DECISION USEFUL DIAGNOSIS 011 — FY2026

Coles Group Limited (ASX: COL)

Remained not decision-useful for retail investors and the public, because net zero and the FY30 target reach Scope 1 and 2, about 6% of the footprint

REPORTING PERIOD	REVIEW DATE	PROTOCOL	SECTOR
FY2026	1 September 2026	Climate Disclosure Review Rules v15.23	Retail Trade

8 / 15 overall score · sum of the five audience ratings, for ranking



4 of 19 load-bearing criteria not met. The score saturates, because a row reaches 1 on two failures, or on one failure of a kind that reads a row down on its own, and cannot go lower; so the criterion count is reported beside it. The two answer different questions: the score is how many audiences can use the disclosure, the count is how many things are wrong.

This review tests Coles' publicly available climate disclosure against CRI's Climate Disclosure Review Rules, which use the CRI Net Zero Standard as the reference for a credible claim together with AASB S2 Climate-related Disclosures. It reflects the information available at the review date, states what the evidence supports, what it does not, and what would resolve each open point, and says "cannot verify", not "no issue", where evidence is missing. It is general information, not legal, financial or investment advice, and not an audit or an assurance engagement. It does not allege illegality, misconduct, greenwashing or dishonesty. Organisations may contact CRI at robc@noco2.com.au to identify an error, provide relevant public information or request review of updated disclosures. See Important information at the end of this report.

Decision-usefulness at a glance

Company	Carbon / supply-chain accounting	Institutional investors	Consumer / retail investors	Consumers & public	Regulators
Coles Group Limited (ASX: COL)	2	2	1	1	2

How to read this report

HOW TO READ THE RATINGS

Each audience gets its own rating.

The same disclosure can be reliable for one reader and misleading for another, so we rate decision-usefulness **separately for each audience** on the three-point scale below. There is no single pass/fail verdict — decision-usefulness is a judgement about each audience, not the report as a whole.

1 **Not decision-useful**
Cannot be relied on in its current form for this reader's decision.

2 **Mostly decision useful**
Usable, with one material limitation the reader must work around.

3 **Decision-useful**
Can be relied on. A deliberately high bar.

The bar below adds the five audience ratings into an **overall score out of 15**. It is used only to rank reports against one another — it carries **no band and no verdict label**. Its colour simply reflects the mix of the five ratings: the more red, the more audiences the disclosure falls short for.



8 / 15
overall score · for ranking only

This review assesses whether the company's climate disclosure is *decision-useful*: whether a reader can actually rely on it for the decision they are making. Because a disclosure that is sound for one reader can mislead another, we score decision-usefulness **separately for each of the main audiences** that rely on climate disclosure. The audiences, and what each needs from the disclosure, are the same across all our reviews:

AUDIENCE	WHAT THEY RELY ON THE DISCLOSURE FOR
Carbon / supply-chain emissions accounting	Lifting the company's emissions figures into their own inventory. They need complete category coverage (nothing material excluded), a single reconcilable footprint, and a disclosed, transparent method. Whether a figure is estimated or supplier-specific is a maturity question, not a fault; the fault is exclusion.
Institutional investors	Pricing climate risk (physical and transition) including target credibility and whether targets are being met with real reductions, the completeness of financed / portfolio exposure, and flow-through exposure inherited from investees or counterparties whose own emissions may be growing. They can usually reconstruct detail, so they are judged on whether the true position is derivable.
Consumer / retail investors	Understanding the company's climate position and target progress without expert reconstruction. They need the headline claims to match the evidence, the material sources to be targeted, and caveats to be easy to find.
Consumers & public	Knowing whether the company's public claims are true: that it is genuinely acting rather than greenwashing, and not fuelling climate change while presenting otherwise. Headline claims matter most to this audience, which is least able to read past a buried caveat.
Regulators	Whether the disclosure is compliant, consistent across sources and audiences (does the company say one thing to one audience and something else to another), and useful across the board.

The **overall score** is simply the sum of the five audience ratings, out of 15. It has **no band and no pass/fail label**; we use it only to rank reports against one another; its colour bar reflects the mix of the five ratings (the more red, the more audiences the disclosure falls short for). §2.1 gives each audience's rating and the reason behind it; §1 covers scope and basis, §2.2–2.3 the evidence dashboard, §3 what the disclosure means for a reader, §4 the findings, §5 disclosure-risk, §6 how to fix it and §7 the conclusion; the working annexes show the rule-level derivation.

Two conventions apply throughout. A certification (including the Australian Government's Climate Active program) is treated as a claim to be tested, not as a strength in itself. Detailed disclosure and candour about a company's own gaps are the baseline expected of a credible discloser, not a credit.

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1. Scope & basis

1.1 What we reviewed

DOCUMENT	REVIEWED?	IF MISSING, EFFECT ON THIS REVIEW
2026 Annual Report, including Coles' first statutory Sustainability Report (pp.40–81) and the EY audit and review report on it	Yes: primary	—
2026 Sustainability Supplement (incl. the EY assurance report, pp.49–52)	Yes: supplementary	—
2026 Sustainability Data Pack (xlsx)	Yes: supplementary (source of the multi-year scope, category, energy and certificate series)	—
Prior-year Annual Reports, Sustainability Reports and Data Packs, FY2020–FY2025	Yes: supplementary / longitudinal context (§3.4, Annex K)	Multi-period series for the trajectory read
NGER / Clean Energy Regulator published data (FY2024-25 register, as at 27 February 2026)	Yes: external register lookup, preserved in the review pack	The 2025-26 register is not yet published, so the reviewed year cannot be reconciled against the regulator; FY25 is reconciled as context
2026 Climate Transition Plan (published 25 August 2026)	Yes: supplementary	—

DOCUMENT	REVIEWED?	IF MISSING, EFFECT ON THIS REVIEW
Group decarbonisation plan	Not published: stated as completed, not published	The Climate Transition Plan describes the areas it funds but gives no capital figure and no lever-level abatement, so the quantified pathway to the FY30 and 2050 targets still cannot be independently assessed
SBTi validation letters (FY30 Scope 1 and 2; FLAG; supplier engagement)	Not provided: referenced by Coles	Validated wording, scope and version taken as stated; not independently confirmed
Protecting Forests Statement	Not provided: referenced by Coles	Deforestation scope and progress taken as stated in the Supplement
Climate Active public register	Not provided: checked 1 September 2026; the register page would not render on direct retrieval	Register status is recorded from two indexed searches at medium confidence, not from the primary source (§3.4, §4.3)

1.2 Standards the company is held to or references

STANDARD / FRAMEWORK	REFERENCED BY COMPANY?	HOW STRONGLY	SECTOR MODULE(S) APPLIED
Corporations Act / Ch 2M	Yes	Binding: FY26 is the first year Coles files a statutory sustainability report. A directors' declaration signed 25 August 2026 states the report is in accordance with the Act, including s296D	Retail
AASB S2	Yes	Binding: bound and asserted. The directors' declaration states compliance with AASB S2; the Group has also early adopted AASB S2025-1 *Amendments to Greenhouse Gas Emissions Disclosures* (effective for periods beginning on or after 1 January 2027)	Retail
ASIC RG 280	No: not expressly	Not referenced: applies to the period as a mandatory reporter; no express reference	Retail
GHG Protocol (Corporate / Scope 2 / Scope 3)	Yes	In accordance with: strong. Operational control boundary under the Corporate Standard (2004); Scope 3 measured in accordance with the Corporate Standard using the AASB S2 Appendix B measurement framework; all fifteen categories considered	Retail
PCAF (financed emissions)	No	Not applicable: not a financial institution. The report states Coles does not undertake the activities specified in AASB S2 paragraph B59	Not applicable
SBTi	Yes: **three targets validated** (FY30 Scope 1 and 2; FLAG; supplier engagement)	In accordance with: strong for all three. The FY30 target is stated as validated as aligned with a 1.5°C pathway; the 2050 net zero target is stated as **not** separately validated under the Net-Zero Standard	Retail
Climate Active / other carbon-neutral framework	No: no reference anywhere in the FY26 suite	Not referenced: neither document mentions Climate Active, carbon neutrality, carbon-neutral products or carbon offsets. Coles held Climate Active *Carbon Neutral Standard* product certifications for the Coles Finest beef range (from April 2022) and pork range (from July 2023) and disclosed offset purchases for them to FY2024. A register check on 1 September 2026 indicates the beef certification remains live and the pork certification was withdrawn effective 4 August 2025, inside the reviewed year (§3.4, §4.3)	Retail
Certificates (GreenPower / LGC / ACCU / REC)	Yes: voluntary LGC surrender; onsite solar; RPP and JRPP	With reference to: central to the renewable-electricity claim and to market-based Scope 2	Retail
GRI 1: Foundation 2021	Yes: "in accordance with"	In accordance with: GRI strict	Retail
NGER Act, NGA Factors 2025 and AR5 global warming potentials	Yes	Binding: NGER and NGA for Scope 1 and 2	Retail
UN Global Compact	Yes	Mentioned: UNGC Communication on Progress	Retail
IFRS Transition Plan Taskforce (TPT) Disclosure Framework	Yes	With reference to: the Climate Transition Plan states it is "informed by" the TPT framework and publishes a clause-by-clause mapping to it, in which the financial-metrics-and-targets and carbon-credit rows are marked not applicable	Retail

Module applicability: Coles is a food and general-merchandise retailer, so the retail sector module is applied, centred on purchased goods (Category 1) and the agricultural supply chain. It is not a financial institution, so the FI and PCAF module is not applied. The year-over-year and cross-period tracking module is applied (seven periods and several report types available). NoCO2 clause-level mapping is applied (§6.1).

1.3 Review basis & limitations

This is a standard, evidence-led review of Coles' FY26 climate disclosure across the statutory Sustainability Report inside the Annual Report, the Sustainability Supplement, the Climate Transition Plan and the Data Pack, with the retail sector module applied and a year-over-year trajectory read across the FY2020–FY2026 series. FY26 is Coles' first mandatory reporting year, so the disclosure is tested as a compliance document as well as a claim set. Three limitations bound the conclusions. The Climate Transition Plan names the actions Coles will take but attaches no capital figure and no abatement quantity to any of them, so the pathway can be described but not priced or sized. The statutory assurance reaches Scope 1 and Scope 2 only, so the 94% of the footprint that sits in Scope 3 carries limited assurance under a separate voluntary engagement and no statutory assurance at all. And the regulator's 2025-26 register is not yet published, so the reviewed year cannot be reconciled against the regulator-facing figures. The detailed working, rule references are in the annexes.

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2. Verdict

2.1 Decision-usefulness by audience

2 **Carbon / supply-chain emissions accounting**
2 met · 1 partial · 1 not met

The footprint lifts cleanly and reconciles on every route tested: Scope 1 splits into five named sources that sum exactly to the location-based total, Scope 2 is dual-reported, and the agriculture and energy-and-industrial blocks sum exactly to the published Scope 3 total. Per-category measurement approach, data inputs, factor sources and limitations are now set out in the audited report itself, including which categories rest on nine months of data extrapolated to twelve. That the dominant Category 1 rests on spend and industry-average factors is the expected starting point for a retailer and is not a fault. What is wrong is the **version and basis record**. The agriculture target's own measurement method changed during the year, without the change being described or bridged, so its base year has to be recalculated before progress can be measured at all. The audited emissions table presents a single Scope 3 total on the market-based basis without saying so. And the reasonably assured "100% renewable" figure still cannot be rebuilt, because the grid-content percentages inside it are withheld.

`§3.1, §3.3, Annex B`

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2 **Institutional investors**
1 met · 5 partial · 0 not met

No criterion is defeated, and the row holds at 2 because five of six carry a real residual. The disclosure is genuinely reconstructable and this year the physical direction of travel is favourable: location-based Scope 1

and 2 fell 4.1%, Scope 1 fell 7.3% on an 11.0% fall in refrigerants, and about 55% of the reduction is Coles' own action rather than grid decarbonisation. Progress is stated plainly: both bases appear in the same paragraph, the agriculture target is said to show no reductions yet, and the supplier-engagement target is stated to be off track. What cannot be priced is the forward position. The one target reported as ahead covers 6% of the footprint and is a floor already beaten by 7.6 percentage points, leaving room for market-based Scope 1 and 2 to rise 43.9% and still be met. The agriculture target's current position is not published as a number. All seven climate risks and opportunities conclude in no material financial effect with nothing separately quantified, and the internal carbon price is applied to Scope 1 and 2 only. The Climate Transition Plan names the levers, their owners and their timeframes, and attaches **no capital figure and no abatement quantity to any of them**: its capital-commitments section commits no dollars, its own mapping to the transition-planning framework marks financial metrics and targets not applicable, and no lever or year between FY26 and FY30 carries a number. It also discloses, and only there, that certificate creation ends after 2030, which is the mechanism the headline reduction rests on.

§3.2, §3.3, §3.4, §4, §5

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1 **Consumer / retail investors**
1 met · 2 partial · 1 not met

One failure carries this row, and it is the one no reader action can cure: the material sources are not targeted. Net zero and the FY30 target reach Scope 1 and 2, about 6% of the footprint. The agriculture target is absolute and validated, but this year's disclosure reveals its boundary covers 6.63 Mt of the 9.89 Mt of agriculture emissions in its base year, about two thirds; so roughly a third of agriculture sits outside it. The supplier-engagement metric is a process measure covering about 34% of the value chain and Coles states it is not on track. On the review's arithmetic **about 5.5 Mt, roughly 29% of the value chain, including end-of-life treatment at 1.44 Mt, is reached by no emissions-reduction target.** The Climate Transition Plan names that source as a hotspot and lists actions against it, and says in the same breath that Coles is "currently unable to track the impacts of any specific actions" on it. Against that, the physical and market-based inventories are printed side by side on one page of the Supplement, 1.26 Mt against 0.26 Mt, where the FY25 reports carried no location-based figure at all.

§3.4, §4.2

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1 **Consumers & public**
1 met · 1 partial · 1 not met

The action is real and visible, and more of it is now in the numbers: refrigerant emissions fell 11.0%, natural refrigerants reached 141 supermarkets and 94 liquor stores, onsite generation rose to 39,370 MWh across 156

sites, and $112 million of separately identified climate capital expenditure is disclosed. What holds this audience at 1 is that two public statements are not true within the boundary they imply. The Supplement's "Top 10 material sustainability issues" table describes the climate issue as "Decarbonising and building climate resilience in our operations **and value chain** to achieve net zero greenhouse gas emissions by 2050", an unqualified whole-of-business net zero, against every target statement in both documents, which limit the commitment to Scope 1 and 2. And "100% renewable electricity" cannot be rebuilt from what Coles discloses: surrendered certificates and onsite solar together account for about 85% of consumption, and the grid-content percentages that would close the remaining 15 points are not published.

§4.2, §5

2

Regulators

0 met · 1 partial · 1 not met

The first mandatory year is filed properly. There is a statutory sustainability report, a directors' declaration asserting compliance with AASB S2, an unmodified audit opinion over the Scope 1 and 2 disclosures and an unmodified review conclusion over governance and the risk and opportunity disclosures, all under the new assurance standards. Coles disclosed all fifteen Scope 3 categories in year one rather than taking the available relief. What holds this row down is **consistency**. The same materiality table states a whole-of-business net zero that no target supports. The audited report tells a reader that annual performance against the FY20 baseline "is presented in this Sustainability Report through graphical and tabular disclosure", and no such table or chart appears in it. The audited emissions table gives one Scope 3 total without naming its basis while the Supplement names it. The Climate Transition Plan states the agriculture target against a baseline of 9.89 Mt with no mention that the target boundary covers 6.63 Mt of it, which the audited report discloses. And a live carbon-neutral product certification on the Australian Government's register, together with a second certification withdrawn during the year, appears nowhere in the reporting suite.

§2.3, §5.3

What the company should fix first: set a reduction target across the value-chain emissions no target currently reaches, starting with the roughly 5.5 Mt made up of end-of-life treatment, use of sold products and the agriculture emissions outside the FLAG target boundary; and publish the in-boundary agriculture figure in tonnes each year so progress against the FY30 target can be seen rather than described.

2.2 Scorecard

Headline claim ↔ evidence match

Disclosure quality **8 / 15**

Inventory completeness (Scope 1/2/3)	●●●●●	Financed-emissions completeness (if FI)	*N/A*
Target credibility	●●○○○	Real reduction vs accounting movement	●●●○○
Offset / certificate / renewable integrity	●●●●●	Assurance coverage vs claim	●●●○○
Standards / compliance confidence	*Appears broadly compliant, minor limitations*	Comparability (like-for-like only)	●●●●●
Reader accessibility	●●●●○	Evidence limitations	*Material*

DIMENSION	RATING	JUSTIFICATION
Headline claim ↔ evidence match	2.5/5	The operational headline is now presented on both bases in the same place, and the physical picture improved. The whole-of-business net-zero statement in the materiality table and the unreconstructable "100%" still outrun the evidence.
Disclosure quality	8 / 15 overall	Per-category method, inputs, factor sources and limitations in the audited report; dual-basis Scope 2; published physical-hazard and refrigerant-transition metrics; an internal carbon price trajectory.
Inventory completeness (Scope 1/2/3)	3.5/5	All fifteen categories considered and eleven quantified; only optional categories excluded; the dominant category via spend and industry-average estimation, an appropriate starting point. Customer travel to stores and indirect use of sold products are excluded on an asserted materiality basis with no screening estimate published.
Financed-emissions completeness (if FI)	N/A	Not a financial institution.
Target credibility	2/5	Three validated targets, but the operational one is a floor already beaten with 43.9% headroom and re-issued unchanged; the agriculture target's progress cannot be measured against its own base year; the supplier-engagement target is stated to be off track; about 29% of the value chain carries no emissions-reduction target. The transition plan behind them names the levers and sizes none of them.
Real reduction vs accounting movement	3/5	The reported 82.6% is a certificate result, but this year there is genuine physical movement underneath it: location-based Scope 1 and 2 fell 4.1%, of which about 55% is Coles' own action and about 45% grid decarbonisation.
Offset / certificate / renewable integrity	2.5/5	No carbon credits used for the Scope 1 and 2 reduction, stated with a policy for their future use in the 2050 target. LGC surrender clearly disclosed. "100%" still includes non-additional grid renewable content and does not reconstruct from the disclosed components.
Assurance coverage vs claim	3/5	Reasonable assurance over Scope 1, Scope 2 on both bases, energy, solar, certificate surrenders and the renewable percentage. Scope 3, agriculture emissions and the supplier percentage carry limited assurance under a separate voluntary engagement; the statutory assurance reaches Scope 1 and 2 only.
Standards / compliance confidence	Appears broadly compliant, minor limitations	First mandatory year filed with a directors' declaration and unmodified assurance outcomes; the limitations are internal cross-references and basis labelling, not substantive non-compliance.
Comparability (like-for-like only)	2.5/5	Dual-basis and seven-year series in the pack; but the audited table carries no comparatives, the value-chain series still crosses the unrestated FY24 method change, and a further agriculture measurement change during FY26 breaks the target's own baseline.
Reader accessibility	4/5	Both Scope 2 bases printed side by side with source splits; "more than 90% of emissions are Scope 3" stated plainly; the value chain broken down for a non-expert; the off-track supplier target stated in terms.
Evidence limitations	Material	No lever in the transition plan carries a cost or an abatement quantity, and the underlying decarbonisation plan is not published; Scope 3 accuracy is not independently verifiable; the reviewed year cannot be reconciled against the regulator's register.

2.3 Standards & compliance snapshot

AREA	RATING	BASIS
Corporations Act / Ch 2M	Appears broadly compliant: minor limitations	First statutory sustainability report, directors' declaration signed 25 August 2026, unmodified EY audit opinion under ASSA 5010 that the Scope 1 and 2 disclosures are prepared in accordance with ss296A(2), 296C and 296D, and an unmodified review conclusion on governance and the risk and opportunity disclosures.
AASB S2	Appears broadly compliant: minor limitations	Compliance asserted in the directors' declaration and supported by the assurance outcomes; AASB S2025-1 early adopted. Two internal defects sit inside the audited report: a cross-reference to graphical and tabular annual performance disclosure that does not appear in it, and a single Scope 3 total whose basis is not named. Anticipated financial effects are disclosed qualitatively across all seven risks and opportunities with nothing separately quantified.
ASIC RG 280	Appears broadly compliant: minor limitations	Applies to the period. No compliance finding is made; the residual matters are the labelling and cross-reference defects above.
GHG Protocol / Scope 2 / Scope 3	Appears broadly compliant: minor limitations	Operational control boundary; NGER methods and NGA Factors 2025 with AR5 global warming potentials; dual-method Scope 2; all fifteen categories considered against the Corporate Value Chain Standard. Data-quality limitations in the dominant category are disclosed.
PCAF / financed emissions	Not applicable	Not a financial institution; the report addresses AASB S2 paragraph B59 in terms.
Carbon-neutral / net-zero framework	Cannot verify: cross-source question open	Every net-zero target statement is Scope 1 and 2 only and is footnoted as such. One table states net zero for "our operations **and value chain**". Separately, no carbon-neutral or Climate Active claim appears anywhere in the FY26 suite, while a register check indicates a Coles Finest product certification remains live and a second was withdrawn during the year.
Certificates / credits	Appears broadly compliant: minor limitations	LGC surrender and the renewable percentage carry reasonable assurance, and the certificate mechanism is explained plainly. Certificate vintage and any temporal or locational matching are not disclosed, and the disclosed components (LGC 82.35% plus onsite solar 2.48%) do not visibly reach 100%.
Other company-referenced framework	Appears broadly compliant: minor limitations	GRI "in accordance"; UNGC Communication on Progress; SBTi validation stated for three targets, with the 2050 target expressly not validated.

3. What this means for a reader

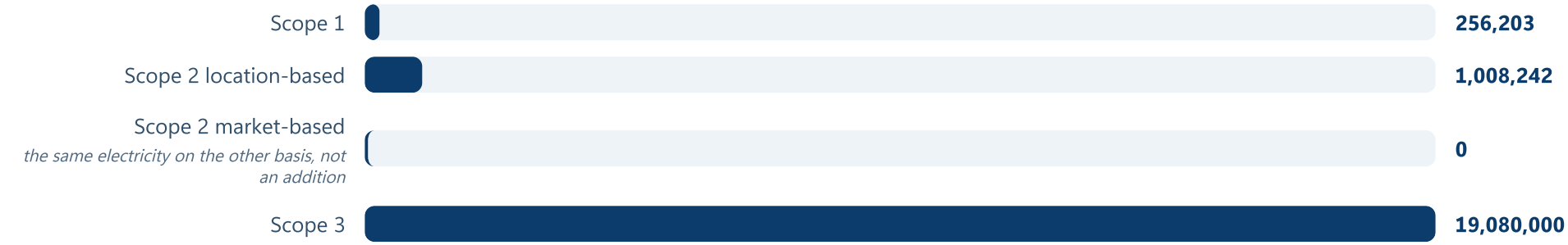
3.1 What is counted / not counted

Boundary note: Coles' FY26 group footprint on the operational control boundary, for the greenhouse gas year 1 July 2025 to 30 June 2026. Scope 1 and Scope 2 together are about 6% of the total on a location basis; Scope 3 is about 94%, dominated by Category 1. The statutory report leads with location-based Scope 2 and presents market-based as supplementary. Category 3 is quantified on both bases; the figure shown below is the location-based one, which is the basis the audited report leads with elsewhere. The two Scope 2 rows measure the same electricity and are not additive.

Emissions composition

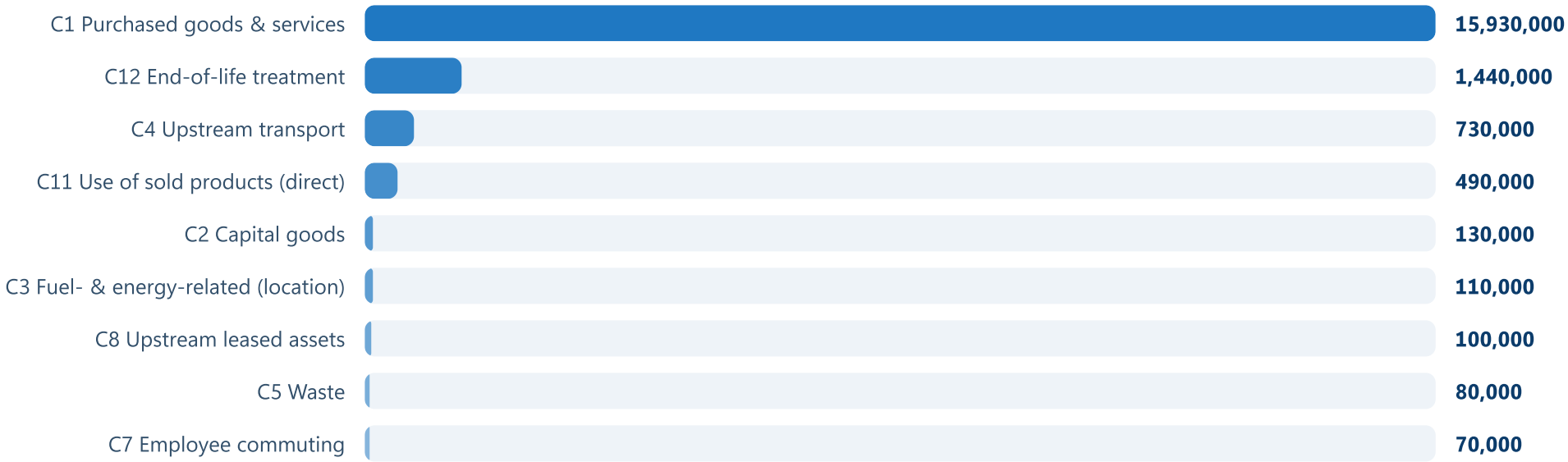
Values as reported (tCO_2e). Bars are independent magnitudes, not a stack. Scope 2 is shown on both bases: they measure the same electricity two ways and are alternatives, not additions, so they are never added together.

