DECISION USEFUL DIAGNOSIS 013 — FY2026

Macquarie Group Limited (ASX: MQG)

Improved to not decision-useful for three of five audiences, because the absolute financed series is printed beside the intensity targets, while about $722bn of managed assets and facilitation sits outside the number

REPORTING PERIOD
Year ended 31 March 2026

REVIEW DATE
7 August 2026 (first reviewed 9 July 2026; revised 15 July 2026, 17 July 2026, 3 August 2026)

PROTOCOL
Climate Disclosure Review Rules v15.23

SECTOR
Financial and Insurance Services

7 / 15 overall score · sum of the five audience ratings, for ranking



7 of 19 load-bearing criteria not met. The score saturates, because a row reaches 1 on two failures 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 Macquarie's 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
Macquarie Group Limited (ASX: MQG)	1	1	2	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.



7 / 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 (5-15), used only to rank reports; it has no band and no verdict of its own. §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 (what's counted, financed-emissions detail, real-vs-accounting movement, trajectory), §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.

1. Scope & basis

1.1 What we reviewed

DOCUMENT	REVIEWED?	IF MISSING, EFFECT ON THIS REVIEW
FY2026 Annual Report: Climate Statements / Sustainability Report (AASB S2), incl. metrics, financed emissions, scenario analysis, methodology and assurance reports (Climate Statements **pp. 65–99** per the company's own statement at p.64; assurance reports pp. 101–106)	Yes: **primary**	—
FY2025 Sustainability Report (extract of the FY2025 Annual Report; voluntary GRI/TCFD/SASB)	Yes: supplementary / prior-year	—
FY2025 Basis of Preparation for Sustainability Reporting (methodology for the PwC-assured metrics)	Yes: supplementary	—
Prior-year climate reports: FY2020 & FY2021 TCFD Implementation Progress & Scenario Analysis; Net Zero & Climate Risk Reports 2022 (FY2022) & 2023 (FY2023); FY2024 Sustainability Report	Yes: supplementary / longitudinal context (§3.4, Annex K)	—
Standalone transition plan	Not published: company states it does not have one; transition content is embedded in the Climate Statements	Limits assessment of a costed, milestone-based delivery pathway
Full PwC assurance methodology / management letters	Not provided: assurance conclusions reviewed in-report	Assurance scope taken from the published conclusions

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: FY2026 is Macquarie's first mandatory climate-reporting year under Div 1, Part 2M.3	FI
AASB S2	Yes	In accordance with: "prepared in accordance with" (Climate Statements)	FI
ASIC RG 280	No: not named expressly	Not referenced: applies as regulator guidance	FI
GHG Protocol (Corporate / Scope 2 / Scope 3)	Yes	With reference to: "guided by" (own methodology, combination of methods)	FI
PCAF (financed emissions)	Yes	With reference to: "guided by", a combination of GHG Protocol, PCAF and internal expertise	FI / PCAF
SBTi	Yes	Mentioned: "considers guidance of" the Corporate Net-Zero Standard (Sept 2025); **not a validated SBTi target**; no third-party validation of any target	FI
Climate Active / other carbon-neutral framework	No	Not referenced: own-operations net zero is **self-declared**, not certified	Not applicable

STANDARD / FRAMEWORK	REFERENCED BY COMPANY?	HOW STRONGLY	SECTOR MODULE(S) APPLIED
Certificates (GreenPower / LGC / ACCU / REC)	Yes: energy attribute certificates and carbon credits	With reference to: energy attribute certificates + carbon credits (Puro.earth biochar, ACCU, Climate Action Reserve)	FI
NGFS scenarios	Yes	With reference to: referenced as guidance, not a compliance obligation	FI
NZBA	Yes	With reference to: referenced as guidance, not a compliance obligation	FI
Net Zero Asset Managers (MAM)	Yes	With reference to: referenced as guidance, not a compliance obligation	FI
Net Zero Investment Framework (NZIF)	Yes	With reference to: referenced as guidance, not a compliance obligation	FI
CRREM	Yes	With reference to: referenced as guidance, not a compliance obligation	FI
UNEP FI target-setting guidelines	Yes	With reference to: referenced as guidance, not a compliance obligation	FI

1.3 Review basis & limitations

This is a standard, evidence-led review centred on the audited/assured statutory disclosure (the FY2026 Annual Report Climate Statements), with the FY2025 Sustainability Report and Basis of Preparation used to reconcile prior-year figures and methodology. Three limitations bound the conclusions. First, financed-emissions figures and sector targets are stated as at 31 March 2025, a disclosed one-year lag behind the FY2026 headline year. Second, the emissions of Macquarie's largest activities as an asset manager and capital-markets house, its $722bn of assets under management and its advisory/underwriting flow: are outside the disclosed financed-emissions number by design, so the 13.2 $MtCO_2e$ figure is not Macquarie's full financed-and-facilitated footprint. Third, assurance over every climate metric is limited-level only, and Macquarie states it obtains no third-party validation of its targets or methodologies against climate science.

2. Verdict

2.1 Decision-usefulness by audience

1

Carbon / supply-chain emissions accounting

1 met · 1 partial · 2 not met

The on-balance-sheet inventory is good and it is not the footprint. Financed emissions are disclosed sector by sector with PCAF data-quality scores against $247.7bn of exposure at default, the operational inventory reconciles arithmetically on every table, and the restatements that matter are footnoted with a stated cause. Two failures still compound. **(a)** The dominant activity is outside the number: **roughly $722bn of managed assets and all capital-markets facilitation and advisory are excluded and unquantified**, with no portfolio-coverage percentage or total-loans-and-investments denominator, Category 7 commuting not reported, and Categories 2, 4 and 8 folded into Category 1, so a material exclusion cannot be ruled out and no bounding estimate exists. Macquarie states it "expects to disclose emissions associated with assets under management" once the transition relief lapses in FY2027, which is a commitment rather than a figure. **(b)** The version record

fails in the first mandatory year: an assured FY2025 Category 1 comparative changed 164,983 → 164,893 with no footnote on a table that footnotes its other two restatements; the commercial-real-estate method was downgraded to economic-intensity estimation with no like-for-like restatement of the prior year; and the bundled-versus-unbundled renewable split, the energy-use denominators and the target-coverage quantification were all withdrawn.

`§3.1, §3.2, Annex B`

1

Institutional investors

0 met · 4 partial · 2 not met

The disclosed half is reconstructable and the half that matters cannot be sized. Sector-level financed emissions, exposure at default, data-quality scores, both intensity metrics with baselines and target ranges, and MAM's alignment bands with their in-scope denominators are all published, so an investor can rebuild the disclosed position and bound the targeted share of it. Two load-bearing criteria fail. **Portfolio completeness**: the $722bn managed book and all facilitation sit outside the 13.2 $MtCO_2e$ figure with no coverage percentage and no bounding estimate, so the number is not Macquarie's footprint as an asset manager and capital-markets house. **Target achievement**: the only target reported achieved, own-operations net zero, was met with renewable certificates and 430 retired removal credits rather than by cutting emissions; residential-mortgage intensity progress is attributed by Macquarie itself to the electricity grid ("primarily due to the slower-than-projected pace of decarbonisation of Australia's electricity grid"); and the only fossil-fuel target is measured across mismatched populations, because pre-production upstream oil and gas producers are inside the exposure and outside the reported emissions. Absolute financed emissions rose about 16% (11.4 → 13.2 Mt) while both intensity metrics eased.

`§3.2, §3.3, §3.4, §4, §5`

2

Consumer / retail investors

0 met · 3 partial · 1 not met

The headlines state their own scope and the correction sits beside them: own-operations net zero is stated as Scope 1 and 2 only, the financed targets are stated as intensity measures for named sectors, no group net-zero-financing claim is made, and the absolute financed-emissions table (11.4 → 13.2 Mt) is printed a page from the intensity target table, so a reader who reads both sees the direction of travel without leaving the document. The one failure is **target coverage**: only upstream oil and gas and residential mortgages carry targets. Transport at 2.2 Mt, the second-largest source, power at 0.9 Mt, commercial real estate and metallurgical coal at 0.8 Mt carry none, the mortgage target covers Scope 1 and 2 only, and the FY2025 statement of how much of the carbon-intensive book the targets reach ("around 80% of its dollar exposures...

and nearly two-thirds of... absolute financed emissions") has no FY2026 equivalent anywhere in the 345-page report, so the reader can no longer be told the coverage figure and must bound it themselves.

§3.4, §4.2

1

Consumers & public

1 met · 1 partial · 1 not met

The claims are individually true and the impression they leave together is not. Nothing here over-claims: "net zero... for our own business operations" says which scopes it covers, "sourced the equivalent of 100% renewable electricity" says on its face that it is a matching claim, and no group net-zero commitment is asserted. Put together, though, "reducing the intensity of our financed emissions" reads as a portfolio decarbonising, when **absolute financed emissions rose about 16%**, the dominant managed-assets and facilitation footprint is not quantified at all, the appetite for metallurgical coal was reopened to permit mine **expansion** and the book re-entered at 0.8 Mt, and the mortgage progress is grid-driven on Macquarie's own account. Against that, the action is real and constrains decisions rather than describing them: thermal-coal exposure is $A0 with a stated forward no-appetite policy, and MAM's 2030 alignment target is measured on investee behaviour against a re-validated baseline, at 68% and 66% of in-scope holdings.

§4.2, §5

2

Regulators

0 met · 1 partial · 1 not met

The first mandatory AASB S2 statements are substantive: governance, strategy, risk, metrics and targets are addressed across pp.65-99, transition relief is applied and disclosed, scenario analysis is performed under named NGFS scenarios, the cross-industry vulnerable-asset metrics are quantified with coverage percentages ($A21.5bn of $A354.9bn transition-vulnerable on 99% coverage; $A2.3-7.4bn of $A248.4bn physically vulnerable on 77%), and two PwC engagements report at pp.101-106. Macquarie is not an NGER controlling corporation, so there is no external Scope 1 and 2 anchor. What holds the row down is **consistency inside the statutory statement itself**: p.72 states that climate risks and opportunities "have not resulted in any current or anticipated effects to Macquarie's business model, resource allocation, strategy or related decision-making processes", while p.69 describes "sector-specific risk appetite settings and review processes", p.77 describes a financed-emissions test applied at deal origination, and p.83 records the coal appetite being changed. The two cannot both be read literally and the document never reconciles them. Alongside that sit an unfootnoted change to an assured comparative and three FY2025 quantifications withdrawn in the year they became statutory.

§2.3, §5.3

What the company should fix first: show the absolute financed-and-facilitated footprint. That means an absolute trajectory (or a disclosed, justified headroom under the existing intensity targets) plus quantified emissions for the roughly $722bn of managed assets and capital-markets activity, so a reader can see whether the real footprint is being capped rather than only whether two intensity ratios are easing. Restore the three FY2025 quantifications withdrawn in the mandatory year (target coverage, energy use in GWh and TJ, and the property-level commercial-real-estate method); publish the upstream oil and gas intensity both with and without pre-production clients in the denominator; and reconcile the "no effect on decision-making processes" statement with the decision gates the same document describes.

2.2 Scorecard

Headline claim ↔ evidence match	●●●●○	Disclosure quality	7 / 15
Inventory completeness (Scope 1/2/3)	●●●○○	Financed-emissions completeness (if FI)	●●●○○
Target credibility	●●○○○	Real reduction vs accounting movement	●●○○○
Offset / certificate / renewable integrity	●●●○○	Assurance coverage vs claim	●●●○○
Standards / compliance confidence	●●●●○	Comparability (like-for-like only)	●●●○○

Reader accessibility

Evidence limitations

DIMENSION	RATING	JUSTIFICATION
Headline claim ↔ evidence match	4/5	Claims are narrowly scoped and mostly match the evidence; the gap is what the claims *don't* cover, not what they overstate.
Disclosure quality	7 / 15 overall	Comprehensive, well-structured AASB S2 statements with clear methodology and exclusions.
Inventory completeness (Scope 1/2/3)	3/5	Own-operations Scope 1 and 2 and operational Scope 3 (Categories 1–6 and 8) reported; commuting (Category 7) not reported. The FY25→FY26 gross Scope 1 movement of −17% carries no disclosed driver, and the energy-use denominators that would decompose it were dropped (F-13).
Financed-emissions completeness (if FI)	3/5	Detailed sector table with PCAF data-quality scores, but no portfolio-coverage % / denominator, no facilitated emissions, and AUM excluded.
Target credibility	2/5	Intensity-only financed targets, two sectors; no absolute cap; no group net zero; no third-party validation.
Real reduction vs accounting movement	2/5	Own-ops "net zero" is contractual/offset-based; financed-emissions intensity easing while absolute rises.
Offset / certificate / renewable integrity	3/5	Credits are named, registry-identified and assured; ~46% of "100% renewable" is unbundled certificates (FY25 split now dropped).
Assurance coverage vs claim	3/5	Broad but **limited-level** assurance across S1/2/3, financed emissions, EAD, intensity, offsets; no reasonable assurance; targets unvalidated.
Standards / compliance confidence	4/5	Appears to meet first-year AASB S2 obligations with transition relief applied and disclosed.
Comparability (like-for-like only)	3/5	Most restatements are disclosed with reasons, and the Scope 1 series is continuous across the voluntary and mandatory bases. What breaks comparability is the financing-side commitment narrowing (§3.4, F-10–F-11), three FY2025→FY2026 disclosure withdrawals (F-12, F-13), a silent change to an assured Category 1 comparative (F-16) and a commercial-real-estate method downgrade that is not carried back (F-15).
Reader accessibility	3/5	Thorough but dense; the "no material financial effects / no change to strategy" conclusions are easy to miss.
Evidence limitations	3/5	One-year financed-emissions lag; AUM and facilitated emissions outside the number; limited assurance only.

