant information **Priority Area: Climate**

# **Operational Emissions:**

As disclosed in the Suncorp Group Climate Related Disclosures Report FY232, in 2022, the Group strengthened its Scope 1 and 2 commitments to be net-zero by 2030. The Group's Scope 1 and 2 emissions abatement activities are set from an FY2020 Baseline and aligned to the Science Based Target initiative emissions accounting approach, eligible methods for setting corporate climate targets, and the definition of abatement outlined in the SBTi Corporate Net-Zero Standard<sup>3</sup>.

#### **Financed Emissions:**

The Bank Co-Chaired UNEP FI's Taskforce reviewing the Principles for Responsible Banking where common climate indicators were identified, and in FY22 joined the UNEP FI Climate Target Setting and Australian Banking Association (ABA) Climate Risk working groups to collaborate at an industry level. The Bank worked with external consultants ERM to consider Scope 3 financed emissions targets and a net zero transition plan respectively. This activity was conducted with lending portfolio leads, approved by accountable business owners.

In FY23 impact targets were explored, aligned to the 2nd principle of PRB to 'set and publish targets where we can have the most significant impact'. In accordance with the UN PRB, the Bank must set at minimum one target within the Climate

The Scope 3 Financed Emissions baseline identified emissions concentration within "business loans" (driven by agribusiness, particularly beef) and "mortgages".

The Bank ESG Team, in consultation with ERM and the Bank ESG Committee (ECO), determined exploring a first interim 2030 emissions reduction target within mortgages would be appropriate. Key reasons behind the determination are:

- Feedback from the UN following the FY22 UN PRB self-assessment to set a target in mortgages (pre scope 3 financed emissions calculations),
- Business Lending EGM seeking improved data quality for business loans,
- Presence of the 1.5 degree aligned Science-based target initiative (SBTi) target setting tool for residential mortgages (v2.1, at 20 Jul'22) to support prioritisation of a mortgages target, verse the relatively new nature (Sep'22) of the SBTi Forestry Land and Agriculture (FLAG) scenario where updates were anticipated in 'early 2023', post the completion of this activity.

### **Priority Area: Financial Health**

The Group published its Financial Inclusion Action Plan (FIAP) in FY22. The Group was the first financial services  $organisation \ to \ publish \ a \ Build \ FIAP \ reconfirming \ the \ Group's \ commitment \ to \ financial \ inclusion \ and \ wellbeing$ of its people, customers, and communities.

The baselining process involved measuring the core and optional indicators over a 4-year period (FY19-22) and resulted in the adoption of a FY22 baseline. This baseline is reasonable and appropriate as it considered the impact of COVID-19 on the financial health of the Banks customers (pre and post event), and represented the most current available baseline year at the time of target setting activities Following baselining, the team determined the SMART Impact target aligned to the <u>UN Guideline</u>. All activities were conducted with portfolio leads, approved by the accountable business owner in the Bank. In selecting the target, baseline insights and national context were considered.

### 2.2 Target Setting (Key Step 2) (continued)

d) Action plan: which actions including milestones have you defined to meet the set targets? Please describe. Please also show that your bank has analysed and acknowledged significant (potential) indirect impacts of the set targets within the impact area or on other impact areas and that it has set out relevant actions to avoid, mitigate, or compensate potential negative impacts.

### High-level summary of bank's response

## response/ relevant information **Priority Area: Climate**

**Operational Emissions:** 

The Bank will continue reducing its own emissions, aligned to Group commitments through a combination of renewable energy purchase 100% by 2025, vehicle fleet electrification, and through optimising energy efficiency of real estate footprints through audits and participating in green leases, upgrades, and fitouts. The Bank remains aligned to the Group commitment to achieving net-zero Scope 1 and 2 emissions by 2030 and has met the commitment in the Bank Sensitive Sector Standards and reflected this in the Groups FY23 Climate Related Disclosures Report.

- Key Performance Indicators are chosen indicators by the bank for the purpose of monitoring progress towards targets.
- 2. Suncorp Climate Related Disclosures Report FY23 (p33)
- 3. Climate Change Action Plan | September 2021

Reference(s)/Link(s) to bank's full

Suncorp Climate Related Disclosures Report FY23 (p33)

Climate Change Action Plan September 2021

Financial Inclusion Action Plan 2022-

https://www.suncorpgroup.com. au/uploads/FY23-Climate-related-Disclosure-Report.PDF

Reference(s)/Link(s) to bank's full

We will continuously increase our positive impacts while reducing the negative impacts on, and managing the risks to, people and environment resulting from our activities, products, and services. To this end, we will set and publish targets where we can have the most significant impacts.

#### High-level summary of bank's response

### Financed Emissions:

To support its targets and continued progress, the Bank has developed an action plan for Home Lending. The Bank will continue to explore how it can support customers to increase the use of renewable energy, reduce natural gas consumption and help customers improve the efficiency of their homes to reduce their emissions and their cost of living. The Bank will focus on incorporating Australian Government issued Bonds (sovereign bonds) in the emissions scope based on the published guidance released in December 2022 and expanding its target setting to the agribusiness portfolio. The Bank will continue to work with customers, third-party data providers and invest in measuring and modelling technologies to increase the quality of emissions data and improve the precision of estimates. The Bank aims to reach SBTi alignment for its targets, continuing to focus in residential and agricultural emissions where actions are most material.

#### **Indirect Impacts:**

The Bank facilitates negative impact on Climate (SDG 13) through our operations and financing activities, however, also has the potential to drive positive impact on the same through enabling and financing the transition. In designing actions (products and services), consideration was given to the potential for unequal access due to lower levels of financial health (SDG 8), which risks leaving parts of the community unable to achieve the same access to affordable and clean energy (SDG 7), or be enabled to address their own climate actions. To support inclusion, our Green Upgrade Equity Home Loan has no establishment or ongoing fees, and our Carbon Insights Account is fee free. While consideration has been given to the indirect impacts on sustainable consumption and production patterns (SDG 12), further work is required to explore and embed actions to mitigate these potential negative impacts.

Additionally, the Bank has begun exploring the nexus between climate change and nature loss, as changing climate will increase pressures on threatened species and ecosystems, and equally loss of natural assets including forests and ocean habitats remove natural carbon sinks and erode natural environmental resilience. Action on climate change (SDG 13) will help reduce pressure on biodiversity loss and protection and enhancement of nature (SDG 15, 14 and 6) can mitigate climate change and increase adaptation to climate impacts. The Bank recognises that it is critical to avoid carbon tunnel vision and risk neglecting nature in the pursuit of climate action.

### **Priority Area: Financial Health**

To support its target and continued progress, the Bank has developed an action plan to improve the financial health of our customers. The Bank will continue to explore how it can increase the awareness, control, and support it offers customers to increase their capability and confidence regarding their finances, especially through the Bank's digital presence. These action plans will support the Bank's existing commitments under the Financial Inclusion Action Plan.

The Bank will continue improving the financial health and inclusion of its own employees through capability sessions, closing the gender pay gap, access to support services such as the employee hardship program and free financial coaching, and other awareness and support initiatives.