Source: 2026 Sustainability Data Pack, "Energy and S1&S2 emissions" tab (Scope 1 256,203.21 t; location-based Scope 2 1,008,241.55 t; market-based Scope 2 nil) and "Scope 3 emissions" tab (location-based total 19.08 Mt), FY26; the same figures appear in Annual Report Table 5, p.61. Scope 2 is shown on both bases: the statutory report leads with location-based and presents market-based as supplementary. Market-based is nil after 1,307,977 LGCs were surrendered, and that nil is the finding rather than a reason to leave the bar out. The two Scope 2 bars are the same electricity measured two ways and do not add



Scope 3 by category (largest first)

Source: 2026 Sustainability Data Pack, "Scope 3 emissions" tab, category rows, FY26 on the location basis (Category 3 at 0.11 Mt), so the eleven reported categories sum to 19.08 Mt. Method, inputs and factor sources per category are in Annual Report Table 10, pp.72 to 74; the same figures appear as percentages of the total, to commodity level, in the 2026 Climate Transition Plan p.14



What is counted

Every scope and Scope 3 category, coloured by inclusion status. Values as reported. A tile shown in brackets is counted but not additive: it either sits inside another line's total, or it is the same emissions measured on the other Scope 2 basis. The values shown do not add up to the reported total.

Source: 2026 Annual Report Table 5 (p.61) and the basis of preparation (pp.70 to 74); 2026 Sustainability Data Pack, "Energy and S1&S2 emissions" and "Scope 3 emissions" tabs; 2026 Sustainability Supplement pp.11 to 13

Scope 1: combustion / fugitive / fleet 256,203 REPORTED	**Scope 2: electricity (location-based)** 1,008,242 REPORTED	**Scope 2: electricity (market-based)** (0) SAME ELECTRICITY, MARKET-BASED MEASURE	**Scope 3 C1 Purchased goods & services** 15,930,000 REPORTED (DOMINANT)	**Scope 3 C2 Capital goods** 130,000 REPORTED	**Scope 3 C3 Fuel- & energy-related** 110,000 REPORTED	**Scope 3 C4 Upstream transport & distribution** 730,000 REPORTED
Scope 3 C5 Waste 80,000 REPORTED	**Scope 3 C5 Water & wastewater in operations** 10,000 REPORTED	**Scope 3 C6 Business travel** 10,000 REPORTED	**Scope 3 C7 Employee commuting** 70,000 REPORTED	**Scope 3 C8 Upstream leased assets** 100,000 REPORTED	**Scope 3 C9 Downstream transport & distribution** EXCLUDED	**Scope 3 C10 Processing of sold products** NOT RELEVANT
Scope 3 C11 Use of sold products 490,000 PARTLY COUNTED	**Scope 3 C12 End-of-life of sold products** 1,440,000 REPORTED	**Scope 3 C13 Downstream leased assets** NOT RELEVANT	**Scope 3 C14 Franchises** NOT RELEVANT	**Scope 3 C15 Investments / financed & facilitated** 10,000 REPORTED		

Reported / counted

Counted, but not additive: inside another line, or the same emissions on the other Scope 2 basis

Partly counted (a figure is given, the category is not complete)

Not counted (excluded or unquantified)

Not relevant or not applicable

SCOPE / CATEGORY	STATUS	QUANTIFIED (tCO_2e)	MATERIAL?	NOTE
Scope 1: combustion / fugitive / fleet	Reported	256,203	Yes	Refrigerants 74.3% of Scope 1; fell 7.3% year on year. Includes refrigeration equipment below the NGER reporting thresholds, which Coles states goes beyond the NGER framework.
Scope 2: electricity (location-based)	Reported	1,008,242	Yes	The basis the statutory report leads with; fell 3.2% year on year. Not additive with the row below.
Scope 2: electricity (market-based)	Reported	0	Yes	The same electricity, measured against contractual instruments: nil after 1,307,977 LGCs were surrendered. Presented as supplementary information; drives the headline percentage. Not additive with the row above.
Scope 3 C1 Purchased goods & services	Reported	15,930,000	Yes: dominant (84% of Scope 3)	Primary mass and volume data for priority commodities; spend-based methods with DEFRA UK input-output factors for the remainder, LCA databases for other key commodities and a 2020 consultants' study for meat. Rose from 15.86 Mt; the rise is entirely agriculture.
Scope 3 C2 Capital goods	Reported	130,000	Yes	Spend-based, DEFRA UK input-output factors.
Scope 3 C3 Fuel- & energy-related	Reported	110,000	Yes	Dual-basis: location-based shown; market-based 10,000. The audited emissions table carries the market-based figure without naming the basis.
Scope 3 C4 Upstream transport & distribution	Reported	730,000	Yes	Coles-managed transport plus third-party logistics; some data gaps in third-party distribution centres are disclosed. Rose 9.1%.
Scope 3 C5 Waste	Reported	80,000	Yes	Waste transport and recycling excluded where assessed as immaterial.
Scope 3 C5 Water & wastewater in operations	Reported	<10,000	No	Disclosed as a separate line in the pack; supermarket water use extrapolated from metered stores.
Scope 3 C6 Business travel	Reported	<10,000	No	Nine months of actual data extrapolated to twelve.
Scope 3 C7 Employee commuting	Reported	70,000	Yes	Census-based estimate; assumes all full-time equivalents worked 225 days.
Scope 3 C8 Upstream leased assets	Reported	100,000	Yes	Lessor data where available, gaps filled by average emissions per shopping centre by centre class. Coles states data came back from some lessors only.
Scope 3 C9 Downstream transport & distribution	Excluded	Not measured	Cannot verify: potentially (customer travel to stores)	Stated as "largely not applicable, with customer transport representing the primary potential downstream activity considered and excluded on the basis of materiality". No screening estimate is published.
Scope 3 C10 Processing of sold products	Not relevant	Not applicable	No	Stated as outside the Scope 3 boundary; reasonable for a retailer.
Scope 3 C11 Use of sold products	Partial	490,000	Cannot verify: potentially (indirect: home cooking and refrigeration)	Direct use only. Direct use quantified from sales volumes and use-phase assumptions; the indirect portion excluded where assessed as immaterial, and not quantified. Fell 13.1%.
Scope 3 C12 End-of-life of sold products	Reported	1,440,000	Yes: second-largest single line	Landfill of organic and packaging waste, estimated from national waste data and Coles' market share. Reached by no reduction target.
Scope 3 C13 Downstream leased assets	Not relevant	Not applicable	No	Stated as outside the Scope 3 boundary.
Scope 3 C14 Franchises	Not relevant	Not applicable	No	Stated as outside the Scope 3 boundary.
Scope 3 C15 Investments / financed & facilitated	Reported	<10,000	No	Joint-venture Scope 1 and 2 on Coles' proportional ownership share. Coles states it does not undertake the activities specified in AASB S2 paragraph B59.

3.2 Financed-emissions detail (financial institutions)

N/A: not a financial institution.

3.3 Real reduction vs accounting movement

Scope 1 and 2 reduction, FY25 to FY26 (location-based, -4.1%)

Decomposition of the reported reduction into its drivers.

Source: 2026 Sustainability Data Pack, "Energy and S1&S2 emissions" tab: location-based Scope 1 and Scope 2 rows and grid electricity consumption for FY25 and FY26; review decomposition of the year-on-year movement into own action and grid emission-factor change



Own action (refrigerants, efficiency, lower consumption) (2.3 pp) Grid decarbonisation (BAU) (1.8 pp)

Of the 4.1 percentage-point reduction reported, about 2.3 pp is own action beyond business-as-usual; the rest is external / accounting movement.

REPORTED CHANGE	DRIVER	REAL-WORLD REDUCTION?
Combined Scope 1 and 2 −82.6% versus FY20, market-based (−7.3% year on year)	**Certificates**: certificate surrender, 1,307,977 LGCs against a market-based Scope 2 of nil. Of the 82.6 percentage points, about 65 are the certificate and market-based accounting effect and about 17 are the physical fall on a location basis	**Partly**: largely no, the great majority is a contractual and accounting movement
Combined Scope 1 and 2 −16.9% versus FY20, location-based (**−4.1% year on year**, 1,318,096 → 1,264,445 t)	**Mixed**: the physical basis. The year-on-year fall of 53,651 t decomposes into about 29,775 t of Coles' own action (55.5%) and about 23,876 t of grid decarbonisation (44.5%)	**Partly**: yes in part; the majority of this year's physical fall is Coles' own action
Scope 1 −7.3% year on year (276,296 → 256,203 t)	**Mixed**: refrigerants, 74.3% of Scope 1, fell 10.96% (213,655 → 190,241 t), a fall of 23,414 t. Stationary fuels fell 17.5% and natural gas 1.0%. Transport fuels rose 15.3% (28,738 → 33,148 t)	**Yes**: the refrigerant transition is now visible in the numbers, partly offset by transport fuels
Scope 2 location-based −3.2% year on year (1,041,800 → 1,008,242 t)	**Mixed**: two drivers moving the same way for the first time in the series. Grid electricity consumption fell 0.93% (1,603,118,230 → 1,588,218,155 kWh), worth about 9,683 t; the implied grid emission factor fell 2.31% (0.6499 → 0.6348 kg CO_2-e/kWh), worth about 23,876 t	**Partly**: about 29% of the Scope 2 fall is Coles' own consumption, about 71% is grid decarbonisation
Total energy consumption −0.12% year on year (6,819,354 → 6,811,126 GJ)	Activity: essentially flat, and still **9.9% above the FY20 baseline**. Energy intensity fell from 153.76 to 149.43 GJ per $M of sales revenue on sales growth of 2.8%. Excludes onsite solar production	**No**: the physical energy base has stopped growing but has not fallen
Scope 3 unchanged at 19.08 Mt location-based (18.98 Mt market-based)	**Mixed**: composition shifted rather than the total; agriculture rose 0.18 Mt (10.38 → 10.56 Mt) while energy and industrial sources fell 0.17 Mt (8.59 → 8.42 Mt). Category 1's rise is entirely the agriculture component	**No**: the 94% of the footprint that sits in the value chain did not fall for a third consecutive year

REPORTED CHANGE	DRIVER	REAL-WORLD REDUCTION?
100% renewable electricity	**Mixed**: surrendered LGCs (1,307,977, i.e. 1,307,977 MWh) are 82.35% of the 1,588,218,155 kWh consumed and onsite solar adds 2.48%. The residual 280,241 MWh, about 15%, is attributed to the renewable power percentage and the jurisdictional percentage in the ACT, and **the values applied are not disclosed**	**Partly**: the certificate retirement and the growing onsite generation are genuine; the residual is existing grid content, is not additional, and cannot be reconstructed

3.4 Trajectory over time

Across FY2020 to FY2026 the reported operational headline improves steadily while the value chain, over 90% of the footprint, does not move. This year the two pictures came closer together than at any point in the series. On the physical basis combined Scope 1 and 2 fell 4.1%, and for the first time the fall is majority Coles' own action: Scope 1 fell 7.3% on an 11.0% fall in refrigerants, and grid electricity consumption fell 0.93% rather than rising. Both bases are now stated together, so a reader meets the 82.6% market-based figure and the 16.9% location-based figure in the same paragraph of the Annual Report, and the two inventories, 0.26 Mt and 1.26 Mt, side by side on one page of the Supplement. Total energy stopped growing after three years of increase, though it remains 9.9% above the FY20 baseline.

The value chain tells a different story, and Coles states it plainly. Scope 3 has been 19.07, 19.08 and 19.08 Mt on a location basis across FY24, FY25 and FY26. Within that total the agriculture block rose again, from 9.89 Mt in the FY24 base year to 10.38 Mt and then 10.56 Mt, about 6.8% above the baseline of the target that requires a 30.3% cut by FY30. The Annual Report says in terms that in-boundary agriculture emissions were 1.8% higher than FY25, that "FLAG emissions reductions are not yet evident", and that a direct comparison against the FY24 base year "is not currently meaningful because of changes in emissions measurement methodologies", so the base year will be recalculated in FY27. The supplier-engagement target moved from 42.3% to 46.9% of suppliers by spend with Scope 1 and 2 science-based targets, and Coles states it is "currently not on track" to reach 80% by FY29.

Three forward items bear on the target set. First, this year's disclosure sizes the agriculture target's boundary for the first time: it covers 6.63 Mt of the 9.89 Mt of agriculture emissions in the base year, about two thirds, so roughly a third of agriculture sits outside the only absolute value-chain target. Second, the FY30 operational target was reported achieved in FY25 and remains unchanged in the FY26–FY30 target set at "more than 75%" against an outturn of 82.6%, which leaves room for market-based Scope 1 and 2 to rise from 256,203 t to 368,679 t, **43.9%**, and still be reported as met; the headroom has widened from 33.4% a year ago because reported emissions fell further against a static target. Third, the 2050 net-zero commitment now carries a stated gross limb, at least a 90% absolute reduction from FY20, with credits reserved for the residual, which is a more testable architecture than the bare net formulation carried previously.

The Climate Transition Plan published on 25 August 2026 is the first of its kind for Coles and it changes what a reader can see in two directions. It sets out the levers by focus area, emissions source, owner and timeframe across both operations and the value chain, maps itself clause by clause to the international transition-planning framework, publishes the value-chain breakdown down to individual commodities, and names the hard-to-abate sources with a stated position on each, including consumer food waste at 7.6% of the value chain. It also discloses one thing that appears nowhere else in the reporting suite and that bears directly on the headline: certificate creation under the Renewable Energy Target **ends after 2030**, and Coles is preparing for the replacement scheme. That matters because surrendered certificates are what take market-based Scope 2 to nil, and the FY30 target year is the year the mechanism expires. In the other direction, the plan quantifies nothing. Its capital-commitments section describes the areas receiving investment and commits no figure; its own framework mapping records financial metrics and targets as not applicable; and no lever, and no year between FY26 and either FY30 or 2050, carries a tonnage. The plan also states the agriculture target against a baseline of 9.89 Mt without repeating that the target boundary covers 6.63 Mt of it, so a reader of the plan alone would take the 30.3% reduction to apply to the whole block.

Two disclosures were added and one dropped. The refrigerant reconciling item behind the gap to the regulator's Scope 1 figure is now stated: Coles reports refrigerant emissions from equipment below the NGER thresholds, which it describes as extending beyond the NGER framework, although the quantity is not given. The FY25 inconsistency in the supplier-engagement target, stated as both 75% by FY27 and 80% by FY29 in one reporting pack, is resolved: both documents now state 80% by FY29 with one explanation. Dropped is the FY25 assessment of 55 core commodities covering about 60% of revenue, replaced by a third-party site-level hazard assessment with published metrics; the asset side is now quantified and the commodity-coverage figure is gone. Two items carry forward unchanged: the materiality table's whole-of-business net-zero wording, and the absence of any reference to the carbon-neutral product certifications and offset purchases that ran to FY2024.

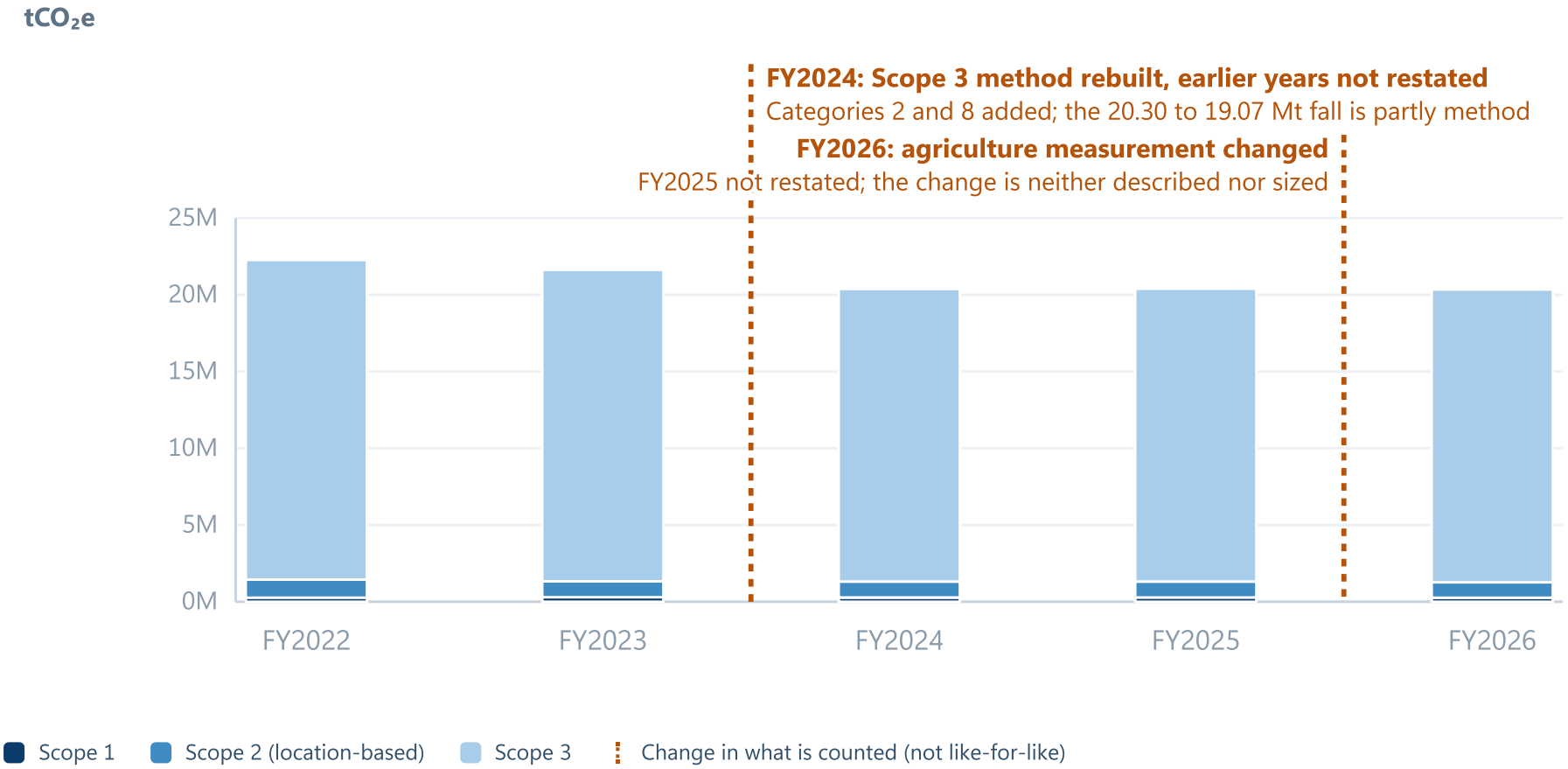
Prior-year reports are context, not current disclosure, and the current-period rating is derived from the current period. Full working detail and evidence IDs are in Annex K.

Metrics over time

Trajectory over time

Reported operational emissions by scope, stacked, in tCO_2e per reporting year. Orange dotted line = a change in what is counted or how: the bars either side of it are not like-for-like. Where the later years count sources the earlier ones left out, the earlier years under-state the footprint.

Source: 2026 Sustainability Data Pack, "Energy and S1&S2 emissions" tab (Scope 1 and location-based Scope 2, FY22 to FY26) and "Scope 3 emissions" tab (location-based total, FY22 to FY26 as republished in the FY26 pack). Scope 2 is charted on the location basis only, because the series is stacked and the two bases measure the same electricity. Scope 3 crosses two method changes, marked on the chart: the FY24 inventory rebuild (2024 pack endnote 15; FY23 was corrected to 20.30 Mt but not moved onto the new method, and Categories 2 and 8 enter in FY24), and the FY26 change in agriculture measurement, which the Annual Report states but does not quantify. Neither earlier year is restated, so the FY23 to FY24 fall is partly method. Year-by-year detail is in Annex P



METRIC	FY2020	FY2022	FY2023	FY2024	FY2025	FY2026	MOVEMENT	DRIVER	NOTE
Scope 1 (tCO_2e)	303,263	271,753	293,665	267,913	276,296	256,203	Down: 15.5% since FY2020; fell 7.3% in FY2026	**Real** abatement: refrigerants down 10.96% in FY2026	Lowest in the seven-year series
Scope 2 location-based (tCO_2e)	1,218,973	1,176,103	1,036,364	1,042,492	1,041,800	1,008,242	Down: 17.3% since FY2020; fell 3.2% in FY2026, the first fall since FY23	**Mixed**: in FY2026 about 29% own consumption, 71% grid; grid electricity consumption 1,561.5 (FY24), 1,603.1 (FY25), 1,588.2 GWh (FY26), its first fall in the disclosed series	Location-based Scope 1+2 −13.4% (FY25) and −16.9% (FY26) against FY20: the physical picture, majority own action this year. Not additive with the row below
Scope 2 market-based (tCO_2e)	1,171,453	1,085,064	686,895	697,896	0	0	Down: nil for a second year	**Certificates**: certificate surrender	FY2025 printed "-" (nil). Market-based Scope 1+2 −81.3% (FY25) and −82.6% (FY26) against FY20: the headline. Not additive with the row above
Scope 3 total ($MtCO_2e$)	22	20.82	20.30	19.07	19.08	19.08	Not comparable: the FY22–FY24 fall crosses an unrestated method change; flat for a third year	**Method** or factor: spend and average-based; unrestated FY24 method change	Location-based; about 94% of the footprint. FY2020 is "approximately 22m" (2022 Sustainability Report)
Emissions intensity (Scope 1 and 2 location-based, tCO_2e/$M sales revenue)	Not disclosed	Not disclosed	32.85	30.08	29.72	27.74	Down: 15.6% since FY2023	**Cannot** verify: the review does not analyse the intensity	Data Pack. The market-based intensity is also published (5.62 in FY2026)
Renewable electricity (% of consumption)	Not disclosed	Not disclosed	45%	45%	100%	100%	Up: 55 percentage points since FY2023	**Mixed**: LGC surrender (82.35% of consumption in FY2026), onsite solar (2.48%) and grid renewable content (RPP/JRPP)	The disclosed components reach about 85% (F-9). Onsite solar 14,790 (FY23), 21,870 (FY24), 33,803 (FY25) and 39,370 MWh (FY26), 156 sites: physical, additional, reasonably assured
Certificates and offsets retired (tCO_2e)	Not disclosed	Not disclosed	Not disclosed	Not disclosed	Not disclosed	Not disclosed	Not disclosed	Not applicable	No carbon credits used for the Scope 1 and 2 reduction. Offsets were purchased to FY2024 for the Coles Finest Climate Active product ranges; no volume is published in the reviewed documents
LGCs voluntarily surrendered (MWh)	Not disclosed	Not disclosed	381,080	396,560	1,313,027	1,307,977	Up: steady after the FY25 step	**Certificates**: contractual instruments	82.35% of consumption
Total energy consumption (GJ)	6,198,496	6,344,774	6,315,055	6,542,090	6,819,354	6,811,126	Up: 9.9% since FY2020; flat in FY2026 after three years of growth	Activity: physical; reasonable assurance	Still 9.9% above the FY20 baseline
Scope 3 agriculture (FLAG) block ($MtCO_2e$)	Not disclosed	Not disclosed	Not disclosed	9.89	10.38	10.56	Up: 6.8% above the FY24 base on the figures as published	**Cannot** verify: measurement change in FY26 not described or bridged	The FY24 base of a −30.3% target; target boundary 6.63 Mt of the 9.89 Mt

Targets and claims over time

TARGET OR CLAIM	AS FIRST STATED (PERIOD)	AS STATED FOR FY2026	CHANGE	EXPLAINED?	NOTE
FY30 Scope 1 and 2 target (>75% below FY20)	Reduce combined Scope 1 and 2 emissions by more than 75% (FY20 baseline) by end of FY30 (set FY2021)	"reduce combined Scope 1 and 2 greenhouse gas emissions by more than 75% (FY20 baseline year) by the end of FY30"	Achieved; Unchanged: reported achieved in FY2025 and re-issued unchanged; ambition static for six years	Not applicable	Market-based. 43.9% headroom, widened from 33.4% (F-7)

TARGET OR CLAIM	AS FIRST STATED (PERIOD)	AS STATED FOR FY2026	CHANGE	EXPLAINED?	NOTE
Net zero by 2050	Not recorded in this review	"Commitment refers only to Coles' Scope 1 and Scope 2 emissions"; now with a stated gross limb, at least a 90% absolute reduction from FY20, credits reserved for the residual	Strengthened: gross limb added	Cannot verify: not addressed in this review	The materiality table states "operations and value chain" (F-8)
100% renewable electricity	Source 100% renewable electricity by the end of FY25 (FY2021)	Maintain 100% renewable electricity	Achieved: in FY2025, maintained as a commitment	Partly: the disclosed components reach about 85% (F-9)	Certificate creation ends after 2030 (F-9, F-22)
FLAG absolute target	−30.3% by FY30 from an FY24 base, SBTi-validated (FY2025)	30.3% reduction by FY30 from FY24; boundary 6.63 Mt of the 9.89 Mt base; base year to be recalculated in FY27	Unchanged: boundary published for the first time	Not applicable	Progress not measurable against the base year (F-6); the transition plan omits the boundary (F-13)
Supplier-engagement target	75% by FY27 (FY2023)	80% by FY29; 46.9% reached, stated "currently not on track"	Extended; Re-scoped; Strengthened: date extended two years; boundary widened, FLAG carved out; % raised	Yes: one explanation in both documents; the prior year's two versions resolved	Process metric, validated; reaches about 34% of Scope 3. About 5.5 Mt (about 29% of the value chain: end-of-life 1.44 Mt, use of sold products 0.49 Mt, other 0.09 Mt, plus agriculture outside the FLAG boundary) is reached by no emissions-reduction target (F-5)
Climate Active certified carbon-neutral products (Coles Finest beef and pork)	Beef certified from April 2022 (FY2022); pork from July 2023; offsets purchased for them	Absent from the suite for a second year	Cannot verify: register indicates the beef certification live and the pork certification withdrawn effective 4 August 2025, at medium confidence	No	Corporate net zero remains Scope 1 and 2 only (F-14, F-21)

4. Findings

4.1 What stands up (genuine / qualified positives)

▲ F–1

The refrigerant transition has moved from a stated programme into the measured result. Refrigerant emissions fell 10.96% (213,655 → 190,241 t CO_2-e), a fall of 23,414 t, and that fall is most of the reason total Scope 1 fell 7.3% to the lowest figure in the seven-year series. Coverage rose from 104 to 141 supermarkets and from 80 to 94 liquor stores using natural refrigerants, on a standing programme of 20 to 30 systems a year tied to end-of-life and refurbishment cycles, a design rule putting new supermarkets on natural refrigerants, and a pipe-replacement programme aimed at leakage.