2.3 Standards & compliance snapshot

AREA	RATING	BASIS
Corporations Act / Ch 2M	Appears broadly compliant: minor limitations	First mandatory year; AASB S2 climate statements prepared and independently reviewed (limited).
AASB S2	Appears broadly compliant: minor limitations	Governance, strategy, risk, metrics and targets addressed; Scope 3 voluntarily disclosed under transition relief; scenario analysis performed. The cross-industry vulnerable-asset metrics **are** disclosed and quantified: transition, $A21.5bn of $A354.9bn assessed (6%), 99% coverage (p.89); physical, $A2.3–7.4bn of $A248.4bn (1–3%), 77% coverage (p.90). Macquarie states quantitative anticipated-financial-effect information beyond the medium term "would not be decision-useful as at the reporting date and has therefore not been disclosed" (p.73).
ASIC RG 280	Cannot verify: evidence not provided	Not addressed head-on; general consistency with mandatory-reporting expectations.

AREA	RATING	BASIS
GHG Protocol / Scope 2 / Scope 3	Appears broadly compliant: minor limitations	Location- and market-based Scope 2 both reported; operational Scope 3 partial (Cat 1–6, 8).
PCAF / financed emissions	Cannot verify: material evidence missing	PCAF "guided by", sector data-quality scores given, but no portfolio-coverage percentage / denominator and no facilitated emissions.
Carbon-neutral / net-zero framework	No apparent issue: self-declared, scoped	Own-ops net zero is self-declared and explicitly limited to Scope 1 & 2 of own operations; no external carbon-neutral certification claimed.
Certificates / credits	Appears broadly compliant: minor limitations	Credits named and registry-identified; retirement assured at limited level; renewable is ~half unbundled certificates.
Other company-referenced framework	Not applicable for the period	NZBA / NZAM / NZIF / CRREM referenced as guidance, not compliance obligations.

3. What this means for a reader

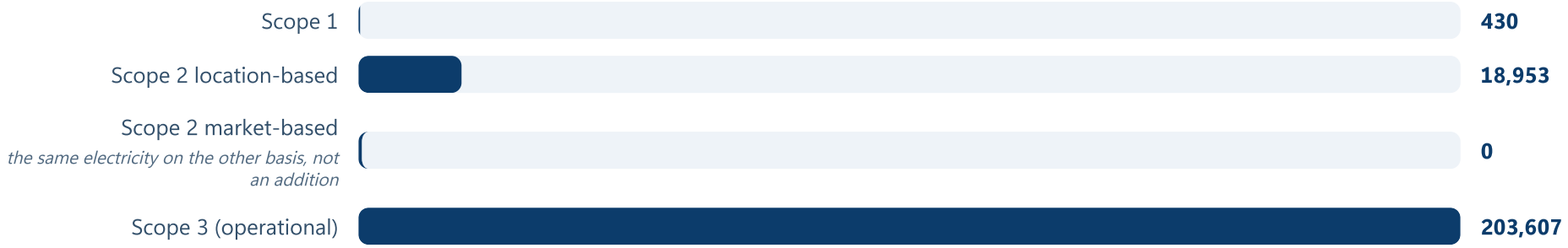
3.1 What is counted / not counted

Reporting basis: operational figures are FY2026 (year ended 31 March 2026), reported on both a location and a market basis; financed emissions are as at 31 March 2025, one year in arrears, which is Macquarie's own reporting basis for that metric and not a substitution. Every figure in this table is the current reported figure on the basis stated for that row; where none exists the row reads "No", and no earlier year is substituted for it. Own-operations emissions are immaterial against on-balance-sheet financed emissions of 13.2 Mt, which are the dominant footprint and are broken out in §3.2. Restated prior-year comparatives and the full series are in §3.4 and Annex K.

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: FY2026 Annual Report p.80 metrics table and p.81 Scope 3 table (own operations, year ended 31 March 2026). Scope 2 is shown on both bases: market-based has been nil since FY2022, and it is the same electricity as the location-based bar rather than an additional source. On-balance-sheet financed emissions of 13.2 Mt are the dominant footprint and are in section 3.2



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: FY2026 Annual Report pp.80-81 (Scope 1, 2 and 3 metrics tables) and pp.65-99 (Climate Statements); FY2025 Basis of Preparation for Sustainability Reporting



SCOPE / CATEGORY	STATUS	QUANTIFIED (tCO_2E)	MATERIAL?	NOTE
Scope 1: combustion / fugitive / fleet	Reported	430	No: low (own operations)	The FY2026 report restates FY2020 to **471** and FY2025 to **518** (footnotes 4 and 5); the series is continuous (477/465/343/385/415/482 → 471/518 restated → 430). The FY25→FY26 movement is **−17%** with no disclosed driver (F-20). Excludes operationally-segregated subsidiaries (OSS).
Scope 2: electricity (location-based)	Reported	18,953	No: low (own operations)	Down 15% YoY vs the FY2025 comparative (22,363); driver (consumption vs grid) not split, and the electricity-consumption and total-energy figures that would allow the split were dropped in FY2026 (F-13). FY2026 is the first year a location-based FY2020 baseline (31,370) is published: there is no prior-year location-based comparative in the corpus.
Scope 2: electricity (market-based)	Reported	0	No: low (own operations)	Zero via 100% renewable, ~46% of which is unbundled certificates. FY2020 market-based baseline restated 29,767 → **29,213** (footnote 6, new reporting platform).
Scope 3 C1 Purchased goods & services	Reported	148,182	Yes: largest operational Scope 3	Above FY2020 baseline (137,030); absorbs C2, C4 and C8, but **not** C5, which is quantified and assured separately.
Scope 3 C2 Capital goods	Partial	Included in C1	Yes	Not separately broken out.
Scope 3 C3 Fuel- & energy-related	Reported	3,946	Moderate	Restated to add well-to-tank / T&D losses.
Scope 3 C4 Upstream transport & distribution	Partial	Included in C1	No: low	—
Scope 3 C5 Waste	Reported	119	No: low	Separately quantified in all three years (112 / 119 / 223) **and separately assured** (PwC schedule (i), p.104): it is *not* folded into C1.
Scope 3 C6 Business travel	Reported	51,360	Yes	Fully offset via carbon credits.
Scope 3 C7 Employee commuting	Excluded	Not measured	Cannot verify: potentially material	"Not currently reported — reviewing methodology and data sources."
Scope 3 C8 Upstream leased assets	Partial	Included in C1	No: low	—
Scope 3 C9 Downstream transport & distribution	Not relevant	Not applicable	Not applicable	Not a product manufacturer.
Scope 3 C10 Processing of sold products	Not relevant	Not applicable	Not applicable	—
Scope 3 C11 Use of sold products	Not relevant: direct	Not applicable	Not applicable	Captured within financed emissions (oil/gas, coal Cat 11). Appears in financed-emissions sector scopes, not operational S3.
Scope 3 C12 End-of-life	Not relevant	Not applicable	Not applicable	—
Scope 3 C13 Downstream leased assets	Reported within C15	Included in C15	Yes	Within transport/aviation financed emissions (Cat 13). Aviation lessor exposure counted as Cat 13.
Scope 3 C14 Franchises	Not relevant	Not applicable	Not applicable	—
Scope 3 C15 Investments / financed & facilitated	Partial	13,200,000	Yes: dominant	Quantified for on-balance-sheet lending/equity (13.2 Mt); **not** for AUM and facilitated. See §3.2: excludes MAM funds, BFS Wealth, advisory/M&A and capital-markets facilitation.

3.2 Financed-emissions detail (financial institutions)

Portfolio header: **13.2 $MtCO_2e$** absolute financed emissions as at 31 March 2025 (≈12-month lag behind the FY2026 report); covers **on-balance-sheet lending + equity investments only**, on **$247.7bn EAD**; sector-level PCAF data-quality scores range **1.0–5.0** (best 1.0 on coal, worst 5.0 on the diffuse "other" sectors,; **portfolio-coverage percentage / total-loans-and-investments denominator not**

disclosed, and the FY2025 report's coverage quantification ("around 80% of dollar exposures to carbon-intensive sectors, and nearly two-thirds of absolute financed emissions from carbon-intensive sectors") has no FY2026 equivalent (F-12); **excluded**: MAM's ~$722bn managed funds, BFS Wealth, advisory/M&A, capital-markets facilitation, trading book, sovereigns, cash/derivatives. Macquarie states that "in the next reporting period, relevant transition reliefs cease to apply under AASB S2, Macquarie expects to disclose emissions associated with assets under management" (p.64), a forward commitment, unquantified and undated beyond FY2027. Not part of any carbon-neutral claim. Absolute total **rose ≈16%** year-on-year (11.4 → 13.2 Mt), tracking ≈14.5% EAD growth. Macquarie states it has "not purchased carbon offsets to meet our financed emissions sector targets" (p.83): a useful integrity constraint on the intensity metrics, though stated as a fact about the past rather than a forward commitment (A-16: not credited as a positive).

SECTOR / ASSET CLASS	IN FINANCED INVENTORY?	CUSTOMER SCOPES INCLUDED	COVERED BY A SECTOR TARGET?	NOTE
Oil/gas (total)	Yes	Scope 1, 2 and 3: Scope 3 is Category 11	Partly: upstream only (intensity)	6.2 Mt: largest single source; downstream/midstream untargeted.
– Upstream oil/gas	Yes	Scope 1, 2 and 3: Scope 3 is Category 11	Yes: intensity (gCO_2e/MJ)	62.0 gCO_2e/MJ, −6% vs FY2020; target 56.3–59.6 by 2030. **Numerator and denominator cover different populations**: "Exposure includes both pre-production and production upstream oil/gas producers. Pre-production producers are excluded from reported emissions" (fn 14, p.82; p.97): so the intensity is flattered by whatever pre-production exposure sits in the $2.4bn EAD (F-14).
Coal (metallurgical mining)	Yes	Scope 1, 2 and 3: Scope 3 is Category 11	No	0.8 Mt; re-entered in FY2025 from 0.0; appetite now allows met-coal mine expansion.
Coal (thermal mining)	Yes	Scope 1, 2 and 3	No	$A0 EAD as at 31 Mar 2025: categorical no-appetite policy.
Real estate (total)	Yes	Scope 1 and 2	Partly: residential mortgages only	1.2 Mt; commercial real estate untargeted. CRE method **downgraded in FY2026** from property-level emissions/energy data to economic-intensity estimation "due to data limitations" (p.98); CRE PCAF data-quality score deteriorated 3.9 (FY2024) → 5.0 (FY2025), the weakest band (F-15).
– Residential mortgages	Yes	Scope 1 and 2: operational use	Yes: intensity ($kgCO_2e/m^2$)	32.6 $kgCO_2e/m^2$, −16% vs FY2021; target 11.6–19.3 by 2030. Scope 3 not in this target.
Transport (incl. shipping, aviation, motor)	Yes	Scope 1, 2 and 3: some Scope 3 (Category 13)	No	2.2 Mt: second-largest source, no target.
Power (incl. generation)	Yes	Scope 1 and 2	No	0.9 Mt, no target; gas vs renewables split not separately shown.
Agriculture, manufacturing, other sectors	Yes	Scope 1 and 2	No	Individually small; mostly data-quality score 5.0 (weakest, estimated).
MAM managed funds (~$722bn AUM)	No	Not applicable	Partly: separate MAM NZIF asset-alignment targets (S1&2 of investees, in-scope holdings only)	Emissions not quantified. The target is "100% of in-scope portfolio holdings aligning/aligned to a net zero pathway by 2030" against a re-validated 0% 2019 baseline, and FY2026 progress is **68%** (Real Assets) and **66%** (Real Estate); the weaker *"Committed to aligning"* band sits at 20% and 14%, and the share with **no** long-term net-zero goal is **12% and 20%**. In-scope = 92% of Real Assets AUM and 64% of Real Estate AUM; Real Assets + Real Estate are themselves only part of the $722bn. Two other MAM 2030 targets were **removed** in FY2026 (F-11).
Capital-markets facilitation / advisory / M&A	No	Not applicable	No	Excluded from financed-emissions coverage; not quantified as facilitated emissions.