### Indirect Impacts:

Further to indirect impacts on Climate, the Bank recognises that addressing financial health (SDG 8, 10) requires consideration of the differing needs and challenges of the communities in which we operate. As an example, increasing digital or self-service options may benefit the financial health and inclusion of some cohorts, while other groups may be negatively impacted should they not have access to these services. The Bank has adopted the <u>Australian Banking Code of Practice</u>, which provides an ethical, customer-oriented and sustainable framework, and guides decision-making when performing work and serving our customers.

Climate Change Action Plan | September 2021

Financial Inclusion Action Plan 2022-

Reference(s)/Link(s) to bank's full

response/ relevant information

FY23-Climate-related-Disclosure-Report.
PDF (suncorpgroup.com.au) p13

Employee benefits | Suncorp Group | Suncorp Group

Which of the following assessing for your	g components of target setting in line with the PRB requir	ements has your bank completed or is currently in a process of
	First area of most significant impact: CLIMATE	Second area of most significant impact: FINANCIAL HEALTH
Alignment	× Yes	
	☐ In Progress	☐ In Progress
	☐ No	□ No
Baseline	× Yes	X Yes
	☐ In Progress	☐ In Progress
	☐ No	□ No
SMART targets	☐ Yes	☐ Yes
	▼ In Progress	▼ In Progress
	☐ No	□ No
Action plan	☐ Yes	☐ Yes
	✓ In Progress	
	☐ No	□ No

We will continuously increase our positive impacts while reducing the negative impacts on, and managing the risks to, people and environment resulting from our activities, products, and services. To this end, we will set and publish targets where we can have the most significant impacts.

#### 2.3 Target implementation and monitoring (Key Step 2)

For each target separately:

Show that your bank has implemented the actions it had previously defined to meet the set target.

Report on your bank's progress since the last Report towards achieving each of the set targets and the impact your progress resulted in, using the indicators and KPIs to monitor progress you have defined under 2.2.

Or, in case of changes to implementation plans (relevant for 2nd and subsequent Reports only): describe the potential changes (changes to priority impact areas, changes to indicators, acceleration/review of targets, introduction of new milestones or revisions of action plans) and explain why those changes have become necessary.

### High-level summary of bank's response

Reference(s)/Link(s) to bank's full response/relevant information

As disclosed in the FY22 PRB Self-Assessment, the Bank committed to measuring the baselines and setting impact targets in FY23. Furthermore, as previously outlined due to the potential sale of the Bank to ANZ, the Bank is currently unable to disclose the quantified results of the baselines or the targets, to demonstrate progress towards implementation of the PRB Principles. The process for how the Bank intends to implement and monitor the actions required to meet the set targets has been outlined below.

### Priority Area: Climate

#### **Operational Emissions**

Aligned to the annual Climate Active Certification, in FY24 the Bank intends to progress work on developing a bank-wide Emissions Reduction Strategy through the 'Emissions Reduction Strategy Working Group'. This strategy will be developed collaboratively with each business function (e.g. Home Lending, Business Banking, Everyday Banking, Consumer Distribution, CFO). Performance will be measured by quarterly monitoring of operational emissions at the business function level where possible. The ECO (Chaired by Bank CEO) will oversee the performance.

#### **Financed Emissions**

Financed emissions for applicable portfolios are intended to be measured and reported to ECO annually to manage performance against the target, and achievement of the targets will be supported by implementation of the portfolio action plans which will also be monitored by ECO. Accountability for the delivery of the action plans is intended to sit with the relevant Portfolio EGM.

### **Priority Area: Financial Health**

The chosen targets are supported by KPIs tracked monthly by the accountable C-suite executive. The financial health indicators and the Bank's progress against targets are intended to be measured and reported to ECO quarterly to track and manage performance, while achievement of the targets is intended to be supported by implementation of the financial health action plan which is also proposed to be monitored by ECO. Accountability for the delivery of the action plan is intended to sit with the relevant Portfolio EGM.

We will work responsibly with our clients and our customers to encourage sustainable practices and enable economic activities that create shared prosperity for current and future generations.

3.1 Client engagement		
Does your bank have a policy or engagement process with clients and customers <sup>1</sup> in place to encourage sustainable practices?	Does your bank have a policy for sectors in which you have identified the highest (potential) negative impacts?	
× Yes	× Yes	
☐ In progress	☐ In progress	
☐ No	☐ No	
Describe how your bank has worked with and/or is planning to work with its clients and customers to encourage sustainable practices and enable sustainable economic activities <sup>2</sup> ). It should include information on relevant policies, actions planned/implemented to support clients' transition, selected indicators on client engagement and, where possible, the impacts achieved.		
This should be based on and in line with the impact analysis, target-setting	and action plans put in place by the bank (see P2).	

#### High-level summary of bank's response

The Responsible Banking Policy, in line with the Bank's commitment to the UN Principles for Responsible Banking (PRB) and the PRB Commitment to Financial Health & Inclusion informs how the Bank:

- Aligns its business strategy to be consistent with and contribute to customers' needs and society's goals, as expressed in the United Nations Sustainable Development Goals, the UNFCC Paris Agreement, and relevant national and regional frameworks,
- Continuously increases its positive impacts whilst reducing the negative impacts on, and managing the risks to, people and environment resulting from its activities, products, and services. To this end, this Policy guides how the Bank will set and publish targets where it can have the most significant impact,
- Works responsibly with its customers to encourage sustainable practices and enable economic activities that create shared prosperity for current and future generations, proactively and responsibly consults, engages, and partners with relevant stakeholders to achieve society's goals,
- Implements commitment to the PRBs through effective governance and a culture of responsible banking, and
- Periodically reviews its individual and collective implementation of the PRBs and remains transparent and accountable for its positive and negative impacts and contribution to society's goals.

The Bank is also guided by three Suncorp Bank Sensitive Sector Standards which prohibit the Bank from lending to entities engaged in Fossil Fuel mining and exploration, Tobacco & Recreational Cannabis, or manufacture or sale of Controversial Weapons. The FY23 ESG Portfolio Review included a screen of the Bank's current lending exposures which validated that there is currently zero exposure to any of these sectors.

The Bank continues to take its responsibility as an essential services provider seriously and the responsible financial service foundations disclosed within the Bank's first UN PRB Self-Assessment (FY20) remain unchanged.

### **Priority Area: Climate**

### Suppliers & Partners

Understanding the Bank's operational emissions required engagement with its suppliers including mail and transport, stationery, advertising, and cash handling. This engagement improved data quality, allowing emissions to be accounted for based on activity verses the less accurate spend method, to inform operational emissions, but also started valuable conversations on transition plans and emissions reduction across the supply chain.

The Bank engaged our top 17 suppliers, who were identified based on their materiality to the Banks spend, and participation in activities known to have an environmental impact (for example transport, production of plastics/paper products) via a survey to build understanding of:

- Suppliers' maturity on understanding climate risks and opportunities
- What areas should be focussed on when engaging suppliers
- How to design the survey to enable scalability

Insights drawn from the survey provided recommendations that will be leveraged in developing the Bank's Emissions Reduction Strategy in FY24.