WHY IT MATTERS

This is the largest single source Coles directly controls, and for the first time the capital programme behind it shows up in the assured numbers rather than in a commitment. It is the reason this year's physical reduction is majority own action.

QUALIFICATION (IF ANY)

The endpoint is 2050 and no interim tonnage milestone or leakage rate is published, so a reader still cannot tell whether the current rate is on track. Transport fuels rose 15.3% in the same year, offsetting about a fifth of the refrigerant gain.

▲ F–2

Physically additional, metered onsite generation and demand-side capability, distinct from certificate purchase: onsite solar generation rose from 33,803 MWh to 39,370 MWh across 156 sites, with 8.96 MW installed across 34 sites during the year, 16.45 MW of rooftop solar and 1.35 MWh of battery storage installed since FY23 under the Origin alliance, a virtual-power-plant battery trial, and a natural gas sub-metering programme that has cut gas use at participating stores by about 18% on average. EY gives reasonable assurance over total solar electricity generated.

WHY IT MATTERS

New generating capacity on Coles' own assets is additional by construction, quantified, growing on a disclosed trajectory and reasonably assured, which is categorically different from surrendering certificates. The gas programme is a measured reduction on a source that is otherwise hard to move.

QUALIFICATION (IF ANY)

Scale: 39,370 MWh is 2.48% of the 1,588 GWh consumed, and total energy consumption remains 9.9% above the FY20 baseline.

▲ F–3

An absolute, validated agriculture (FLAG) target on the single largest slice of the footprint, now with its boundary published: a 30.3% reduction by FY30 from an FY24 base, covering 6.63 Mt of the 9.89 Mt of agriculture emissions in that year, with the boundary, the greenhouse gases, the sectoral pathway and the third-party validation all set out in the audited report.

WHY IT MATTERS

It is an absolute reduction target, not an intensity one, placed on the biggest and hardest source in a food retailer's footprint, where most retailers set nothing; and sizing the boundary lets a reader work out what the target does and does not reach.

QUALIFICATION (IF ANY)

Delivery is not evident: agriculture emissions rose 1.8% in-boundary and the total block is 6.8% above the base year. Progress cannot currently be measured against the base year at all, and the boundary leaves about a third of agriculture outside it. Coles' own no-deforestation ambition, which the target references, was missed for beef after suppliers indicated they could not support it.

▲ F–4

The physical and market-based inventories are now presented together where a non-expert reader meets them. The Supplement prints the FY26 combined Scope 1 and 2 inventory twice on one page, market-based at 0.26 Mt and location-based at 1.26 Mt, each broken into electricity, natural gas, refrigerants and fuels; and the Annual Report states the 82.6% market-based reduction and the 16.9% location-based reduction in consecutive sentences.

WHY IT MATTERS

A reader who sees only the headline percentage cannot tell that it is an accounting measure. Printing the two magnitudes side by side is what lets a non-specialist see the difference without going to a data pack.

QUALIFICATION (IF ANY)

This is presentation of what was already measured rather than a change in the underlying position, and the Supplement gives the location-based level but not the location-based trend, which appears only in the Annual Report.

4.2 What does not stand up (negatives)

▼ F–5

The material sources are not targeted. Net zero and the FY30 target cover Scope 1 and 2, about 6% of the footprint. The agriculture target is absolute and validated but its boundary is 6.63 Mt of the 9.89 Mt of agriculture emissions in its base year, so about a third of agriculture is outside it: on the FY26 agriculture total of 10.56 Mt that is of the order of 3.5 Mt. The supplier-engagement target reaches about 6.40 Mt, 33.7% of the 18.98 Mt value chain, and is a process measure, not a reduction. End-of-life treatment of sold products (1.44 Mt, the second-largest single line), direct use of sold products (0.49 Mt) and 0.09 Mt of other energy and industrial sources, about 2.02 Mt, are reached by neither target; together with the agriculture emissions outside the target boundary, roughly 5.5 Mt, about 29% of the value chain, carries no emissions-reduction target. The Climate Transition Plan does address end-of-life, naming consumer food waste as a hotspot at 7.6% of the value chain and listing waste diversion, product stewardship and food-rescue actions against it, alongside packaging targets for recycled content and recyclability. None of those is an emissions target, and the plan states that Coles is "currently unable to track the impacts of any specific actions" on that source.

WHY IT MATTERS TO A READER

Over 90% of Coles' emissions sit in the value chain, and a reader who takes "net zero by 2050" and "ahead of our FY30 target" as statements about the business is reading about 6% of it. A tenth of the value chain, including its second-largest line, is addressed only by activity that the company says it cannot yet measure the effect of.

WHAT WOULD FIX IT

Set an absolute or intensity reduction target across the remaining value chain, beginning with end-of-life treatment and the agriculture emissions outside the

▼ F–6

The agriculture target's progress cannot be measured against its own base year. The Annual Report states that a direct comparison of FY26 emissions with the reported FY24 base "is not currently meaningful because of changes in emissions measurement methodologies", and that the FY24 base year will therefore be recalculated in FY27. The changes are not described, quantified or bridged anywhere in the suite. Meanwhile the agriculture block rose from 9.89 Mt (FY24) to 10.38 Mt (FY25) to 10.56 Mt (FY26) on the figures as published, and in-boundary emissions rose 1.8% this year.

WHY IT MATTERS TO A READER

This is the only absolute reduction target over the 94% of the footprint that matters, it was validated a year ago, and one year in a reader cannot tell whether it is on track, behind or ahead. The one comparison that is available points the wrong way.

WHAT WOULD FIX IT

Publish the in-boundary agriculture figure in tonnes for each year, describe the measurement changes and bridge the base year now rather than in FY27, so that progress is a number rather than a narrative.

FLAG boundary, and publish the abatement attributed to the circularity actions already under way.

▼ F–7

The forward operational target is a floor that has already been beaten, and the headroom has widened. The FY26–FY30 target set carries the same target Coles reported achieving in FY25: "reduce combined Scope 1 and 2 greenhouse gas emissions by more than 75% (FY20 baseline year) by the end of FY30", against an FY26 outturn of 82.6%. Against the disclosed FY20 market-based base of 1,474,716 t, a 75% floor permits 368,679 t; the FY26 position is 256,203 t. The target therefore permits market-based Scope 1 and 2 to rise 43.9% and still be reported as met, against 33.4% of headroom a year ago. Coles reports being "ahead of the FY30 interim target and on track towards 2050".

WHY IT MATTERS TO A READER

A reader taking the FY26–FY30 strategy as a statement of forward intent is reading a target already beaten by 7.6 percentage points on the smallest part of the footprint, on a basis that can be met with certificates.

WHAT WOULD FIX IT

Re-base the operational target on the FY26 outturn, or convert it to an absolute tonnage cap with interim milestones, and publish the decarbonisation plan behind it.

▼ F–8

One statement of the net-zero commitment is not true within the boundary it implies. The Supplement's "Top 10 material sustainability issues" table describes the climate issue as "Decarbonising and building climate resilience in our operations and value chain to achieve net zero greenhouse gas emissions by 2050". Every target statement in both documents limits the commitment to Scope 1 and 2, and the Annual Report footnotes it in terms: "Commitment refers only to Coles' Scope 1 and Scope 2 emissions." The same wording appeared in the prior year's materiality table and has not been corrected.

WHY IT MATTERS TO A READER

The materiality table is where a reader looks to find out what the company thinks matters. Told there that net zero covers operations and the value chain, a reader has no way to know from that page that the commitment reaches about 6% of emissions.

WHAT WOULD FIX IT

Correct the materiality-table wording to match the target boundary, and state the boundary beside every use of "net zero".

▼ F-9

"100% renewable electricity" does not reconstruct from the components Coles discloses, and the mechanism behind it expires inside the target horizon. Surrendered LGCs (1,307,977, i.e. 1,307,977 MWh) are 82.35% of the 1,588,218,155 kWh of grid electricity consumed, and onsite solar adds 2.48%: about 85% in total. The residual 280,241 MWh is attributed to the renewable power percentage and, in the ACT, the jurisdictional percentage, but the values applied are not disclosed, and the renewable power percentage represents existing grid content rather than additional procurement. Market-based Scope 2 is nonetheless reported as nil. Separately, the Climate Transition Plan discloses that Coles is preparing for the replacement certificate scheme and for "the cessation of LGC creation after 2030"; that appears in no other document in the suite.

WHY IT MATTERS TO A READER

The figure carries reasonable assurance and is one of only two climate statements in the Supplement's front-page snapshot, yet a reader cannot rebuild it, and a nil market-based Scope 2 attributes zero emissions to electricity whose attributes were not surrendered to Coles. The certificate surrender is also what takes market-based Scope 1 and 2 to 256,203 t and produces the 82.6% headline, so a reader pricing the FY30 target needs to know that the instrument behind it stops being created in the target year.

WHAT WOULD FIX IT

Publish the renewable power percentage and jurisdictional percentage values and volumes applied, and the arithmetic from consumption to 100%, together with the residual-mix treatment behind a nil market-based Scope 2; and carry the post-2030 certificate transition into the Annual Report and the Supplement, where the reduction claim is made.

▼ F-10

Two defects sit inside the audited climate statement. It tells a reader that "annual emissions performance relative to the FY20 baseline is presented in this Sustainability Report through graphical and tabular disclosure"; no multi-year emissions table or chart appears anywhere in that report, whose only emissions table covers FY26 alone with no comparative column. Separately, that table presents a single Scope 3 total of 18.98 Mt with Category 3 at 0.01 Mt, which is the market-based basis, and neither names the basis nor gives the location-based total of 19.08 Mt; the Supplement footnote does both.

WHY IT MATTERS TO A READER

A reader following a cross-reference in an audited document to find the emissions trend finds nothing, and a reader taking the Scope 3 total from that table does not know which basis it is on. Both are small in magnitude and easy to fix, and both sit in the one document a regulator reads first.

WHAT WOULD FIX IT

Publish the FY20 to FY26 series in the statutory report, or remove the cross-reference; and label the Scope 3 basis in the emissions table, giving both bases as the report does for Scope 2.

▼ F–11

The financial effect of climate risk is disclosed entirely in words. All seven climate-related risks and opportunities conclude in no material effect on financial position, performance or cash flows, and the mitigation and adaptation costs are repeatedly stated as "not been separately quantified". The only monetary climate figures in the report are $112 million of separately identified capital expenditure and an internal carbon price rising from $56 to $170 a tonne. That price is applied to Scope 1 and 2 and expressly excludes Scope 3, while the carbon-price risk narrative states that Coles considered its agriculture emissions as part of the carbon-price assessment; the result of that consideration is not published.

WHY IT MATTERS TO A READER

An investor pricing transition risk is given a shadow carbon price, an agricultural footprint of 10.56 Mt that the company says it ran through a carbon-price assessment, and no number connecting the two. The conclusion that carbon pricing is immaterial cannot be tested from the disclosure.

WHAT WOULD FIX IT

Publish the modelled cost exposure behind the carbon-price assessment, including the value-chain component, at the disclosed shadow prices, and state the thresholds behind the materiality conclusions.

▼ F–12

The Climate Transition Plan names the levers and sizes none of them. The plan sets out actions by focus area, emissions source, owner and timeframe across operations and the value chain, and maps itself clause by clause to the international transition-planning framework. It attaches no capital figure and no abatement quantity to any action: the "Capital commitments" section describes the areas receiving investment (refrigeration transition, building design and energy efficiency, landlord and energy-partner solar and battery deployment) and commits no dollars; the plan's own framework mapping records "Financial metrics and targets" as not applicable, referring the reader to the Annual Report; and every action is dated only "Ongoing", "FY25 – FY50" or "FY26 – Ongoing", with no interim year and no tonnage. The only three tonnage figures in the document are the FY20 and FY24 baselines.

WHY IT MATTERS TO A READER

A transition plan is where a reader expects to find what the transition costs and what each lever delivers. This one answers what Coles will do and neither what it will spend nor how far it gets, so the FY30 and 2050 targets still cannot be tested against a pathway. The refrigerant programme, the largest lever Coles controls, runs to 2050 at 20 to 30 systems a year with no interim milestone.

WHAT WOULD FIX IT

Publish the capital envelope and its phasing, and the abatement expected from each lever, with at least one interim milestone between FY26 and FY30 and one between FY30 and 2050.

▼ F-13

The transition plan states the agriculture target against the whole agriculture block, without the boundary the audited report discloses. The plan's target table gives "30.3% reduction in Scope 3 FLAG emissions by the end of FY30, Baseline year: FY24, Baseline emissions: 9.89 MtCO2-e". The audited Annual Report states that the same target's boundary "comprises 6.63 Mt CO2-e, representing 67% of FY24 FLAG emissions". The plan does not repeat that qualifier.

WHY IT MATTERS TO A READER

A reader of the transition plan alone takes the 30.3% reduction to apply to all 9.89 Mt, which would be about 3.0 Mt of abatement; on the disclosed boundary it is about 2.0 Mt. The difference is roughly a megatonne, and the version without the qualifier is the one in the document written to explain the transition.

WHAT WOULD FIX IT

Repeat the target boundary wherever the target is stated, as the audited report does.

▼ F-14

A live carbon-neutral product certification and an in-period withdrawal appear nowhere in the reporting suite. Neither the Annual Report nor the Supplement mentions Climate Active, carbon neutrality, carbon-neutral products or carbon offsets. Coles held Climate Active *Carbon Neutral Standard* certifications for the Coles Finest beef range from April 2022 and the pork range from July 2023, and disclosed to FY2024 that "carbon offsets are only purchased for the purpose of the Coles Finest carbon neutral products". A register check on 1 September 2026 indicates the beef certification remains live and the pork certification was withdrawn effective 4 August 2025, inside the reviewed year.

WHY IT MATTERS TO A READER

A shopper sees a government-backed carbon-neutral claim on a Coles product; a reader of the climate statement sees a company that makes no carbon-neutral claim and buys no credits. Both can be true at once, because the corporate statements are scoped to Scope 1 and 2, but the reporting suite gives a reader no way to see that. Withdrawing a certification is neither a fault nor a credit; not saying so is the gap.

WHAT WOULD FIX IT

State the product-level certifications held, their boundary and their status, including any withdrawn during the period, beside the corporate carbon-credit policy.

4.3 What cannot be verified

?

F–15

What each transition lever delivers, and what the transition costs.

WHY IT IS OPEN

The Climate Transition Plan names the levers and attaches no abatement quantity or cost to any of them; its capital-commitments section commits no figure and its framework mapping marks financial metrics not applicable. The underlying Group decarbonisation plan, which it says incorporates funded programs, is an internal document.

WHAT WOULD RESOLVE IT

The decarbonisation plan, or a revised transition plan, with per-lever abatement, the capital envelope and its phasing, and interim milestones.

?

F–16

The arithmetic from disclosed components to "100% renewable electricity", and the basis for a nil market-based Scope 2.

WHY IT IS OPEN

Certificate surrender (82.35%) plus onsite solar (2.48%) reach about 85%; the renewable power percentage and jurisdictional percentage values applied to the residual are not disclosed.

WHAT WOULD RESOLVE IT

Disclosure of the percentages and volumes applied, and the residual-mix treatment for unmatched consumption.

?

F–17

Temporal and locational matching of surrendered certificates to consumption.

WHY IT IS OPEN

Coles names the sourcing states and the generator relationships and states that the arrangements "match what we consume", but certificate vintage and any annual, interval or grid-region matching evidence are not disclosed.

WHAT WOULD RESOLVE IT

A certificate register showing vintage, volume and matching basis against consumption.

?

F–18

The reviewed year's Scope 1 and Scope 2 against the regulator-facing figures.

WHY IT IS OPEN

The Clean Energy Regulator's 2025-26 corporate emissions and energy data is not yet published at the review date. On the 2024-25 register the prior year reconciled to 0.005% on location-based Scope 2 and 1.19% on energy, with Scope 1 sitting 19,505 t above the register figure; the FY26 report now discloses a reconciling item, that refrigerant reporting extends beyond the NGER framework, but does not quantify it.

WHAT WOULD RESOLVE IT

Publication of the 2025-26 register, and disclosure of the tonnage attributable to the beyond-NGER refrigerant coverage.

?

F–19

Accuracy of the value-chain total, especially the dominant purchased-goods category.

WHY IT IS OPEN

It rests on spend and industry-average estimates, including DEFRA UK input-output factors applied to Australian spend, with several categories built from nine months of data extrapolated to twelve, and it carries limited assurance only.

WHAT WOULD RESOLVE IT

Supplier-specific data for material commodities and reasonable assurance over the Scope 3 total.

?

F–20

Materiality of the excluded value-chain sources: customer travel to stores, and indirect use of sold products.

WHY IT IS OPEN

Both are excluded on an asserted materiality basis with no screening estimate published, and both could be material for a supermarket.

WHAT WOULD RESOLVE IT

A screening estimate of each excluded source to confirm or rebut the materiality conclusion.

?

F–21

The current status of the Coles Finest carbon-neutral product certifications.

WHY IT IS OPEN

The Climate Active register page would not render on direct retrieval on 1 September 2026. Two indexed searches agree that the beef certification is active and the pork certification was withdrawn effective 4 August 2025, but the primary source was not obtained, so this is recorded at medium confidence.

WHAT WOULD RESOLVE IT

A retrieval of the Climate Active public register entry, and a statement from Coles on the status and boundary of each certification.

?

F–22

The effect of the post-2030 certificate transition on the FY30 target and the renewable-electricity commitment.

WHY IT IS OPEN

The transition plan discloses that certificate creation ends after 2030 and that Coles is preparing for the replacement scheme, and says nothing about how the FY30 target or the "maintain 100% renewable electricity" commitment is met once the current instrument is unavailable.

WHAT WOULD RESOLVE IT

Coles' assessment of the replacement scheme's effect on the market-based Scope 2 position, the FY30 target and the renewable-electricity commitment.

5. Disclosure risk exposure

5.1 Risk read

Two features of Coles' FY2026 disclosure lower its exposure against its FY2025 reporting: the correction to the headline is printed beside the headline, and the physical numbers moved in the direction the narrative claims. What remains concentrates in one place: the gap between what the targets say and what they reach, and the fact that the transition plan behind them names the levers without sizing or

pricing any of them. A reader is told the company is ahead of its emissions target and on track to net zero, on a target covering about 6% of the footprint, while the only absolute target over the other 94% cannot presently be measured against its own base year, the engagement target that stands in for part of the rest is stated to be off track, and roughly 29% of the value chain carries no target at all. The single biggest driver is the whole-of-business net-zero wording in the materiality table, which is the one place the disclosure asserts, in the company's own voice, a boundary its targets do not support.

5.2 Risk by lens

Risk exposure by lens

Relative exposure across disclosure-risk lenses; see the table for what drives each and what would reduce it.

Source: Review analysis of the FY26 disclosure suite

Legal (misleading-conduct / disclosure / director-duty)	**Moderate**	Medium confidence
Regulatory (ASIC / ACCC / Clean Energy Regulator / AASB S2)	**Low to moderate**	Medium confidence
Technology (dependence on unproven abatement)	**Moderate**	Medium confidence
Physical (physical-risk disclosure consistency)	**Low**	Medium confidence
Other: instrument continuity	**Moderate**	High confidence
Other: commercial and reputational	**Moderate**	High confidence

LENS	EXPOSURE	CONFIDENCE	WHAT DRIVES IT	WHAT WOULD REDUCE IT
Legal (misleading-conduct / disclosure / director-duty)	Moderate	Medium	The materiality table's operations-and-value-chain net-zero wording, uncorrected across two periods, against a Scope 1 and 2 commitment; and a "100% renewable electricity" claim carried in the consumer-facing snapshot that cannot be rebuilt from the disclosed components. Every target statement is correctly bounded, which limits the exposure to those two statements.	Correct the materiality-table wording; publish the renewable percentage arithmetic.
Regulatory (ASIC / ACCC / Clean Energy Regulator / AASB S2)	Low to moderate	Medium	The first mandatory filing is complete and carries unmodified assurance outcomes and a directors' declaration, which is the substantial part. The residual is internal: an audited cross-reference to disclosure that is not present, and an unlabelled Scope 3 basis in the audited emissions table. The reviewed year cannot yet be reconciled against the regulator's register.	Fix the two internal defects; quantify the beyond-NGER refrigerant coverage so the register comparison is bridgeable.

LENS	EXPOSURE	CONFIDENCE	WHAT DRIVES IT	WHAT WOULD REDUCE IT
Technology (dependence on unproven abatement)	Moderate	Medium	The agriculture target depends on on-farm abatement and supplier action, and Coles states that reductions are "not yet evident", citing "immaturity of emissions reduction technologies, demand dynamics and reliance on suppliers". Its own no-deforestation ambition for beef was missed after suppliers indicated they could not support it. The transition plan names the levers without sizing or costing any of them, so the dependency cannot be bounded.	Publish the abatement pathway with quantified levers and supplier coverage, and interim milestones between FY26 and FY30.
Physical (physical-risk disclosure consistency)	Low	Medium	Site-level hazard exposure is now assessed by a third party and published as a metric across supermarkets, liquor stores and large facilities, with scenario analysis under three named pathways. The residual is that all financial effects are qualitative and the FY25 commodity-coverage assessment is not repeated.	Quantify at least the modelled range of physical financial effects, and restate the agricultural commodity coverage alongside the asset-side metric.
Other: instrument continuity	Moderate	High	The certificate surrender that takes market-based Scope 2 to nil produces both the 82.6% headline and the position against the FY30 target. The transition plan discloses that creation of that instrument ends after 2030, the FY30 target year, and that a replacement scheme is being prepared; no document states what the position is under the replacement.	Publish the assessment of the replacement scheme's effect on the market-based position, the FY30 target and the renewable-electricity commitment.
Other: commercial and reputational	Moderate	High	Two of three climate-related targets are publicly stated by Coles to be behind: agriculture emissions are rising against a 30.3% reduction target, and the supplier-engagement target is off track with the pipeline of eligible suppliers narrowing. Coles states both positions in its own words, and both remain adverse facts a reader will price.	Publish the revised pathway and the interim milestones that would show either target returning to track.