3.3 Real reduction vs accounting movement

REPORTED CHANGE	DRIVER	REAL-WORLD REDUCTION?
Own-ops Scope 2 market-based → 0	**Certificates**: contractual, 100% renewable, ~46% unbundled energy attribute certificates	**Partly**: location-based Scope 2 fell 15%, but the "zero" is contractual and the kWh/energy data needed to split consumption from grid factor was dropped in FY2026 (F-13)
Own-ops "net zero Scope 1 & 2"	**Mixed**: residual Scope 1 offset by 430 carbon-removal credits (biochar) + renewable certificates	**No**: no net removal beyond the offset; a purchased/retired-credit position, not gross-zero. The 430 credits equalling the 430 tCO_2e gross figure is the **design** of the commitment ("carbon removal units ... equivalent to annual Scope 1 emissions", p.80), not an anomaly
Gross Scope 1: 518 (FY25, restated) → 430 (FY26), **−17%**	**Cannot** verify: restatements small and footnoted (FY20 477→471, new platform emission factors; FY25 482→518, estimated→actual data); the FY25→FY26 movement itself is not reconciled	Cannot verify: no driver disclosed. The series itself is continuous, with no basis break between the voluntary and mandatory reports
Financed emissions absolute: 11.4 → 13.2 Mt (+16%)	Activity: mostly portfolio growth (EAD +14.5%); intensity roughly flat	**No**: absolute footprint grew
Oil/gas intensity: 62.3 → 62.0 gCO_2e/MJ (−0.5% YoY; −6% vs baseline)	**Mixed**: portfolio/asset-mix and client performance	**Partly**: modest real intensity easing; absolute sector emissions still rose (5.3 → 6.2 Mt). Not fully like-for-like: pre-production producers are in the exposure but out of the emissions (F-14)
Resi-mortgage intensity: 33.2 → 32.6 $kgCO_2e/m^2$ (−16% vs baseline)	**Mixed**: grid decarbonisation + portfolio	**Partly**: largely BAU. Macquarie's own words: "the rate of reduction has been slower than our reference scenario pathway... primarily due to the slower-than-projected pace of decarbonisation of Australia's electricity grid" (p.85): i.e. the company itself attributes the pathway to the grid, not to its own action (G-BAU). Absolute rose (0.7 → 0.8 Mt)

3.4 Trajectory over time

Across six reporting years (FY2020–FY2026) and three report families, the FY2020/FY2021 TCFD reports, the 2022/2023 Net Zero & Climate Risk reports, and the FY2024–FY2026 sustainability/annual disclosures, Macquarie's operational story has been broadly stable while its financing-side ambition has narrowed. On the operational side the picture is genuinely steady: electricity use has fallen by roughly a third since FY2014, market-based Scope 2 has been nil since FY2022, and the operations have been reported as offset-based "carbon neutral" since 2010, restated in recent years as own-operations "net zero Scope 1 & 2" (achieved FY2025). But most of that is unchanged in substance rather than improving. The gross Scope 1 series is continuous across the voluntary and mandatory bases: 477, 465, 343, 385, 415 and 482 tonnes as voluntarily reported, restated to 471 (FY2020) and 518 (FY2025) with a stated cause for each, and 430 in FY2026. What is open is the −17% FY2025 to FY2026 movement, which carries no disclosed driver, in a year when the FY2025 *rise* had been explained (the 1 Elizabeth Street base building, including refrigerants). The more important movement is on the financing side, and it points the other way. The absolute financed-emissions book has grown every year the exposure has been disclosed (EAD ≈ $167bn → $192bn → $216bn → $248bn across FY2022–FY2025), so absolute financed emissions rose even as the two intensity metrics eased. At the same time the financing-side *commitments* have been pared back: the group ambition to align all financing activity with net zero by 2050 (stated FY2021–FY2024) is absent from the FY2026 ambition, Macquarie left the Net-Zero Banking Alliance (FY2025), the motor-vehicle sector intensity target was withdrawn (FY2025, on the BFS car-loan wind-down), and the whole-of-coal run-off achieved by end-2024 was immediately followed by a reopened appetite for metallurgical-coal financing including mine expansion. Two further 2030 targets were removed *in the reporting year itself*: MAM's asset-alignment target for fixed income and listed equities, and its engagement-threshold target across fixed income, listed equities and real estate, following the December 2025 sale of MAM's North American and European public investments business to Nomura (p.88, F-11). Five transparency items moved the wrong way in the mandatory year: the bundled-versus-unbundled renewable-electricity split, disclosed and improving across FY2022–FY2025 (unbundled certificate share ~57% → 46%), was dropped; the FY2025 quantification of target coverage ("around 80% of dollar exposures to carbon-intensive sectors, and nearly two-thirds of absolute financed emissions from carbon-intensive sectors") has no FY2026 equivalent (F-12); electricity consumption (42.6 GWh) and total energy use (159 TJ) disappeared entirely, having been the subject of an explicit FY2025 promise to *re-baseline* in FY2026 (F-13); the commercial-real-estate methodology was downgraded from property-level data to economic-intensity estimation "due to data limitations", with the data-quality score falling 3.9 → 5.0 (F-15); and an assured FY2025 Category 1 comparative was changed 164,983 → 164,893 with no footnote, on a table where the two other FY2025 restatements each carry one (F-16). Several prior-year figures (the Scope 3 FY2020 baseline, now further restated to 211,900; the oil/gas

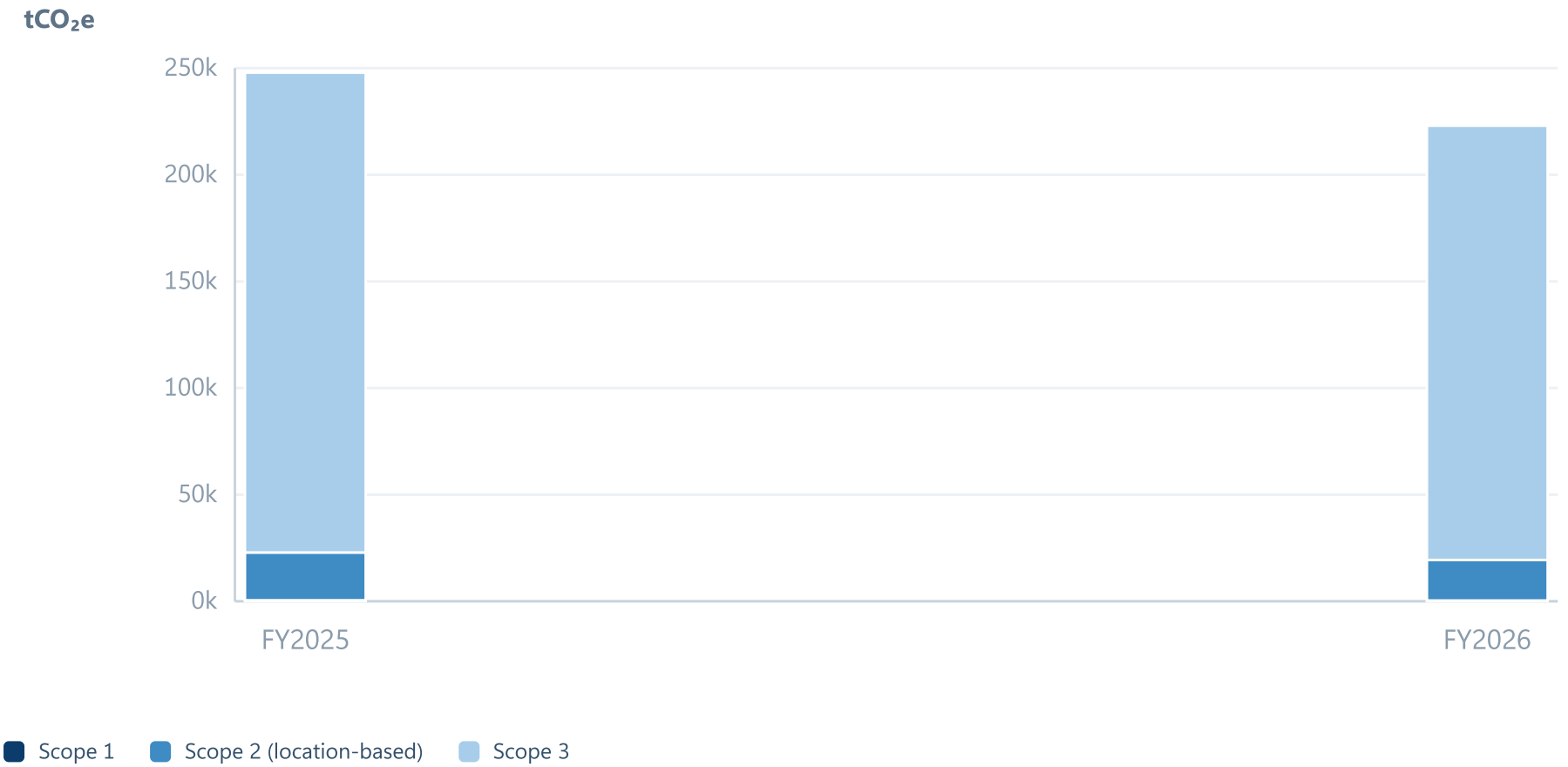
intensity baseline) were also restated with stated reasons and so are acceptable in principle; the concern is that, taken together, the trajectory shows a company disclosing more structure under mandate while withdrawing quantifications and committing to less on the part of its footprint that matters most. Full working detail and evidence IDs are in Annex K.

Metrics over time

Operational emissions

Reported operational emissions by scope, stacked, in tCO_2e per reporting year.

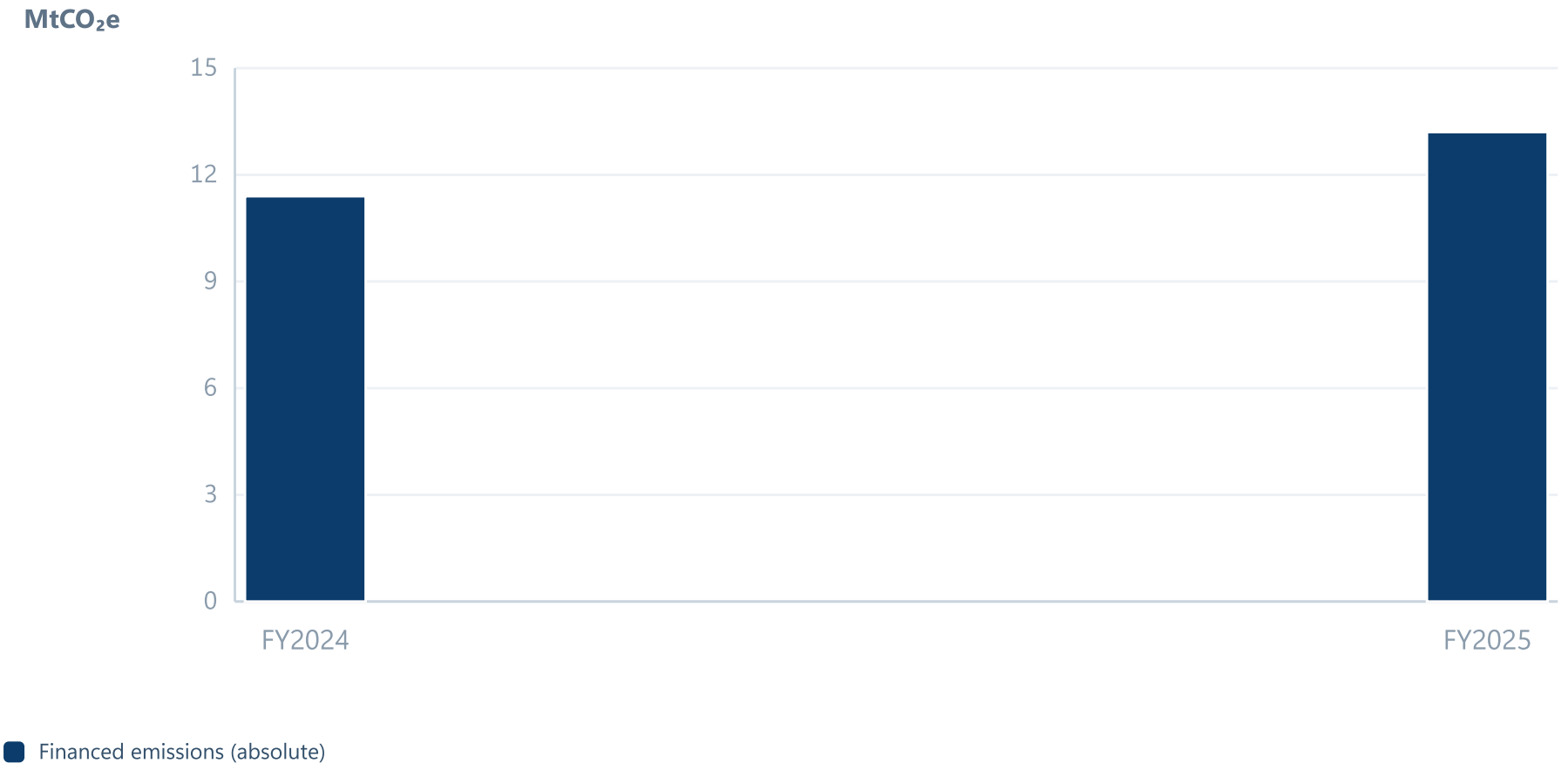
Source: FY2026 Annual Report pp.80-81 (Absolute Scope 1 and Scope 2 table; Absolute Scope 3 Categories 1-6 and 8 table). Both years are taken from the FY2026 tables so the comparison is like-for-like on a single basis: FY2025 Scope 1 restated to 518 (fn 5) and Scope 3 to 224,960 (fn 8-9). No FY2024 location-based Scope 2 figure exists in the reviewed corpus, so no FY2024 point is plotted.



Financed & facilitated emissions

Reported financed & facilitated emissions in $MtCO_2e$ per reporting year; each portfolio series is shown separately (side by side), not stacked.

Source: FY2026 Annual Report p.82 (Absolute gross financed emissions and Exposure at Default). On-balance-sheet lending and equity investments only; data as at 31 March 2025 and 31 March 2024 respectively (a disclosed one-year lag), each charted under the year its data covers. Excludes MAM's ~$722bn AUM and all capital-markets facilitation.