### Key Insights:

Awareness is growing in the **procurement** space however there is still room for improvement. Majority of our suppliers have some form of climate change training, however are still immature in taking action on making operations sustainable. Awareness is rapidly growing in the governance space with majority of suppliers increasing sustainability policies and undertaking materiality assessments. Renewable energy, recycling, water and waste is the most widely understood theme, with awareness on actions increasing Maturity on reputational risk scored the lowest across all suppliers. The Bank will focus on uplifting

- A client engagement process is a process of supporting clients towards transitioning their business models in line with sustainability goals by strategically accompanying them through a variety of customer relationship channels
- 2. Sustainable economic activities promote the transition to a low-carbon, more resource-efficient and sustainable economy

maturity of reputational risk and green-washing when engaging our suppliers.

### Reference(s)/Link(s) to bank's full response/ relevant information

Suncorp Responsible Banking Policy

Suncorp Annual Report FY23 (p117)

Suncorp's United Nations Principles for Responsible Banking (UN PRB) Self-Assessment FY20

We will work responsibly with our clients and our customers to encourage sustainable practices and enable economic activities that create shared prosperity for current and future generations.

#### High-level summary of bank's response

Reference(s)/Link(s) to bank's full response/ relevant information

The Bank recognises that successful climate action requires engagement and collaboration with our customers given the materiality of emissions related to our lending portfolios.

- In July 2022 the Bank commissioned research, which was conducted by Kantar, to survey more than 2000 Australians. This survey aimed to understand Australians' biggest worries, concerns, and priorities for the future. It revealed that:
  - · 2 in 3 are worried about the environment for future generations and wish they could do more to protect the environment.
  - 95% of respondents didn't know their greenhouse gas emissions, and
  - 90% agreed there are things they could do to reduce their impact on the environment.
- The Solar Homes Bonus campaign, which rewarded customers who had solar power systems installed on the property, ended 31 December 2022. Following this the Bank engaged participants for feedback on the initiative, which will inform the development of future initiatives to support emissions reductions in home lending.
- In May 2021, a Bank customer engaged the Queensland rural agricultural organisation AgForce to understand the GHG emissions of their operations. Through engagement with the Bank, in FY23 this customer shared the outcome of their Report including the methodology applied, providing the Bank a case study of measuring farm based GHG emissions.
- In July 2022, the Bank visited the property Emaroo where some its carbon offsets were generated to better understand how carbon projects work and the impact that the Bank's investment had on the land. The Bank also visited one of its own customers who engage in carbon farming to understand their relationship with the Bank and how the process can be improved to encourage more customers to invest in carbon projects. These engagements were shared internally with employees to drive awareness of the Bank's offsets and encourage them to enable customers who want to engage in carbon projects1.
- In March 2023, the Bank ESG team attended a site visit to Valdora solar farm at Maroochydore where the Group purchases renewable energy via Diamond Energy to build an understanding of the operations.

Suncorp Bank is helping Australian farmers create a brighter future through carbon farming | Suncorp Group

### **Priority Area: Financial Health**

Financial health evades quantification as it is a deeply personal and circumstantial measure of wellness, confidence, and capability. The Bank identified that to measure impact or set targets in financial health, we would need direct engagement with customers and community to understand their perception and understanding of their own financial health.

In September 2021, the Bank engaged nearly 6,000 customers regarding the new Bank ambition to Create a Brighter Future, asking them to rate the importance of sustainability and wellbeing in their personal lives. Over 78% of respondents said that paying bills on time was important, and 71% said financial literacy for kids was an important deliverable to achieve financial wellbeing<sup>2</sup>. This helped solidify the wellbeing pillar of the Bank's strategy and focus efforts on helping people control money inflows and outflows and continue enabling financial literacy for kids.

### **Emerging Priority Area: Nature** Case Study: Justin & Lorroi Kirkby

The Bank Chief Executive Office, and the Chief Risk Officer visited Agribusiness customers at 'Amarula Dorpers' in NSW to learn about sustainable farming practices, and how the Bank can support more farmers to adopt them. The customers are winners of the 2020 Australian Government Landcare Farming Award for regenerative farming practices and host a number of field days showing what they have done to the land to optimise on productivity and the benefits to nature and people.

The Australian Government Landcare Farming Award to Amarula Dorpers

- 1. Suncorp Bank is helping Australian farmers create a brighter future through carbon farming | Suncorp Group
- 2. What's next? Suncorp 2021, https://www.suncorp.com.au/about-us/a-brighter-future.html#survey-infographic-text

We will work responsibly with our clients and our customers to encourage sustainable practices and enable economic activities that create shared prosperity for current and future generations.

### 3.2 Business opportunities

Describe what strategic business opportunities in relation to the increase of positive and the reduction of negative impacts your bank has identified and/or how you have worked on these in the Reporting period. Provide information on existing products and services, information on sustainable products developed in terms of value (USD or local currency) and/or as a % of your portfolio, and which SDGs or impact areas you are striving to make a positive impact on (e.g., green mortgages – climate, social bonds – financial inclusion, etc.).

### High-level summary of bank's response

The Annual Report 2022-23 details the types of daily interactions with customers via contact centres, intermediaries, branches, customer surveys, dispute resolution processes and dealings with the Suncorp Group Customer Advocate. The scope of these interactions is broad, offering support for customers impacted by natural disasters and customers experiencing vulnerability, financial resilience, customer experience, cyber and data security, scam and fraud awareness and support, digital capability, and innovation.

### **Priority Area: Climate**

The Bank identified Climate as a priority impact area (aligned with SDG 13 Climate Action) since its first UN PRB self-assessment in FY20. The Bank acknowledges that the risks and opportunities presented by Climate are material to its customers and organisation and has integrated Climate into the Bank's strategy and has delivered a number of initiatives to enable a reduction in our own impact, and that of our customers in FY23, as set out below.

#### **Operational Emissions**

In July 2022 the <u>Bank was certified</u> by the national certifier Climate Active as a carbon neutral organisation, and its personal transaction deposit accounts certified as a carbon neutral service.

#### **Financed Emissions**

Prior to baselining the Bank was aware that residential homes would present a material source of emissions due to the relative size of the home lending book (81.4% \$ exposure). Consequently, two initiatives were delivered focused on incentivising and enabling customers to increase the energy efficiency of their home. The Solar Home Bonus included a loyalty offering for existing Suncorp Bank customers who met eligibility criteria relating to solar installations in their home (\$500 cashback), and a new-to-bank offer which rewarded customers for purchasing or refinancing a home which met the same eligibility criteria (\$3,000 cashback) which ran across FY22 and FY23. In July 2022 the <u>Green Upgrades Equity Home Loan</u> was launched and it continues to be offered, supporting home lending customers transition to a lower-carbon future offering lower-interest rates on energy and water efficiency upgrades their homes, including the installation of certain types solar energy systems.

