



Environment Policy

nbn: Commercial
6 February 2024
Owner: Sustainability (People & Culture)





Policy Overview

Introduction

This policy outlines [nbn](#)'s commitment to help protect and restore the [environment](#), reduce our carbon emissions and other environmental impacts, and adapt our network and business to ensure it remains resilient to the effects of climate change.

Why this is a policy

This policy supports [nbn](#)'s approach to corporate governance, satisfying its obligations as a [Government Business Enterprise](#), and its commitment to maintaining public trust in [nbn](#).

Who does it apply to?

This policy applies to [nbn employees](#), [contractors](#), and [Directors](#).

Related policies and documentation

- [nbn Statement of Expectations](#)
- [nbn Board Charter](#)
- [Code of Conduct](#)
- [nbn@ Supplier Code of Conduct](#)
- [Enterprise Risk & Resilience Management Policy](#)
- [Procurement Policy](#)
- [Enterprise Compliance Policy](#)

Key Takeaways

- Through its [Sustainability Approach](#), [nbn](#) is committed to optimising long-term environmental value for our people, customers, communities, partners, country, and planet.
- [nbn](#) aims to build a resource-efficient, climate-resilient network and business while also helping to protect and restore the environment.
- [nbn](#)'s [Environmental Management System](#) provides the framework for protecting and restoring the environment (including places of cultural heritage significance).



1 Purpose

This policy outlines [nbn's](#) commitments related to the environment and climate change, to guide our business activities and decision-making in line with those commitments and inform external stakeholders of our position.

Being environmentally responsible and helping to minimise climate change is an integral part of being a sustainable business. Through its [Sustainability Approach](#), [nbn](#) is committed to helping to enable long-term environmental value for our people, customers, communities, partners, country, and planet.

We aim to create and protect value by building a resource-efficient, climate-resilient network and business while also protecting and restoring the environment, and helping our customers address their own environmental challenges by leveraging the digital connectivity of our network.

The principles expressed in this policy apply to all activities, products, and services that [nbn](#) controls or can influence through its external supplier organisations.

2 Scope

This policy applies to all [nbn employees](#), [contractors](#), and [Directors](#).

3 Policy

3.1 nbn's objectives

We are committed to reducing [nbn's](#) environmental impacts and dependencies and helping to protect and restore the environment in which we operate.

To achieve this aim, [nbn](#):

- Undertakes appropriate due diligence to identify and conserve areas of environmental significance, including natural ecosystems and places of [heritage value](#);
- Deploys and operates the network in a responsible manner which mitigates pollution and reduces our overall environmental footprint; and
- Applies circular economy and environmental design principles to our products and services to minimise the use of natural resources, improves reuse and recycling, and reduces the generation of waste.

We are also committed to reducing carbon emissions, supporting the transition to [net zero](#) emissions, and improving the network's resilience to climate change risks in line with the [nbn Statement of Expectations](#).

To achieve this aim, [nbn](#):

- Has developed, implemented, and maintains a Climate Change Transition Plan that outlines how [nbn's](#) business model is aligned with our climate change commitment;
- Reduces the carbon emissions of our activities, products, and services by improving energy efficiency, using renewable energy sources where these are reasonably available, and influencing our suppliers and customers to reduce emissions along our value chain;
- Has set near-term and long-term reduction targets in alignment with the latest climate science for our scope 1, 2 and 3 carbon emissions, and delivers reductions consistent with meeting or exceeding the Government's commitment to net zero emissions by 2050; and
- Assesses its climate change risks and deploys measures to adapt and increase the networks resilience and improve our disaster readiness and response capability.