METRIC	FY2020	FY2022	FY2023	FY2024	FY2025	FY2026	MOVEMENT	DRIVER	NOTE
Scope 1 (tCO_2e)	477	343	385	415	482	430	Down: continuous series; −17% in FY2026 against the restated FY2025	Cannot verify: no driver disclosed	FY2021: 465. The FY2026 report restates FY2020 to **471** (fn 4) and FY2025 to **518** (fn 5); **no series break**

METRIC	FY2020	FY2022	FY2023	FY2024	FY2025	FY2026	MOVEMENT	DRIVER	NOTE
Scope 2 location-based (tCO_2e)	31,370	Not disclosed	Not disclosed	Not disclosed	22,363	18,953	Down: 15% in FY2026	**Mixed**: grid and consumption, not split	31,370 is a **newly published** FY2020 location-based baseline, **not** a restatement of 29,767; no FY2024 location-based figure exists in the reviewed corpus
Scope 2 market-based (tCO_2e)	29,767	0	0	0	0	0	Down: nil since FY2022	**Certificates**: contractual (100% renewable)	FY2021: 22,121. The 29,767 (FY20) and 22,121 (FY21) chart bars are **market-based** (FY25 report fn 9); the FY20 baseline is restated 29,767 → **29,213** (fn 6)
Scope 3 total (tCO_2e)	222,364	Not disclosed	216,018	223,010	227,896	203,607	Down: 8% first to last as published; the report reads the series as broadly flat	**Mixed**	Own-operations Scope 3, excluding Category 15; financed emissions are in their own row. FY20 baseline restated 222,364 → 218,310 → 208,337 → **211,900** (fn 8, Category 3 scope expanded); FY25 comparative restated to **224,960**, so the like-for-like FY25→FY26 move is **−9.5%**; Category 1 baseline 149,454 → 137,030
Emissions intensity (upstream oil and gas, gCO_2e/MJ)	65.8	Not disclosed	61.9	62.3	62.0	Not disclosed	Down: 6% below the FY2020 baseline; broadly flat since FY2023, above the 2030 target	**Mixed**: portfolio/asset-mix and client performance	Financed sector intensity, the target metric. Baseline restated 66.2→65.8 (disclosed). The FY2026 report's figure is at 31 March 2025 and sits under FY2025
Renewable electricity (% of consumption)	Not disclosed	100	100	100	100	100	Flat: 100% since FY2022	**Certificates**: contractual	FY2020 and FY2021: target only. Unbundled certificate share 57% (FY2022), 53.5% (FY2023), 53% (FY2024), 46.2% (FY2025); bundled/unbundled split dropped in FY2026
Certificates and offsets retired (tCO_2e)	Not disclosed	Not disclosed	Not disclosed	Not disclosed	53,970	51,790	Down: 4% in FY2026	**Cannot** verify	Offsets purchased and retired for the year (FY2025 Basis of Preparation; FY2026 assurance report). FY2026: 430 removal credits against residual Scope 1 and 51,360 against business travel. Residual Scope 1 removal units: 411 (FY2023), 482 (FY2025), 430 (FY2026)
Financed emissions ($MtCO_2e$)	Not disclosed	Not disclosed	Not disclosed	11.4	13.2	Not disclosed	Up: 16%	Activity: book growth	Every financed row in this table (absolute, intensity and exposure) sits under the year its data covers, to 31 March; Macquarie publishes each one a year later, so the FY2026 report's figures sit under FY2025 and FY2026 has none yet. Group total first disclosed in the FY2025 report (11.4 at 31 March 2024); FY2022 and FY2023 sector figures only. Portfolio EAD ($A bn): 167.1 (FY2022), 191.5 (FY2023), 216.3 (FY2024), 247.7 (FY2025), rising ~15% a year; real estate/mortgages dominate
Residential mortgages intensity ($kgCO_2e/m^2$)	Not disclosed	Not disclosed	34.1	33.2	32.6	Not disclosed	Down: 16% below the FY2021 baseline	**Grid** factor: largely BAU	FY2021 baseline 38.7. Absolute rose 0.7→0.8 Mt. The FY2026 report's figure is at 31 March 2025 and sits under FY2025

Targets and claims over time

TARGET OR CLAIM	AS FIRST STATED (PERIOD)	AS STATED FOR FY2026	CHANGE	EXPLAINED?	NOTE
Group financing net-zero commitment	FY2021: new, align financing with net zero by 2050	Not stated as a group commitment	Withdrawn: financing-alignment pillar absent from the FY2026 ambition	No	Retained FY2022–FY2024; left NZBA (FY2025). See F-10
Sector targets (count / coverage)	FY2022–FY2023: oil/gas, motor vehicles, coal, + mortgages	Oil/gas + residential mortgages only	**Re-scoped**: narrowed; motor-vehicle target withdrawn (FY2025)	Partly: motor-vehicle target retired with the reason disclosed	Coal run-off achieved by end-2024 and followed by a reopened metallurgical-coal appetite including mine expansion (see F-1, F-10)

TARGET OR CLAIM	AS FIRST STATED (PERIOD)	AS STATED FOR FY2026	CHANGE	EXPLAINED?	NOTE
MAM 2030 targets: fixed-income and listed-equity asset alignment; engagement threshold	First year not recorded in this review	**Removed in FY2026** after the Nomura sale (p.88)	Withdrawn	Partly: divestment stated; the real-estate leg is not explained by it	See F-11
MAM 2030 NZIF asset-alignment target (Real Assets, Real Estate)	First year not recorded in this review	100% of in-scope holdings aligning/aligned by 2030, from a re-validated 0% 2019 baseline; FY2026 progress 68% / 66%	Cannot verify: earlier wording not recorded in this review	Cannot verify	See F-4
Upstream oil/gas intensity target	56.3–59.6 gCO_2e/MJ by 2030 from a FY2020 baseline of 66.2 (2022 Net Zero and Climate Risk Report)	56.3–59.6 gCO_2e/MJ by 2030; FY2020 baseline 65.8	**Rebased**: baseline restated 66.2→65.8; target unchanged	Yes	See F-14
Residential mortgages intensity target	11.6–19.3 $kgCO_2e/m^2$ by 2030 from a FY2021 baseline	11.6–19.3 $kgCO_2e/m^2$ by 2030; Scope 1 and 2 only	Unchanged	Not applicable	See F-6
Financed-target coverage quantification	FY2025: "~80% of dollar exposures to carbon-intensive sectors; nearly two-thirds of absolute financed emissions from carbon-intensive sectors"	**Dropped**	Withdrawn: no FY2026 equivalent anywhere in the 345-page report	No	See F-12
Own-operations net-zero / carbon-neutral claim	FY2020–FY2021: "carbon neutral since 2010" (S1+S2+travel)	Net zero Scope 1 and 2 maintained (achieved FY2025)	Replaced: "carbon neutral" restated as "net zero S1&2 by FY25", progressing → achieved	Cannot verify	Offset- and certificate-based throughout; self-declared, no external certification
Renewable electricity: 100%	FY2020–FY2021: target only	100%; bundled/unbundled split dropped	Achieved: 100% since FY2022	Not applicable	Split disclosed FY2022–FY2025, dropped FY2026

Withdrawn activity data. Energy use (electricity GWh / total TJ): FY2024 39.9 GWh; FY2025 42.6 GWh (−34% vs FY2014) and 159 TJ; **dropped** in FY2026. F-13: FY25 promised an FY2026 re-baselining for the new Sydney headquarters; instead the metric disappeared.

4. Findings

4.1 What stands up (genuine / qualified positives)

▲ F–1

Categorical, policy-backed thermal-coal exclusion. Macquarie ran off on-balance-sheet coal exposure and holds $A0 EAD in thermal coal mining, with a stated no-appetite policy for financing thermal-coal purchase/operation/development/expansion beyond 12 months.

WHY IT MATTERS

For a diversified financier, a categorical forward exclusion that constrains actual decisioning is a real constraint, not just disclosure.

QUALIFICATION (IF ANY)

Qualified: the same policy was *loosened* for metallurgical coal, whose appetite now expressly includes mine **expansion** (met-coal mining re-entered the book at 0.8 Mt in FY2025 from zero). The exit itself is not credited: only the forward thermal-coal constraint.

▲ F–2

Scope-stated, non-over-claimed headline. The disclosure is explicit that own-ops net zero covers only Scope 1 & 2, that financed-emissions targets are intensity measures for named sectors, and that no group-wide net-zero-financing claim is made.

WHY IT MATTERS

Readers are not misled into thinking a group "net zero" commitment exists; boundary and dependency caveats are stated plainly.

QUALIFICATION (IF ANY)

This is credited as claim discipline, not as completeness: the underlying footprint gaps remain (see §4.2).

▲ F–3

Both location- and market-based Scope 2 disclosed, with credits registry-identified and assured. Carbon credits are named to project and registry (Puro.earth biochar; ACCU / Climate Action Reserve savanna/forestry), and retirement is under limited assurance.

WHY IT MATTERS

Lets a reader see the gross position and the instruments doing the work, rather than only a net figure.

QUALIFICATION (IF ANY)

Limited-level assurance only; ~46% of the renewable claim is unbundled certificates.

▲ F–4

MAM's 2030 NZIF asset-alignment target is a dated, quantified target measured on investee behaviour, with a re-tested baseline and a disclosed in-scope denominator. By 2030, 100% of in-scope Real Assets and Real Estate holdings to be "aligning"/"aligned" to a net zero pathway per the Net Zero Investment Framework, from a 2019 baseline of 0% that MAM re-validated in 2025 using "evidence and assumption-based tests"; FY2026 progress 68% (Real Assets) and 66% (Real Estate). NZIF "Aligning" requires the *investee* to hold science-based net zero targets, governance and emissions disclosure; "Aligned" additionally requires a decarbonisation plan and forecast performance at least equal to a net zero pathway. The in-scope denominator and its residual are itemised (92% of Real Assets AUM, with the 8% split 6% undeployed / 2% fiduciary-constrained; 64% of Real Estate AUM, split 3% / 17% / 16% influence-band).

WHY IT MATTERS

This is above baseline (A-16) because it is not disclosure of a position but a target whose metric tracks third-party behaviour change, with a validated baseline and a measurable delivery record. It is the only place in the disclosure where MAM's fiduciary book is held to a dated numerical outcome.

QUALIFICATION (IF ANY)

Heavily qualified. It covers only Real Assets and Real Estate in-scope holdings, a subset of the $722bn, measures investee **Scope 1 and 2 only**, and carries no emissions weighting, so 68% of holdings says nothing about 68% of emissions. MAM "has not sought formal validation of its climate-related targets or adopted methodology by a third party" (p.88), and two sibling 2030 targets were removed in the same year (F-11).

4.2 What does not stand up (negatives)

▼ F–5

No absolute financed-emissions target and no group net-zero-financing commitment; the only targets are intensity measures. Absolute financed emissions rose ~16% (11.4 → 13.2 Mt) while intensity edged down.

WHY IT MATTERS TO A READER

Intensity targets can be met while absolute financed emissions grow with the book: so "reducing the intensity of our financed emissions" does not tell a reader the footprint is shrinking.

WHAT WOULD FIX IT

Add an absolute financed-and-facilitated emissions trajectory, or disclose and justify the permitted absolute headroom under the intensity targets.

▼ F–6

Target coverage is narrow. Only upstream oil/gas and residential mortgages have sector targets. Transport (2.2 Mt), power (0.9 Mt), commercial real estate and metallurgical coal (0.8 Mt) have none, and the mortgage target is Scope 1 & 2 only.

WHY IT MATTERS TO A READER

The second-largest emitting sector (transport) and a re-growing coal exposure sit outside any target.

WHAT WOULD FIX IT

Set interim targets (or a disclosed credible pathway) for the material untargeted sectors; extend the mortgage target beyond operational scopes where relevant.

▼ F–7

The two largest climate-relevant activities are outside the financed-emissions number. About $722bn of MAM managed assets and all capital-markets facilitation and advisory are excluded and unquantified. MAM is covered by an NZIF *asset-alignment* target (68% and 66% progress toward 100% by 2030, credited at F-4), but that is a count of holdings, not tonnes: it is unweighted by emissions, limited to investee Scope 1 & 2, and applies only to in-scope Real Assets and Real Estate holdings (92% and 64% of those AUM pools) rather than to the $722bn. Macquarie states it "expects to disclose emissions associated with assets under management" once the AASB S2 transition relief lapses in FY2027 (p.64): a commitment, not a figure.

WHY IT MATTERS TO A READER

The 13.2 Mt figure is not Macquarie's climate footprint as an asset manager and capital-markets house. An alignment-share metric can rise while the tonnes behind it rise too.

WHAT WOULD FIX IT

Quantify managed-portfolio and facilitated emissions in absolute terms with a coverage %, and weight the NZIF alignment share by emissions, not by AUM count.

▼ F–8

Own-operations "net zero" depends on offsets and certificates, and no absolute financed target validation exists. Market-based Scope 2 is zero via certificates (~46% unbundled) and residual Scope 1 is offset; Macquarie states it obtains no third-party validation of any target or methodology against climate science.

WHY IT MATTERS TO A READER

A net-zero position built on retired credits and contractual certificates is weaker than a gross reduction, and unvalidated targets carry less assurance weight.