The Bank also recognises the critical role agriculture plays in providing food and fibre both domestically and internationally and has established a long and proud history of supporting rural and regional communities. In FY23, insights from the impact analysis on nature, and impact measurement of Scope 3 Financed Emissions highlighted the opportunity to engage and partner with our Agri-Business customers to drive positive impact. Driven by these insights, the Bank engaged with a number of customers, to learn from their experiences on topics such as natural hazard resilience, carbon farming, renewable energy projects, sustainable farming practices and natural capital to better understand how to collaborate to enable and accelerate their actions. Further engagement was conducted with industry organisations such as Meat and Livestock Australia (MLA) and AgForce to learn how banks can better support the wider industry. These learnings will support the development of action planning in FY24.

### **Everyday Banking Customer Emissions**

While not measurable under PCAF and not considered under scope 3 financed emissions, the emissions of customer purchases were explored due to the higher number of customers in this portfolio, which is more than four times that of the biggest lending portfolio, and therefore has the potential to drive impact through customer purchasing behaviours and decisions.

Disclosed in the Banks FY22 UN PRB Self-Assessment through partnerships with sustainability Fintech startup Cogo, the Bank identified that our customers' largest footprint is in transport and groceries.

These key findings combined with information provided by Cogo and customer feedback found that 95% of our customers didn't know their own carbon footprint. As a result, this inspired the Bank to launch the <u>Carbon Insights Account</u> in October 2022. This account, as well as all our personal transaction deposit accounts, are offered as a Climate Active certified carbon neutral service, the first financial service in Australia to receive this certification. The account offers customers estimated carbon emissions for their eligible transactions helping them to understand the emissions associated with their purchases and providing them with increased knowledge of the potential impacts of their purchases. The product was awarded the 2023 CANSTAR Innovation Excellence Award and 2023 Mozo Expert Choice Award - Banking Innovation.

In FY24, the Bank will continue to enhance this product to deliver additional features to support our customers in helping better understand their impact. Additional findings also highlighted that through identifying one of our customers' largest footprints were in groceries, the Bank undertook a search to find a suitable partner. In March 2023, the Bank proudly launched a 3-year partnership with OzHarvest. OzHarvest is Australia's leading food rescue organisation. By educating Australians about how they can reduce food waste at home and redirecting food away from landfill the Bank is on the path to helping customers save what matters, food, money, and the planet.

Reference(s)/Link(s) to bank's full response/relevant information

Suncorp Annual Report (p20)
Annual-Report-for-2022-23.PDF
[suncorpgroup.com.au]

Suncorp Metway Limited | Climate Active

Green Upgrades Equity Home Loan

Carbon Insights Account | Suncorp Bank

Innovation Excellence Awards 2023 |
CANSTAR

Bank Accounts | Mozo Experts Choice Awards 2023

Suncorp Bank teams up with OzHarvest | Suncorp Group

We will work responsibly with our clients and our customers to encourage sustainable practices and enable economic activities that create shared prosperity for current and future generations.

#### High-level summary of bank's response

### Priority Area: Financial Health

As disclosed in prior PRB Self-Assessments, the Bank has a number of strategic partnerships that continues to support the financial health and inclusion of our customers in FY23:

- since 2016, Suncorp has partnered with Financial Basics Foundation (FBF) to create 'ESSI Money', a game that helps students understand the fundamentals of earning, saving, spending, and investing. In 2022, FBF had 2,199 ESSI money classes, representing 78% of schools in Australia and had registered 16,436 games with students all over Australia. In 2022, after participating in ESSI Money 73% of students highlighted they had an improved understanding of financial services and products
- since 2018 Suncorp's partnership with Darcy Street has continued to help provide employment opportunities and offer valuable on-the-job training. For five years, the Partnership has evolved to fit the needs of vulnerable Australians offering work experience, and support services to people who have encountered barriers to entering further education or employment. The program provides a space where individuals looking to enter the Australian workforce can build confidence and a professional network while learning applicable skills to gain meaningful employment and thrive
- since 2019 the Bank has partnered with Australia Post to offer banking services through regional post offices through a service called Bank@Post. Through this initiative, the Bank has been able to increase the accessibility of banking services through 3,500 post offices across the nation, including 1,550 communities without a Bank branch<sup>1</sup>. In FY23 422,500 transactions were processed through Bank@Post
- since 2021, recognising the inaccessibility of branch and phone channels for persons not confident in English, the Bank has partnered with the <u>Australian Government Translating and Interpreting Service</u> (TIS) to expand the Bank's available languages and increase accessibility. TIS is offered through the personal contact centre, business banking contact centre, and branches. The service offers translation for more than 150 languages in total, the most popular being Mandarin, Arabic, and Vietnamese. In FY23, our customers used this service across 41 different languages
- in 2021, recognising the impact of vision impairment on accessibility of essential banking services, the Bank worked with its card providers Placard and its ATM network to incorporate tactile indicators on Bank EFTPOS and Visa Debit cards and braille onto ATMs.

Working in partnership with the Queensland University of Technology, in July 2022 the Bank added a gambling lock within the Suncorp App, and a toolkit to its suite of bank products and services which support customers experiencing gambling related harm. This includes voluntary blocks on cards being used for gambling (online or in person), a dedicated customer care team trained to help people experiencing gambling related harm, and training materials for all the Bank's customer facing teams. Since its launch the gambling lock has supported over 7,000 customers to manage

During FY23 Suncorp Bank partnered with Auslan Services to provide in-branch interpreter services for our customers who are hearing impaired to all 64 of its branches nationally (launching in August - FY24). When a customer at risk of vulnerability is identified due to a hearing impairment or being deaf, branch staff can complete a booking with an Auslan interpreter to assist with clear communication via a Teams meeting.

Suncorp Bank's partnership with Auslan Services for translation services showcases its commitment to inclusivity and accessibility. By providing translation services for hearing-impaired customers, Suncorp is breaking down communication barriers and creating a more inclusive banking experience.

This new partnership highlights the positive impact the Bank can have on society by embracing accessibility

#### Reference(s)/Link(s) to bank's full response/ relevant information

**Financial Basics Foundation** 

Darcu St

Suncorp invests in Australia Post partnership | Suncorp Group

Gambling Support Toolkit

Australia Post announces Bank@Post Suncorp partnership, Mirage 2019, https://www.miragenews.com/australia-post-announces-bank-post-suncorp-partnership/

### Principle 4: Stakeholders

We will proactively and responsibly consult, engage and partner with relevant stakeholders to achieve society's goals.

4.1 Stakeholder identification and consultation
Does your bank have a process to identify and regularly consult, engage, collaborate and partner with stakeholders (or stakeholder groups') you have identified as relevant in relation to the impact analysis and target setting process?
× Yes
☐ In progress
□ No
Please describe which stakeholders (or groups/types of stakeholders) you have identified, consulted, engaged, collaborated or partnered with for the purpose of implementing the Principles and improving your bank's impacts. This should include a high-level overview of how your bank has identified relevant stakeholders, what issues were addressed/results achieved and how they fed into the action planning process.

#### High-level summary of bank's response

Reference(s)/Link(s) to bank's full response/relevant information

In addition to the materiality assessments (Principle 1 above), and clients and customer engagements (Principle 3 above), the Bank conducted the following engagements with stakeholders in FY23.

### **Priority Area: Climate**

Due to the complexity of climate risk and the specialist knowledge required to address it, the Bank works with a wide range of stakeholders and various experts to understand the Bank's impact on climate, and the risks and opportunities the Bank is exposed to and support the impact analysis and target setting process.