3.2 How nbn helps to protect the environment

nbn's [Environmental Management System](#) provides the framework for achieving these objectives. Through implementation of the [EMS](#), nbn is committed to:

- Developing strong leadership, clear operational accountability and an organisational culture that promotes responsible environmental management and supports our environmental objectives;
- Integrating environmental considerations into our business planning and decision making, to ensure environmental management is part of everyday practices and behaviours;
- Proactively identifying the significant environmental risks and opportunities associated with our activities, products, and services, and implementing effective controls to prevent or reduce impacts;
- Ensuring compliance with applicable environmental laws, regulations, and voluntary commitments;
- Defining environmental objectives and targets with supporting action plans, to set clear expectations of our people, and driving continuous improvement in our performance over time;
- Engaging with external supplier organisations and working with them to reduce the environmental impact of our products and services in the value chain;
- Collaborating with regulators, government entities, academic institutions, industry groups, and other stakeholders to accelerate research and innovation that addresses shared and complex environmental challenges;

- Promoting our network's digital services as a way for our customers to identify technology solutions that can address their environment challenges and create positive environmental value for our society;
- Providing appropriate training and information to our employees, external supplier organisations and customers so they have the knowledge and skills to deliver on our environmental objectives;
- Monitoring and evaluating our environmental performance, allowing us to make evidence-based decisions and transparently report progress to our stakeholders consistent with regulator and industry standards;
- Implementing a risk-based assurance program that assesses compliance and effectiveness of risk controls and the EMS; and
- Responding to and investigating environmental non-conformances or other issues in a timely fashion and implementing any necessary actions to mitigate adverse impacts and prevent reoccurrence.

To ensure that the EMS remains current and effective, nbn is committed to maintaining certification to ISO14001 (*Environmental management systems*), regularly evaluating its suitability, and implementing opportunities for continuous improvement.

3.3 What this means for you

Everyone at nbn has a role to play in supporting nbn's environment strategy and objectives.

It is your responsibility to ensure that environmental considerations are built into your business planning and decision making, in line with the guidance provided in the EMS and nbn's approach to risk management, and to work with the Sustainability team to adjust your operational processes and procedures where required.



4 Roles and responsibilities

Role	Responsibilities
Employees and contractors	<p>nbn employees and contractors have a responsibility to:</p> <ul style="list-style-type: none">• Perform their work in compliance with the EMS, as well as with applicable environmental legislative and regulatory requirements;• Identify and rectify issues in relation to negative environmental impacts, and implement opportunities where feasible to better protect and restore the environment;• Report actual or possible negative environmental impacts caused by nbn operations to their manager; and• Complete mandatory training in relation to environmental requirements.
Managers	<p>nbn managers have the same responsibilities as employees and contractors, plus the following additional obligations to:</p> <ul style="list-style-type: none">• Integrate environmental considerations into business processes and decision making and promote continued improvement in environmental performance;• Ensure that their team members are aware of and comply with the requirements of the EMS, as well as applicable environmental legislative and regulatory requirements;• Ensure that team members are provided with necessary training, information, supervision, and equipment to perform their jobs without risk to the environment; and• Monitor and improve compliance with environment requirements and processes in their area of responsibility.
Sustainability Team	<p>The Sustainability Team is responsible for:</p> <ul style="list-style-type: none">• Providing guidance and training for employees and contractors to ensure that nbn's environment aims are supported;• Ensuring that there is subject-matter expertise support to ensure that nbn is able to comply with its statutory and regulatory obligations in relation to the environment; and• Regularly reviewing the EMS for suitability and to identify and implement improvements.



Role	Responsibilities
Land Access & Stakeholder Engagement Team	The Land Access & Stakeholder Engagement Team is responsible for: <ul style="list-style-type: none">Managing due diligence processes to ensure areas of environment and heritage significance are identified, and harm to them is avoided or minimised; andManaging processes to ensure required environment and heritage statutory approvals are obtained, and any associated requirements are complied with.
Board	The key responsibilities of Board are set out in its charter, which is available on the nbn website .

5 Contact details

6 Policy approval

Policy approver	Board
Version	1.0
Date approved	6 February 2024
Review cadence	Biennial
Next review date	March 2026

7 Version history overview

Additional detail regarding previous versions of this policy may be obtained from the Enterprise Compliance team. The policy will be periodically reviewed to check that it is operating effectively and whether any changes are required.