WHAT WOULD FIX IT

Prioritise gross Scope 1 abatement; disclose the bundled/unbundled renewable split (as in FY25); pursue third-party target validation.

▼ F-9

Scenario analysis found no material financial effects and "did not lead to any change to strategy", and no quantified anticipated financial effects are disclosed.

WHY IT MATTERS TO A READER

For a financier with material fossil-fuel and physical-risk exposure, a blanket "no material effect / no change" is a strong conclusion for a reader to accept without figures. Two things are on the record and are stated here. Macquarie gives a reason for the absence: beyond the medium term, "the degree of measurement uncertainty... Is such that quantitative information would not be decision-useful as at the reporting date and has therefore not been disclosed" (p.73). And scenario outputs were "benchmarked against Macquarie's current capital adequacy levels, in line with its established capital stress testing approach", with the result that Macquarie "is sufficiently capitalised to absorb the potential financial impacts modelled" (p.73). Neither is credited (A-16: candour and process description are baseline), but the finding is that the *outputs* are unquantified, not that no reason or test was offered.

WHAT WOULD FIX IT

Disclose quantified scenario outputs (even ranges) for the most exposed portfolios, the capital-impact magnitude behind the "sufficiently capitalised" conclusion, and the thresholds that would change strategy.

▼ F-10

The financing-side net-zero architecture has narrowed over time. The group commitment to align *all* financing activity with net zero by 2050 (stated FY2021–FY2024) is not made in FY2026; Macquarie left the Net-Zero Banking Alliance (FY2025); the motor-vehicle sector intensity target was withdrawn (FY2025); and the whole-of-coal run-off achieved by end-2024 was followed by a reopened metallurgical-coal financing appetite including mine expansion.

WHY IT MATTERS TO A READER

The pieces of the disclosure that once pointed at an eventual whole-portfolio destination have been pared back, while the book and its absolute financed emissions grew: so a reader tracking Macquarie over time sees commitment shrinking on the part of the footprint that matters most.

WHAT WOULD FIX IT

Restate a group-level financing net-zero end-state (or explain its removal); disclose whether the withdrawn/loosened commitments will be replaced, and on what evidence.

▼ F–11

Two further 2030 targets were removed during the reporting year. "Following completion of that transaction [the December 2025 sale of MAM's North American and European public investments business to Nomura], MAM reviewed its Decarbonisation Strategy and climate-related targets… This included revising some of its interim targets, removing the 2030 asset alignment target for fixed income and listed equities and the 2030 engagement threshold target that applied to its fixed income, listed equities and real estate businesses" (p.88). The real-estate engagement target was removed even though the real-estate business was not sold.

WHY IT MATTERS TO A READER

The FY2026 narrowing is wider than F-10 recorded: it happened *in the mandatory year*, and one of the two removals is not explained by the divestment. A reader tracking MAM's 2040 commitment now has one surviving 2030 interim target where there were three.

WHAT WOULD FIX IT

Disclose, for each removed target, the progress achieved at removal and whether and how the underlying exposure is now managed: particularly for real estate, which was retained.

▼ F–12

The FY2025 quantification of target coverage was dropped and not replaced. The FY2025 Sustainability Report stated (p.70) that "Macquarie's targets cover around 80% of its dollar exposures to carbon-intensive sectors, and nearly two-thirds of Macquarie's absolute financed emissions from carbon-intensive sectors". No equivalent quantification appears anywhere in the FY2026 Annual Report.

WHY IT MATTERS TO A READER

This is the one number that told a reader how much of the carbon-intensive book the two surviving targets actually reach. Its removal is the direct cause of the coverage gap the review records at F-19 / D8-1: and the removal happened in the first *mandatory* year, so the loss is not explained by immaturity.

WHAT WOULD FIX IT

Restore the coverage quantification (share of carbon-intensive dollar exposure and of absolute financed emissions covered by a target), and extend it to a whole-portfolio PCAF coverage percentage and denominator.

▼ F–13

Electricity consumption and total energy use disappeared from the FY2026 disclosure, after FY2025 promised to re-baseline them. FY2025 disclosed 42.6 GWh of electricity ("a 34% decrease compared with the FY2014 baseline of 64.2 GWh") and 159 terajoules of total energy, and said "Macquarie will re-baseline electricity consumption in FY2026 to reflect the energy performance of the new Sydney global headquarters at 1 Elizabeth Street and 50 Martin Place". Neither GWh nor terajoule energy data appears anywhere in the FY2026 Annual Report's climate section; "GWh" survives only in the glossary.

WHY IT MATTERS TO A READER

This is the activity denominator. Without it, the 15% fall in location-based Scope 2 cannot be decomposed into consumption change versus grid-factor change (G-BAU; F-21, D3-2), and the FY2014 electricity-reduction commitment can no longer be tracked at all. A promised re-baselining that ends in the metric being withdrawn is the most adverse form of a restatement.

WHAT WOULD FIX IT

Restore electricity consumption (GWh) and total energy use (TJ) with the re-baselined FY2014 comparison, alongside the grid emission factors applied.

▼ F–14

The only fossil-fuel target is measured on a numerator and a denominator covering different populations. "Exposure includes both pre-production and production upstream oil/gas producers. Pre-production producers are excluded from reported emissions" (fn 14, p.82), confirmed at p.97: "their emissions have not been considered for absolute emissions disclosure and emissions intensity calculations as those clients have zero production".

WHY IT MATTERS TO A READER

The 62.0 gCO_2e/MJ figure and the "−6% versus baseline" progress statement are therefore not like-for-like against the $2.4bn of upstream exposure they are presented beside. Financing a field before it produces is precisely the decision with the largest forward emissions consequence, and it is invisible in both the absolute number and the target metric.

WHAT WOULD FIX IT

Disclose pre-production exposure separately with its committed/forecast production emissions, and state the intensity both with and without pre-production clients in the denominator.

▼ F–15

The commercial-real-estate method was downgraded in the first mandatory year and the data quality fell to the weakest band. "This methodology represents a change from the previous reporting period due to data limitations. The previous methodology utilised property-level emissions data as well as energy consumption, floor area and relevant emission factors" (p.98); the CRE PCAF data-quality score moved 3.9 (FY2024) → 5.0 (FY2025), the worst available score.

WHY IT MATTERS TO A READER

Method quality moving backwards is the opposite of the direction AASB S2 anticipates, and the review's own "PCAF data-quality scores are disclosed" observation reads as reassurance unless the *direction of travel* is shown. CRE is also untargeted (F-6).

WHAT WOULD FIX IT

Disclose the emissions impact of the method change on a like-for-like basis, restate the prior year on the new method, and set out how property-level data will be recovered.

▼ F–16

An assured prior-year comparative was changed without a footnote. Scope 3 Category 1 for FY2025 is 164,983 tCO_2e in the FY2025 Sustainability Report and in the PwC-assured FY2025 Basis of Preparation, but 164,893 tCO_2e in the FY2026 Annual Report's FY2025 column (p.81). Both totals tie internally (227,896 and 224,960 respectively). The two *other* FY2025 restatements on the same table, Category 3 and Category 6, each carry an explanatory footnote (8 and 9); this one carries none.

WHY IT MATTERS TO A READER

90 tCO_2e is immaterial in size, but a silent change to a figure that carried limited assurance, on a table that footnotes its other restatements, is a restatement-discipline defect in a statutory document: and it is exactly the kind of item a regulator reconciling across sources would query. Either the FY2026 figure is a typographical error in a climate statement or an assured comparative was corrected without saying so.

WHAT WOULD FIX IT

State which figure is correct and footnote the change, on the same basis as footnotes 8 and 9.

▼ F–17

The Climate Statements say climate has had no effect on decision-making, and then describe climate decision gates. p.72: "The identified climate-related risks and opportunities have not resulted in any current or anticipated effects to Macquarie's business model, resource allocation, strategy or related decision-making processes." p.69: "Macquarie has... implemented sector-specific risk appetite settings and review processes." p.77: escalated transactions "are assessed for material environmental and social impacts... This includes considering impacts on Macquarie's financed emissions targets as specified in Macquarie's Financed Emissions Target Risk Assessment Standard", and for in-scope upstream oil/gas deals "the analysis considers whether the financed emissions from a given deal will keep our portfolio aligned with the required emissions reduction pathway." p.83: the coal appetite was changed in FY2025 to permit metallurgical-coal mine expansion.

WHY IT MATTERS TO A READER

The "no effects" sentence sits in the AASB S2 Strategy disclosure, where a reader, and a regulator, will read it as the entity's position on whether climate changes what it does. The rest of the same document says climate demonstrably enters transaction approval and appetite-setting. The two cannot both be read literally, and the disclosure never reconciles them.

WHAT WOULD FIX IT

Reconcile the statement: either qualify "no effects" to mean *no material financial-statement effects quantified*, or describe the decision effects the risk-management section already evidences.

4.3 What cannot be verified

?

F-18

Emissions of MAM's ~$722bn AUM and of capital-markets facilitation/advisory

WHY IT IS OPEN

Not disclosed: excluded from financed-emissions coverage. Macquarie commits to disclose AUM emissions from FY2027 (p.64) but gives no figure, method or coverage now

WHAT WOULD RESOLVE IT

Absolute managed-portfolio / facilitated emissions with coverage %

?

F-19

Portfolio-coverage percentage of the financed-emissions inventory (denominator)

WHY IT IS OPEN

Sector emissions and EAD given, but not the % of total loans and investments covered. Footnote 11 states the inventory "includes on-balance sheet lending and equity investments for all sectors", so coverage of the **declared** scope is 100% by construction; what is missing is coverage against total loans and investments: and the FY2025 report's 80% / two-thirds coverage quantification was dropped (F-12)

WHAT WOULD RESOLVE IT

Total loans-and-investments denominator and coverage % by asset class

?

F-20

Driver of the FY2025→FY2026 gross Scope 1 movement (518 → 430, −17%)

WHY IT IS OPEN

The FY2020 and FY2025 restatements are small, footnoted and explained; the year-on-year movement itself is not reconciled. Downgraded from a series-break finding to a minor limitation (see withdrawn N5)

WHAT WOULD RESOLVE IT

Note reconciling restated FY2025 (518) to FY2026 (430)

?

F-21

Driver split of the Scope 2 location-based fall (consumption vs grid factor)

WHY IT IS OPEN

Not decomposed: the electricity-consumption (GWh) and total-energy (TJ) figures that would allow the split were dropped in FY2026 (F-13)

WHAT WOULD RESOLVE IT

kWh consumption trend alongside grid-factor movement

?

F–22

Inherited emissions-growth exposure through MAM holdings / on-balance-sheet equity

WHY IT IS OPEN

Holding weights and investee target headroom not disclosed at look-through level

WHAT WOULD RESOLVE IT

Weighted look-through of investee permitted growth vs Macquarie's own targets

5. Disclosure risk exposure

5.1 Risk read

On the evidence, Macquarie's disclosure exposes the company, and a reader relying on it, most in the financed-emissions layer, which is the material footprint for a diversified financier. The single biggest driver is that the only financed-emissions targets are intensity measures covering two of many carbon-intensive sectors, while absolute financed emissions rose about 16 per cent over the year, and the two largest climate-relevant activities, roughly $722 billion of managed assets and all capital-markets facilitation and advisory, sit outside the 13.2 $MtCO_2e$ number entirely. A reader could therefore read "reducing the intensity of our financed emissions" as the portfolio decarbonising, when the disclosed footprint is in fact growing in absolute terms and is not Macquarie's whole footprint. Because Macquarie is not an NGER controlling corporation for the year, there is no external statutory Scope 1/2 anchor; and in any case its operational Scope 1/2 is immaterial to the financed footprint, so a small operational number should not be read as a small climate footprint. Smaller residual exposures attach to an own-operations "net zero" that leans on carbon-removal credits and roughly half unbundled certificates, a financing-side commitment set that has narrowed over the past three years and narrowed further inside the mandatory year itself (F-11), a set of FY2025 quantifications that were withdrawn rather than uplifted in the first mandatory year, target coverage (F-12), energy use (F-13) and the commercial-real-estate method (F-15), and a scenario analysis that reports no material financial effects and no change to strategy without quantified figures. A reader should also note that the statutory "no effect on decision-making processes" statement is contradicted by the same document's description of climate decision gates (F-17), and that the only fossil-fuel target is measured across mismatched populations (F-14). None of the following is an allegation of misconduct, greenwashing or breach; each is a forward risk a reasonable reader, regulator or director should be able to see and price.