5.3 Consistency across audiences

CLAIM / METRIC	TO THE REGULATOR	TO INVESTORS / PUBLIC	CONSISTENT AFTER NORMALISING BOUNDARY?
Scope 1	256,791 t on the 2024-25 register for the prior year; the 2025-26 register is not yet published	276,296 t (FY25) and 256,203 t (FY26)	Not testable: not yet testable for FY26. On FY25 the disclosure sat 19,505 t (7.6%) above the register. The FY26 report now names the reconciling item, refrigerant reporting extending beyond the NGER framework, but does not quantify it
Scope 2, location-based	1,041,747 t on the 2024-25 register for the prior year	1,041,800 t (FY25); 1,008,242 t (FY26)	Yes: on FY25, to 0.005%. FY26 not yet testable
Net energy	6,901,598 GJ on the 2024-25 register for the prior year	6,819,354 GJ (FY25); 6,811,126 GJ (FY26)	Yes: broadly, to 1.19% on FY25. FY26 not yet testable
Net-zero boundary	Scope 1 and 2, stated in the audited climate statement and footnoted at each target	"Operations and value chain" in the Supplement's materiality table; Scope 1 and 2 everywhere else	No: the two statements sit in the same reporting suite and nothing tells a reader which governs
Scope 3 total and basis	18.98 Mt in the audited emissions table, basis not named	18.98 Mt market-based and 19.08 Mt location-based, both named in the Supplement footnote	No: on labelling. The figures agree; the audited table does not say which basis it is on
Carbon-neutral product claims	Absent from the audited climate statement	Absent from the Supplement; a register check indicates one certification live and one withdrawn 4 August 2025; on-pack claims are made to shoppers	Cannot verify: the corporate statements are correctly scoped to Scope 1 and 2, so nothing conflicts; but the product-level position is not disclosed to either audience
Supplier-engagement target	80% of suppliers by spend by FY29, in the audited target table	80% by FY29 in the Supplement and the transition plan, with the same explanation	Yes: the prior year's two-version statement is resolved
Agriculture target baseline and boundary	Baseline 9.89 Mt, target boundary 6.63 Mt, "representing 67% of FY24 FLAG emissions", in the audited target table	Transition plan states "Baseline emissions: 9.89 MtCO2-e" with no boundary qualifier	No: same target, same baseline, and the boundary that limits it appears in one document and not the other
Post-2030 certificate transition	Not stated in the audited climate statement	Stated only in the transition plan: preparing for the replacement scheme and "the cessation of LGC creation after 2030"	No: on completeness. The dependency behind the headline reduction is disclosed in one document of the suite and not in the two that carry the claim

6. How to fix it

6.1 NoCO2 Standard alignment

FINDING	REVIEW FINDING (WHY IT MATTERS)	NOCO2 MECHANISM	DOCUMENT / CLAUSE	REQUIRED EVIDENCE	LIKELY NOCO2 OUTCOME
N1 Target coverage: about 29% of the value chain untargeted	Over 90% of emissions sit in the value chain; the only absolute target there reaches about two thirds of one block and roughly 29% including the second-largest single line is reached by nothing	Reduction obligation over the attributable inventory, with influence-based categories disclosed where a category is not attributable	4.7 Reduction Obligations; 4.7.4 Accelerated Reduction Timeline; 4.5.2 Inventory Types; 4.5.6 Influence Based Inventory Categories	Category-level abatement pathway covering the untargeted categories; influence-based classification and rationale for any category left outside the reduction obligation	Non-conformance against the reduction obligation until a pathway covers the attributable inventory
N2 FLAG target progress unmeasurable against its own base year	The only absolute value-chain target has no measurable progress one year after validation; the base year is to be recalculated in FY27 and the measurement changes are undescribed	Base-year consistency and historical-series transparency	4.9.2 Metrics & Targets (base year consistency); 5.1.10 Emissions Tracking; 4.3 Initial Year & Reporting Period	Restated base year on the current method with a bridge; in-boundary emissions in tonnes per period	Non-conformance on emissions tracking until the base year is bridged
N3 FY30 target is a beaten floor with 43.9% headroom	The forward operational target carries no incremental ambition for a sixth year and permits reported emissions to rise 43.9% and still be met	Accelerated Reduction Timeline: a 1.5°C-aligned trajectory rather than a floor	4.7.4 Accelerated Reduction Timeline; 4.7.5 Net Zero Status Requirements; 4.9.2 Metrics & Targets	Re-based target on the FY26 outturn with interim milestones and an absolute tonnage path	Non-conformance against the ART requirement while the target permits growth
N4 Materiality table asserts a whole-of-business net zero	The one statement in the suite that a reader cannot reconcile against anything else in it; unchanged across two periods	Claim wording accuracy and boundary description	4.9.1 Use of Claims and Statements (4.9.1.2 Net Zero Claims); 1.1.3; 5.1.7 Boundary Description	Corrected wording; boundary stated at each use of "net zero"	Claim qualification required before any net-zero representation
N5 "100% renewable electricity" does not reconstruct	An assured, consumer-facing completeness claim in which about 15 points rest on undisclosed grid-content percentages that are not additional procurement	Contractual-instrument disclosure and the market-versus-location methodology	4.5.5 Methodology; 5.1.13 Contractual Instruments for Purchased Energy	RPP and JRPP values and volumes applied; certificate vintage and matching basis; residual-mix treatment	Claim qualification: the percentage must reconstruct from disclosed instruments
N6 Audited cross-reference to disclosure that is not present	A reader following a pointer in the audited statutory statement to find the emissions trend finds nothing; the only table in it is a single year	Public reporting and historical-series disclosure	4.9.4 Public Reporting & Disclosure; 5.1.10 Emissions Tracking; 5.1.8 GHG Inventory Table	The FY20 to FY26 series presented in the statutory report, or the cross-reference removed	Minor non-conformance on disclosure presentation
N7 Financial effects wholly qualitative; internal carbon price excludes Scope 3	An investor is given a shadow carbon price, a 10.56 Mt agricultural footprint stated to have been run through a carbon-price assessment, and no number connecting the two	Internal cost of carbon and target integrity	4.9.2 Metrics & Targets (internal cost of carbon)	Modelled exposure at the disclosed shadow prices including the value-chain component; materiality thresholds applied	Standard review item: the internal price exists but does not reach the material inventory
N8 Product-level carbon-neutral certifications absent from the suite	A government-register carbon-neutral claim made to shoppers, and a withdrawal inside the reviewed period, appear nowhere in the reporting suite	Claim disclosure and carbon-credit reporting	4.9.1 Use of Claims and Statements; 5.1.12 Carbon Credit Reporting; 4.9.4 Public Reporting & Disclosure	Certifications held, their boundary and status; credits retired against them; any withdrawal in the period	Disclosure requirement: all live claims and their credit basis must be reported
P1 Refrigerant transition now visible in the assured numbers	A 10.96% fall on the largest directly controlled source, from a capital-approved conversion programme	Required Interventions Schedule	4.7.1 Required Interventions; Annex A	Conversion schedule with dated tonnage milestones and a disclosed leakage rate	Conforming intervention, subject to being placed on a dated schedule
P2 Onsite generation and demand-side capability	39,370 MWh across 156 sites, additional by construction and reasonably assured, distinct from certificate purchase	Reduction obligation delivered by physical abatement rather than instruments	4.7 Reduction Obligations; 4.8.1 Abatement Principles (abatement before offset)	Generation records by site; the abatement attributable to storage and demand flexibility	Conforming abatement
P3 Absolute validated agriculture target with its boundary published	An absolute target on the hardest and largest source, with the boundary sized so a reader can see what it reaches	Reduction obligation over an attributable Scope 3 category	4.7.4 Accelerated Reduction Timeline; 4.5.3 GHG Emission Categories	Abatement pathway with quantified levers, supplier coverage and interim milestones	Conforming in architecture; delivery not yet evidenced

FINDING	REVIEW FINDING (WHY IT MATTERS)	NOCO2 MECHANISM	DOCUMENT / CLAUSE	REQUIRED EVIDENCE	LIKELY NOCO2 OUTCOME
P4 Scope 3 first-year relief not taken	The whole footprint entered the statutory statement in year one, which is what makes the coverage arithmetic possible	Category coverage in the disclosed inventory	4.5.3 GHG Emission Categories; 5.1.8 GHG Inventory Table	—	Conforming
N8 Transition plan names the levers and sizes none	The plan carries no capital figure and no per-lever abatement, so the pathway to FY30 and 2050 cannot be tested	Reduction-obligation progress and trajectory disclosure	5.1.11 Reduction Obligation Progress; 4.7.4 Accelerated Reduction Timeline; 4.9.2 Metrics & Targets (internal cost of carbon)	Capital envelope and phasing; abatement expected per lever; interim milestones	Non-conformance on reduction-obligation progress disclosure until the pathway is quantified
N9 CTP states the FLAG baseline without the target boundary	The same validated target reads about a megatonne larger in the plan than in the audited accounts	Claim wording accuracy and boundary description	4.9.1 Use of Claims and Statements; 5.1.7 Boundary Description	The target boundary repeated wherever the target is stated	Claim qualification
D6-6 Certificate creation ends after 2030	The instrument behind the headline reduction and the FY30 target stops being created in the target year; disclosed only in the transition plan	Contractual-instrument disclosure	5.1.13 Contractual Instruments for Purchased Energy; 4.5.5 Methodology	The position under the replacement scheme, and the dependency carried into the documents making the claim	Disclosure requirement
CV1 Per-lever abatement and the cost of the transition	Neither is published, and the underlying decarbonisation plan is internal	Reduction-obligation progress disclosure	5.1.11 Reduction Obligation Progress	The decarbonisation plan, or a revised transition plan with per-lever abatement and capital phasing	Cannot assess
CV5 Value-chain accuracy	Spend and industry-average estimation with several nine-month extrapolations, under limited assurance	Data-quality ranking and supplier-specific factors	4.6 Data Quality; 4.6.4 SSEF Assessment; 5.1.14	Supplier-specific factors for material commodities; data-quality ranking by category	Improvement plan required, not a non-conformance
D7-2 Statutory assurance reaches Scope 1 and 2 only	The 94% of the footprint in the value chain carries no statutory assurance and limited voluntary assurance	Independent assurance	6.1 Assurance Requirements; 6.2 Conformance Requirements	Assurance over the value-chain total at the level the phase-in permits	Standard review item during the assurance phase-in

7. Conclusion & next steps

Coles' first mandatory climate report is a substantially better document than the one it replaces, and the improvement is real rather than presentational: the physical operational footprint fell 4.1%, the majority of that fall is the company's own action rather than the grid's, the refrigerant programme finally shows in the numbers, and the correction to the headline percentage now sits beside the headline where a non-expert reader will meet it. The company also says plainly that two of its three climate targets are behind.

The verdict turns on the part of the footprint the targets do not reach. Net zero and the target Coles reports being ahead of cover about 6% of its emissions. Of the other 94%, the only absolute target covers about two thirds of the agriculture block and its progress cannot presently be measured against its own base year; the engagement metric that stands in for another third is off track; and roughly 29%, including the second-largest single line in the whole inventory, is reached by no emissions target at all.

The first Climate Transition Plan is a well-built document that answers what Coles will do and not what it will spend or what any of it delivers. Its capital-commitments section commits no figure, its own framework mapping marks financial metrics not applicable, and no lever and no year between FY26 and FY30 carries a tonnage. It also discloses, alone in the suite, that the certificate scheme behind the headline reduction stops creating certificates after 2030, which is the FY30 target year.

Four things would close most of this. Set a reduction target across the value-chain emissions no emissions target reaches, starting with end-of-life treatment and the agriculture emissions outside the FLAG boundary. Publish the in-boundary agriculture figure in tonnes each year, and bridge the FY24 base year now rather than in FY27, so that the target's progress is a number. Attach a capital envelope and a per-lever abatement figure to the transition plan, with at least one interim milestone before FY30. And correct the one sentence in the materiality table that describes net zero as covering the value chain, which is the single statement in the suite that a reader cannot reconcile against anything else in it.

Important information

This diagnosis is general information, published to support transparency, accountability and public debate on corporate climate disclosure. It sets out CRI's assessment of the publicly available climate disclosures of the organisation named above, for the reporting period stated, based on third-party information available at the review date. The assessment is made against CRI's Climate Disclosure Review Rules (version stated above), which use the CRI Net Zero Standard as the reference for a credible claim together with AASB S2 Climate-related Disclosures, and it gives reasons for each finding.

It assesses the disclosure, not the organisation's underlying climate performance or intent, and it does not allege illegality, misconduct, greenwashing or dishonesty. It is not tailored advice, nor legal, financial or investment advice, and it is not an audit, an assurance engagement or a certification. CRI does not accept liability for any error or omission in this analysis, or for any loss arising from use of or reliance on it.

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--- ANNEXES (INTERNAL WORKING LAYER) ---

These annexes are the detailed working layer behind the findings in the body: the evidence base, rule application and traceability. Much of it is review working, retained for transparency and of interest to both the internal review team and external readers who want to see how each finding was reached.

Annex A: Documents reviewed & completeness (A-01A)

DOCUMENT	STATUS	CRITICALITY	NOTES
2026 Annual Report (incl. statutory Sustainability Report pp.40–81; EY report under ASSA 5010 pp.77–81; directors' declaration p.76)	Reviewed: primary	Critical	Identity confirmed from body text and the directors' declaration dated 25 August 2026. The audited source under A-01B
2026 Sustainability Supplement (incl. EY assurance report pp.49–52)	Reviewed: supplementary	Critical	Identity confirmed from the report-scope note: "covers the period 30 June 2025 to 28 June 2026 (FY26)"
2026 Sustainability Data Pack (xlsx)	Reviewed: supplementary	Critical	Source of the FY20–FY26 scope, energy, certificate and category series; named in the EY subject-matter tables
2025 Annual Report; 2025 Sustainability Report; 2025 Data Pack	Reviewed: prior-period context	Material	Year-over-year normalisation and restatement checks
2023 and 2024 Data Packs; Sustainability Reports FY2020–FY2024	Reviewed: prior-period context	Material	Longitudinal series; the FY24 inventory-rebuild note lives only in the FY24 pack
NGER corporate emissions and energy data 2024-25 (as at 27 February 2026)	Reviewed: external register lookup, extract preserved in `_working/`	Material	2025-26 register not yet published, so the reviewed year cannot be reconciled
2026 Climate Transition Plan (published 25 August 2026)	Reviewed: supplementary	Critical	Identity confirmed from the cover ("2026 Climate Transition Plan. Published: 25 August 2026") and the Chairman and CEO foreword. Part of the FY26 reporting suite and referenced throughout the Annual Report and Supplement
Group decarbonisation plan	Not published; stated as completed (AR p.57; CTP §6)	Material	The transition plan states it "incorporates funded emissions-reduction programs" but publishes no capital figure or per-lever abatement, so the quantified pathway remains unassessable (CV1)
SBTi validation letters (FY30 Scope 1 and 2; FLAG; supplier engagement)	Referenced, not provided	Useful	Validated wording, version and boundary taken as stated
Protecting Forests Statement	Referenced, not provided	Useful	Deforestation scope and progress taken as stated in the Supplement
Climate Active public register entry	Checked 1 September 2026; primary page would not render (two timeouts)	Material	Status recorded from two indexed searches at medium confidence (CV7)
2026 Corporate Governance Statement; 2026 Modern Slavery Statement; 2026 Economic Contribution Report	Not provided	Optional	Named in the reporting suite; no climate metric depends on them

Corpus scoping (Step 1). FY2026 is the latest period Coles has reported and no later-period document exists at the review date, so no exclusion for forward reach was required. The two external checks recorded above establish an absence or a register status as at the review date and cite the search, not a later document.

Annex B: Evidence table (AI-02)

EVIDENCE ID	SOURCE (DOC · PAGE/TABLE)	WHAT IT SHOWS	LINKED CLAIM / FINDING	RULE IDS	STATUS
EV-01	AR Table 5, p.61	Scope 1 256,203; Scope 2 location 1,008,242; Scope 2 market 0; Scope 3 total 18.98 Mt with eleven category lines	§3.1; A2	G-01, G-06, G-07, S2-26, S2-28, S2-29	Verified
EV-02	Data Pack, `Energy and S1&S2 emissions`	FY20–FY26 Scope 1 and Scope 2 on both bases; five named emission sources; grid electricity consumption; LGC surrenders; onsite solar; energy consumption and intensity	§3.3, §3.4, Annex K.1	G-06, G-07, YOY-02	Verified
EV-03	Data Pack, `Scope 3 emissions`	FY22–FY26 category series; FLAG by commodity FY25–FY26 (total 10.38 → 10.56 Mt); Energy & Industrial by category (8.59 → 8.42 Mt); totals on both bases	§3.1, §3.4, N1, N2	S3-01, S3-25, YOY-02	Verified
EV-04	AR p.66, Table 6 "Progress achieved during the year and trends"	"an 82.6% reduction in combined Scope 1 and Scope 2 GHG market-based emissions relative to the FY20 baseline… a 7.3% decrease compared with FY25… also achieved a 16.9% reduction in combined Scope 1 and Scope 2 location-based GHG emissions… a 4.1% decrease compared with FY25"	§3.3, F-4	T-MI-06, G-BAU, A-19	Verified
EV-05	AR p.64, Table 6 Baseline row	"In FY20 the location-based combined Scope 1 and 2 emissions were 1,522,236 tCO2-e (applicable for the Net Zero target). In FY20 the market-based combined Scope 1 and 2 emissions was 1,474,716 tCO2-e (applicable for the FY30 Scope 1 and 2 target)"	N3 headroom calculation	T-BASE-01, T-14	Verified
EV-06	Supplement p.8 target table; AR p.65 milestones row	FY26–FY30 target set carries "Reduce combined Scope 1 and 2 greenhouse gas emissions by more than 75% (FY20 baseline year) by the end of FY30"	N3	S2-41, T-14, A-18	Verified
EV-07	AR p.67, Table 7 Baseline row	"FY24 FLAG emissions were 9.89 Mt CO2-e. The target boundary comprises 6.63 Mt CO2-e, representing 67% of FY24 FLAG emissions"	N1, F-3	T-COV-02, S3-25	Verified
EV-08	AR p.67, Table 7 Progress row	"in-boundary FLAG emissions were 1.8% higher compared with FY25. Direct comparison of FY26 emissions with the reported FY24 base year emissions is not currently meaningful because of changes in emissions measurement methodologies… FLAG emissions reductions are not yet evident"	N2	T-BASE-01, G-10, YOY-04	Verified
EV-09	AR p.69, Table 8 Progress row; Supplement p.13	"approximately 46.9% of suppliers by spend have set Scope 1 and 2 science-based emissions targets, and 41.1% … Progress during the year has been slower than anticipated, and we are currently not on track to achieve our FY29 target"	N1, §3.4	T-SUP-03, T-PROC-05, A-16	Verified
EV-10	AR p.65, Table 6 Gross/net row	"Net GHG emissions target. The associated gross target is to reduce absolute Scope 1 and Scope 2 GHG emissions by at least 90% from the FY20 baseline by 2050. Any residual emissions remaining in 2050 may be neutralised using carbon credits"	§3.4, Annex D.5	G-11, E-08, T-01	Verified
EV-11	Supplement p.11 inventory panel	Market-based 0.26 Mt and location-based 1.26 Mt printed together with source splits (electricity, natural gas, refrigerants, fuels and others)	F-4; R1	OUT-TB-03, T-MI-06	Verified
EV-12	Supplement p.12	"By the end of FY26, we reduced our combined Scope 1 and 2 emissions relative to the FY20 baseline by 82.6%, positioning us ahead of our FY30 target. This has been achieved through market-based renewable electricity purchases… Coles has not used carbon credits to achieve our Scope 1 and Scope 2 emissions reductions"	R1, R4, N3	OUT-TB-02, OUT-TB-15, E-08	Verified
EV-13	Supplement p.44, "Our top 10 material sustainability issues for FY26"	Climate change described as "Decarbonising and building climate resilience in our operations and value chain to achieve net zero greenhouse gas emissions by 2050"	N4; P1	OUT-TB-02, OUT-TB-05, G-04	Verified

EVIDENCE ID	SOURCE (DOC · PAGE/TABLE)	WHAT IT SHOWS	LINKED CLAIM / FINDING	RULE IDS	STATUS
EV-14	AR p.63 footnote 1 to Table 6 milestones; Supplement p.5 footnote 8 and p.8 footnote 2	The renewable electricity percentage "includes voluntary LGCs surrendered by us, renewable power percentage (RPP), jurisdictional renewable power percentage (JRPP) and onsite solar within Coles' operational control"	N5; CV2	E-01, E-11, E-24, OUT-TB-21	Verified
EV-15	AR pp.77–81, EY report under ASSA 5010	Audit opinion over Scope 1 and 2 (AASB S2 subparagraphs 29(a)(i)(1) to (2) and 29(a)(ii) to (v), Tables 5 and 9); review conclusion over governance (para 6) and risks and opportunities (subparas 9(a), 10(a), 10(b)). Scope 3 is in neither scope	§2.3, G1, D.7	GOV-12, A-11, S2-45	Verified
EV-16	Supplement pp.49–52, EY assurance report	Limited assurance over Scope 3 emissions, FLAG sector emissions and suppliers by spend with science-based targets; reasonable assurance over energy consumption, Scope 1, Scope 2 on both bases, energy produced (solar), LGC surrenders and renewable electricity %	§2.2, A4	GOV-12, A-11	Verified
EV-17	AR p.66, Table 6 Progress row, final sentence	"Annual emissions performance relative to the FY20 baseline is presented in this Sustainability Report through graphical and tabular disclosure"	N6	A-01B, DR-02, OUT-TB-06	**Verified as not satisfied**: no multi-year emissions table or chart appears in AR pp.40–81; Table 5 is FY26 only with no comparative column
EV-18	AR p.63, cross-industry and transition-risk metrics	Physical hazard: supermarkets 5% (40), liquor 5% (47), large facilities 0% (0). Transition: natural refrigerants in 16% (141) of supermarkets. Sales revenue $45,580m; lower-carbon product share not reliably determinable	I1, F-1	N-01, N-04, S2-33	Verified
EV-19	AR p.63, capital deployment and internal carbon price	$112m separately identified climate-related capital expenditure; shadow prices $56 (FY26–FY28) rising to $170 (FY41 onwards); "The internal carbon price applies to Scope 1 and Scope 2 emissions and excludes Scope 3 emissions"	N7; I1	S2-35, S2-38, T-01	Verified
EV-20	AR pp.70–71, Table 9	"Coles reports refrigerant emissions from in-scope refrigeration and air-conditioning equipment, including those with charge of less than 100 kg and a global warming potential (GWP) less than 1,000… extends beyond the requirements under the National Greenhouse and Energy Reporting (NGER) framework"	§5.3; Annex J.2	A-01C, DR-02, G-06	Verified; the reconciling item is named, not quantified
EV-21	AR pp.72–74, Table 10	Per-category measurement approach, data quality and verification, emission factors and limitations, including nine-month extrapolations for C1 GNFR spend, C4 3PL, C6, C7, C8 and C15, and DEFRA UK spend-based factors on the dominant line	A1, A3, A4, CV5	S3-EST, S3A-03, GHG-STD-08	Verified
EV-22	AR p.70, basis of preparation	"Category 10… Category 13… and Category 14… are not applicable. Category 9… is largely not applicable, with customer transport representing the primary potential downstream activity considered and excluded on the basis of materiality. Category 11 (indirect use of sold products) and certain elements of Category 5… have also been excluded where assessed as immaterial"	A1; CV6	S3-25, S3-26, G-19	Verified; no screening estimate published
EV-23	AR p.56 and Supplement p.11	"The Group's first Climate Transition Plan (CTP), released in August 2026…" with scope, key assumptions, dependencies and limitations summarised; the plan itself at colesgroup.com.au/climate	CV1	S2-40, T-01, T-DEP-04	Document not provided
EV-24	Supplement pp.12–13	"In FY26, we maintained sourcing of 100% renewable electricity for our operations"; 8.96 MW installed across 34 sites; 156 solar-enabled sites; 39,370 MWh, "representing 2.4% of Coles' electricity consumption"; natural refrigerants 141 supermarkets and 94 liquor stores; gas sub-metering cutting participating-store gas use by about 18%	F-1, F-2; N5	E-01, E-24, A-16	Verified
EV-25	AR pp.74–75, Contractual instruments	Certificate mechanism, LGC sourcing states (Victoria, NSW, South Australia, Queensland) and the substantiation logic; no certificate vintage and no temporal or locational matching evidence	CV3	E-11, E-12, E-19	Verified
EV-26	Supplement pp.4, 17–19; AR remuneration report pp.105–106	No-deforestation ambition achieved for soy, palm oil and timber/paper/pulp; **not achieved for beef and cocoa**, with reasons (EUDR delay; suppliers "unable to support our initial no deforestation ambition")	F-3 qualification; D.9	N-01, N-02, T-DEP-04	Verified
EV-27	AR pp.105–106, remuneration report	MD & CEO FY26 STI Sustainability measure: 10% target weighting, outcome "Threshold Achieved" at 5.0%; narrative names the off-track supplier-engagement target and the missed beef and cocoa deforestation ambitions	D.7	GOV-08, GOV-09, A-11	Verified