#### Consultants and Experts

Emissions: In FY23 the Bank worked with external carbon consultants Pangolin Associates and NDEVR to understand and measure the Bank's operational and financed emissions, and with ERM to explore emissions reduction targets. Internally, experts from the business portfolios worked collaboratively to support the work delivered by consultants.

Climate Change Scenario Analysis: In FY23 the Bank engaged CoreLogic in partnership with Munich Re to conduct analysis on physical risk only for the residential and commercial real estate lending portfolios, and with Wollemi for a pilot covering physical and transition risk assessment for agribusiness.

In FY23, the Bank leveraged geospatial capability and improved the granularity of analysis from top-down postcode level assessment to bottom-up property level analysis. Additional capability is required to translate climate change impacts (both physical and transitional risk) to customer impacts such as credit losses (PDs and LGDs) and to better understand sector specific transition risk pathways and impacts to our customers This will be an ongoing focus for the Bank.

### **Industry Engagement**

The Bank continues to participate in the UN' Asia Pacific Climate Targets Support Programme and the Australian Banking Association (ABA) Climate Risk Working Groups, working with national and international banks to share the Bank's approach and challenges and learn from others.

### Priority Area: Financial Health

The Bank engaged with a wide range of stakeholders to support the impact analysis and target setting process for Financial Health.

### **Industry Engagement**

The Bank participates in the UN Financial Health Working Group, working with national and international banks to collectively develop an approach to measuring financial health and setting ambitious targets to improve it for our customers. This engagement was central to the development of the chosen financial health indicators and financial health target. The Bank continues to participate in this working group and relevant Australian Banking Association (ABA) working groups to share experience and support other banks focusing on financial health.

### Internal Stakeholders

To achieve the requirements set under the PRB Commitment to Financial Health and Inclusion, an internal working group was established to connect the various customer focus teams across the Bank and deliver on developing robust financial health measures and targets. This working group included representatives from each business portfolio as well as specialist teams from the Bank's customer care and hardship teams. This group met frequently to understand the guidance from the UN Financial Health Target Setting Working Group and implement the baseline measurements. The working group agreed on which measures should form a potential target and underpinning key performance indicators, and the framework for how those targets would be set (which was consulted with the UN lead for financial health and inclusion).

Such as regulators, investors, governments, suppliers, customers and clients, academia, civil society institutions, communities, representatives of indigenous population and non-profit organizations

### Principle 4: Stakeholders

We will proactively and responsibly consult, engage and partner with relevant stakeholders to achieve society's goals.

#### High-level summary of bank's response

Reference(s)/Link(s) to bank's full response/relevant information

The Financial Basics Foundation (FBF) are one of the Bank's two community partners and are a trusted non-profit organisation who provide free financial literacy resources to educators around Australia. FBF reviewed the Bank's baseline and targets and supported the Bank's choice of indicators and focused targets. Their commentary and perspective on the Australian context were incorporated into the target setting decision.

Founded by Ronni Kahn AO in 2004 after noticing the huge volume of food going to waste, OzHarvest quickly grew to become Australia's leading food rescue organisation. Oz Harvest's strategic focus on reducing GHG emissions from food waste and increasing financial wellbeing by reducing overconsumption has strong alignment with the Bank's own Create a Brighter Future Ambition, and in 2022 the Bank entered in to a 3-year strategic partnership with OzHarvest. OzHarvest were engaged during target setting to help the Bank develop reasonable action plans to achieve the targets, focused on food expenses which remains the largest spend category of the Bank's customers.

### **Emerging Priority Area: Nature**

As part of the deep dive into the emerging impact area of nature, when assessing nature impact and dependencies it became apparent that it was not feasible to complete this work in isolation, and a broad group of academics, advocates, customers, and stakeholders would be needed.

#### Consultants & Experts

The following people were engaged to assist:

### Natasha Cadenhead - PhD Candidate, University of Queensland School of the Environment

As part of her PhD "Investigating ways to incorporate biodiversity into decision making in Australian financial institutions", Natasha completed an industry placement with the Bank to better understand how banks perform financial decision making, and to assist the Bank in understanding its nature risks, opportunities, and impacts. Throughout her placement Natasha provided the Bank with essential ecological expertise and assisted in developing and implementing the models used throughout in the Banks FY23 Nature Portfolio Review Report.

### Liz O'Brien - CEO Queensland Trust for Nature

Dr Liz O'Brien is the Chief Executive Office of the Queensland Trust for Nature (QTFN). QTFN works to restore and safeguard spaces and adapt them to serve other valuable purposes; strategic carbon and biodiversity offsetting opportunities on productive agricultural land, immersive outdoor classrooms, thriving research sites and powerful community projects. The Bank engaged QTFN for review and input on the Nature Report.

#### Brendan Wintle - Professor, University of Melbourne School of Agriculture, Food and Ecosystem Sciences

Professor Brendan Wintle is a Professor in Conservation Ecology at The University of Melbourne, in the School of Ecosystem & Forest Sciences, recent Director of the National Environmental Science Program Threatened Species Recovery Hub, and one of the Principal Investigators in the Quantitative and Applied Ecology group (QAECO). He is a global leader in conservation ecology and ecological modelling research, specializing in dealing with uncertainty in environmental decisions, and measuring cost-effectiveness of conservation programs. Prof. Wintle was consulted regarding the methodology of the spatial analysis and supported the view that the chosen methods were appropriate for getting a high-level, first pass insight into the Bank's potential biodiversity impacts and dependencies

### Matthew Rees - Postdoctoral Research Fellow & Ecologist, CSIRO

 $Dr \ Matthew \ Rees \ is \ a \ Postdoctoral \ Research \ Fellow \ \& \ Ecologist \ at \ CSIRO \ working \ in \ Adaptive \ Biosecurity \ Management.$ He specializes in spatial modelling and forecasting for conservation and agricultural decision making. He has extensive experience in integrating various types and sources of data and using them to create statistical models to better understand species dynamics and interactions across a landscape, as well as our ability to monitor and manage these processes. Dr Rees was consulted regarding the methodology of the spatial analysis and supported the view that the chosen methods were appropriate for getting a high-level, first pass insight into the Bank's potential biodiversity impacts and dependencies.

### Industry

In FY23 the Bank participated in multiple Biodiversity & Healthy Ecosystems pilots with UNEP FI and the ABA and is a member of the UN's PRB Biodiversity Target Setting Working Group who intend to publish a PRB Biodiversity Target Setting Guidance Document.

### Internal Consultation

To gain meaningful insights from the analysis performed, it was crucial to engage with the various business areas across the Bank and gain their insight and views on the outcomes. Representatives from each business area including a selection of front-line teams reviewed the analysis and findings and helped shape the use case and next steps.

### University of Queensland Nature Luncheon

In collaboration with the University of Queensland, the Bank hosted a Nature luncheon attended by our material civil society stakeholders including retail and business customers, relevant NGOs, and academic specialists. This luncheon focused on the methodological approach of the Bank's nature Report and the materiality of nature to the bank. Stakeholders were broadly supportive of the work undertaken and the integrity of the methodology, supporting the use of government data to highlight areas of impact.

