



ENVIRONMENT POLICY

nbn-COMMERCIAL
12 May 2026
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?

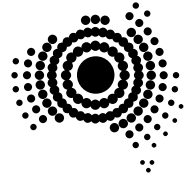
This policy applies to nbn [employees](#), [contractors](#), and [Directors](#).

RELATED POLICIES & DOCUMENTATION

- [nbn Statement of Expectations](#)
- [nbn Board Charter](#)
- [People, Safety and Sustainability Committee](#)
- [Code of Conduct](#)
- [nbn® Supplier Code of Conduct](#)
- Enterprise Risk Management Policy
- Procurement Policy
- Enterprise Compliance Policy

KEY TAKEAWAYS

- Through its [Sustainability Approach](#), nbn is committed to enabling environmental value for our customers and the nation, both now and in the future.
- nbn aims to build a resource-efficient, climate-resilient network and business while also helping to protect and restore the environment.
- nbn's [Environment Management System](#) provides the framework for protecting and restoring the environment (including places of cultural heritage significance).



1 PURPOSE

The purpose of this policy is to outline 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 enabling environmental value for our customers and the nation, both now and in the future.

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 prevents 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, improve reuse and recycling, and reduce the generation of waste.

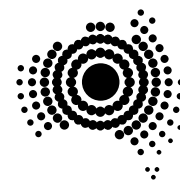
We are also committed to reducing carbon emissions, supporting the transition to [net zero](#) emissions, and improving the network's resilience to climate change risks in line with the nbn [Statement of Expectations](#).

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 network resilience and improve our disaster readiness and response capability.

3.2 HOW NBN HELPS TO PROTECT THE ENVIRONMENT

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



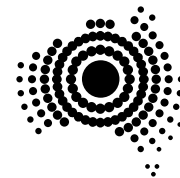
- Developing strong leadership, clear operational accountability and an organisational culture that promotes responsible environmental management and supports our environmental objectives;
- Integrating environmental considerations into our business planning and decision making, to ensure environmental 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, including mandatory environmental and climate-related reporting;
- 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 aligning to ISO14001 (Environmental Management Systems), regularly evaluating its suitability, and implementing opportunities for continuous improvement.

3.3 WHAT THIS MEANS FOR YOU

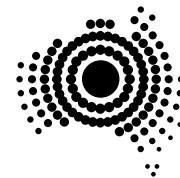
Everyone at nbn has a role to play in supporting nbn's environment strategy and objectives.

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 performance 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">• Maintaining the EMS and provide relevant documentation, guidance and training for employees and contractors to ensure that nbn's environment aims are supported;• Providing subject-matter expertise support to ensure that nbn is able to comply with its statutory and regulatory obligations in relation to the environment;• Evaluating nbn performance and compliance with environmental requirements, and regularly reviewing the EMS for suitability and to implement improvements; and• Provide ExCo and Board oversight of environmental performance, and coordinate the preparation and publication of external environmental disclosures and reports. |



| ROLE | RESPONSIBILITIES |
|--|--|
| Land Access & Stakeholder Engagement Team | <p>The Land Access & Stakeholder Engagement Team is responsible for:</p> <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; and• Managing processes to ensure required environment and heritage statutory approvals are obtained, and any associated requirements are complied with. |
| ExCo members | <p>ExCo have a responsibility to provide management oversight and monitoring for:</p> <ul style="list-style-type: none">• The sustainability and environment approach at nbn on behalf of the Board. Specifically, this includes oversight of climate change risks and opportunities; and• The effectiveness of nbn’s sustainability governance framework, strategy and actions. |
| Board and People, Safety and Sustainability Committee | <ul style="list-style-type: none">• The key responsibilities of Board are set out in its charter available on the nbn website.• The key responsibilities of the People, Safety and Sustainability Committee of the board are set out in its charter available on the nbn website. |

5 CONTACT DETAILS

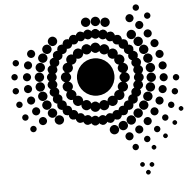
6 POLICY APPROVAL

| | |
|-------------------------|---|
| Policy approver | People, Safety and Sustainability Committee |
| Revision | 2.0 |
| Date approved | 12 May 2026 |
| Review cadence | Biennial |
| Next review date | May 2028 |

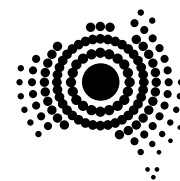
7 VERSION HISTORY OVERVIEW

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 |
|----------------|-------------|--------------------------|
|----------------|-------------|--------------------------|



| | | |
|-----|------------|--|
| 2.0 | 12/05/2026 | Amended to reflect governance changes for sustainability at nbn and align to nbn's sustainability strategy. |
| 1.0 | 06/02/2024 | Initial approval of policy, following the relocation of health and safety aspects of the Health, Safety & Environment Policy into the Safety & Wellbeing Policy. |



9 DEFINITIONS

Board means the nbn Board of Directors.

Board Committee means [ARC](#), PSS, or another Committee of the Board.

CEO means the Chief Executive Officer.

contractors means an [extended worker](#).

Directors means a member of the nbn Board of Directors.

EGM means Executive General Manager.

employees means permanent and maximum term employees 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.

ExCo means nbn's Executive Committee, which consists of the heads of each business unit.

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.

Function head means the ExCo Member, GM or EGM of a business function.

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.

GM means General Manager.

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.

manager refers to the person an employee or contractor reports to.

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

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.

people leader means nbn [managers](#) who have direct teams and supervisory responsibilities.

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.

PSSC means the People, Safety & Sustainability Committee of the Board.



staff means all workplace participants at nbn, including all employees, contractors, managers, and any individuals or groups undertaking activity for or on behalf of nbn.

Sustainability Approach means how nbn embeds sustainability in all of its activities to support our purpose

to lift the digital capability of Australia, enabling social, economic, and environmental value for our customers and the nation, now and in the future.

“**we**” refers to nbn.

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