EVIDENCE ID	SOURCE (DOC · PAGE/TABLE)	WHAT IT SHOWS	LINKED CLAIM / FINDING	RULE IDS	STATUS
EV-28	AR pp.44–52, CRRO tables 1 and 2	Seven climate-related risks and opportunities; each concludes in no material financial effect; mitigation and adaptation costs repeatedly "not been separately quantified"	N7	S2-35, S2-36, S2-37	Verified
EV-29	External: Climate Active public register, checked 1 September 2026	Coles Finest Certified Carbon Neutral Beef indicated **active**; the certified pork product indicated **withdrawn effective 4 August 2025**. Primary page would not render; recorded from two indexed searches	N8; CV7	E-25, A-18, DR-02	**Medium confidence**: primary source not retrieved
EV-30	FY2023 Sustainability Report, footnote 1	"Coles currently does not purchase carbon offsets to decarbonise its operations. Carbon offsets are only purchased for the purpose of the Coles Finest carbon neutral products"	N8; Annex K.3	E-25, A-18, YOY-05	Verified (prior period, context)
EV-31	FY2025 Annual Report p.40	"we have assessed 55 core commodities (covering ~60% of revenue)"; not repeated in FY26	Annex K.3	SEC-SF-11, YOY-05	Verified (prior period, context)
EV-32	AR p.61 Table 5 footnote 2	"Financed emissions (Category 15): Coles does not undertake the asset management, commercial banking or insurance activities specified in AASB S2 paragraph B59 and is therefore not subject to the additional disclosure requirements"	§3.2; I4	S2-29, SEC-FI-REL-01 (not triggered)	Verified
EV-33	AR p.42	"The Group has also elected to early adopt AASB S2025-1 Amendments to Greenhouse Gas Emissions Disclosures, issued in December 2025"	§1.2, G1	S2-01, S2-45	Verified
EV-34	CTP cover and foreword	"2026 Climate Transition Plan. Published: 25 August 2026"; "Our first Climate Transition Plan (CTP) aims to support this purpose and our corporate strategy by setting out how we will contribute to lower emissions and a more resilient food system in Australia"	CV1; §3.4	S2-40, T-01	Verified: document identity and status
EV-35	CTP §6 Capital commitments (p.22) and §8.2 mapping (p.25)	The section describes refrigeration transition, building design and energy efficiency, and landlord and energy-partner solar and battery deployment, and **states no monetary amount**; the framework mapping records "Financial metrics and targets" against "N/A1 — Refer to Coles' Sustainability Report within the latest Annual Report". A whole-document search returns **no dollar figure** and **no interim milestone**; the only tonnage figures are the FY20 baselines (1.47 Mt market, 1.52 Mt location) and the FY24 FLAG baseline (9.89 Mt)	N8	S2-38, S2-40, T-01	**Verified as absent**: no capital figure, no per-lever abatement, no interim milestone
EV-36	CTP §3.3 Key actions (p.9)	LGC arrangements action: "Procure LGCs to match Coles' purchased electricity consumption, while preparing for the introduction of the Australian Government's Renewable Electricity Guarantees of Origin (REGOs) certificates and **the cessation of LGC creation after 2030**"	N5; §5.2	E-11, E-19, T-DEP-04, DR-02	Verified; appears in no other document in the suite
EV-37	CTP §4.1 target table (p.13)	"30.3% reduction in Scope 3 FLAG emissions by the end of FY30. Baseline year: FY24. Baseline emissions: 9.89 MtCO2-e", carrying **no target-boundary qualifier**, against AR Table 7's "The target boundary comprises 6.63 Mt CO2-e, representing 67% of FY24 FLAG emissions" (EV-07)	N9; G2	T-COV-02, T-BASE-01, DR-02, A-01B	Verified divergence
EV-38	CTP §4.2 breakdown (p.14) and §4.4 data challenges (p.17)	FY26 value-chain breakdown by commodity and category as percentages: FLAG 55.6% (beef 20.6, dairy 5.4, chicken 3.5, pork 3.1, lamb 2.9, fresh produce 1.9, all other FLAG 18.2) and energy and industrial 44.4% (goods for resale 26.6, consumer waste 7.6, transport 3.8, product use 2.6, goods not for resale 1.7, capital goods 0.7, leased assets 0.5, all other 0.5, waste 0.4). Consumer food waste is named a hotspot and a hard-to-abate source: "Reducing food waste and diverting it from landfill requires widespread consumer behaviour change..."; and, in the data challenges, "consumer food waste is a material emissions source but cannot be measured directly from Coles' customers. We take national averages downscaled to Coles' market share to estimate this source; however, **we are currently unable to track the impacts of any specific actions**"	N1; A4; R3	S3-01, S3-25, T-PROC-05	Verified: all sixteen percentages reconcile to the Data Pack
EV-39	CTP §3.4 (p.11)	"Coles' decarbonisation pathway under the Scope 2 location-based emissions method is influenced by the trajectory of the Australian electricity grid, including the pace of grid decarbonisation"	D3-1	G-BAU, A-19	Verified: the grid dependency is acknowledged, though not quantified and not attached to the reported reduction
EV-40	CTP §4.3 (pp.15–16)	Focus area "Enable circularity and reduce end-of-life impacts" with three actions (waste diversion above 85%, product stewardship schemes, food waste reduction); §4.1 lists the packaging targets (30% recycled content by FY30; above 85% reusable or recyclable) under "Our Scope 3 targets"; a carbon removals strategy is to be developed for FLAG; trading-area transition plans from FY26	N1; D4-3	T-PROC-05, S3-25, A-21	Verified: actions and circularity targets exist against end-of-life; no emissions target and no attributed abatement

Annex C: Claim register (AI-18 / OUT-TB-15)

CLAIM ID	WORDING / PARAPHRASE	CLAIM OBJECT	CLAIM SOURCE & BASIS (OUT-TB-15)	DOC & LOCATION	STRENGTH	AUDIENCE	EVIDENCE REQ/FOUND/MISSING	TRIGGERED SCANS	RULE IDS	STATUS
C1	"By the end of FY26, we reduced our combined Scope 1 and 2 emissions relative to the FY20 baseline by 82.6%, positioning us ahead of our FY30 target"	Combined Scope 1 and 2, market-based, against an FY20 market-based base of 1,474,716 t	Self-declared; SBTi-validated target; reasonable assurance over the underlying Scope 1 and 2 figures	Supplement p.12	Strong, prominent	Retail investors, consumers	Found: pack series, FY20 base, LGC volumes. Missing: nothing	Target achievement; market-based headline; BAU decomposition	T-MI-06, A-19, T-14	Substantiated on its stated basis; the basis is named in the following sentence and the location-based magnitude is printed on the page before
C2	"a 16.9% reduction in combined Scope 1 and Scope 2 location-based GHG emissions relative to the FY20 baseline… a 4.1% decrease compared with FY25 emissions"	Combined Scope 1 and 2, location-based	Self-declared; reasonable assurance over the underlying figures	AR p.66	Moderate	Institutional investors, regulators	Found: pack series	Real-vs-accounting decomposition	G-BAU, A-19	Substantiated; decomposed at §3.3 into about 55% own action and 45% grid
C3	"In FY26, we maintained sourcing of 100% renewable electricity for our operations"	Electricity consumed by Coles' operations, market-based	Self-declared; reasonable assurance over the renewable electricity percentage; LGC surrender under the Renewable Energy Target	Supplement pp.5, 8, 12; AR p.65	Strong, consumer-facing	Consumers, retail investors	Found: LGC volume, solar generation, consumption. **Missing: the RPP and JRPP values applied**	Renewable-electricity chain; certificate ownership and retirement; residual mix	E-01, E-11, E-24, OUT-TB-21	**Cannot reconstruct**: LGC 82.35% plus solar 2.48% is about 85%; the residual 15% rests on undisclosed grid-content percentages
C4	"Deliver net zero Scope 1 and Scope 2 GHG emissions by 2050", with a gross limb of at least 90% below FY20 and credits for the residual	Scope 1 and Scope 2 only, operational control	Self-declared; expressly **not** validated by SBTi under the Net-Zero Standard	AR pp.64–65; Supplement p.8	Strong	All	Found: boundary, gross limb, credit policy, baseline. Missing: the pathway	Net-zero chain; residual emissions; offsets	T-01, G-11, E-08	Correctly bounded and now more testable than a bare net formulation; pathway cannot-verify
C5	"Decarbonising and building climate resilience in our operations **and value chain** to achieve net zero greenhouse gas emissions by 2050"	Operations plus value chain: whole of business	Self-declared, in the materiality table	Supplement p.44	Strong, unqualified	Consumers, retail investors	Found: every target statement contradicts it	Reader-impression; boundary	OUT-TB-02, OUT-TB-05, G-04	**Not true within its implied boundary**; unchanged from the prior period
C6	"Deliver 30.3% reduction in Scope 3 Forest, Land and Agriculture (FLAG) sector emissions by the end of FY30 (FY24 baseline year)"	6.63 Mt of the 9.89 Mt FY24 FLAG block, i.e. 67%	Self-declared; validated by SBTi against its FLAG criteria; SBTi FLAG sector pathway	AR pp.66–67; Supplement p.8; **CTP p.13, where the same target is stated against "Baseline emissions: 9.89 MtCO2-e" with no boundary qualifier**	Strong	Institutional and retail investors	Found: boundary, base year, gases, pathway, validation. **Missing: the in-boundary figure in tonnes for FY25 and FY26**	Coverage %; base-year recalculation; external dependency; cross-source consistency	T-COV-02, T-BASE-01, T-DEP-04, DR-02	Genuine absolute target; progress not measurable against its own base year; the boundary is stated in one document of the suite and not another (N9)

CLAIM ID	WORDING / PARAPHRASE	CLAIM OBJECT	CLAIM SOURCE & BASIS (OUT-TB-15)	DOC & LOCATION	STRENGTH	AUDIENCE	EVIDENCE REQ/FOUND/MISSING	TRIGGERED SCANS	RULE IDS	STATUS
C7	"Achieve Scope 3 supplier engagement target of 80% of suppliers by spend… by the end of FY29"	Suppliers by spend across C1, C2, C4, C5 and C8, excluding FLAG	Self-declared; validated by SBTi; assessed against SBTi supplier-engagement guidance	AR pp.68–69; Supplement pp.8, 13	Moderate: a process metric	Institutional investors	Found: 46.9% and 41.1% at FY26; boundary; due-diligence process	Engagement-versus-reduction; coverage	T-SUP-03, T-PROC-05, T-COV-02	Stated by Coles as not on track; reaches about 33.7% of the value chain and measures activity, not abatement
C8	"Coles has not used carbon credits to achieve our Scope 1 and Scope 2 emissions reductions"; "The Group does not plan to use carbon credits to achieve its FY30 Scope 1 and Scope 2 emissions reduction target"	The corporate Scope 1 and 2 reduction only	Self-declared	Supplement p.12; AR p.65	Moderate	All	Found: no credits in the Scope 1 and 2 series	Offsets chain; certification currency	E-08, E-22, E-25	Substantiated as scoped. The product-level certifications and the offsets bought for them are absent from the suite (N8)
C9	"More than 90% of the Group's total value chain emissions are indirect greenhouse gas (GHG) emissions (or Scope 3 emissions)"	Share of the total footprint	Self-declared; limited assurance over the Scope 3 total	AR p.44; Supplement p.13	Moderate	All	Found: 19.08 ÷ 20.34 = 93.8% on a location basis	Scope 3 coverage	S3-01	Substantiated
C10	"the Group deployed approximately $112 million of separately identified capital expenditure in relation to managing climate-related risks"	Separately identifiable climate capital expenditure	Self-declared; expressly excludes climate expenditure embedded in broader programs	AR pp.44, 63	Moderate	Institutional investors	Found: the figure and its stated exclusions	Capital deployment	S2-38	Substantiated as scoped; the total climate capital is expressly not represented

Annex D: Detailed findings, two-track (A-03)

D.1 Applicability gate & AASB S2 readiness (Sections 04–05)

ID	FINDING & EVIDENCE CHAIN	MIN-COMPLIANCE	DECISION-USEFULNESS / CLAIM-QUALITY	SEVERITY · CONFIDENCE	CONSEQUENCE	WHAT WOULD FIX IT
D1-1	FY26 is Coles' first mandatory reporting year. The Group is a Group 1 entity for a period beginning 30 June 2025. A statutory Sustainability Report is filed inside the Annual Report (pp.40–81), with a directors' declaration (EV-15, p.76) asserting compliance with s296D and AASB S2, and AASB S2025-1 early adopted (EV-33)	**Met.** Statutory report filed; declaration signed; unmodified audit opinion over Scope 1 and 2 and unmodified review conclusion over governance and the risk and opportunity disclosures	No apparent issue: the applicability gate is satisfied and the obligation is discharged on its face	No apparent issue · High	—	—

ID	FINDING & EVIDENCE CHAIN	MIN-COMPLIANCE	DECISION-USEFULNESS / CLAIM-QUALITY	SEVERITY · CONFIDENCE	CONSEQUENCE	WHAT WOULD FIX IT
D1-2	Coles disclosed all fifteen Scope 3 categories with a stated disposition in its first mandatory year (EV-01, EV-22), rather than relying on the first-year Scope 3 relief available under AASB S2 Appendix C	**Met and exceeded.** The relief was available and not taken	**Positive (above baseline).** Putting the 94% of the footprint into the statutory statement in year one is not required and is what makes the target-coverage arithmetic in this review possible	Positive · High	A reader of the statutory report sees the whole footprint in year one	—
D1-3	The statutory emissions table (Table 5) carries **no comparative column**; the first-year comparatives relief is taken for the audited metric, while the Supplement and the Data Pack carry comparatives voluntarily. EY's other-matter paragraph addresses comparative information	**Met.** The relief is available and its use is permitted	Decision-usefulness limitation: a reader of the audited statement alone sees a single year and must go to a voluntary document for the trend, which is the same document the statement's own cross-reference (EV-17) points at incorrectly	Minor limitation · High	The audited statement carries no trend	Present the FY20–FY26 series in the statutory report from FY27
D1-4	Anticipated financial effects are disclosed qualitatively across all seven CRROs; every one concludes in no material effect and mitigation costs are repeatedly "not been separately quantified" (EV-28). The only monetary figures are $112m of climate capital expenditure and the shadow carbon price trajectory (EV-19)	**Met, on its face.** AASB S2 permits qualitative disclosure where effects cannot be measured with sufficient reliability, and Coles states the judgement it applied	Decision-usefulness concern: the internal carbon price is applied to Scope 1 and 2 and **excludes** Scope 3, while the carbon-price risk narrative states that FLAG emissions were considered in the carbon-price assessment. The result of that consideration is not published, so the non-materiality conclusion cannot be tested against the 10.56 Mt agricultural footprint	Decision-usefulness concern · High	Transition risk cannot be priced from the disclosure	Publish the modelled exposure at the disclosed shadow prices, including the value-chain component, and the materiality thresholds applied

D.2 GHG inventory foundation & Scope 1 (Sections 06–07)

ID	FINDING & EVIDENCE CHAIN	MIN-COMPLIANCE	DECISION-USEFULNESS / CLAIM-QUALITY	SEVERITY · CONFIDENCE	CONSEQUENCE	WHAT WOULD FIX IT
D2-1	The footprint reconciles exactly on every route tested (figure-fidelity log, tests 1 to 5): Scope 1 plus location-based Scope 2 equals the published location total; the five named sources sum to the same figure; FLAG plus Energy & Industrial equals the market-based Scope 3 total; the eleven reported categories sum to the same total. AR, Supplement and pack agree on every line tested	**Met**	No apparent issue: a single reconcilable footprint. Baseline expected of a credible discloser and not credited	No apparent issue · High	—	—
D2-2	Scope 1 fell 7.3% to 256,203 t, the lowest in the seven-year series. Refrigerants, 74.3% of Scope 1, fell 10.96% (a fall of 23,414 t); stationary fuels fell 17.5%; natural gas fell 1.0%; **transport fuels rose 15.3%** (28,738 → 33,148 t) (EV-02)	**Met**	**Positive (above baseline) on refrigerants**, qualified: the capital-approved conversion programme is now visible in the assured numbers, and it is the reason this year's physical reduction is majority own action. Transport fuels offset about a fifth of the refrigerant gain and are not separately addressed by any disclosed programme	Positive, qualified · High	The largest directly controlled source is falling; the fleet is not	Publish a tonnage trajectory and interim milestones for the refrigerant programme, and a stated approach to transport fuels
D2-3	Coles reports refrigerant emissions from equipment below the NGER thresholds (charge under 100 kg and GWP under 1,000), stating this "extends beyond the requirements under the National Greenhouse and Energy Reporting (NGER) framework" (EV-20). This is the reconciling item behind the prior year's 19,505 t gap to the register	**Met**	No apparent issue on completeness. Decision-usefulness residual: the reconciling item is **named but not quantified**, so the gap to the regulator-facing figure still cannot be closed arithmetically, and the 2025-26 register is not yet published	Minor limitation · High	The register comparison remains approximate	Disclose the tonnage attributable to the beyond-NGER coverage
D2-4	Total energy consumption 6,811,126 GJ, down 0.12% and **9.9% above the FY20 baseline**; intensity fell 153.76 → 149.43 GJ/$M on sales growth of 2.8%. Excludes onsite solar production (EV-02)	**Met**	Decision-usefulness observation: the physical energy base has stopped growing but has not fallen. Intensity improvement is partly the denominator	Minor limitation · High	An 82.6% reduction headline sits over a flat, historically elevated energy base	Co-locate the absolute energy trend with the reduction headline

D.3 Scope 2 & renewable electricity (Section 08)

ID	FINDING & EVIDENCE CHAIN	MIN-COMPLIANCE	DECISION-USEFULNESS / CLAIM-QUALITY	SEVERITY · CONFIDENCE	CONSEQUENCE	WHAT WOULD FIX IT
D3-1	Dual-basis Scope 2 reported, with the statutory report leading on location-based and presenting market-based as supplementary (EV-01, AR p.70). Location-based Scope 2 fell 3.2% to 1,008,242 t. Decomposed: grid electricity consumption fell 0.93% (worth about 9,683 t) and the implied grid emission factor fell 2.31% (worth about 23,876 t), so about 29% of the fall is Coles' own consumption and 71% grid decarbonisation	**Met**	Decision-usefulness improvement on the prior period, where own consumption rose while the grid factor carried a flat result. The BAU split is derivable but is **not disclosed**: the reader is told the reduction reflects "continued sourcing of 100% renewable electricity… reductions in refrigerant emissions… and energy efficiency initiatives", with no grid component named. The CTP does acknowledge the dependency in general terms, stating that the location-based pathway "is influenced by the trajectory of the Australian electricity grid, including the pace of grid decarbonisation" (EV-39), without quantifying it or attaching it to the reported reduction	Minor limitation · High	Part of the improvement is the grid's, and the disclosure names the dependency without sizing it	State the grid-emission-factor and own-consumption components beside the reduction
D3-2	"100% renewable electricity" (C3). LGCs surrendered 1,307,977 MWh = 82.35% of the 1,588,218,155 kWh consumed; onsite solar 39,370 MWh = 2.48%; residual 280,241 MWh (17.65%) attributed to RPP and JRPP, **values not disclosed** (EV-14, EV-24). Market-based Scope 2 reported nil	**Met** on GHG Protocol Scope 2 market-based reporting: the instruments are surrendered, quality criteria are addressed and the mechanism is explained	**Decision-usefulness concern.** The claim cannot be rebuilt from the disclosed components; the RPP is existing grid content, not additional procurement; and a nil market-based Scope 2 attributes zero emissions to electricity whose attributes were not surrendered to Coles. The figure carries reasonable assurance, which raises rather than lowers the expectation that it reconstructs. Unchanged from the prior period	Decision-usefulness concern · High	A consumer-facing, assured completeness claim that a reader cannot check	Publish the RPP and JRPP values and volumes and the arithmetic from consumption to 100%, with the residual-mix treatment
D3-3	Certificate provenance: sourcing states named (Victoria, NSW, South Australia, Queensland), generator relationships named (Origin, CleanCo), arrangements stated to "match what we consume". **No certificate vintage and no temporal or locational matching evidence** (EV-25)	**Met**: no rule requires hourly matching	Cannot verify (evidence not provided): matching quality is untestable	Cannot verify · Medium	Certificate quality cannot be assessed	Certificate register showing vintage, volume and matching basis
D3-4	Onsite generation 33,803 → 39,370 MWh across 156 sites; 8.96 MW installed in the year; 16.45 MW of solar and 1.35 MWh of storage under the Origin alliance since FY23; a virtual-power-plant battery trial; gas sub-metering cutting participating-store gas use by about 18% (EV-24). Reasonable assurance over solar generation (EV-16)	**Met**	**Positive (above baseline).** Additional by construction, metered, growing on a disclosed trajectory and reasonably assured; categorically different from certificate purchase	Positive · High	Real physical capacity added	—

D.4 Scope 3 & value chain (Section 09)

ID	FINDING & EVIDENCE CHAIN	MIN-COMPLIANCE	DECISION-USEFULNESS / CLAIM-QUALITY	SEVERITY · CONFIDENCE	CONSEQUENCE	WHAT WOULD FIX IT
D4-1	All fifteen categories considered with a stated disposition; eleven quantified; C10, C13 and C14 not applicable; C9 customer transport and the indirect portion of C11 excluded on an asserted materiality basis with **no screening estimate published** (EV-22)	**Met**: the exclusions are identified and reasoned, as S3-26 requires on its first limb	Decision-usefulness residual on the second limb: for a supermarket, customer travel to stores and indirect use of sold products are exactly the sources S3-26 names as potentially decision-useful, and neither is sized. Better than the prior period, where no materiality assessment was asserted at all	Minor limitation · High	Two potentially material downstream sources are excluded on an untested assertion	Publish a screening estimate for each

ID	FINDING & EVIDENCE CHAIN	MIN-COMPLIANCE	DECISION-USEFULNESS / CLAIM-QUALITY	SEVERITY · CONFIDENCE	CONSEQUENCE	WHAT WOULD FIX IT
D4-2	The dominant Category 1 (15.93 Mt, 84% of Scope 3) rests on primary mass and volume data for priority commodities and spend-based DEFRA UK input-output factors for the remainder, with LCA databases and a 2020 consultants' study for meat; several categories built from nine months of data extrapolated to twelve (EV-21)	**Met**	**Not a fault (S3-EST).** Spend-based and industry-average estimation is the expected starting point for a retailer and is preferable to exclusion. The residuals are improvement recommendations: Australian supplier-specific factors for material commodities, and closing the nine-month extrapolations	Improvement recommendation · High	—	Supplier-specific factors for the material commodities
D4-3	**Target coverage.** FLAG target boundary 6.63 Mt of 9.89 Mt FY24 FLAG (67%) (EV-07). Supplier-engagement boundary computed from the pack's Energy & Industrial rows: 5.049 + 0.317 + 0.135 + 0.727 + 0.068 + 0.104 = **6.40 Mt, 33.7% of the 18.98 Mt** total. Reached by neither: C11 direct use 0.491 + C12 end-of-life 1.440 + other E&I 0.09 = **2.02 Mt (10.7%)**; plus the roughly one third of FLAG outside the target boundary, indicatively 3.5 Mt on the FY26 block of 10.56 Mt. Total untargeted about **5.5 Mt, about 29%**. The CTP addresses end-of-life without targeting it: consumer food waste is named a hotspot at 7.6% of the value chain, three circularity actions are listed against it, and the packaging targets sit under the Scope 3 target heading; Coles states it is "currently unable to track the impacts of any specific actions" on that source (EV-38, EV-40)	**Met**: no rule compels a target over every category	**Decision-usefulness concern, escalated (A-17).** Over 90% of emissions sit in the value chain; the only absolute target there reaches about two thirds of one block, the engagement metric is a process measure over another third, and roughly 29% including the second-largest single line is reached by no emissions target. The FY26 disclosure of the FLAG boundary is what makes the size of the gap visible for the first time. The circularity actions are activity, not abatement, and by the company's own statement their effect cannot yet be measured, so they do not close the gap (T-PROC-05)	Decision-usefulness concern · High	"Net zero" and "ahead of target" describe about 6% of the footprint	Set a reduction target across the untargeted value chain with a published pathway, and attribute abatement to the circularity actions already under way
D4-4	Scope 3 flat at 19.08 Mt location-based for a third year; composition shifted, FLAG 10.38 → 10.56 Mt and Energy & Industrial 8.59 → 8.42 Mt (EV-03). Category 1's rise is entirely the FLAG component	**Met**	Decision-usefulness observation: the value chain is not falling, and the offsetting movements inside it are visible only from the pack's block split, not from the audited table	Minor limitation · High	A reader of the audited table sees a flat total and not the composition shift	Present the FLAG and Energy & Industrial split in the statutory report
D4-5	The audited Table 5 presents a single Scope 3 total of 18.98 Mt with Category 3 at 0.01 Mt, which is the market-based basis, and neither names the basis nor gives the location-based 19.08 Mt. The Supplement footnote does both (EV-01)	**Met**: both figures are published in the suite	Decision-usefulness concern: the audited statement dual-reports Scope 2 and single-basis-reports Scope 3 without labelling, so a reader of that document alone cannot tell which basis the value-chain total is on	Decision-usefulness concern · High	The primary statutory figure carries an unstated basis	Label the basis in Table 5 and give both, as the report does for Scope 2

D.5 Offsets, credits & net claims (Section 10)

ID	FINDING & EVIDENCE CHAIN	MIN-COMPLIANCE	DECISION-USEFULNESS / CLAIM-QUALITY	SEVERITY · CONFIDENCE	CONSEQUENCE	WHAT WOULD FIX IT
D5-1	No carbon credits used in the Scope 1 and 2 reduction, stated at each occurrence (C8). The 2050 net-zero target now carries a stated gross limb, at least 90% below FY20, with credits reserved for the residual and a stated intention to prioritise high-quality credits; nature, quality and volume "not yet determined" (EV-10)	**Met**	Decision-usefulness improvement: a gross limb makes the net claim testable, which a bare net formulation does not. Residual: no quality criteria, no permanence or durability standard and no residual definition, deferred to the period of first use	Minor limitation · High	The credit dependency in the 2050 target is bounded in size but undefined in quality	State the eligibility, permanence and durability criteria now
D5-2	Neither FY26 document mentions Climate Active, carbon neutrality, carbon-neutral products or carbon offsets. Coles held Climate Active product certifications for Coles Finest beef (April 2022) and pork (July 2023) and disclosed offset purchases for them to FY2024 (EV-30). A register check on 1 September 2026 indicates the beef certification remains live and the pork certification was withdrawn effective 4 August 2025, inside the reviewed year (EV-29)	**Met**: no corporate claim is made that the FY26 disclosure contradicts, and the corporate statements are correctly scoped	**Decision-usefulness and cross-source concern.** Withdrawing or holding a certification is neither a fault nor a credit (A-18); the gap is that a government-register carbon-neutral claim made to shoppers, and a withdrawal occurring inside the reviewed period, appear nowhere in the reporting suite, so a reader cannot reconcile the two audiences' positions. No allegation is made	Decision-usefulness concern · **Medium** (register status not retrieved at the primary source)	On-pack and investor-facing positions cannot be reconciled from the reports	Disclose the product-level certifications held, their boundary and their status, including any withdrawn in the period

D.6 Targets & transition (Section 11)