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 FY2026 disclosure suite and the FY2020 to FY2025 climate report chain

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)	**Low to moderate**	Medium confidence
Physical (physical-risk disclosure consistency)	**Low to moderate**	Medium confidence
Other: market / commercial (fossil-fuel financing signal)	**Low to moderate**	Medium confidence

LENS	EXPOSURE	CONFIDENCE	WHAT DRIVES IT	WHAT WOULD REDUCE IT
Legal (misleading-conduct / disclosure / director-duty)	Moderate	Medium	The public "reducing the intensity of our financed emissions" framing sits against absolute financed emissions rising about 16 per cent, and the 13.2 Mt figure excludes the dominant managed-assets and facilitated footprint; a reasonable investor could over-read the portfolio as decarbonising.	Add an absolute financed-and-facilitated trajectory (or disclose and justify the permitted headroom under the intensity targets); quantify the emissions tied to the ~$722bn of managed assets and capital-markets activity.
Regulatory (ASIC / ACCC / Clean Energy Regulator / AASB S2)	Low to moderate	Medium	First mandatory AASB S2 year with transition relief applied; PCAF financed emissions disclosed without a portfolio-coverage percentage or denominator, facilitated emissions omitted, no third-party target validation, and ASIC RG 280 not addressed head-on. NGER exposure is negligible (not a controlling corporation; operational Scope 1/2 immaterial).	Disclose portfolio-coverage percentage and denominator, disclose facilitated emissions, pursue third-party target validation, and build the second-year AASB S2 uplift.
Technology (dependence on unproven abatement)	Low to moderate	Medium	Own-operations "net zero" rests on retired carbon-removal credits (biochar) plus renewable claimed roughly half via unbundled energy attribute certificates, rather than gross operational abatement.	Prioritise gross Scope 1 abatement; disclose the removal-versus-reduction credit split and restore the bundled/unbundled renewable composition.

LENS	EXPOSURE	CONFIDENCE	WHAT DRIVES IT	WHAT WOULD REDUCE IT
Physical (physical-risk disclosure consistency)	Low to moderate	Medium	The AASB S2 vulnerable-asset metric **is** disclosed and quantified: $A2.3–7.4bn of $A248.4bn of home loans and business lending (1–3%) vulnerable to physical risk, on 77% population coverage, using property-level annual-expected-damage-cost data under a high-warming scenario (p.90); transition-vulnerable assets are likewise quantified at $A21.5bn of $A354.9bn (6%) on 99% coverage (p.89). What is still absent is an expected-loss or value-at-risk quantification, a limitation Macquarie itself states ("not a forecast of expected credit losses, probability of default or value-at-risk"), and quantified scenario outputs for the most exposed portfolios.	Quantify the expected-damage-cost financial effect and scenario outputs (even as ranges), extend physical coverage beyond the 77% BFS population to the market-facing businesses, and disclose the thresholds that would change strategy.
Other: market / commercial (fossil-fuel financing signal)	Low to moderate	Medium	Thermal-coal exposure is excluded ($A0), but the appetite for metallurgical coal was loosened to allow mine expansion (re-entered the book at 0.8 Mt); the only fossil-fuel target excludes pre-production producers from its emissions while including them in its exposure (F-14); and oil/gas transition support is evidenced by process rather than outcome, a mixed transition signal. A named gate does exist: the **Financed Emissions Target Risk Assessment Standard** (p.77), under which escalated transactions are assessed for impact on the financed-emissions targets and, for in-scope upstream oil/gas deals, "the analysis considers whether the financed emissions from a given deal will keep our portfolio aligned with the required emissions reduction pathway", with independent ESR review and challenge (p.83–84) and very-high-risk escalation to the CRO, CEO or two Non-Executive Directors (p.67). It is **not credited as a positive** (A-16: a described policy is baseline; the framing is permissive, deals "may be reviewed", targets "may be managed" at deal level) and **no outcome is disclosed**, no capped, declined, conditioned or exited transaction, no count, no volume. The finding is therefore not that no mechanism exists, but that its effect is unevidenced.	Disclose the gate's outcomes, transactions declined, capped, conditioned or exited on financed-emissions grounds, with volumes, set limits or a phase-out on the metallurgical-coal expansion appetite, and state the intensity metric with pre-production clients included.

5.3 Consistency across audiences

CLAIM / METRIC	TO THE REGULATOR	TO INVESTORS / PUBLIC	CONSISTENT AFTER NORMALISING BOUNDARY?
Operational Scope 1 & 2 FY26	Not an NGER controlling corporation for FY2024-25: no statutory register entry	Scope 1 430 tCO_2e; Scope 2 location-based 18,953 tCO_2e; market-based 0 (global, own operations)	Not testable: no external anchor. NGER cannot corroborate the operational figures; but operational Scope 1/2 is immaterial to the financed footprint regardless, so this is not a material consistency risk.
Financed emissions 13.2 $MtCO_2e$	Not an NGER / statutory metric (financed emissions are outside NGER scope)	13.2 Mt (on-balance-sheet lending + equity only), with a "reducing the intensity of our financed emissions" framing	Yes: figure is internally consistent across the FY2026 Annual Report; the risk is a framing tension within Macquarie's own documents (intensity down while absolute up ~16%), not audience arbitrage.
Scope 3 Category 1 FY2025 comparative	Not a regulator metric, but carried limited assurance in the FY2025 engagement	**164,983 tCO_2e**, FY2025 Sustainability Report p.68 and the PwC-assured FY2025 Basis of Preparation vs **164,893 tCO_2e**, FY2026 AR p.81 FY2025 column	No: unexplained divergence (DR-02). Same year, same metric, same boundary; both totals tie internally. No footnote, on a table that footnotes its other two FY2025 restatements. 90 tCO_2e is immaterial in size but the silence is a restatement-discipline defect (F-16).
"No effect on decision-making processes"	AASB S2 Strategy disclosure to the regulator (p.72)	Climate Risk Management describes climate decision gates at deal origination (p.77), and Climate Strategy describes "sector-specific risk appetite settings and review processes" (p.69)	No: internal contradiction, not audience arbitrage; but it is a contradiction inside the statutory statement itself, which is the more serious location for one (F-17).
"100% renewable electricity"	Not a regulator metric	FY2026 "100% renewable" with the bundled/unbundled split dropped; FY2025 disclosed 53.8% building-owner/utility + 46.2% energy attribute certificates	No: framing regression within Macquarie's own documents: the FY2025 report disclosed the ~46% unbundled share, the FY2026 report does not.
Own-operations "net zero Scope 1 & 2"	Self-declared; not on any statutory or certification register	Self-declared, explicitly scoped to own-operations Scope 1 & 2	Yes: consistent across own documents; scope stated, offset- and certificate-dependent.
Gross Scope 1 movement (**518** → **430** tCO_2e)	No statutory anchor (not on NGER register)	FY2026 AR reports 430 tCO_2e; FY2025 restated to **518** (from 482 in the FY2025 report, footnote 5: estimated→actual activity data); FY2020 restated 477 → **471** (footnote 4)	Yes: consistent. The restatements are −1.3% and +7.5%, and both are footnoted with a cause. The residual open point is only the −17% FY25→FY26 movement, unreconciled, so it cannot be verified as abatement (F-20).

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
D6-1 (intensity-only, no absolute)	Footprint not capped	Reduction-trajectory / target-integrity requirement	4.7 Reduction Obligations; 4.7.4 ART; 4.9.2 Metrics & Targets	Absolute trajectory + headroom	Would require absolute pathway
D8-2/D8-3 (AUM + facilitated excluded)	Footprint understated	Influence-based / facilitated-emissions accounting	4.5.5.8 Investments (cat 15a/15b); 4.5.6 Influence Based Inventory; Annex B	Managed-portfolio & facilitated emissions	Broader boundary
D8-1 (no coverage %)	Completeness unproven	PCAF coverage & denominator disclosure	4.5.5.8 Investments (PCAF completeness/coverage); Annex B	Coverage % by asset class	Coverage disclosure
D4-1 (C7 gap; folded categories)	Operational S3 incomplete	Full inventory	4.5.3 GHG Emission Categories; 4.5.4 Quantification; 4.4 Organisational Boundary	C7 data; C1 disaggregation	Complete inventory
D3-1 (unbundled certificates)	Renewable overstated	Contractual-instrument disclosure	4.5.5 Methodology (market vs location); 5.1.13 Contractual Instruments	Bundled/unbundled split; PPA	Transparent renewable claim
D5-1 (offset reliance)	Net-zero leans on credits	Residual-emissions + removal/reduction split	4.8.1 Abatement Principles; 4.8.2 CDR Criteria; 5.1.12 Carbon Credit Reporting	Removal vs avoidance split	Clarified net position
D2-1 (Scope 1 movement)	Time-series confidence	Restatement discipline	4.9.2 Metrics & Targets; 5.1.10 Emissions Tracking	Driver disclosure for 518 → 430	Reconciled series
F-16 (silent change to an assured comparative)	Restatement discipline in a statutory document	Restatement & tracking requirements	4.9.2 Metrics & Targets; 5.1.10 Emissions Tracking; 6.1 Conformance	Footnoted cause for every prior-year change	Reconciled, footnoted series
F-13 (energy-use data withdrawn)	Reductions cannot be attributed	Activity-data / energy reporting	4.5.4 Quantification; 4.6 Data Quality; 5.1.10 Emissions Tracking	GWh and TJ with re-baselined comparison	Attributable reductions
F-14 (pre-production excluded from the fossil target)	Target measured across mismatched populations	Target-boundary integrity	4.7 Reduction Obligations; 4.7.4 ART; 4.9.2 Metrics & Targets	Pre-production exposure + forecast production emissions	Like-for-like target metric
F-1 (thermal-coal exclusion)	Genuine forward constraint	Prohibited/clean-alternative alignment	1.1.2 Prohibited Activities; 4.7.2 Clean Alternative Assessment	Policy text	Positive retained

7. Conclusion & next steps

Macquarie scores **7 out of 15**, with **seven of nineteen load-bearing criteria not met**. This is a thorough, broadly assured first mandatory-year statement whose claims state their own scope and, at the level claimed, largely stand up; two audiences, retail investors and regulators, can work with it. What holds the other three back is one thing, described three ways: the disclosure does not let a reader see whether Macquarie's real climate footprint is being capped and reduced, only whether two intensity ratios are easing. The single most important fix is therefore an absolute financed-and-facilitated trajectory (or an explicit, justified headroom disclosure), targets for the material untargeted sectors, and quantification of the emissions tied to the roughly $722bn of managed assets and capital-markets activity that currently sit outside the number. Closing the smaller gaps would raise confidence further: reconcile the FY2025 to FY2026 Scope 1 movement, restore the renewable-composition split, the energy-use denominators and the target-coverage quantification, publish the upstream oil and gas intensity with and without pre-production clients, and give quantified scenario financial effects. Tracked over seven years, the operational story is stable but the financing-side commitments have narrowed (the group 2050 financing-alignment ambition dropped, the Net-Zero Banking Alliance left, the motor-vehicle target

withdrawn, and two more MAM 2030 targets removed inside the mandatory year) even as the book grew, so the trajectory makes the absolute-footprint question more pressing, not less. And in the first statutory year three quantifications that Macquarie had published voluntarily were withdrawn rather than uplifted. The practical path runs through the inventory-completion, decarbonisation-strategy and assurance-uplift steps in §6; none require Macquarie to make a claim it is not already implying, only to show the footprint behind 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
FY2026 Annual Report: Climate Statements (**pp. 65–99** per the company's statement at p.64) plus assurance reports pp. 101–106	Reviewed: primary	Critical	AASB S2 mandatory statements; metrics pp.80–83; MAM targets pp.86–88; vulnerable-asset metrics pp.89–90; methodology pp.92–99; assurance pp.101–106. **Re-extracted page by page at rev 2**: raw `pdftotext` for the metric tables, since footnote superscripts concatenate into figures (rev 2 ruling D-012).
FY2025 Sustainability Report	Reviewed: supplementary	Material	Prior-year; renewable-composition split (53.8%/46.2%); NZBA reference.
FY2025 Basis of Preparation for Sustainability Reporting	Reviewed: supplementary	Material	Assured-metric methodology; financed emissions lagged to FY2024.
FY2020 & FY2021 TCFD Implementation Progress & Scenario Analysis	Reviewed: longitudinal context	Useful	Emissions-reduction stats, RE100/net-zero-suite origin, energy-sector exposures; no absolute S1/2/3 inventory (refer to contemporaneous ESG reports). Annex K.
Net Zero & Climate Risk Reports 2022 (FY2022) & 2023 (FY2023)	Reviewed: longitudinal context	Material	Financed-emissions sector EAD/intensity baselines & targets; coal run-off commitment; Scope 1/2/3 baselines. Annex K.
FY2024 Sustainability Report	Reviewed: longitudinal context	Material	Scope 1/2/3 series; renewable split; sector targets; coal-appetite change. Annex K.
Standalone transition plan	Not provided	Material	Company states it has none; content embedded in Climate Statements.
Full PwC assurance methodology	Not provided	Useful	Conclusions reviewed in-report.