- It was raised that given the early adoption of this methodology by the Bank, there is no current precedent on which data sources to use, for example choosing between state and federal database. While there are merits to both approaches consideration must be given to the assumptions and limitations that are built into the outputs based on the decisions.
- It was highlighted that non-bank attendees misunderstood the relationship between banks and valuers. While most banks receive valuations from independent valuers through procurement relationships, many non-bank attendees assumed banks were valuing properties themselves. This was relevant when considering land value implications of carbon farming assuming that banks conducted valuations themselves rather than the common arrangement where banks receive valuations from valuers through a procurement relationship.

### Principle 5: Governance & Culture

We will implement our commitment to these Principles through effective governance and a culture of responsible banking.

#### 5.1 Governance Structure for Implementation of the Principles

Does your bank have a governance system in place that incorporates the PRB?

× Yes

☐ In progress

☐ No

Please describe the relevant governance structures, policies and procedures your bank has in place/is planning to put in place to manage significant positive and negative (potential) impacts and support the effective implementation of the Principles. This includes information about

- Which committee has responsibility over the sustainability strategy as well as targets approval and monitoring (including information about the highest level of governance the PRB is subjected to),
- Details about the chair of the committee and the process and frequency for the board having oversight of PRB implementation (including remedial action in the event of targets or milestones not being achieved or unexpected negative impacts being detected), as well as
- Remuneration practices linked to sustainability targets.

#### High-level summary of bank's response

Reference(s)/Link(s) to bank's full response/ relevant information

#### Governance of the Responsible Banking Commitment

The Bank's commitment to responsible banking is central to the strategy and management of the Bank.

Ultimate accountability for the responsible banking commitment including impact performance management and approval of targets.

### Sustainability & Diversity Committee

Suncorp Group's Sustainability & Diversity Committee (S&D) which is jointly chaired by the CEO & Managing Director and Group Executive for People, Culture, and Advocacy, meets every two months to oversight sustainability and diversity risks and opportunities and disclosure across the Group.

### ESG & Create a Brighter Future Committee

Implementation of the Responsible Banking Policy (RBP) is overseen by the ESG and Create a Brighter Future Committee (ECO), chaired by the Bank CEO. The program of work addresses ESG risks and opportunities for the Bank and provides regular updates to the Sustainability & Diversity Committee.

In FY23 the Bank further embedded the implementation of the principles into the business functions through the establishment of two new ESG Steering Committees in the Banks CFO (chaired by Bank CFO), and Business Banking functions (chaired by the EGM Business Banking), both responsible for the delivery of initiatives to address both ESG risks and opportunities. Numerous working groups have also been established, reporting into the Steering Committees to enable delivery of the program of work, and build capability across the Bank. Having measured impact in FY23, the focus of existing forums shifted to managing the performance of the strategy.

Disclosed in the Groups FY23 Climate-related Disclosure Report, the internal approval of the Bank's targets for Climate have been paused due to extraordinary circumstances related to the proposed sale of the Bank to ANZ. The risks and impacts of this decision were escalated in line with this governance structure, with visibility and discussion from a portfolio level up to the Suncorp Group Board. Given the expected completion period, and to allow sufficient time for ANZ board engagement and disclosure-related governance, an 18-month extension (until 31 March 2025) to implement the Principles has been granted by the Banking Board and the UNEP FI Secretariat. Monthly updates are provided to the ECO on the Banks progress, and bi-monthly updates are provided to the S&D Committee.

Remuneration practices for the Group are disclosed in the Annual Report.

Responsible Banking Policy

FY23 Climate-related Disclosure Report

Suncorp Annual Report (p68-94) Annual-Report-for-2022-23.PDF (suncorparoup.com.au)

### Principle 5: Governance & Culture

We will implement our commitment to these Principles through effective governance and a culture of responsible banking

#### 5.2 Promoting a culture of responsible banking:

Describe the initiatives and measures of your bank to foster a culture of responsible banking among its employees (e.g., capacity building, e-learning, sustainability trainings for client-facing roles, inclusion in remuneration structures and performance management and leadership communication, amongst others).

#### High-level summary of bank's response

The Bank began its journey initially focused on building a culture of responsible banking among all its employees from senior executives down to front line. The Bank brings the strategy to life through a weekly initiative called Feel Good Friday where the Bank shares positive stories to drive engagement and learnings. The Banks Feel Good Hub continues to provide learning resources for all employees to familiarise themselves with the pillars of sustainability and wellbeing underlying the ambition.

The Bank CEO hosts a monthly webcast, inviting guest speakers from across the business to discuss responsible banking in their role promoting engagement and collaboration across different functions and teams.

Each month all Suncorp Group employees are invited to participate in a monthly Loop survey, which monitors the perception and experience of people across Engagement, Health & Wellbeing, and Diversity & Inclusion drivers. Monthly insights provide leadership teams opportunities to continuously improve on strategic communication and to take accountability on fostering the desired culture in Bank.

a Brighter Future strategy, in December 2022 the ESG 101 Webinar was launched, hosted by the Bank CEO, EM ESG and EGM Everyday Banking. The webinar provided foundational capability on the PRB commitment and explored common terminology and the drivers for taking action on the Bank's priority impact areas of Climate and Financial Wellbeing. It also introduces all Bank new starters to the Ambition and strategic priorities such as ESG, along with a Welcome CEO email. The key messages from this email have also been integrated into Day 1 onboarding of our frontline teams.

The Bank has also equipped employees in its Risk teams through training programs delivered by both internal and external experts. In FY23, the Magnify program was delivered, which provided the entire Business Banking team with a week of face-to-face training, including ESG fundamentals and how they can drive positive impact and identify risks in the Bank's priority impact areas.

 $Throughout\ FY23,\ the\ Bank\ ESG\ team\ delivered\ targeted\ capability\ on\ topics\ including\ CPG229,\ Climate\ Risk,\ ISSB,$ Net-Zero Transition Planning for Scope 3 Financed Emissions, Carbon Farming, Climate Active and Carbon Offsetting, managing green-washing risk and nature and biodiversity. Capability was also delivered by Bank ESG to the risk and product teams to embed the Responsible Banking Policy, and Bank Sensitive Sector Standards.

As a member of the United Nations Principles of Responsible Banking (UN PRB) Academy Curriculum Committee, the Bank offered UN PRB Academy courses to its people through the Chartered Banker Institute which launched in October 2022. The Bank is excited to offer its people the opportunity to learn and develop by undertaking the Academy program, and our first cohort of employees has completed the Customers and Clients module.

Through the Banks partnership with OzHarvest, each year the Bank will fund 500 staff across Australia to undertake Cooking for a Cause. Cooking for a Cause is a practical based class delivered by OzHarvest, with the objective for participants to learn more about zero-waste cooking skills, while transforming rescued ingredients into gourmet meals with the aim to support vulnerable communities.