ID	FINDING & EVIDENCE CHAIN	MIN-COMPLIANCE	DECISION-USEFULNESS / CLAIM-QUALITY	SEVERITY · CONFIDENCE	CONSEQUENCE	WHAT WOULD FIX IT
D6-1	**FY30 operational target headroom.** Target expressed as a floor, "more than 75% below FY20", re-issued unchanged in the FY26–FY30 set (EV-06) after being reported achieved in FY25. FY20 market-based base 1,474,716 t (EV-05); a 75% floor permits 368,679 t; FY26 actual 256,203 t. **Permitted increase 43.9%**, against 33.4% a year ago. Coles reports being "ahead of the FY30 interim target and on track towards 2050" (EV-04)	**Met**: a target may be a floor and may be exceeded	**Decision-usefulness concern.** The forward target carries no incremental ambition for a sixth year, the headroom has widened because reported emissions fell against a static target, and the cap binds a market-based measure that can be met with certificates. "Ahead of target" is true and uninformative	Decision-usefulness concern · High	A reader takes the FY26–FY30 target set as forward intent and is reading a beaten floor	Re-base on the FY26 outturn or convert to an absolute tonnage cap with interim milestones
D6-2	**FLAG target measurability.** The FY24 base cannot be compared to FY26 "because of changes in emissions measurement methodologies", to be recalculated in FY27; the changes are not described, quantified or bridged; in-boundary emissions rose 1.8%; the FLAG block as published rose 9.89 → 10.38 → 10.56 Mt (EV-07, EV-08, EV-03)	**Met**: base-year recalculation is permitted under the GHG Protocol and Coles discloses its policy and its intention	**Decision-usefulness concern.** One year after validation, the only absolute target over the material footprint has no measurable progress against its own base year, and the one available comparison points the wrong way. Coles states this plainly, which is the right treatment and is baseline, not a credit	Decision-usefulness concern · High	The target's status cannot be established by any reader	Publish the in-boundary figure in tonnes per year, describe the measurement changes and bridge the base year now
D6-3	**Supplier-engagement target.** 46.9% of suppliers by spend with Scope 1 and 2 science-based targets and 41.1% with Scope 1, 2 and 3, up 4.6 and 2.7 points; Coles states it is "currently not on track" and that the pipeline of eligible suppliers has narrowed (EV-09)	**Met**	Decision-usefulness residual: the metric is engagement, not measured abatement, and no supplier reduction flows into the inventory. The candour is baseline and is not credited. The prior period's two-version statement of this target is resolved: both documents now say 80% by FY29 with one explanation	Decision-usefulness concern · High	A third of the value chain is addressed by an activity measure that is behind	Publish measured supplier abatement flowing into the inventory, not only target adoption
D6-4	**Transition plan, assessed.** The CTP (published 25 August 2026) sets out levers by focus area, emissions source, initiative, action and timeframe across operations and the value chain, maps itself clause by clause to the IFRS Transition Plan Taskforce framework, publishes the value-chain breakdown to commodity level and names the hard-to-abate sources with a position on each (EV-34, EV-38, EV-40). It attaches **no capital figure and no abatement quantity to any lever**: §6 Capital commitments states no monetary amount, the framework mapping records "Financial metrics and targets" as N/A, every action is dated only "Ongoing", "FY25 – FY50" or "FY26 – Ongoing", and the only tonnage figures in the document are the three baselines (EV-35)	**Met**: a transition plan exists, is board-approved and its scope, assumptions, dependencies and limitations are disclosed in the statutory report as well as the plan	**Decision-usefulness concern.** A transition plan is where the cost of the transition and the contribution of each lever belong. This one answers what Coles will do and neither what it will spend nor how far any lever gets it, so the FY30 and 2050 targets cannot be tested against a pathway. The refrigerant programme, the largest lever Coles controls, runs to 2050 at 20 to 30 systems a year with no interim milestone	Decision-usefulness concern · High	Target deliverability remains untestable, now on the plan's own content rather than its absence	Publish the capital envelope and its phasing, the abatement expected from each lever, and interim milestones between FY26 and FY30 and between FY30 and 2050
D6-5	**The CTP states the FLAG target against the whole block, without the boundary the audited report discloses.** CTP p.13: "30.3% reduction in Scope 3 FLAG emissions by the end of FY30. Baseline year: FY24. Baseline emissions: 9.89 MtCO2-e". AR Table 7: "The target boundary comprises 6.63 Mt CO2-e, representing 67% of FY24 FLAG emissions" (EV-37, EV-07)	**Met**: the boundary is disclosed in the audited source, which governs under A-01B	**Decision-usefulness and cross-source concern.** A reader of the plan alone takes the 30.3% to apply to 9.89 Mt, about 3.0 Mt of abatement, where the disclosed boundary yields about 2.0 Mt. The unqualified version sits in the document written to explain the transition	Decision-usefulness concern · High	The target reads about a megatonne larger in the plan than in the audited report	Repeat the target boundary wherever the target is stated
D6-6	**Instrument continuity.** The CTP discloses that Coles is procuring LGCs "while preparing for the introduction of the Australian Government's Renewable Electricity Guarantees of Origin (REGOs) certificates and the cessation of LGC creation after 2030" (EV-36). Certificate surrender is what takes market-based Scope 2 to nil and produces both the 82.6% headline and the position against the FY30 target. The statement appears in no other document in the suite	**Met**: the dependency is disclosed, and disclosure of a forward dependency is not a fault	Decision-usefulness concern on **placement and consequence**: the instrument behind the headline stops being created in the target year, and neither the Annual Report nor the Supplement, where the claim is made, says so. No document states the position under the replacement scheme	Decision-usefulness concern · High	A reader pricing the FY30 target cannot see that its mechanism expires in the target year	Carry the post-2030 certificate transition into the documents that carry the claim, and state the effect on the market-based position and the renewable-electricity commitment

D.7 Governance, remuneration & assurance (Section 12)

ID	FINDING & EVIDENCE CHAIN	MIN-COMPLIANCE	DECISION-USEFULNESS / CLAIM-QUALITY	SEVERITY · CONFIDENCE	CONSEQUENCE	WHAT WOULD FIX IT
D7-1	Governance: Board ultimate responsibility; Audit and Risk Committee oversight with quarterly risk-profile reporting; Executive Sustainability Committee, Sustainability Steering Committee and ASRS Steering Committee; CCSO accountable for climate reporting and strategy; the Board reviewed and approved the CTP and this report and received climate presentations on three occasions in FY26	**Met**	No apparent issue. Governance machinery is the baseline expected of a credible discloser and is not credited (A-16)	No apparent issue · High	—	—
D7-2	**Assurance architecture.** Statutory (ASSA 5010): audit opinion over Scope 1 and 2 only; review conclusion over governance and the risk and opportunity disclosures. Voluntary (Supplement and pack): reasonable assurance over Scope 1, Scope 2 on both bases, energy, solar, LGC surrenders and renewable %; limited assurance over the Scope 3 total, FLAG sector emissions and suppliers by spend with science-based targets (EV-15, EV-16)	**Met**: the statutory coverage matches the phase-in, and Coles obtains voluntary assurance beyond it	Decision-usefulness limitation: **the 94% of the footprint that is Scope 3 carries no statutory assurance**, and its voluntary assurance is limited. FLAG emissions and the supplier percentage are newly inside limited assurance this period, which extends coverage over the target metrics	Minor limitation · High	The statutory opinion reaches 6% of the footprint	Extend reasonable assurance toward the value-chain total as the phase-in allows
D7-3	**Climate-linked pay.** MD & CEO FY26 STI includes a Sustainability measure at 10% target weighting, "determined by delivery of the Group Sustainability Strategy, with progress against our sustainability strategy commitments, including customer perception, being considered holistically". Outcome: "Threshold Achieved", 5.0% of the 10% (EV-27). The supporting narrative names the off-track supplier-engagement target and the missed beef and cocoa deforestation ambitions	**Met**	Decision-usefulness limitation: the measure is a holistic judgement over a broad sustainability basket including a customer-perception input, not a measured emissions outcome, and it applies to the MD & CEO. The downward assessment is consistent with the disclosed underperformance, which is the correct treatment and is baseline, not a credit	Minor limitation · High	A reader cannot tell what emissions outcome, if any, moved the pay outcome	Include a quantified emissions or target-progress gate with a stated boundary
D7-4	**Two internal defects inside the audited climate statement.** AR p.66 states annual emissions performance relative to the FY20 baseline "is presented in this Sustainability Report through graphical and tabular disclosure"; no such table or chart appears in AR pp.40–81 (EV-17). Separately, D4-5 (unlabelled Scope 3 basis in Table 5)	**Met** on substance; these are internal-consistency defects, not omissions of required content	Decision-usefulness concern: a reader following the cross-reference in the audited statement to find the trend finds nothing. Small in magnitude, and in the document a regulator reads first	Decision-usefulness concern · High	An audited pointer leads nowhere	Publish the FY20–FY26 series in the statutory report, or remove the cross-reference

D.8 Sector module & new-module findings (Section 13)

ID	FINDING & EVIDENCE CHAIN	MIN-COMPLIANCE	DECISION-USEFULNESS / CLAIM-QUALITY	SEVERITY · CONFIDENCE	CONSEQUENCE	WHAT WOULD FIX IT
D8-1	**Retail module (SEC-RET).** The purchased-goods and agricultural exposure is quantified to an unusual depth: Category 1 15.93 Mt; FLAG 10.56 Mt split by commodity (beef 3.92, dairy 1.03, chicken 0.66, pork 0.59, lamb 0.56, fresh produce 0.36, all other 3.46); Energy & Industrial 8.42 Mt by category; supplier target coverage measured (EV-03, EV-09)	**Met**	The retail-specific exposure is identified and sized, which is what the module requires. The residual is that no measured supplier abatement flows into the inventory, so the engagement metric and the footprint move independently	Minor limitation · High	Supply-chain progress is measured by activity, not outcome	Supplier-specific factors so abatement shows in the inventory
D8-2	**Retail module: customer-side sources.** Customer travel to stores (C9) and indirect use of sold products (C11) excluded (D4-1); end-of-life treatment of sold products quantified at 1.44 Mt but reached by no target (D4-3)	**Met**	Decision-usefulness concern: for a supermarket these are the customer-side sources the module exists to test, and two are unsized while the third is untargeted	Decision-usefulness concern · High	The consumer-facing half of the footprint is partly unmeasured and wholly untargeted	Screen the excluded sources; extend a target to end-of-life
D8-3	FI and PCAF module not applied: not a financial institution; AR Table 5 footnote 2 addresses AASB S2 paragraph B59 in terms (EV-32). SEC-FI-REL-01 not triggered: no financed-emissions relevance or materiality exclusion is asserted under a carbon-neutral claim	N/A	N/A	Not applicable · High	—	—

Financed-emissions target headroom & benchmark (SEC-FI-TGT-04): *N/A: not a financial institution.*

SECTOR TARGET	LATEST REPORTED	TARGET VALUE	% CHANGE PERMITTED	FLAT-LINE BENCHMARK	FOSSIL-FUEL OVERRIDE?	RULING
N/A	N/A	N/A	N/A	N/A	N/A	Not a financial institution; no financed-emissions target exists

D.9 Nature & physical risk (Section 14)

ID	FINDING & EVIDENCE CHAIN	MIN-COMPLIANCE	DECISION-USEFULNESS / CLAIM-QUALITY	SEVERITY · CONFIDENCE	CONSEQUENCE	WHAT WOULD FIX IT
D9-1	Physical risk assessed by ClimSystems using CSIRO and Bureau of Meteorology projections on CMIP6, with published site-level metrics: supermarkets 5% (40), liquor stores 5% (47), large facilities 0% (0) at high hazard exposure, flood being the primary driver (EV-18). Three named scenarios (SSP1-2.6, SSP2-4.5, SSP5-8.5), with anticipated effects assessed on SSP2-4.5 and resilience tested on SSP5-8.5	**Met**	Decision-usefulness improvement: exposure is now a published number rather than a narrative, and the assessment is third-party. Residuals: financial effects remain qualitative (D1-4), and the FY25 assessment of 55 core commodities covering about 60% of revenue is not repeated, so the agricultural side of physical exposure is no longer sized (EV-31)	Minor limitation · High	The asset side is quantified; the commodity side is no longer	Restate the agricultural commodity coverage alongside the asset-side metric
D9-2	No-deforestation ambition: achieved for soy, palm oil and timber, paper and pulp; **not achieved for beef and cocoa**, with reasons given (EUDR implementation delay; beef suppliers "unable to support our initial no deforestation ambition") (EV-26). The FLAG target is stated to include a commitment to work toward no-deforestation outcomes	**Met**: the outcome and the reasons are disclosed	Decision-usefulness concern bearing on the FLAG target: the deforestation limb most closely tied to the largest FLAG commodity, beef at 3.92 Mt, was missed on supplier dependency, which is the same dependency the FLAG target rests on. The candour is baseline and is not credited	Decision-usefulness concern · High	The FLAG target's key external dependency has already produced one missed commitment	Publish the revised deforestation timeline and how it feeds the FLAG pathway

Annex E: Cross-rule escalation chains (AI-06 / AI-23)

BASE ISSUE	CHAINS TO	RULE + EVIDENCE IDS	ESCALATED SEVERITY
Target coverage: about 29% of the value chain reached by no target (D4-3)	The headline "net zero by 2050" and "ahead of our FY30 target", which a reader takes as statements about the business	A-17, T-COV-02, OUT-TB-02; EV-04, EV-06, EV-07, EV-03	Escalated to decision-usefulness concern and made the ceiling for the retail-investor row
FLAG measurement change undescribed and unbridged (D6-2)	The validated FLAG target's stated progress, and the comparability of the FY24–FY26 FLAG series in Annex K	T-BASE-01, G-10, YOY-04; EV-07, EV-08, EV-03	Escalated: the only absolute value-chain target cannot be tested
"100% renewable electricity" not reconstructable (D3-2)	The consumer-facing snapshot claim and the nil market-based Scope 2 that carries the 82.6% headline	E-24, OUT-TB-21, S2-28; EV-14, EV-24, EV-02	Escalated to a claim-quality concern for the consumers and public row
Materiality-table whole-of-business net zero (C5)	Every correctly bounded target statement in the same suite, and the cross-source consistency read at §5.3	OUT-TB-02, G-04, DR-02; EV-13, EV-10	Escalated: a literal-truth failure that reads a row down on its own
Audited cross-reference to absent disclosure (D7-4)	The regulator-facing consistency read, because the defect sits in the audited statutory statement	A-01B, DR-02; EV-17	Held at decision-usefulness concern: an internal-consistency defect, not an omission of required content
Product-level carbon-neutral certification absent from the suite (D5-2)	The corporate "no carbon credits" statement, which is correctly scoped, and the shopper-facing on-pack claim	E-25, A-18, DR-02; EV-29, EV-30	Held at decision-usefulness concern, medium confidence; no allegation made (AI-20)
Internal carbon price excludes Scope 3 while FLAG is stated to have been assessed (D1-4)	The conclusion that carbon pricing is not material to the Group	S2-35, S2-36, A-05; EV-19, EV-28	Held: cannot verify the non-materiality conclusion from the disclosure

BASE ISSUE	CHAINS TO	RULE + EVIDENCE IDS	ESCALATED SEVERITY
Transition plan attaches no cost or abatement to any lever (D6-4)	The FY30 and 2050 targets, whose pathway cannot be tested; and the qualitative financial-effects position at D1-4, which the plan's framework mapping defers back to the Annual Report	S2-38, S2-40, T-01; EV-35	Escalated to decision-usefulness concern: the plan is where the pathway belongs and it carries no numbers
Certificate creation ends after 2030 (D6-6)	The 82.6% headline and the FY30 target, both of which rest on certificate surrender, in the target year itself	E-11, E-19, T-DEP-04; EV-36, EV-02	Escalated to decision-usefulness concern on placement: the dependency is disclosed only outside the documents carrying the claim
CTP states the FLAG baseline without the target boundary (D6-5)	The reader's understanding of what the only absolute value-chain target delivers, and the cross-source consistency read at §5.3	T-COV-02, DR-02, A-01B; EV-37, EV-07	Held at decision-usefulness concern: the audited source carries the qualifier and governs

Annex F: NoCO2 Net Zero Required Interventions, CAAM & Prohibited Activities screen (OUT-05)

SCREEN	OUTPUT	BASIS
Required Interventions Schedule	Applicable	Refrigeration conversion from high-GWP to natural refrigerants is a required intervention on the largest directly controlled source; it is under way at 20 to 30 systems a year with a 2050 endpoint and no interim tonnage milestone. Electrification of gas heat (heat pumps replacing boilers) is disclosed as a trial. Both belong on a dated schedule with tonnage milestones
Clean Alternative Assessment	Potentially applicable; evidence required	Transport fuels rose 15.3% this year and no disclosed programme addresses them. A clean alternative assessment would test the available lower-emissions options before further fleet commitments. Evidence required: fleet composition, duty cycles and replacement schedule
Prohibited Activities Schedule	Not apparently applicable	No prohibited activity identified from the reviewed materials. Coles' facilities are expressly not captured by the Safeguard Mechanism

Annex G: Rule-application table

RULE FAMILY	APPLIED?	RESULT
Applicability gate (L / S2-01..06)	Yes	Group 1 entity, first mandatory year; statutory report filed with a directors' declaration; AASB S2025-1 early adopted. Gate satisfied (D1-1)
GHG inventory foundation (G / GHG-STD)	Yes	Operational control boundary; footprint reconciles exactly on every route tested (D2-1). G-20 not triggered: no source is asserted to be outside the boundary on another party's control
Scope 1 (G-06 / S2-26)	Yes	Fell 7.3% on an 11.0% refrigerant reduction; transport fuels rose 15.3%; beyond-NGER refrigerant coverage named but not quantified (D2-2, D2-3)
Scope 2 & renewables (E / S2-28)	Yes	Dual-basis reported; BAU split derivable but undisclosed (D3-1); "100%" not reconstructable (D3-2); matching evidence absent (D3-3); onsite generation a positive (D3-4)
Scope 3 (S3 / S3A / G-15)	Yes	All fifteen categories considered, eleven quantified; S3-EST applied so estimation is not scored as a fault (D4-2); coverage concern at D4-3; basis-labelling concern at D4-5
Offsets / net claims (E-08..22 / G-11)	Yes	No credits in the Scope 1 and 2 reduction; a gross limb now stated for 2050 (D5-1); E-25 applied to the product-level certifications at medium confidence (D5-2)
Targets & transition (T / S2-14/15/40)	Yes	T-14 applied (absolute targets, so the intensity qualification does not arise); headroom 43.9% (D6-1); T-BASE-01 on the FLAG base year (D6-2); T-SUP-03 and T-PROC-05 on the engagement metric (D6-3); CTP not provided (D6-4)
Governance / remuneration / assurance (GOV / A-11)	Yes	Governance is baseline and not credited (D7-1); assurance architecture at D7-2; pay link is holistic and not emissions-gated (D7-3); audited cross-reference defect at D7-4

RULE FAMILY	APPLIED?	RESULT
Sector (SEC-*)	Yes	Retail module applied (D8-1, D8-2)
SEC-FI-TGT-04	No	Not a financial institution
SEC-FI-05A	No	Not a financial institution
SEC-SF / SEC-INV-LT	Partly	SEC-SF-11 applied in Annex K.3 (dropped and added disclosures). SEC-INV-LT not triggered: Category 15 is joint-venture Scope 1 and 2 under 10,000 t, with no material equity or fund book
NOCO2-MAP-01/02	Yes	Clause-level mapping at §6.1
Nature / physical risk (N)	Yes	N-01, N-02 and N-04 applied (D9-1, D9-2)
Transition plan (S2-40 / T-01 / T-DEP-04)	Yes	The 2026 Climate Transition Plan was reviewed. Architecture and coverage meet the rules; the plan attaches no cost or abatement to any lever (D6-4), states the agriculture baseline without its target boundary (D6-5) and discloses that certificate creation ends after 2030 (D6-6)
Disclosure risk (DR-01..07 / A-01C)	Yes	Cross-source matrix and register at Annex J; the reviewed year cannot be reconciled to NGER, the 2025-26 register not being published
Year-over-year (YOY-01..08)	Yes	Seven periods and several report types; trajectory at §3.4 and Annex K
A-19 / G-BAU	Yes	Location-based Scope 1 and 2 decomposed: about 55% own action, 45% grid (D3-1, §3.3)
A-21	Yes	Applied to the stated intention to recalculate the FLAG base year in FY27 and to review the SET in FY27: neither is a fault nor a credit. The FLAG concern at D6-2 rests on the independent ground that progress cannot presently be measured
OUT-TB-21	Yes	Applied to "100% renewable electricity for our operations": bounded on its face to operational electricity, so tested on whether the coverage is real and evidenced. It is not fully evidenced (D3-2)

Annex H: Evidence requests / cannot-verify items (AI-21 / A-05)

ID	ITEM	PACK	EVIDENCE REQUESTED	STATUS
CV1	Per-lever abatement, the capital envelope and interim milestones behind the targets	Target progress	The Group decarbonisation plan, or a revised transition plan, with abatement per lever, capital allocation and phasing, and interim milestones between FY26 and FY30 and between FY30 and 2050	Open: the transition plan was provided and reviewed; it quantifies none of these
CV10	The effect of the post-2030 certificate transition on the FY30 target and the renewable-electricity commitment	Renewable electricity	Coles' assessment of the replacement certificate scheme's effect on the market-based Scope 2 position, the FY30 target and the "maintain 100% renewable electricity" commitment	Open: the dependency is disclosed, the consequence is not
CV2	Arithmetic from disclosed components to "100% renewable electricity", and the basis for a nil market-based Scope 2	Renewable electricity	The renewable power percentage and jurisdictional percentage values and volumes applied; the consumption-to-100% arithmetic; the residual-mix treatment	Open: material evidence missing
CV3	Temporal and locational matching of surrendered certificates	Renewable electricity	Certificate register showing vintage, volume and matching basis against consumption	Open: evidence not provided
CV4	Reviewed-year reconciliation to the regulator-facing figures	Statutory register	Publication of the 2025-26 NGER corporate emissions and energy data; and the tonnage attributable to the beyond-NGER refrigerant coverage	Open: register not yet published at the review date
CV5	Accuracy of the value-chain total, especially the dominant purchased-goods category	Scope 3	Supplier-specific data for the material commodities; reasonable assurance over the Scope 3 total; the full-year data behind the nine-month extrapolations	Open: material evidence missing
CV6	Materiality of the excluded downstream sources: customer travel to stores; indirect use of sold products	Scope 3	A screening estimate of each excluded source and the materiality threshold applied	Open: evidence not provided

ID	ITEM	PACK	EVIDENCE REQUESTED	STATUS
CV7	Status of the Coles Finest carbon-neutral product certifications	Offsets and certification	A retrieval of the Climate Active public register entry; a statement of the certifications held, their boundary, their status and any withdrawn in the period	Open: recorded at medium confidence from indexed search, primary source not retrieved
CV8	The carbon-price exposure behind the non-materiality conclusion	Target progress	The modelled cost exposure at the disclosed shadow prices, including the value-chain component the internal price excludes, and the materiality thresholds applied	Open: evidence not provided
CV9	The in-boundary agriculture figure in tonnes	Target progress	FLAG in-boundary emissions in tonnes for FY24, FY25 and FY26, and a description of the measurement changes made during FY26	Open: material evidence missing

Annex I: Evidence-chain & triggered-scan log (AI-10)

CHAIN ID	TRIGGER	FOLLOW-UP SCANS RUN	EVIDENCE IDS	FINAL LABEL
M-01	Net zero claim	Target boundary; transition plan; Scope 1/2/3; gross versus net; residual emissions; credits; assurance scope; prior claims; reader-burden caveats (§§10, 11, 03)	EV-10, EV-13, EV-15, C4, C5	Correctly bounded at every target statement; one contradicting statement in the materiality table → decision-usefulness concern (N4)
M-02	100% renewable electricity / market-based Scope 2	Location versus market; consumption; certificate evidence, ownership, retirement, timing; residual mix; sold certificates; wording (§08)	EV-02, EV-14, EV-24, EV-25	Certificate retirement genuine; about 15 points unaccounted → decision-usefulness concern and cannot-verify (N5, CV2, CV3)
M-03	Target achievement / on-track	Boundary; baseline; current year; progress calculation; gross versus net; Scope 3 coverage; method changes; restatements; assurance; remuneration links (§11)	EV-04, EV-05, EV-06, EV-08, EV-09, EV-27	FY30 target a beaten floor with 43.9% headroom (N3); FLAG progress unmeasurable (N2); SET off track
M-04	Scope 3 disclosed / omitted / selected	Category coverage; business-model-obvious categories; exclusions; data quality; spend versus supplier-specific; target boundary; consistency (§09)	EV-01, EV-03, EV-21, EV-22	All fifteen considered, eleven quantified; two customer-side exclusions unsized → minor limitation (D4-1); estimation not scored (S3-EST)
M-05	Assurance statement	Subject matter; level; assured metrics; exclusions; qualifications; Scope 3 completeness; whether nearby claims imply broader assurance (§12)	EV-15, EV-16	Statutory audit over Scope 1 and 2 only; voluntary limited assurance over Scope 3, FLAG and the supplier percentage → minor limitation (D7-2)
M-06	Climate-linked remuneration	Metric boundary; gross versus net; Scope 3 inclusion; offsets; target progress; assurance; controls (§12)	EV-27	Holistic 10% sustainability basket assessed at threshold; not emissions-gated → minor limitation (D7-3)
M-07	Coverage % claim	Numerator; denominator; excluded categories (T-COV-02)	EV-07, EV-03, EV-09	FLAG target boundary 67% of FY24 FLAG; SET 33.7% of the value chain; about 29% untargeted (N1)
M-08	Externally-dependent target	Target year versus dependency pathway; disclosed bridge; fallback actions (T-DEP-04)	EV-08, EV-09, EV-26	FLAG and SET both depend on supplier action; the beef deforestation limb already missed on that dependency → decision-usefulness concern (D9-2)
M-09	Supplier-engagement / process metric	Engagement is not Scope 3 reduction; measured trajectory required (T-SUP-03, T-PROC-05)	EV-09	Process measure over 33.7% of the value chain, stated off track (D6-3)
M-10	Market-based headline reduction	Co-locate gross and location-based trend; decompose physical versus contractual (T-MI-06)	EV-04, EV-11, EV-02	Both bases now co-located; about 65 of the 82.6 percentage points are the certificate effect (§3.3)
M-11	Any reduction claim: BAU counterfactual	Grid emission factor versus consumption trend versus market instruments (G-BAU, A-19)	EV-02, EV-04	Own action about 55%, grid about 45% of the location-based fall; split not disclosed (D3-1)
M-12	Combined Scope 1+2 figure	Decompose into Scope 1 and Scope 2, and Scope 2 into both bases (G-06, G-07, S2-26, S2-28)	EV-01, EV-02	Decomposed throughout §3.1, §3.3 and §3.4; both bases carried; never summed