Annex B: Evidence table (AI-02)

EVIDENCE ID	SOURCE (DOC · PAGE/TABLE)	WHAT IT SHOWS	LINKED CLAIM / FINDING	RULE IDS	STATUS
E-01 **(corrected rev 2)**	FY26 AR p.80 metrics table	S1 **471**/430/**518**; S2 loc 31,370/18,953/22,363; S2 mkt 29,213/0/0 (FY20/FY26/FY25). ~~S1 4,714 … 5,185~~: the trailing digits were footnote superscripts 4 and 5, concatenated by the PDF text layer; same artefact as "29,2136" = 29,213[6] on the same row. Confirmed by: no thousands separator on those two cells alone; "4,714"/"5,185" absent from the whole 345-page AR; p.92 "no material impact on previously reported Scope 1 and 2 historical emissions"; the assured "98% reduction … since FY2020".	F-8, ~~N5~~, F-3, §3.1, F-20	G-06, S2-26, S2-28, E-01, FIGURE-FIDELITY	**Re-extracted and corrected 3 Aug 2026**

EVIDENCE ID	SOURCE (DOC · PAGE/TABLE)	WHAT IT SHOWS	LINKED CLAIM / FINDING	RULE IDS	STATUS
E-15 *(added rev 2)*	FY26 AR pp.86–88 MAM NZIF tables	Real Assets: target 100% of in-scope holdings aligning/aligned by 2030; baseline 2019 = 0% (re-validated 2025); FY2026 progress **68%**; bands 68 / 20 / 12. Real Estate: FY2026 progress **66%**; bands 66 / 14 / 20. In-scope = 92% of Real Assets AUM, 64% of Real Estate AUM, residuals itemised. "MAM has not sought formal validation of its climate-related targets or adopted methodology by a third party."	F-4, F-7, C-04, D8-3, D8-4	SEC-INV-LT-17, T-INV-01, SEC-SF	Confirmed (primary; direct table read)
E-16 *(added rev 2)*	FY26 AR p.88 "Review of targets"	Nomura sale of MAM's North American and European public investments business completed Dec 2025; MAM "revis[ed] some of its interim targets, removing the 2030 asset alignment target for fixed income and listed equities and the 2030 engagement threshold target that applied to its fixed income, listed equities and real estate businesses"	F-11, P4-4, P4-8	YOY-06, A-18, T-INV-01	Confirmed (primary)
E-17 *(added rev 2)*	FY25 Sust. Report p.70 vs FY26 AR (whole document)	FY2025: targets "cover around 80% of its dollar exposures to carbon-intensive sectors, and nearly two-thirds of Macquarie's absolute financed emissions from carbon-intensive sectors". No equivalent phrase or figure anywhere in the FY2026 AR	F-12, F-19, D8-1	YOY-05, SEC-FI-PCAF-03A	Confirmed (full-text search of the 345-page AR)
E-18 *(added rev 2)*	FY25 Sust. Report pp.68–69 vs FY26 AR	FY2025: electricity 42.6 GWh (−34% vs FY2014 baseline 64.2 GWh); total energy 159 TJ; explicit statement that Macquarie "will re-baseline electricity consumption in FY2026". FY2026 AR: no GWh or TJ energy figure in the climate section ("GWh" appears only in the glossary)	F-13, F-21, D3-2	YOY-05, G-BAU	Confirmed (full-text search)
E-19 *(added rev 2)*	FY26 AR p.82 fn 14; p.97	"Exposure includes both pre-production and production upstream oil/gas producers. Pre-production producers are excluded from reported emissions"; p.97: "their emissions have not been considered for absolute emissions disclosure and emissions intensity calculations as those clients have zero production"	F-14, D6-1, §3.2	SEC-FI-PCAF-12, T-14	Confirmed (primary)
E-20 *(added rev 2)*	FY26 AR p.98; p.82 table	CRE method changed to economic-intensity estimation "due to data limitations"; previous method used property-level emissions data. CRE PCAF data-quality score 3.9 (FY2024) → 5.0 (FY2025)	F-15, D8-1	SEC-FI-PCAF-02, YOY-04	Confirmed (primary)
E-21 *(added rev 2)*	FY25 Sust. Report p.68 + FY25 Basis of Preparation vs FY26 AR p.81	Scope 3 Category 1 FY2025 = **164,983** tCO_2e (assured) vs **164,893** tCO_2e (FY2026 comparative). No footnote, while Cat 3 and Cat 6 FY2025 restatements on the same table carry footnotes 8 and 9. Totals tie internally (227,896 / 224,960)	F-16, §5.3	DR-02, YOY-04, A-01C	Confirmed (cross-source)
E-22 *(added rev 2)*	FY26 AR p.72 vs pp.69, 77, 83	p.72 "have not resulted in any current or anticipated effects to … related decision-making processes"; p.69 "implemented sector-specific risk appetite settings and review processes"; p.77 Financed Emissions Target Risk Assessment Standard applied at deal origination; p.83 coal appetite changed FY2025 to permit met-coal mine expansion	F-17, D8-6, §5.2	DR-02, S2-14, A-01C	Confirmed (primary, same document)
E-23 *(added rev 2)*	FY26 AR pp.89–90; p.76	Transition-vulnerable assets $A21.5bn of $A354.9bn assessed (6%), 99% coverage; physically vulnerable home loans and business lending $A2.3–7.4bn of $A248.4bn (1–3%), 77% coverage, property-level annual-expected-damage-cost method under a high-warming scenario; explicit that the metric "is not a forecast of expected credit losses, probability of default or value-at-risk"	D9-1, §2.3, §5.2, R-04	S2-31..34, N	Confirmed (primary): **not recorded anywhere in rev 1**
E-24 *(added rev 2)*	FY26 AR p.64; p.65	"In the next reporting period, relevant transition reliefs cease to apply under AASB S2, Macquarie expects to disclose emissions associated with assets under management"; Scope 3 disclosed voluntarily in FY2026, mandatory from FY2027	F-7, F-18, D8-3	SEC-FI-PCAF-09, S2-05	Confirmed (primary): **not recorded in rev 1**
E-25 *(added rev 2)*	FY26 AR p.77; p.83; p.67	Financed Emissions Target Risk Assessment Standard: escalated transactions assessed for impact on financed-emissions targets; for in-scope upstream oil/gas, "the analysis considers whether the financed emissions from a given deal will keep our portfolio aligned with the required emissions reduction pathway"; ESR team provides "independent and objective review and challenge"; very-high-risk transactions may require CRO / CEO / two-NED review. **No outcome data disclosed** (no declined, capped, conditioned or exited transactions)	D8-6, §5.2	SEC-FI-05, SEC-FI-06, A-16	Confirmed (primary). Not credited as a positive (A-16: described policy, permissive framing, no outcomes)
E-26 *(added rev 2)*	FY26 AR p.73; p.85	"Climate scenario analysis outputs were benchmarked against Macquarie's current capital adequacy levels … The results indicate that Macquarie is sufficiently capitalised to absorb the potential financial impacts modelled"; quantitative anticipated-effect information beyond the medium term "would not be decision-useful as at the reporting date and has therefore not been disclosed"; mortgage progress "slower than our reference scenario pathway … primarily due to the slower-than-projected pace of decarbonisation of Australia's electricity grid"	F-9, §3.3, G-BAU	S2-14/15, A-16, G-BAU	Confirmed (primary). Candour and process description not credited (A-16); the grid attribution is the company's own BAU admission
E-02	FY26 AR p.80 targets table	Own-ops net zero via 430 biochar credits (Puro.earth) + 100% renewable; "no third-party validation"	F-8, F-3, CV	E-08..22, G-11, T-13	Confirmed

EVIDENCE ID	SOURCE (DOC · PAGE/TABLE)	WHAT IT SHOWS	LINKED CLAIM / FINDING	RULE IDS	STATUS
E-03	FY26 AR p.81 Scope 3 table	Cat1 148,182; C3 3,946; C5 119; C6 51,360; total 203,607 (FY26); C7 not reported	§3.1, N (C7 gap)	S3-01.., S3A, S3-EST, G-08	Confirmed (arithmetic ties)
E-04	FY26 AR p.81 supplier targets	47% (C1) / 83% (C6) of emissions from suppliers with science-aligned targets; "75% by 2030"	Target-quality (process metric)	T-SUP-03, T-PROC-05	Confirmed
E-05	FY26 AR p.82 financed-emissions table	Total 13.2 Mt / $247.7bn EAD (FY2025) vs 11.4 Mt / $216.3bn (FY2024); sector breakdown + PCAF DQ scores	F-5, F-6, F-7, §3.2	SEC-FI-PCAF-01/02/03A/06, SEC-FI-08	Confirmed (assured)
E-06	FY26 AR p.83 target table	Oil/gas 62.0 gCO_2e/MJ (target 56.3–59.6 by 2030, −6% vs FY20 65.8); resi mortgages 32.6 $kgCO_2e/m^2$ (target 11.6–19.3, −16% vs FY21 38.7)	F-5, F-6, T-14	T-14, SEC-FI-TGT-04, SEC-FI-PCAF-12	Confirmed (assured)
E-07	FY26 AR p.83 coal narrative	$A0 thermal-coal EAD; met-coal appetite incl. expansion; met-coal mining re-entered FY2025 (0.8 Mt)	F-1, F-6	SEC-FI-05, SEC-FI-06, A-18	Confirmed
E-08	FY26 AR p.95 coverage/exclusions	Excludes MAM funds, BFS Wealth, advisory/M&A, facilitation, trading, sovereigns; one-year lag	F-7, F-18, F-19	SEC-FI-PCAF-03A/09, SEC-FI-03	Confirmed
E-09 **(corrected rev 2)**	FY26 AR pp.86–88 MAM targets (AUM figure is from the Operating & Financial Review, not the Climate Statements)	AUM $A722.1bn (down from $941bn per Note 25, or "up 8% … excluding the impact of divested business" per the OFR); MAM interim target = **NZIF asset alignment, 100% of in-scope holdings by 2030**, progress 68% / 66%: ~~% AUM with net zero goal (Real Assets 20%, Real Estate 14%)~~ **withdrawn: 20% / 14% is the "Committed to aligning" band, not the target metric**; investee S1&2 only; net zero 2040. Superseded by E-15.	F-7, F-4, F-22	SEC-INV-LT-17, T-INV-01, SEC-SF, SEC-FI-09	**Corrected 3 Aug 2026**
E-10	FY26 AR pp.72–75 scenario/financial effects	No material financial effects; no quantified anticipated effects; scenario analysis "did not lead to any change to strategy"; NGFS 1.5°C + 3°C	F-9	S2-14/15, S2-31..34	Confirmed
E-11	FY26 AR pp.101–106 assurance	Statutory review over governance + risk/opp table + S1/S2 only; separate limited assurance over S3, renewable, offsets, financed emissions, EAD, PCAF, intensity	F-8, §2.3	A-11, GOV, S2-44	Confirmed
E-12	FY25 Sust. Report p.63	Renewable = 53.8% building-owner/utility + 46.2% energy attribute certificates	F-3, F-8, C-2	E-01..24, S2-28	Confirmed (prior-year)
E-13 **(corrected rev 2)**	FY20/FY21 TCFD; NZ&CR 2022/2023; FY24/FY25 Sust (multi-year series)	Scope 1 477/465/343/385/415/482 (voluntary basis) vs FY26 AR restated FY20 **471** / FY25 **518** ~~4,714 / 5,105~~; renewable split 57%→46.2% EAC then dropped; EAD 167→192→216→248 $bn; financing-alignment-2050 pillar FY21–FY24 then dropped FY26; NZBA left FY25; motor-vehicle target withdrawn FY25; coal run-off achieved end-2024 then met-coal reopened	N5, F-10, §3.4, Annex K	YOY-01..08, G-10, T-BASE-01, S2-41, A-18, DR-02	Confirmed (longitudinal context; normalised)
E-14 **(corrected rev 2)**	FY26 AR p.80 footnotes 3–5 and p.92; p.69 ambition	S1 FY20 baseline restated 477→**471** (new SaaS platform emission factors) & FY25 restated 482→**518** (estimated→actual); p.92 confirms the platform change had "no material impact on previously reported Scope 1 and 2 historical emissions"; "own business operations excludes OSS"; FY26 ambition = own-ops net zero + reduce financed-emissions intensity + green-asset finance (no group financing-2050 pillar)	N5, F-10, §3.4	YOY-04, YOY-06, G-10	Confirmed (primary)

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
C-01	"Maintain a net zero emissions position across Scope 1 and Scope 2 for our own business operations"	Own-ops S1+S2 only (excl. OSS)	Self-declared; guided by SBTi/NZBA/Oxford offset principles	FY26 AR p.80	Strong (achieved)	Investors/public	Found: S2 mkt 0, 430 credits; Missing: gross S1 driver, renewable split	Net zero, carbon-neutral, renewable, offsets	E-25 n/a (self-decl), E-08..22, G-11, S2-28	Substantiated at claimed scope; offset/cert-dependent
C-02	"Sourced the equivalent of 100% renewable electricity" (RE100)	Own-ops electricity	Self-declared; RE100	FY26 AR p.80 / FY25 p.63	Strong	Investors/public	Found: 100%; ~46% unbundled EACs (FY25)	Renewable, market-based S2	E-01..24, S2-28	Substantiated; ~half unbundled certificates
C-03	"Continuing to reduce the intensity of our financed emissions in accordance with existing targets"	Financed emissions, 2 sectors, intensity	Own methodology; UNEP FI / NGFS / CRREM; no third-party validation	FY26 AR p.69, p.83	Moderate	Investors	Found: −6% / −16% intensity; absolute +16%; no offsets used to meet the sector targets (p.83). Missing: the pre-production population excluded from the oil/gas numerator but not the denominator (F-14); the FY2025 coverage quantification (F-12)	Target progress, PCAF, BAU	T-14, SEC-FI-TGT-04, SEC-FI-08, G-BAU	Substantiated on intensity; does not cap absolute; the oil/gas leg is not like-for-like
C-04 **(corrected rev 2)**	MAM "manage assets in line with net zero Scope 1 and 2 emissions by 2040"	MAM controlled/influenced assets, S1&2	NZAM / NZIF; MAM Decarbonisation Strategy	FY26 AR pp.69–70, 86–88	Moderate, heavily caveated	Clients/investors	Found: **68% / 66% of in-scope holdings aligning or aligned** against a 100%-by-2030 target, from a re-validated 0% 2019 baseline (~~28%/14% AUM with goals~~: that was the "Committed to aligning" band). Missing: AUM absolute emissions; any emissions weighting of the alignment share; two sibling 2030 targets removed in-year (F-11)	Inherited-growth, target design	SEC-INV-LT-17, T-INV-01, SEC-SF, T-DEP-04	Substantiated as an alignment-share target (credited F-4); emissions unquantified
C-05	"$A0 EAD in the thermal coal mining sector"; no appetite for thermal-coal financing	Thermal-coal exposure	Policy-backed exclusion	FY26 AR p.83	Strong	Investors/public	Found: $A0 EAD	Fossil-fuel policy	SEC-FI-05, A-18	Substantiated (forward exclusion credited; exit not credited)
C-06	"These targets are aligned with the Paris Agreement" (own-ops & supplier)	Own-ops + supplier-engagement targets	Self-assessed vs SBTi guidance; not validated	FY26 AR p.80–81	Moderate	Investors	Found: guidance considered; Missing: validation	SBTi halo, target quality	T-SBTi-01/03, C-SBTi-02, T-14	Alignment self-asserted, unvalidated
C-07	"75% of our Scope 3 Cat 1 & Cat 6 suppliers… science-aligned target by 2030"	Supplier engagement %	Own methodology	FY26 AR p.81	Moderate	Investors	Found: 47%/83% progress	Supplier engagement vs reduction	T-SUP-03, T-PROC-05	Process metric, not measured Scope 3 reduction