Version	Date	Summary of change
1.0	6/2/2024	Initial approval of policy, following the relocation of health and safety aspects of the Health, Safety & Environment Policy into the Safety & Wellbeing Policy.



8 Definitions

Board means the **nbn** Board of Directors.

Board Committee includes the [ARC](#) and [PRC](#).

CEO means the Chief Executive Officer.

contractor/s includes [temporary staff augmentation](#) and [extended workers](#).

Director/s means a member of the **nbn** Board of Directors.

employee/s means permanent and maximum term employee/s of **nbn**.

environment means (as defined by the *Environment Protection and Biodiversity Conservation Act 1999* (Cth)): (a) ecosystems and their constituent parts, including people and communities; (b) natural and physical resources; (c) the qualities and characteristics of locations, places, and areas; (d) heritage values of places; (e) the social, economic, and cultural aspects of (a), (b), (c) or (d).

Environmental Management System (EMS) means **nbn**'s set of interrelated processes that provides a structured approach to managing the environmental impacts of its activities, with the goal of fulfilling environmental compliance obligations, addressing environmental risks and opportunities, and continuously improving environmental performance.

extended worker or **extended workforce** (EW) means a non-employee (or multiple non-employees) performing work defined as such under the Recruitment & Employee Development Policy. The resource need is typically Outcome Based. **nbn** agrees with a third party to deliver an identified business outcome or project under a [statement of work](#). EWs do not count as headcount within a business unit's Workforce Plan Budget (a consulting budget is required) and are managed by the **nbn** Procurement Team.

Government Business Enterprise means a commercial company owned by the Australian Government, which is wholly-owned by Government

Ministers, which, with their Departments, set expectations as to how the entity operates.

heritage value of a place means (as defined by the *Environment Protection and Biodiversity Conservation Act 1999* (Cth)) a place's natural and cultural environment having aesthetic, historic, scientific, or social significance, or other significance, for current and future generations of Australians.

Key Stakeholders mean **nbn** teams that are responsible for content in a policy that is owned by another team. Teams identified as Key Stakeholders must be consulted on and may also trigger changes to the policy in question.

net zero means (as defined by the *Science Based Targets initiative (SBTi) Corporate Net Zero Standard*) setting corporate net-zero targets aligned with meeting societal climate goals by (a) reducing scope 1, 2 and 3 emissions to zero or a residual level consistent with reaching net-zero emissions at the global or sector level in eligible 1.5°C scenarios or sector pathways, and (b) neutralizing any residual emissions at the net-zero target date – and any GHG emissions released into the atmosphere thereafter.

nbn is **nbn** co limited (ABN 86 136 533 741) and its related entities.

policies mean **nbn**'s corporate policies, which focus on enterprise-wide principles and set out key roles and responsibilities. These documents are administered by Enterprise Compliance and are approved by either the [CEO](#), a [Board Committee](#), or the Board.

PRC means the People & Remuneration Committee of the Board.

statement of work (SOW) means an agreement between **nbn** and a supplier that sets out the approved outcome or project scope with milestones and deliverables and what is expected of the supplier to enable the supplier to complete the work on schedule, within budget, and to the required standard of quality.

Sustainability Approach means how **nbn** embeds sustainability in all of its activities to support our purpose to lift the digital capability of Australia, enabling long-term social, economic, and environmental value for our



people, customers, communities, partners, country, and planet.

temporary staff augmentation (TSA) means a non-employee performing work defined as such under the Recruitment & Employee Development Policy. The resource need is typically Role Based. **nbn** agrees with a third party to payroll the non-employee and provide the services of the TSA to perform an identified, temporary

role. TSAs count as headcount within a business unit's Workforce Plan Budget and are recruited by the nbn Talent Acquisition Team and are managed by **nbn** People Leaders.

“**we**” refers to **nbn**.

WE ARE PURPOSE DRIVEN

Through living our values, we fulfil our purpose of lifting the digital capability of Australia