CHAIN ID	TRIGGER	FOLLOW-UP SCANS RUN	EVIDENCE IDS	FINAL LABEL
M-13	Method / boundary / factor / base-year / restatement change	Time-series comparability; baseline recalculation; target progress; real versus accounting; peer comparability (§§06, 11)	EV-08, EV-03, FY24 pack	FLAG measurement change undescribed (N2); FY24 inventory rebuild still unrestated beneath the longer series (Annex K.2)
M-14	SBTi / science-based label	Validated wording, version, validation date, scope, baseline, exclusions; validated-versus-claimed gap (T-SBTi-01, T-SBTi-03)	EV-06, EV-07, C6, C7	Three targets stated as validated with boundaries disclosed; the 2050 target expressly not validated. Validation letters not provided, so wording taken as stated
M-15	Australian entity: cross-source consistency	NGER register lookup; cross-source matrix; boundary normalisation (§16, A-01C, DR-02)	EV-20, NGER 2024-25 lookup	2025-26 register not published, so FY26 not testable; FY25 reconciled as context; the Scope 1 reconciling item is now named but not quantified (Annex J.2)
M-16	More than one period or report type	Multi-period series; trajectory; restatements; dropped and added disclosures; target weakening; cross-report-type divergence; certification continuity (§17)	EV-02, EV-03, EV-29, EV-30, EV-31	Seven periods built; §3.4 and Annex K
M-17	Completeness word beside a named quantity	OUT-TB-21: bounded on its face, so test whether the coverage is real and evidenced	EV-14, EV-24	"100% renewable electricity for our operations" is bounded; the coverage is not fully evidenced (N5)
M-18	Disclosed intention to review, extend or improve	A-21: neither a fault nor a credit; test for a pattern across periods	EV-08, EV-09	The FY27 base-year recalculation and the FY27 SET review are neutral and do not enter a criterion verdict (D-013)
M-19	Source described as controlled by another party	G-20 which-scope test before any exclusion or cannot-verify finding	EV-22, AR p.61	Not triggered: no such assertion is made. The Scope 3 exclusions run on S3-25 and S3-26 in full (D-014)
M-20	Transition plan published	Actions; capital; dependencies; milestones; Scope 3 coverage; scenario analysis; financial effects; delivery risk (§11)	EV-34, EV-35, EV-38, EV-39, EV-40	Levers, owners and timeframes disclosed and framework-mapped; **no capital figure, no per-lever abatement and no interim milestone** → decision-usefulness concern (D6-4, N8)
M-21	Externally-dependent instrument with a stated end date	Target-year versus dependency pathway; disclosed bridge; fallback actions (T-DEP-04)	EV-36, EV-02	Certificate creation ends after 2030, the FY30 target year; no document states the position under the replacement scheme → decision-usefulness concern and cannot-verify (D6-6, CV10)
M-22	Same target stated in more than one document	Reconcile baseline year, base-year value, coverage and boundary; same number is not the same metric (T-BASE-01, DR-02)	EV-37, EV-07	Baseline and base year agree; the target boundary qualifier appears in the audited report and not in the plan → decision-usefulness concern (D6-5, N9)

Annex J: Cross-source consistency matrix & disclosure-risk register (DR-01..DR-07 / A-01C / OUT-TB-18)

O.1 Cross-source consistency matrix (DR-02)

CLAIM / METRIC	ANNUAL / FINANCIAL REPORT	SUSTAINABILITY / ESG	MARKETING / WEBSITE	CLIMATE ACTIVE PDS	CDP	INVESTOR PRESENTATIONS	NGER / CER / SAFEGUARD	BOUNDARY/PERIOD NORMALISATION	DIVERGENCE?
Scope 1	256,203 t (Table 5, audited)	0.26 Mt panel; pack 256,203.21 t	Not separately stated	Not in the FY26 suite	Not reviewed	Not reviewed	2025-26 register not yet published; 2024-25 shows 256,791 t for FY25	FY26 not testable. FY25 disclosed 276,296 t against 256,791 t on the register	**Not yet testable.** The FY26 report names the reconciling item (refrigerant reporting beyond the NGER framework) but does not quantify it

CLAIM / METRIC	ANNUAL / FINANCIAL REPORT	SUSTAINABILITY / ESG	MARKETING / WEBSITE	CLIMATE ACTIVE PDS	CDP	INVESTOR PRESENTATIONS	NGER / CER / SAFEGUARD	BOUNDARY/PERIOD NORMALISATION	DIVERGENCE?
Scope 2 location-based	1,008,242 t (Table 5, audited)	1.26 Mt panel; pack 1,008,241.55 t	Not separately stated	—	Not reviewed	Not reviewed	2024-25 register 1,041,747 t for FY25	FY25 reconciled to 0.005%	**No divergence within the suite**
Scope 2 market-based	0 (Table 5, audited)	0 Mt panel; pack 0	"100% renewable electricity"	—	Not reviewed	Not reviewed	Not a register metric	Same electricity, contractual basis	**No divergence in the figure; the substantiation gap is at N5**
Scope 3 total	18.98 Mt (Table 5, audited), **basis not named**	18.98 Mt market-based and 19.08 Mt location-based, both named (Supplement footnote; pack)	Not separately stated	—	Not reviewed	Not reviewed	Not a register metric	The figures agree	**Yes, on labelling. The audited table does not say which basis its total is on**
Emissions trend versus FY20	82.6% market and 16.9% location stated in consecutive sentences (p.66); **no multi-year table or chart anywhere in the report, which nonetheless states one is presented**	0.26 Mt and 1.26 Mt panels; the pack carries the FY20 to FY26 series	Not separately stated	—	Not reviewed	Not reviewed	—	Same period, same boundary	**Yes. An audited cross-reference points at disclosure that is not in the document**
Net-zero boundary	Scope 1 and 2, footnoted at each target	Scope 1 and 2 at each target; **"operations and value chain" in the materiality table**	Not separately stated	—	Not reviewed	Not reviewed	—	Same claim, same period	**Yes. Two statements in one suite and nothing tells a reader which governs**
Supplier-engagement target	80% of suppliers by spend by FY29, with one explanation (Table 8)	80% by FY29, same explanation	Supplier Central referenced	—	Not reviewed	Not reviewed	—	Same target	**No.** The prior period's two-version statement is resolved
Carbon-neutral product claims	Absent	Absent	On-pack Coles Finest claims; a carbon-neutral product page is maintained	Register indicates one certification active and one withdrawn 4 August 2025	Not reviewed	Not reviewed	—	Product-level, not corporate	**Cannot verify. The corporate statements are correctly scoped so nothing conflicts, but the product-level position is disclosed to neither audience in the reporting suite. Medium confidence**

CLAIM / METRIC	ANNUAL / FINANCIAL REPORT	SUSTAINABILITY / ESG	MARKETING / WEBSITE	CLIMATE ACTIVE PDS	CDP	INVESTOR PRESENTATIONS	NGER / CER / SAFEGUARD	BOUNDARY/PERIOD NORMALISATION	DIVERGENCE?
Energy consumption	Not separately stated in the climate statement	6,811,126 GJ (pack, reasonable assurance)	Not separately stated	—	Not reviewed	Not reviewed	2024-25 register 6,901,598 GJ for FY25	FY25 reconciled to 1.19%	**No divergence within the suite**
Agriculture target baseline and boundary	Baseline 9.89 Mt with the target boundary stated: 6.63 Mt, "representing 67% of FY24 FLAG emissions" (AR Table 7, audited)	Transition plan p.13: "Baseline emissions: 9.89 MtCO2-e", **no boundary qualifier**; Supplement p.8 states the target without either figure	Not separately stated	—	Not reviewed	Not reviewed	—	Same target, same base year, same baseline figure; only the boundary qualifier differs	**Yes. The target reads about a megatonne larger in the plan than in the accounts; the audited source carries the qualifier and governs**
Post-2030 certificate transition	Not stated	Transition plan p.9 only: procuring LGCs "while preparing for the introduction of the Australian Government's Renewable Electricity Guarantees of Origin (REGOs) certificates and the cessation of LGC creation after 2030"	Not stated	—	Not reviewed	Not reviewed	Renewable Energy Target scheme rules	Same instrument, same claim	**Yes, on completeness. The dependency behind the headline reduction is disclosed in one document of the suite and not in the two carrying the claim**
Transition-plan capital	$112m separately identified climate capital expenditure (AR p.63)	Transition plan §6 "Capital commitments" states **no monetary amount**, and its framework mapping marks financial metrics and targets not applicable, referring back to the Annual Report	Not stated	—	Not reviewed	Not reviewed	—	Different measures: one is FY26 spend, the other a forward envelope	**No conflict, but the forward figure exists nowhere.** The plan defers to the report and the report gives only the year's outturn

O.2 NGER statutory reconciliation (A-01C)

Coles Group Limited (ABN 11 004 089 936) is an NGER controlling corporation. The 2025-26 register is not published at the review date, so the reviewed year cannot be reconciled. The 2024-25 register (as at 27 February 2026), covering Coles' FY25, is reconciled below as context; it is the year the FY26 report itself cites when describing Coles as Australia's twelfth largest location-based Scope 2 emitter.

METRIC	DISCLOSED (REPORT)	NGER REGISTER (YEAR · AS-AT)	BOUNDARY DIFFERENCE (OP-CONTROL / AU-ONLY / METHOD / PERIOD)	RECONCILED?	LABEL
Scope 1	276,296 t (FY25); 256,203 t (FY26)	256,791 t (2024-25, as at 27 Feb 2026)	Both operational control and Australia-only. The FY26 report discloses a reconciling item: refrigerant emissions are reported from equipment with a charge under 100 kg and a GWP under 1,000, which Coles states "extends beyond the requirements under the NGER framework". The tonnage attributable to that coverage is not given	Partly, on FY25: the direction and cause are explained, the magnitude is not. FY26 not testable	**Cannot verify (material evidence missing): the reconciling item is named but unquantified**

METRIC	DISCLOSED (REPORT)	NGER REGISTER (YEAR · AS-AT)	BOUNDARY DIFFERENCE (OP-CONTROL / AU-ONLY / METHOD / PERIOD)	RECONCILED?	LABEL
Scope 2 (location-based)	1,041,800 t (FY25); 1,008,242 t (FY26)	1,041,747 t (2024-25)	Same basis	Yes on FY25, to 0.005%. FY26 not testable	No apparent issue
Net energy (GJ)	6,819,354 GJ (FY25); 6,811,126 GJ (FY26)	6,901,598 GJ (2024-25)	Coles' disclosed energy consumption excludes onsite solar production; the register measure is net energy	Broadly on FY25, to 1.19%. FY26 not testable	Minor limitation

O.3 Disclosure-risk register (DR-01 / DR-03..DR-07)

#	LENS	EXPOSURE & CONFIDENCE	DRIVER (FINDING / EVIDENCE IDS)	CROSS-SOURCE LINK (DR-02)	WHAT WOULD REDUCE IT
O-1	Legal	Moderate · Medium	The materiality table's operations-and-value-chain net zero, uncorrected across two periods, against a Scope 1 and 2 commitment footnoted everywhere else (N4, EV-13)	O.1 net-zero boundary row	Correct the materiality-table wording
O-2	Legal	Moderate · Medium	"100% renewable electricity" carried in the consumer-facing snapshot with reasonable assurance, in which about 15 points rest on undisclosed, non-additional grid content (N5, EV-14, EV-24)	O.1 Scope 2 market-based row	Publish the renewable-percentage arithmetic and the residual-mix treatment
O-3	Regulatory	Low to moderate · Medium	Two internal defects inside the audited statutory statement: a cross-reference to a series that is not there, and an unlabelled Scope 3 basis (N6, D4-5, EV-17, EV-01)	O.1 emissions-trend and Scope 3 rows	Publish the series in the statutory report; label the Scope 3 basis and give both
O-4	Regulatory	Low · Medium	The reviewed year cannot be reconciled to the regulator's register, and the named Scope 1 reconciling item is unquantified (CV4, EV-20)	O.2	Quantify the beyond-NGER refrigerant coverage
O-5	Technology	Moderate · Medium	The FLAG target depends on on-farm abatement and supplier action; Coles states reductions are "not yet evident", citing technology immaturity and supplier reliance, and its own beef deforestation limb was missed after suppliers said they could not support it (D6-2, D9-2, EV-08, EV-26)	—	Publish the abatement pathway with quantified levers, supplier coverage and interim milestones
O-6	Physical	Low · Medium	Site-level hazard exposure is now third-party assessed and published; the residual is that financial effects remain qualitative and the prior period's commodity-coverage assessment is not repeated (D9-1, D1-4, EV-18, EV-31)	—	Quantify the modelled range of physical financial effects; restate the commodity coverage
O-7	Commercial and reputational	Moderate · High	Two of three climate targets are stated by Coles to be behind: agriculture rising against a 30.3% reduction target, and the supplier-engagement target off track with a narrowing pipeline (EV-08, EV-09)	O.1 supplier-engagement row	Publish the revised pathway and interim milestones that would show either target returning to track
O-8	Legal and reputational	Low to moderate · **Medium**	A carbon-neutral product certification indicated as live on the Australian Government's register, and a second indicated as withdrawn inside the reviewed year, appear nowhere in the reporting suite (N8, EV-29, EV-30)	O.1 carbon-neutral product row	Disclose the certifications held, their boundary and status, including any withdrawn in the period
O-9	Regulatory and commercial	Low to moderate · High	Anticipated financial effects are qualitative across all seven risks and opportunities, and the internal carbon price excludes the value chain while the carbon-price assessment is stated to have considered it (N7, EV-19, EV-28)	—	Publish the modelled exposure at the disclosed shadow prices, including the value-chain component
O-10	Commercial and regulatory	Moderate · High	Certificate creation under the Renewable Energy Target ends after 2030, the FY30 target year, and certificate surrender is what produces both the 82.6% headline and the position against that target. The dependency is disclosed only in the transition plan, and no document states the position under the replacement scheme (D6-6, EV-36, CV10)	O.1 post-2030 certificate transition row	Publish the assessment of the replacement scheme's effect on the market-based position, the FY30 target and the renewable-electricity commitment, in the documents that carry the claim
O-11	Commercial	Moderate · High	The transition plan attaches no capital figure and no abatement quantity to any lever, and its framework mapping marks financial metrics not applicable, so neither the cost of the transition nor the contribution of any lever can be assessed (N8, EV-35)	O.1 transition-plan capital row	Publish the capital envelope and its phasing, and the abatement expected from each lever, with interim milestones

#	LENS	EXPOSURE & CONFIDENCE	DRIVER (FINDING / EVIDENCE IDS)	CROSS-SOURCE LINK (DR-02)	WHAT WOULD REDUCE IT
O-12	Legal and reputational	Low to moderate · High	The transition plan states the agriculture target against a 9.89 Mt baseline without the 6.63 Mt target boundary the audited report discloses, so the target reads about a megatonne larger in the plan (N9, EV-37, EV-07)	O.1 agriculture target row	Repeat the target boundary wherever the target is stated

Annex K: Longitudinal series & cross-period tracking register (YOY-01..08 / OUT-TB-19)

P.1 Multi-period headline series (YOY-02)

METRIC / CLAIM	PERIOD →	FY20	FY22	FY23	FY24	FY25	FY26	SOURCE(S) PER CELL	BOUNDARY/METHOD NORMALISATION
Scope 1 (t CO_2-e)		303,263	271,753	293,665	267,913	276,296	**256,203**	Data Packs FY23–FY26, `Energy and S1&S2 emissions` ; AR26 Table 5	Operational control throughout; FY20 recalculated in FY23 for the Viva Energy divestment, disclosed
Scope 2 (location)		1,218,973	1,176,103	1,036,364	1,042,492	1,041,800	**1,008,242**	As above	Same basis throughout
Scope 2 (market)		1,171,453	1,085,064	686,895	697,896	Nil	**0**	As above	Same basis; FY25 shown as "-" and FY26 as "0" in the pack, a presentational change only
Scope 3 by category		—	20.82 Mt	20.30 Mt	19.07 Mt	19.08 Mt	**19.08 Mt** (location)	Data Packs FY24–FY26, `Scope 3 emissions`	**Not like-for-like across FY23/FY24:** the FY24 pack discloses a comprehensive inventory rebuild with FY23 restated and no earlier year restated
Scope 3 FLAG block		—	—	—	9.89 Mt	10.38 Mt	**10.56 Mt**	AR26 Table 7 (FY24 base); Data Pack FY26 (FY25, FY26)	**Not like-for-like FY24 to FY26:** AR26 states measurement methodologies changed and the base will be recalculated in FY27
Scope 3 Energy & Industrial block		—	—	—	—	8.59 Mt	**8.42 Mt**	Data Pack FY26	Market-based basis (Category 3 market)
Total (Scope 1+2, location)		1,522,236	1,447,855	1,330,029	1,310,405	1,318,096	**1,264,445**	As above	Same basis
Intensity (t CO_2-e/$M sales, location)		—	—	32.85	30.08	29.72	**27.74**	Data Pack FY26	Denominator is group sales revenue; $45,580m in FY26
Renewable electricity %		—	—	45.0%	45.0%	100%	**100%**	Data Packs FY24–FY26	Market-based, including LGC, RPP, JRPP and onsite solar throughout
Offset / certificate volume (LGC)		—	—	381,080	396,560	1,313,027	**1,307,977**	As above	Voluntary surrender
Onsite solar generation (kWh)		—	—	14,790,269	21,870,033	33,803,011	**39,369,854**	As above	Reasonable assurance from FY25
Energy consumption (GJ)		6,198,496	6,344,774	6,315,055	6,542,090	6,819,354	**6,811,126**	As above	Excludes onsite solar production throughout
Suppliers by spend with Scope 1 and 2 science-based targets		—	—	—	—	42.3%	**46.9%**	AR25 and AR26 remuneration reports; AR26 Table 8	Same boundary from FY25 (FLAG carved out; C2, C5 and C8 added)

P.2 Silent restatement & baseline-rebasing log (YOY-04)

#	FIGURE / BASELINE	AS STATED IN REPORT OF THE PERIOD	AS RESTATED IN A LATER REPORT	DISCLOSED & LIKE-FOR-LIKE?	EFFECT ON AN ON-TRACK / PAY / FINANCING CLAIM	LABEL (CONCERN / ACCEPTABLE / CANNOT-VERIFY)
P2-1	Scope 3 inventory, FY22 and FY23	FY22 20.82 Mt; FY23 20.30 Mt on the pre-rebuild method	FY23 restated in the FY24 pack; FY22 not restated	**Disclosed in the FY24 pack only; not like-for-like.** The FY26 pack republishes the FY22 to FY26 series with no note of the break	The FY22 to FY24 fall reads as a reduction and is partly a method change	Concern, carried forward from the prior period
P2-2	FLAG base year, FY24	9.89 Mt (AR26 Table 7)	To be recalculated in FY27	**Disclosed, and expressly not comparable.** AR26: "changes in emissions measurement methodologies"; the changes are not described or quantified	The only absolute value-chain target has no measurable progress against its base year	Concern: disclosed, unbridged
P2-3	FY20 Scope 1 and 2 baseline	1,522,236 t location and 1,474,716 t market	Recalculated in FY23 for the Viva Energy divestment	**Disclosed and reasoned** (AR26 Table 6 baseline row), with a stated recalculation policy	Neutral: the recalculation aligns the baseline with the current boundary	Acceptable
P2-4	Category 8 upstream leased assets	FY24 0.26 Mt; FY25 0.113 Mt; FY26 0.10 Mt	No restatement	The 57% FY24-to-FY25 fall remains unexplained; the FY25-to-FY26 movement is small and consistent	Immaterial to any target claim	Concern, carried forward and now static
P2-5	Category 15 investments	FY22 0.41 Mt; FY23 0.30 Mt; under 0.01 Mt from FY24	No restatement	Explained obliquely in the FY24 pack ("emissions were estimated and the source deemed immaterial"); the FY26 report gives the method (joint-venture proportional Scope 1 and 2) but not the bridge	Immaterial to any target claim	Cannot verify, carried forward

P.3 Dropped / added disclosure log (YOY-05)

#	ITEM (METRIC / CATEGORY / TARGET / CLAIM / LIMITATION)	PRESENT IN	ABSENT/ADDED IN	EXPLAINED?	LABEL
P3-1	Climate Active carbon-neutral product certifications and the offsets bought for them	FY2022 to FY2024 reports	**Absent from FY25 and FY26**	No. Neither FY26 document mentions Climate Active, carbon neutrality or offsets. A register check indicates one certification live and one withdrawn 4 August 2025, inside FY26	**Concern, now a two-period pattern; medium confidence on register status**
P3-2	Assessment of 55 core commodities covering about 60% of revenue for physical risk	FY2025 Annual Report p.40	**Absent from FY26**; a third-party site-level hazard assessment with published metrics is added in its place	Not explained as a change, though the replacement is disclosed on its own terms	**Minor limitation: the asset side is now quantified, the commodity side is no longer sized**
P3-3	Location-based Scope 1 and 2 magnitude and trend in the narrative reports	**Absent from FY25 narrative reports**	**Added in FY26**: side-by-side panels in the Supplement and the 16.9% figure in the Annual Report	Added without comment	Added: closes the prior period's principal retail-investor gap
P3-4	FLAG target boundary size	Absent from FY25	**Added in FY26**: 6.63 Mt of 9.89 Mt, 67%	Stated in the target table	Added: makes the coverage gap visible for the first time
P3-5	Gross limb of the 2050 net-zero target	Absent from FY25	**Added in FY26**: at least 90% absolute reduction from FY20, credits for the residual	Stated in the target table	Added: makes the net claim testable
P3-6	Internal carbon price and separately identified climate capital expenditure	Absent from FY25	**Added in FY26**: $56 to $170 a tonne; $112m	Stated in the metrics section	Added, with the stated limitation that the internal price excludes Scope 3

#	ITEM (METRIC / CATEGORY / TARGET / CLAIM / LIMITATION)	PRESENT IN	ABSENT/ADDED IN	EXPLAINED?	LABEL
P3-7	NGER reconciling item for Scope 1	Absent from FY25	**Added in FY26**: refrigerant reporting from equipment below the NGER thresholds	Stated in Table 9	Added but unquantified: the gap is explained in cause, not in magnitude
P3-8	Per-category Scope 3 measurement approach, data quality, factors and limitations	In the FY25 pack's method tab	**Moved into the audited report in FY26** (Table 10) and expanded	Not stated as a change	Added: the method disclosure is now inside the assured document set
P3-9	Multi-year emissions table or chart in the narrative climate report	Present in the FY25 Sustainability Report	**Absent from the FY26 statutory Sustainability Report, which nonetheless states one is presented**	No	**Concern: an audited cross-reference to disclosure that is not there**
P3-10	Comparative column in the primary emissions table	Present in the FY25 voluntary reporting	**Absent from the FY26 audited Table 5** (first-year relief)	Not stated in the table; EY's other-matter paragraph addresses comparatives	**Minor limitation: permitted relief, with a decision-usefulness cost**
P3-11	Climate Transition Plan	Absent from FY25, where disclosure was flagged from FY27	**Added in FY26**, published 25 August 2026, a year earlier than flagged, mapped to the IFRS transition-planning framework	Published in its own right and summarised in the statutory report	Added; the residual is that it quantifies no lever and no capital (N8)
P3-12	Post-2030 certificate transition	Absent from FY25	**Added in FY26**, in the transition plan only: preparing for the replacement scheme and "the cessation of LGC creation after 2030"	Stated as an action, not as a consequence for the target	Added, with the residual that it sits outside the documents carrying the claim (D6-6)
P3-13	Value-chain breakdown by commodity as a share of the total	Published in the FY25 Sustainability Report chart	**Republished and extended in FY26** across the transition plan (percentages to commodity level, including consumer food waste at 7.6%) and the Data Pack (absolute figures)	Presented as the emissions profile	Added: the hotspot and hard-to-abate characterisation is new

P.4 Target-trajectory log (YOY-06 / YOY-08)