The Group has a number of offerings that were delivered in FY23 to further embed our well and inclusive culture. Online learning was delivered to leaders across the Bank around managing team wellbeing, psychological safety, managing burnout and financial literacy through partnership with Blackdog Institute and the Employee Council. Modules supporting our frontline and specialist care teams in navigating customer vulnerability and aggression are delivered through onboarding and on an as-needs basis.

The Group has also partnered with organisations including Mind Tribes and Diversity Council to deliver online workshops, in which Bank employees are able to participate, uplifting capability across a range of topics such as age and cultural diversity, and indigenous reconciliation awareness. The Bank also had 20 high potential females participate in Career Resiliency programs. Our partnership with Career Trackers has also supported building our pipeline of First Nations talent.

#### Reference(s)/Link(s) to bank's full response/ relevant information

Responsible Banking Policy: https:// www.suncorpgroup.com.au/uploads/ Responsible-Banking-Policy-July-2023.

FY23 Climate-related Disclosure Report https://www.suncorpgroup.com. au/uploads/FY23-Climate-related-Disclosure-Report.PDF

<u>Prioritising wellbeing in the workplace:</u> Suncorp Group announces partnership with Black Dog Institute | Suncorp Group

Diversity and inclusion | Suncorp Group Suncorp Group

### Principle 5: Governance & Culture

We will implement our commitment to these Principles through effective governance and a culture of responsible banking

#### 5.3 Policies and due diligence processes

Does your bank have policies in place that address environmental and social risks within your portfolio? Please describe.

Please describe what due diligence processes your bank has installed to identify and manage environmental and social risks associated with your portfolio. This can include aspects such as identification of significant/salient risks, environmental and social risks mitigation and definition of action plans, monitoring and reporting on risks and any existing grievance mechanism, as well as the governance structures you have in place to oversee these risks.

#### High-level summary of bank's response

The Suncorp Board-approved Corporate Sustainability Principles continue to guide the Groups approach to governance and risk management, strategy and policy development, business decision making, and disclosure of non-financial

In FY23 the Suncorp Financial Accountability Regime (FAR) Project recommended the Bank CEO be accountable for the operational aspects of ESG, shifting accountability from the Group Executive People, Culture, & Advocacy (GE PC&A). The ECO Committee as well as the Sustainability & Diversity Committee and Board Risk Committee endorsed, and the Suncorp Group Board approved the separation of the Responsible Banking & Insurance Policy (RBIP) and Sensitive Sector Standard (SSS) into the Responsible Banking Policy (RBP) and Bank Sensitive Sector Standard (BSSS).

These Policies establish the Bank's approach to the management of environmental, social, and governance (ESG) risks and opportunities across the Bank's business, including the implementation of PRB. It seeks to align Suncorp Bank's institutional conduct and business practices with positive customer, environmental, and social outcomes now and into

In line with the Responsible Banking Policy, the Bank's ECO oversees the management of ESG risks and opportunities. In FY23 the Committee endorsed the Create a Brighter Future program which documents the Bank's focus on product innovation, customer engagement, and enhanced ESG risk management. This program also explicitly documents the Bank's ongoing commitments to UN PRB target setting and action plan monitoring. During FY23 the Committee discussed the insights and recommendations from the annual ESG Portfolio Review, and noted any instances of existing or emerging risks, escalating material issues to the S&D Committee when required.

The Bank manages risk using the three lines of defence model. The above activities performed by the first line of defence are overseen by the operationally independent second line of defence who provided challenge and guided improvement in the execution and governance of the UN PRBs. Internal and External Audit are the Third Line of Defence who provide independent Reporting to the Board Audit Committee and Board Risk Committee.

In FY23, the risk and control environment were uplifted for a number of Bank functions to increase clarity and understanding of the management of ESG risks. Outputs included internally publishing the Carbon Neutral Guideline, ESG Portfolio Review & PRB Self-Assessment Guideline, Green-washing Self-Assessment template, ESG QA Guideline,  $and \ ESG \ Advice \ engagement \ process \ to \ both \ standardise \ and \ formalise \ the \ day-to-day \ management \ of \ ESG \ risks \ and$ 

To support the Bank's Climate Active Certification, activities are guided by the Suncorp Group Carbon Offsetting Standard, Climate Active Licence Agreement and Climate Active Carbon Neutral Standards.

Reference(s)/Link(s) to bank's full response/ relevant information

Responsible Bankina Policu: https:// www.suncorpgroup.com.au/uploads/ Responsible-Banking-Policy-July-2023.

Selt-assessment summary:				
Does the CEO or other C-suite officers have regular oversight over the implementation of the Principles through the bank's governance system?				
X Yes   No				
Does the governance system entail structures to oversee PRB implementation (e.g., incl. impact analysis and target setting, actions to achieve these targets and processes of remedial action in the event targets/milestones are not achieved or unexpected neg. impacts are detected)?				
	x Yes	☐ No		
Does your bank have measures in place to promote a culture of sustainability among employees (as described in 5.2)?				
	× Yes	☐ No	☐ In Progress	

Applicable examples of types of policies are exclusion policies for certain sectors/activities; zero-deforestation policies; zero-tolerance policies; gender-related policies; social due diligence policies; stakeholder engagement policies; whistle-blower policies etc., or any applicable national guidelines related to social risks.

Principle 6: Transparency & Accountability			
We will periodically review our individual and collective implementation of these Principles and be transparent about and accountable for our positive and negative impacts and our contribution to society's goals.			
6.1 Assurance  Has this publicly disclosed information on your PRB commitments been assured by an independent assurer?  Yes Partially No If applicable, please include the link or description of the assurance statement.			
	eference(s)/ Link(s) to bank's full esponse/ relevant information		
In line with the requirements of the UN Principles for Responsible Banking, this Report has been externally assured by KPMG to ensure alignment with the principles and accuracy of disclosed information. Assurance has focused on impact analysis/emissions baseline, target setting, target implementation and monitoring, and governance for implementing the principles. KPMG's limited assurance letter is attached as an appendix to this Report.			
6.2 Reporting on other frameworks  Does your bank disclose sustainability information in any of the listed below standards and frameworks?   ☐ GRI ☐ SASB ☐ CDP ☐ IFRS Sustainability Disclosure Standards (to be published) ☐ TCFD ☐ Other:			
	eference(s)/Link(s) to bank's full esponse/relevant information		
	Y23-Suncorp-Group-Sustainability- ata-Pack.xlsx (live.com)		

For example, outlining plans for increasing the scope by including areas that have not yet been covered, or planned steps in terms of portfolio composition, context, and performance measurement.

<sup>2.</sup> For example, outlining plans for baseline measurement, developing targets for (more) impact areas, setting interim targets, developing action plans etc.

### Principle 6: Transparency & Accountability

We will periodically review our individual and collective implementation of these Principles and be transparent about and accountable for our positive and negative impacts and our contribution to society's goals.

#### 6.3 Outlook

What are the next steps your bank will undertake in next 12 month-Reporting period (particularly on impact analysis¹ target setting² and governance structure for implementing the PRB)? Please describe briefly.

#### High-level summaru of bank's response

The Bank was unable to publish its fourth UN PRB self-assessment, inclusive of Suncorp Group approved targets on 9 August 2023, due to extenuating circumstances of the proposed sale of the Bank to ANZ, announced on 18 July 2022. This sale is subject to approvals of the relevant competition authorities, the Queensland State Government, and the

Since this announcement, on 4 August 2023 the Australian Competition and Consumer Commission (ACCC) denied authorisation of the sale of the Bank to ANZ. Subsequently, Suncorp Group and ANZ have applied to the Australian Competition Tribunal (Tribunal) for a review of the ACCC's decision. This application was lodged on 25 August 2023, with an outcome currently expected by 20 February 2024, noting the potential for a 30-day extension by the Tribunal.

In addition to the approval from the Tribunal, the sale remains subject to additional pre-completion requirements. including the amendment of the (Queensland) State Financial Institutions and Metway Merger Act, as well as approval from the Federal Treasurer under the Financial Sector (Shareholdings) Act. Should all approvals be received, completion is expected around the middle of the 2024 calendar year. Suncorp Group remains fully committed to the Bank while the approval process continues.

Given the expected completion period, and to allow sufficient time for ANZ board engagement and disclosure-related governance, an 18-month extension (until 31 March 2025) to implement the Principles has been granted by the Banking Board and the UNEP FI Secretariat.

The Bank remains committed to the implementation of the Principles and appreciates the ongoing support and collaboration with UNEP FI. The Banks priorities for FY24 include:

### Principle 1 - Alignment

- Continuing to deliver on the 'Create a Brighter Future' ambition and strategy, which is underpinned by the two priority impact areas of Climate and Financial Health.
- Developing a bank wide 'Emissions Reduction Strategy' to address Scope 1, 2 and 3 (Operational) emissions as part of the Climate Active Certification.
- Continuing to deliver on the actions outlined in the Suncorp Group Climate Change Action Plan, and Financial Inclusion Action Plan.

### Principle 2 - Impact & Target Setting

- Delivering the FY24 ESG Portfolio Review, as required by the Responsible Banking Policy.
- Continuing to improve the data quality of our impact measurement of Operational Emissions, and Scope 3 (Financed Emissions) for the FY23 baseline, to support future target setting activities.
- Continuing to improve our ability to understand and measure our customers financial health.
- Building capability across the business functions to understand and embed performance management and action planning to achieve targets in our priority impact areas.

### Principle 3 - Clients & Customers

- Increasing engagement with our customers in the Agribusiness portfolio to partner and share learnings on how the
- Continuing engagement with our supply chain to explore risks and opportunities and drive positive impact.
- Continuing product innovation to support our customers to reduce their impact.
- Continuing to drive positive impact through our strategic partnerships.

### Principle 4 - Stakeholders

- Continuing to work with industry specialists and customer representatives through industry working groups domestically, and globally via UN PRB.
- Establishing a Community Advisory Group to include academics, NGOs, and community representatives to provide input, review, and recommendations for the Bank's continued action to drive positive impact.

### Principle 5 - Governance & Culture

- Continued monitoring and oversight of risks, opportunities, and strategic delivery through our established
- Further uplift and embedment of the management of ESG risks and opportunities through Group and Bank risk frameworks, including uplifting the Banks alignment to APRA CPG229.
- Continuing to provide our people with opportunities to build their capability through the delivery of 'ESG Learning Pathways' including the UN PRB Academy, and through activation of our partnership with Oz Harvest.
- Continue sharing knowledge, stories, and engagement opportunities through Feel Good Fridays.

### Principle 6 - Transparency & Accountability

Continued engagement with the UN PRB Implementation Team through disclosure, participation in working groups, and direct engagement from the Banks C-Suite.

Reference(s)/Link(s) to bank's full response/ relevant information

ACCC denies authorisation for ANZ to acquire Suncorp Bank | ACCC

https://www.competitiontribunal. gov.au/ data/assets/PDF file/0020/111863/230829-Directions.PDF

### Principle 6: Transparency & Accountability

We will periodically review our individual and collective implementation of these Principles and be transparent about and accountable for our positive and negative impacts and our contribution to society's goals.

6.4 Challenges  Here is a short section to find out about challenges your bank is possibly facing regarding the implementation of the Principles for Responsible Banking. Your feedback will be helpful to contextualise the collective progress of PRB signatory banks. What challenges have you prioritized to address when implementing the Principles for Responsible Banking? Please choose what you consider the top three challenges your bank has prioritized to address in the last 12 months (optional question).	
	Customer engagement
Gaining or maintaining momentum in the bank	Stakeholder engagement
Getting started: where to start and what to focus on in the beginning.	□ Data availability
Conducting an impact analysis	☑ Data quality
Assessing negative environmental and social impacts	Access to resources
Choosing the right performance measurement methodology/ies	Reporting
■ Setting targets	Assurance
Other:	Prioritizing actions internally
If desired, you can elaborate on challenges and how you are tackling these:	
In measuring the Bank's impact across the priority areas, several challenges were experienced which will be considered over the next year to improve identification, measurement, target setting, action planning and disclosure (to name a few):	
— Data quality, quantity, and accessibility are one of the most pressing challenges to measuring both climate risks (physical and transitional) and operational and financed emissions. The type of data required to estimate both climate risks and emissions with precision has either previously not been required or has not been used in that format previously. For emissions this necessitated the use of proxies and assumptions when measuring emissions levels, specifically for more complex sources such as refrigerants, household energy use, or cattle emissions. This data was also often difficult to access at scale in a format that could be readily analysed, requiring either manual workarounds or new data extracts to be developed.	
— The lack of a global methodology to estimate emissions remains a challenge to producing comparable emissions Reporting. Not all organisations globally Report under the PCAF methodology, meaning financed emissions are not comparable across all organisations. Similarly for operational emissions, while the Carbon Neutral Standard is widespread in Australia, it is not consistently applied by non certified organisations and is not interchangeable with international models. While the Bank has chosen its methodologies for their consistency and robustness, there is continued advocacy required to increase their adoption and ensure their continued evolution does not compromise comparability.	
<ul> <li>Data quantity and quality was also a challenge limiting the Bank's ability to segment the financial health measures to specific priority/vulnerable customer groups including First Nations' people, persons who require translation services, or specific socio-economic statuses. This meant indicators were broader in scope and insights were less targeted. The Bank will continue to explore opportunities to improve data quality to support customer initiatives.</li> </ul>	
<ul> <li>Internal capability will continue to be a focus of the Bank to ensure that teams understand not only how to measure financial health and emissions and set targets, but also how to design and execute action plans which achieve those targets.</li> </ul>	
Navigating the increasing focus on green-washing was a challenge for the Bank in communicating our initiatives and progress. The Bank will work closely	

How to avoid green-washing when offering or promoting sustainability-related products | ASIC

with internal stakeholders, and be guided by regulatory guidance that has been published in FY23 by ASIC and the ACCC:

Environmental and sustainability claims - Draft guidance for business | ACCC

# Further Information on Suncorp Group

Suncorp's 2022-23 Annual Report is available on the Suncorp Group website at suncorpgroup.com.au/investors/reports.

You can obtain a copy on request by contacting our share registry, Link Market Services (see the shareholder enquiries contact details below).

To see more, go online suncorpgroup.com.au

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