#	TARGET / CLAIM	BASE YR	TARGET YR	COVERAGE / SCOPE	CHANGE ACROSS PERIODS	ON-TRACK SURVIVES SERIES?	LABEL
P4-1	Reduce combined Scope 1 and 2 by more than 75%	FY20 (market, 1,474,716 t)	FY30	Scope 1 and 2, about 6% of the footprint	Set FY21; reported achieved FY25 at −81.3%; **re-issued unchanged** in the FY26–FY30 set; FY26 outturn −82.6%	**Yes on its stated basis, and the headroom widened from 33.4% to 43.9%**	**Concern: a beaten floor with no incremental ambition for a sixth year**
P4-2	Net zero Scope 1 and 2	FY20 (location, 1,522,236 t)	2050	Scope 1 and 2	Gross limb added in FY26 (at least 90% absolute reduction); credit policy stated; expressly not SBTi-validated under the Net-Zero Standard	Not yet testable; the architecture is now testable	**Acceptable, improved**
P4-3	30.3% reduction in FLAG sector emissions	FY24 (9.89 Mt block; 6.63 Mt target boundary)	FY30	About 67% of the FLAG block, roughly 35% of the value chain	Set and validated FY25; boundary disclosed FY26; base year to be recalculated FY27	**No.** In-boundary emissions rose 1.8%; the block rose 6.8% from the base year; progress against the base is stated to be not currently meaningful	**Concern: unmeasurable against its own base year one year after validation**

#	TARGET / CLAIM	BASE YR	TARGET YR	COVERAGE / SCOPE	CHANGE ACROSS PERIODS	ON-TRACK SURVIVES SERIES?	LABEL
P4-4	Supplier engagement, suppliers by spend with science-based targets	n/a	FY29	About 33.7% of the value chain, FLAG carved out	Originally 75% by FY27 (August 2023); **modified to 80% by FY29** on SBTi boundary requirements; the prior period stated both versions in one pack, now resolved to one	**No.** 46.9% at FY26 against 80% by FY29; Coles states it is "currently not on track"	**Concern, disclosed: a process metric, behind, over a third of the value chain**
P4-5	Maintain sourcing of 100% renewable electricity	n/a	Ongoing from FY25	Operational electricity	45.0% (FY23, FY24) → 100% (FY25) → 100% (FY26)	**Yes on its stated market basis; about 15 points of it are unaccounted from the disclosed components**	**Concern on substantiation, not on achievement**
P4-6	No deforestation across material Coles Own Brand primary deforestation-linked commodities	n/a	31 December 2025	Beef, cocoa, palm oil, soy, timber/pulp/paper in scope	Set FY25; **achieved for soy, palm oil and timber, paper and pulp; not achieved for beef and cocoa**	**No**, for two commodities, with reasons disclosed	**Concern, disclosed: the beef limb bears directly on the FLAG target's dependency**

P.5 Cross-report-type consistency over time (YOY-07 / DR-02)

#	CLAIM / METRIC	REPORT TYPES COMPARED	PER-PERIOD DIVERGENCE (AFTER NORMALISATION)	TREND IN DIVERGENCE	AUDITED-SOURCE PREFERENCE APPLIED (A-01B)	LABEL
P5-1	Net-zero boundary	Materiality table versus target statements, within the sustainability report of each period	FY25: whole-of-business in the materiality table against Scope 1 and 2 in every target statement. FY26: identical	**Static:** unchanged across two periods	The audited target statements govern, but the materiality table sits in a document the same reader reads	**Concern, persisting**
P5-2	Supplier-engagement target	Annual Report versus Sustainability Report/Supplement	FY25: 75% by FY27 in one, 80% by FY29 in the other, with two different explanations. FY26: 80% by FY29 in both, one explanation	**Resolved**	Not needed: the sources now agree	Resolved
P5-3	Scope 1 against the regulator	Report versus NGER register	FY25: disclosed 276,296 t against 256,791 t, no reconciling item stated at the time. FY26: the reconciling item is stated but not quantified, and the register year is not yet published	**Narrowing in explanation, unresolved in magnitude**	The audited report is preferred; the register difference is a boundary difference, not a conflict	**Cannot verify**
P5-4	Scope 3 total and its basis	Audited Annual Report versus Supplement and Data Pack	FY25: the reports quoted a location-based prior year against a market-based current year. FY26: the figures agree across all three, but the audited table alone does not name its basis	**Changed in kind:** the arithmetic defect resolved, a labelling defect remains inside the audited source	The audited source is preferred and is the one carrying the defect	**Concern**
P5-5	Emissions trend presentation	Audited statutory report versus Data Pack	FY26: the statutory report states annual performance against FY20 is presented in it graphically and tabularly; the series exists only in the pack, a different document	**New in FY26**, arising with the statutory report itself	The audited source is preferred and is the one carrying the defect	**Concern**
P5-6	Carbon-neutral product claims	Reporting suite versus on-pack and the Climate Active register	FY2022–FY2024: disclosed in the sustainability reports. FY25 and FY26: absent from the suite while the register indicates a live certification	**Widening:** a second period of silence, and a withdrawal inside FY26 undisclosed	The audited source makes no claim, so nothing conflicts; the gap is disclosure, not contradiction	**Cannot verify, medium confidence**
P5-7	Agriculture target boundary	Audited Annual Report versus Climate Transition Plan	FY26 only, the plan being the first of its kind: the audited report states the 6.63 Mt boundary, the plan states the 9.89 Mt baseline alone	**New in FY26**, arising with the plan itself	The audited source carries the qualifier and governs, so no figure in this review changes	**Concern**

#	CLAIM / METRIC	REPORT TYPES COMPARED	PER-PERIOD DIVERGENCE (AFTER NORMALISATION)	TREND IN DIVERGENCE	AUDITED-SOURCE PREFERENCE APPLIED (A-01B)	LABEL
P5-8	Post-2030 certificate dependency	Climate Transition Plan versus Annual Report and Supplement	FY26 only: disclosed in the plan, absent from both documents carrying the reduction claim	**New in FY26**	The audited source is silent, so the plan is the only source; the finding is placement, not conflict	Concern

Prepared under the Climate Disclosure Review Rules v15.23 (controlled AI-assisted review). The body (§1–§7) states the verdict and may be issued on its own; the annexes are the working layer. General information only: not legal, financial or investment advice, an audit, an assurance opinion, or a NoCO2 certification or conformance determination. © Carbon Reduction Institute Pty Ltd, ABN 26 122 969 233.

Annex L: How each score was reached

Each audience score is built from a fixed set of load-bearing criteria, marked before the score is set. "Partial" means the criterion is satisfied only with reader effort that this audience can reasonably spend, not a soft failure. The count matters as well as the score: a score can reach its floor on two failed criteria, so two reports sharing a score may sit some distance apart on the detail below.

ID	AUDIENCE	CRITERION	VERDICT	WHY
A1	Carbon accounting	No material category excluded (Scope 1/2/3, incl. customer Scope 3 where material)	Partial	All fifteen categories carry a stated disposition in the audited report and eleven are quantified. C10, C13 and C14 are outside the boundary on reasons that hold for a retailer. Two customer-side sources remain out: **C9 downstream transport and distribution**, which for a supermarket carries customer travel to stores, and the **indirect** portion of C11, while C11 direct use (0.49 Mt) and C12 end-of-life (1.44 Mt) are quantified. S3-26 has two limbs and Coles now meets the first more fully than in the prior period: it states that customer transport was "considered and excluded on the basis of materiality", which is an assessment rather than a bare omission. The second limb still fails, because **no screening estimate is published** for either source. **Workable:** the accountant reads the basis of preparation, which names precisely which categories are in, out and why, and bolts a C9 screening estimate onto a boundary they can see exactly: routine work at this audience's bar. OUT-STK-13 does not fire, its rebuttal test being satisfied by a full category breakdown with per-category method, inputs, factors and limitations
A2	Carbon accounting	A single reconcilable footprint (no competing totals)	Pass	One footprint, and it reconciles on every route tested. Scope 1 (256,203.21) plus location-based Scope 2 (1,008,241.55) equals the published location total (1,264,444.76) **exactly**; the five named emission sources sum to the same figure exactly; the market-based total equals Scope 1 because market-based Scope 2 is nil. On the value chain the **FLAG block (10.56 Mt) plus the Energy and Industrial block (8.42 Mt) equals the published market-based total of 18.98 Mt exactly**, and the eleven reported categories sum to the same figure. Annual Report Table 5, the Supplement panels and the Data Pack agree on every line tested. Dual-basis reporting on Scope 2 and Scope 3 is two labelled bases, not two competing totals; that one of them is unlabelled in the audited table is a basis-transparency defect and is counted at A3
A3	Carbon accounting	Method, boundary and version transparency (incl. restatements disclosed)	Not met	The per-category method disclosure is materially better than the prior period and now sits inside the audited report: Table 9 and Table 10 give measurement approach, data inputs, factor sources, verification and limitations for every category, including the candid disclosure of which categories rest on nine months of data extrapolated to twelve and the concession that lessor data came back from some lessors only. What defeats the criterion is the **version and basis record**, which this criterion expressly covers, and it fails in three places. **First**, the FLAG target's measurement method changed during FY26 and the change is not described, quantified or bridged; the Annual Report says only that a comparison with the FY24 base "is not currently meaningful because of changes in emissions measurement methodologies" and that the base will be recalculated in FY27, while the pack publishes an FY25 and FY26 FLAG series as though comparable. **Second**, the audited emissions table presents a single Scope 3 total of 18.98 Mt on the market-based basis with Category 3 at 0.01 Mt and does not name the basis or give the location-based 19.08 Mt, which the Supplement footnote does. **Third**, the reasonably assured "100% renewable" figure still cannot be rebuilt, because the RPP and JRPP percentages inside it are withheld: LGC 82.35% plus onsite solar 2.48% is 84.83%, leaving about 15 points unaccounted. The FY24 inventory rebuild remains unrestated beneath the longer series. **Not workable:** no bridge exists to rebuild a like-for-like FLAG series, and no disclosed cell supplies the withheld renewable components
A4	Carbon accounting	Granularity and assurance sufficient to lift into a third party's inventory	Pass	The figures lift directly: Scope 1 split into five named sources with shares, Scope 2 on both bases across seven years, eleven categories with a five-year series, FLAG broken out by commodity (beef 3.92 Mt, dairy 1.03, chicken 0.66, pork 0.59, lamb 0.56, fresh produce 0.36, all other 3.46), the Energy and Industrial block by category, grid electricity consumption, certificate volumes, onsite solar, seven years of energy and energy intensity. Assurance is **reasonable** over Scope 1, Scope 2 on *both* methods, energy consumption, solar generation, LGC surrenders and the renewable percentage, and **limited** over the Scope 3 total, FLAG sector emissions and suppliers by spend, the last two newly inside assurance this period. That the dominant Category 1 rests on spend and industry-average factors is the expected starting point for a retailer and is never scored (S3-EST); assurance depth over Scope 3 and the non-Australian factor basis are improvement notes, not liftability defects

ID	AUDIENCE	CRITERION	VERDICT	WHY
I1	Institutional investors	Physical risk disclosed and financially linked or quantified (N-04)	Partial	Exposure is now a published number rather than a narrative: a third-party hazard assessment by ClimSystems on CSIRO and Bureau of Meteorology projections under CMIP6, reported as 5% (40) of supermarkets, 5% (47) of liquor stores and 0% of large facilities at high hazard exposure, with flood named as the primary driver; three named scenarios with anticipated effects assessed on SSP2-4.5 and resilience tested on SSP5-8.5; time horizons stated; and $112 million of separately identified climate capital expenditure. Financial effects remain **qualitative** across all seven risks and opportunities, the transition plan's capital-commitments section commits no figure and its framework mapping marks financial metrics not applicable, and the prior period's assessment of 55 core commodities covering about 60% of revenue is not repeated, so the agricultural side of physical exposure is no longer sized. **Workable:** the investor reads the site-level hazard metrics and the scenario disclosure against the disclosed network of 870 supermarkets, 988 liquor stores and the distribution and fulfilment estate, and forms its own exposure view. Assessed for relevance and methodology transparency only, not modelling quality
I2	Institutional investors	Transition risk: target credibility, absolute caps or visible / derivable headroom	Partial	Headroom is fully derivable, and deriving it is unflattering. The FY30 operational target is expressed as a **floor** ("more than 75% below FY20") and was reported achieved in FY25, then re-issued **unchanged** in the FY26–FY30 set: against the disclosed FY20 market base of 1,474,716 t, a 75% floor permits 368,679 t versus an FY26 actual of 256,203.21 t, so **market-based Scope 1 and 2 may rise 43.9% and the target is still met**, wider than the 33.4% a year ago because reported emissions fell against a static target. Coverage: net zero and FY30 reach Scope 1 and 2, about 6% of the footprint; the FLAG target's boundary is now disclosed at 6.63 Mt of the 9.89 Mt FY24 FLAG block, about two thirds; the engagement metric is a process measure over 6.40 Mt, 33.7%, and is stated off track; roughly 5.5 Mt, about 29%, is untargeted. **Workable:** every figure in that sentence was computed here from published cells, so a sophisticated reader can price the ceiling the disclosure does not state. Two residuals sharpen it rather than defeating the criterion. The cap binds reported rather than physical emissions and can be met with certificates; and the transition plan discloses that creation of those certificates **ends after 2030**, the target year, with no document stating the position under the replacement scheme. The plan that would otherwise let a reader price the pathway attaches no cost and no abatement to any lever
I3	Institutional investors	Target achievement: met with real reductions, progress stated honestly	Partial	This is the criterion that moved most against the company's own prior disclosure, and it moved in Coles' favour. On the **real-reduction** limb, the physical position improved and the majority of the improvement is Coles' own action: location-based Scope 1 and 2 fell 4.1% (53,651 t), of which about 29,775 t (55.5%) is Scope 1 abatement plus lower own consumption and about 23,876 t (44.5%) is grid decarbonisation; Scope 1 fell 7.3% on a 10.96% fall in refrigerants; grid electricity consumption fell 0.93% rather than rising. On the **honesty** limb, the Annual Report states the 82.6% market-based and 16.9% location-based reductions in consecutive sentences, attributes them to renewable electricity sourcing, refrigerant reductions and energy efficiency, and each of those three is supported by the assured data. Coles also states in terms that FLAG "emissions reductions are not yet evident" and that it is "currently not on track" for the supplier-engagement target. **Workable:** the investor takes the pack's Scope 2 and consumption rows, computes the implied grid emission factor on both sides and separates own action from grid movement, exactly as done here. The residual, priced at I2 rather than doubled here, is that the target reported as ahead covers about 6% of the footprint and is a beaten floor
I4	Institutional investors	Portfolio / financed-emissions exposure completeness	Pass	Not a financial institution and no PCAF or portfolio claim is made, so the FI module is not applied. The audited report addresses AASB S2 paragraph B59 in terms and states Coles does not undertake the specified activities. The investment exposure that exists is disclosed with its method: Category 15 is joint-venture Scope 1 and 2 on Coles' proportional ownership share, under 10,000 t
I5	Institutional investors	Flow-through / look-through exposure raised and quantified	Partial	For a supermarket the counterparty exposure is the supplier and agricultural value chain, and it is raised and **quantified to an unusual depth**: Category 1 at 15.93 Mt, FLAG at 10.56 Mt broken down by commodity, the Energy and Industrial block at 8.42 Mt by category, and an absolute validated target on the largest slice with its boundary now sized. Supplier target coverage is measured at 46.9% and 41.1% by spend. **Workable:** the investor takes the FLAG commodity split and the target-boundary enumeration, computes what each target reaches and prices the residual. The residual is that no measured supplier abatement flows into the inventory, the engagement metric is activity rather than delivered emissions and is behind, and the no-deforestation limb tied to the largest FLAG commodity was missed after suppliers indicated they could not support it
I6	Institutional investors	Reconstructability by a sophisticated reader	Partial	This is the criterion that carries the institutional row, and it holds. Every quantitative claim in this review was rebuilt from Coles' own published cells: the own-action versus grid split on both sides, the 43.9% target headroom, the 33.7% engagement coverage and the roughly 29% reached by no target, the seven-year energy series and the exact footprint reconciliations at A2. **Workable:** the disclosed seven-year Scope 1 and 2 series on both bases, the five-year category series, the FLAG and Energy-and-Industrial splits, the electricity, certificate and solar rows and the target boundary enumerations are together sufficient to redo the whole decomposition. The residual is real and has grown in one respect: the withheld RPP and JRPP inputs still make the renewable percentage unrebuildable (counted at A3); the FLAG target's in-boundary position is **not published as a number in any year**, including in the transition plan, so its progress cannot be reconstructed at all, only inferred from the total block; and no lever in the transition plan carries an abatement quantity or a cost, so the forward pathway cannot be rebuilt either. What the reader can rebuild is the present position, which is what holds the criterion
R1	Retail investors	Headline-to-evidence match without cross-document reconstruction	Partial	The gap this reader faced against Coles' own prior disclosure has closed on the point that mattered. The Supplement prints the FY26 combined Scope 1 and 2 inventory twice on one page, market-based at 0.26 Mt and location-based at 1.26 Mt, each split into electricity, natural gas, refrigerants and fuels, so the corrective magnitude is co-located with the claim rather than sitting in a data pack. The Annual Report states the 82.6% market-based and 16.9% location-based reductions in consecutive sentences, and the reduction is attributed to drivers the assured data support. **Workable:** the retail reader meets both magnitudes on one page of the document written for them, sees that the market-based figure is nil electricity against 1.01 Mt physically consumed, and reads the reduction accordingly: no second document and no arithmetic is required to get the point. The residual is that the Supplement gives the location-based **level** but not the location-based **trend**, and the 82.6% headline sentence does not carry a basis label at the figure itself, naming the market-based mechanism in the following sentence instead

ID	AUDIENCE	CRITERION	VERDICT	WHY
R2	Retail investors	Targets cover the material sources; achievement stated honestly	Not met	Over 90% of the footprint has no measured reduction target, and this year's disclosure shows the gap is wider than the prior period's information allowed. Net zero and the FY30 target reach Scope 1 and 2, about 6%. The FLAG target is genuinely absolute and validated, but its boundary is **6.63 Mt of the 9.89 Mt** FLAG block in its base year, so about a third of agriculture sits outside the only absolute value-chain target. The engagement metric is a process measure over **6.40 Mt, 33.7%** of the value chain, and Coles states it is not on track. **About 2.02 Mt is reached by neither target, including end-of-life treatment of sold products at 1.44 Mt, the second-largest single line in the whole inventory; with the agriculture emissions outside the FLAG boundary, roughly 5.5 Mt, about 29% of the value chain, carries no emissions-reduction target.** The transition plan does not close this: it names consumer food waste as a hotspot at 7.6% of the value chain, lists three circularity actions and the packaging targets against it, and states that Coles is "currently unable to track the impacts of any specific actions" on that source, so the activity is real and its abatement is unmeasured (T-PROC-05). On honesty, the FY30 target was reported achieved and re-issued unchanged with 43.9% of headroom and is described as "ahead". **Not workable:** no reader action supplies a target that does not exist, and none supplies an abatement figure the company says it cannot yet measure
R3	Retail investors	Material risks are legible	Pass	The single most important fact for reading this company is stated plainly and early in both documents: "More than 90% of the Group's total value chain emissions are indirect greenhouse gas (GHG) emissions (or Scope 3 emissions)", with the value chain then broken down for a non-expert into agriculture at 55.6% and energy and industrial sources at the balance, and the agriculture block itemised by commodity. The Annual Report sets out seven risks and opportunities with three named scenarios, time horizons and stated limitations, and publishes site-level hazard exposure. A non-specialist can see where the emissions actually are, and that they are not where the headline percentage is
R4	Retail investors	Caveats findable, understandable and fairly presented	Partial	The load-bearing caveats are in the primary reports and are legible where this reader meets them. The renewable-electricity footnote discloses in full, at every occurrence including the front-page snapshot, that the percentage is market-based and includes the renewable power percentage and the ACT jurisdictional percentage as well as surrendered certificates and onsite solar. The net-zero commitment is footnoted at the target in terms: "Commitment refers only to Coles' Scope 1 and Scope 2 emissions." The value-chain total carries a footnote naming the market and location bases and both figures. **Workable:** the reader meets the boundary footnote at each target statement, which is where a retail reader encounters a target. The residual is that one table contradicts those footnotes; that contradiction is a literal-truth failure and is counted at P1, not doubled here
P1	Consumers & public	Public claims literally true within their implied boundary	Not met	Most claims are true on their stated basis, and two are not true within the boundary they imply. The Supplement's "Top 10 material sustainability issues" table states the climate issue as "**Decarbonising and building climate resilience in our operations and value chain to achieve net zero greenhouse gas emissions by 2050**": an unqualified whole-of-business net zero, in the table a reader consults to find out what the company thinks matters, and the same wording stood in the prior period's table and has not been corrected. Every target statement in both documents contradicts it, limiting the commitment to Scope 1 and 2, about 6% of emissions. Separately, "100% renewable electricity", carried in the front-page snapshot with reasonable assurance behind it, counts the grid's existing non-additional renewable content and does not rebuild from the disclosed components: surrendered certificates and onsite solar reach about 85%, and the percentages that would close the remaining 15 points are withheld. **Not workable:** preferring the footnotes over the company's own materiality table would be selecting the favourable statement and calling it reconciled, and nothing in either document tells the reader which governs; and no disclosed cell supplies the withheld renewable components
P2	Consumers & public	No greenwashing or misleading composite impression	Partial	The composite this audience meets has changed against Coles' own prior disclosure, and the change is favourable. The consumer-facing snapshot carries one climate headline, "100% renewable electricity sourced for our operations", and not the reduction percentage; the 82.6% figure appears once, on the same page as the two inventory panels that show 0.26 Mt against 1.26 Mt; and the impression of physical decarbonisation is now substantially supported, because location-based Scope 1 and 2 fell 4.1% with the majority of the fall being Coles' own action, refrigerants fell 10.96% and total energy stopped growing. The corrective facts are co-located and stated in the company's own voice: that more than 90% of emissions are in the value chain, that the value chain total is 18.98 Mt, that FLAG reductions "are not yet evident", and that the supplier-engagement target is "currently not on track". **Workable:** the reader stays within one four-page climate section of the document written for them and meets all four facts. The residual is the literal-truth failure counted at P1, and that the reader is not told the value chain has been flat for three years
P3	Consumers & public	Genuine climate action visible versus inaction	Pass	Real, capital-backed action is visible and more of it is now in the numbers than in the commitments. The refrigerant transition, on the source that is 74.3% of Scope 1, produced a **10.96% fall (23,414 t)** this year, with coverage rising from 104 to 141 supermarkets and 80 to 94 liquor stores, on a standing 20-to-30-systems-a-year programme, a design rule for new supermarkets and a pipe-replacement programme aimed at leakage. Alongside it, **metered onsite generation rising to 39,370 MWh across 156 sites** under reasonable assurance, 8.96 MW installed in the year, battery storage and a virtual-power-plant trial, a gas sub-metering programme cutting participating-store gas use by about 18%, $112 million of separately identified climate capital expenditure and an internal carbon price applied in capital decisions. Plus an absolute validated target on agriculture, the hardest slice. This is action, not presentation: the framing, not the effort, is what caps this audience
G1	Regulators	Standards compliance / readiness (AASB S2, Ch 2M, GHG Protocol)	Partial	The first mandatory year is filed properly and the evidence is on the face of the document: a statutory Sustainability Report inside the Annual Report, a directors' declaration signed 25 August 2026 asserting compliance with s296D and AASB S2, an unmodified audit opinion under ASSA 5010 that the Scope 1 and 2 disclosures are prepared in accordance with ss296A(2), 296C and 296D, and an unmodified review conclusion over governance and the risk and opportunity disclosures. AASB S2025-1 is early adopted. Coles disclosed all fifteen Scope 3 categories in year one rather than taking the available first-year relief. **Workable:** the regulator reads the declaration, the assurance report and the named criteria to see exactly what has been tested and to what level. Three residuals: the statutory assurance reaches Scope 1 and 2 only, so the 94% of the footprint in the value chain carries no statutory assurance; the audited emissions table carries no comparative column, the first-year relief being taken there; and anticipated financial effects are qualitative across all seven risks and opportunities, with the internal carbon price applied to Scope 1 and 2 and expressly excluding Scope 3

ID	AUDIENCE	CRITERION	VERDICT	WHY
G2	Regulators	Cross-source / audience consistency	Not met	Two of the prior period's four inconsistencies closed and five live ones remain, two of them inside the audited statement and two turning on material content that sits only outside it. **Within one document:** the materiality table states net zero for "our operations and value chain" while every target statement limits it to Scope 1 and 2, unchanged across two periods. **Inside the audited statement:** it tells a reader that annual emissions performance relative to the FY20 baseline "is presented in this Sustainability Report through graphical and tabular disclosure", and no multi-year emissions table or chart appears anywhere in it; and its emissions table gives one Scope 3 total of 18.98 Mt on the market-based basis without naming the basis, while the Supplement footnote names it and gives the location-based 19.08 Mt. **Across audiences:** a Climate Active carbon-neutral product certification indicated as live on the Australian Government's register, and a second indicated as withdrawn on 4 August 2025 inside the reviewed year, appear nowhere in the reporting suite, which mentions neither Climate Active nor carbon neutrality nor offsets; recorded at medium confidence, the register page not having been retrieved. **Across the suite:** the transition plan states the agriculture target against "Baseline emissions: 9.89 MtCO2-e" with no mention of the 6.63 Mt target boundary the audited report discloses, so the same validated target reads about a megatonne larger in the plan than in the accounts; and the plan alone discloses that certificate creation ends after 2030, the dependency behind the headline reduction, which the two documents carrying that reduction do not mention. **Closed since the prior period:** the supplier-engagement target reads 80% by FY29 in all three documents with one explanation, and the gap to the regulator's Scope 1 figure has a named reconciling item, refrigerant reporting beyond the NGER framework, though it is not quantified. **Not workable:** a reader cannot tell which statement governs, and the audited-source preference resolves none of the live limbs: two are defects inside the audited source itself, and two turn on material content that sits only outside it