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	FY2026 is Macquarie's first mandatory AASB S2 year (Corporations Act Div 1 Pt 2M.3); Climate Statements "prepared in accordance with AASB S2", independently reviewed (limited) [E-11]	Appears to meet first-year obligation; transition relief applied and disclosed	Comprehensive governance/strategy/risk/metrics/targets; scenario analysis performed	Minor limitation · High	Compliance baseline met	Second-year uplift (quantified financial effects, coverage %)
D1-2	Scope 3 voluntarily disclosed in FY2026 under transition relief; mandatory from FY2027 [E-03]	Compliant (relief)	Voluntary early disclosure is baseline, not a credit (A-16)	No apparent issue: baseline (not credited) · High	—	Maintain and complete (C7)

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~~ **BASIS WITHDRAWN (rev 2)**	~~Gross Scope 1 fell 5,185 → 430 tCO_2e (−92%) with no disclosed driver; FY26 figure equals offsets purchased (430)~~ [E-01]	Metric reported and assured	~~Unexplained order-of-magnitude change breaks time-series confidence~~ **Withdrawn**: the 5,185 was a footnote-superscript extraction artefact (471[4] / 518[5]); see N5 and rev 2 correction C1. The 430-credits-for-430-tonnes identity is prescribed by p.80 ("carbon removal units … equivalent to annual Scope 1 emissions"), so it is conformance, not an anomaly	~~Decision-usefulness concern~~ → **Minor limitation · Cannot determine (driver)**	Residual: the −17% FY25→FY26 movement is unreconciled	Disclose the driver of the restated FY2025 (518) → FY2026 (430) movement
D2-3 *(added rev 2)*	The energy denominators needed to test the operational series were withdrawn in FY2026: 42.6 GWh electricity and 159 TJ total energy were disclosed in FY2025, with an explicit promise to re-baseline in FY2026; neither appears in the FY2026 AR [E-18]	No mandatory energy-disclosure obligation breached	Removes the ability to decompose either the Scope 2 fall or the Scope 1 movement into activity vs factor change; retires the FY2014 electricity-reduction commitment without saying so	Decision-usefulness concern · High	Reductions cannot be attributed (G-BAU)	Restore GWh and TJ with the promised re-baselined FY2014 comparison
D2-2	Own-ops boundary excludes operationally-segregated subsidiaries (OSS); OSS included in Scope 3 Cat 15 [E-01, E-08]	Disclosed boundary choice	Reader must track where OSS emissions land	Minor limitation · High	Boundary transparency	Keep cross-reference explicit

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	Market-based Scope 2 = 0 via 100% renewable; ~46% is unbundled energy attribute certificates (FY25 split now dropped in FY26) [E-01, E-12]	Both location & market disclosed (compliant)	Unbundled-certificate reliance and dropped split reduce transparency	Decision-usefulness concern · High	"100% renewable" overstates physical greenness	Restore bundled/unbundled split; disclose PPA pathway

ID	FINDING & EVIDENCE CHAIN	MIN-COMPLIANCE	DECISION-USEFULNESS / CLAIM-QUALITY	SEVERITY · CONFIDENCE	CONSEQUENCE	WHAT WOULD FIX IT
D3-2	Location-based Scope 2 fell 22,363 → 18,953 (−15%); consumption-vs-grid driver not split [E-01]	Reported	Cannot tell real efficiency from grid decarbonisation (G-BAU)	Cannot verify (driver) · Medium	BAU vs own-action indistinguishable	Disclose kWh trend alongside grid factor

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 **(corrected rev 2)**	Operational Scope 3 Cat 1–6, 8 reported (total 203,607); Cat 7 commuting "not currently reported"; **C2/C4/C8** folded into C1 ~~C5~~: Category 5 is separately quantified in all three years (112 / 119 / 223) and separately assured (PwC schedule (i), p.104), and p.93 defines Category 1 as including Categories 2, 4 and 8 only [E-03]	Voluntary; partial	C7 gap + folded categories reduce granularity	Decision-usefulness concern · High	Incomplete operational S3	Report C7; disaggregate C1 sub-categories
D4-2	Cat 1 (148,182) above FY2020 baseline (137,030) though below FY2025 [E-03]	Reported	Largest operational S3 line is above baseline	Minor limitation · High	Reduction not yet evident vs baseline	Supplier-specific factors + trajectory
D4-3 **(extended rev 2)**	Supplier-engagement targets = "% of emissions covered by suppliers with science-aligned targets" (FY2026 47% C1 / 83% C6). **The prior year, printed alongside on p.81, was 39% C1 / 89% C6: so the travel leg went backwards by 6 points while the review reported only the FY2026 pair** [E-04]	Disclosed (both years)	Engagement ≠ measured Scope 3 reduction; and the metric is *falling* on Category 6, which is the offset-dependent category	Decision-usefulness concern · High	Process metric read as performance; deterioration invisible in the review as first written	Add measured Scope 3 reduction trajectory and report both years' engagement shares with the direction of travel

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	430 carbon-removal credits (biochar, Puro.earth) offset residual Scope 1; 51,360 credits (ACCU/Climate Action Reserve savanna/forestry) offset Cat 6; retirement assured (limited) [E-02]	Credits named, registry-identified, assured	Mix of removal (biochar) and reduction/avoidance (savanna/forestry) credits; net-zero leans on retirement	Minor limitation · High	Net position partly avoidance-based	Split removal vs reduction credits; residual-emissions disclosure
D5-2	Some offset purchase/retirement occurs after year-end "to facilitate correct amount" [E-02]	Disclosed timing	Retirement-timing mismatch vs claim period	Minor limitation · Medium	Claim-period alignment	Disclose retirement dates vs reporting year

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	Financed-emissions targets are intensity-only (gCO_2e/MJ, $kgCO_2e/m^2$); no absolute target; absolute financed emissions +16% [E-05, E-06]	Targets disclosed	Intensity target does not cap absolute; footprint grew	Serious target-integrity / decision-usefulness concern · High	"Reducing intensity" masks absolute growth	Add absolute trajectory or disclose/justify headroom

ID	FINDING & EVIDENCE CHAIN	MIN-COMPLIANCE	DECISION-USEFULNESS / CLAIM-QUALITY	SEVERITY · CONFIDENCE	CONSEQUENCE	WHAT WOULD FIX IT
D6-2	No group-wide net-zero-financing commitment; ambition = own-ops net zero + intensity reductions + green-asset finance [E-05, ambition p.69]	No overreach (no false net-zero claim)	Reader gets no absolute end-state for the portfolio	Decision-usefulness concern · High	No portfolio destination	Set/disclose a portfolio-level end-state
D6-3	No standalone transition plan; no third-party validation of targets/methodologies [E-02, E-06]	Permitted (embedded plan)	No costed, milestone-based delivery pathway; unvalidated targets	Decision-usefulness concern · High	Delivery credibility limited	Publish costed transition plan; seek validation
D6-4	Target coverage narrow: only upstream oil/gas + resi mortgages; transport/power/coal/CRE untargeted [E-05, E-06]	Disclosed	Material sources without targets	Decision-usefulness concern · High	Untargeted footprint	Targets/pathways for material untargeted sectors

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	Two PwC engagements, both limited-level: statutory review over governance + risk/opp table + Scope 1/2 only; separate limited assurance over S3, renewable, offsets, financed emissions, EAD, PCAF, intensity [E-11]	Assurance present (first-year)	Broad coverage but no reasonable assurance; targets unvalidated	Decision-usefulness concern · High	Assurance weaker than claims imply	Move core metrics toward reasonable assurance
D7-2	Board committees, COG (own-ops), MAM governance model documented [E-11, gov pp.67–68]	Governance disclosed (baseline)	Baseline expectation, not a credit (A-16)	No apparent issue: baseline (not credited) · High	—	—

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 **(recalibrated rev 2)**	PCAF "guided by"; sector data-quality scores disclosed (**1.0–5.0**, corrected from "1.9–5.0") but **no portfolio-coverage % / total-loans-and-investments denominator**. Footnote 11 states the inventory "includes on-balance sheet lending and equity investments for all sectors", so coverage *of the declared scope* is 100% by construction: which weakens the compliance edge of this finding. Against that: the FY2025 report's coverage quantification (80% of carbon-intensive dollar exposure / nearly two-thirds of carbon-intensive absolute financed emissions) was **dropped** in the first mandatory year (F-12), and the CRE data-quality score deteriorated 3.9 → 5.0 on a method downgrade (F-15) [E-05, E-08, E-17, E-20]	PCAF referenced	Coverage % against total loans and investments still missing; direction of travel on data quality is adverse and was not shown	~~Potential compliance / misleading risk concern~~ → **Decision-usefulness concern · Medium** (severity reduced: fn 11 defeats the "unproven completeness of the declared scope" limb)	Financed-emissions completeness against the balance sheet unproven	Disclose coverage % and denominator by asset class; restore the FY2025 target-coverage quantification; show DQ scores year-on-year
D8-2	**Facilitated emissions not disclosed**; capital-markets/advisory excluded [E-08]. *Rev 2:* Macquarie commits to disclose AUM emissions from FY2027 when the transition relief lapses (p.64, E-24): no equivalent commitment is made for facilitated/advisory emissions	Disclosed exclusion	Major activity for a capital-markets house omitted, with no stated intention to close it	Decision-usefulness concern · High	Footprint understated for reader	Disclose facilitated emissions

ID	FINDING & EVIDENCE CHAIN	MIN-COMPLIANCE	DECISION-USEFULNESS / CLAIM-QUALITY	SEVERITY · CONFIDENCE	CONSEQUENCE	WHAT WOULD FIX IT
D8-3 **(corrected rev 2)**	MAM AUM $722bn (Note 25: down from $941bn; the OFR presents the same figure as up 8% excluding the divested business). Target = **NZIF asset alignment, 100% of in-scope holdings by 2030; FY2026 progress 68% / 66%** ~~% AUM with net-zero goal (20%/14%)~~; investee S1&2 only; absolute AUM emissions not disclosed [E-09, E-15, E-24]	Disclosed	The metric is stronger than rev 1 described (credited F-4) but is still a **count of holdings, not tonnes**, unweighted by emissions and scoped to 92% / 64% of two AUM pools; the dominant asset-manager footprint remains unquantified	Decision-usefulness concern · High	AUM climate exposure opaque	Quantify managed-portfolio emissions + coverage; weight the alignment share by emissions
D8-4 **(corrected rev 2)**	Inherited emissions-growth exposure via MAM holdings + on-balance-sheet equity. ~~80%/86% of AUM lacks a net-zero goal~~: **wrong**: the share of *in-scope holdings* with no long-term net-zero goal is **12%** (Real Assets) and **20%** (Real Estate); a further 20% / 14% have goals but interim targets that are absent or not science-based ("Committed to aligning"), concentrated in hard-to-abate sectors reliant on CCUS, green hydrogen and heavy-vehicle electrification. The unmeasured exposure is the 8% / 36% *outside* the in-scope denominator, plus every asset class other than Real Assets and Real Estate [E-09, E-15]	Raised (SEC-INV-LT-17 trigger, no holdings file needed)	Cannot quantify without weights/headroom (A-05); no auto-breach, no rating hit on composition alone	Cannot verify · Medium	Own-target compatibility unassessed	Look-through of investee headroom vs own targets; emissions-weight the NZIF bands
D8-5	Thermal-coal $A0 EAD + no-appetite policy (credit); met-coal appetite expanded incl. mine **expansion**, re-entered at 0.8 Mt FY2025 [E-07]	Policy-backed exclusion (thermal)	Met-coal loosening undercuts the exclusion; exit itself not credited (A-18)	Qualified positive (thermal) / decision-usefulness concern (met-coal) · High	Mixed fossil-fuel signal	Limits/phase-out on met-coal expansion appetite
D8-6 **(corrected rev 2)**	Oil/gas: no divestment, no mandated client transition plans; gas supported as remaining in energy mix [E-07, pp.69, 96]. **A named deal-level gate does exist and rev 1 did not record it**: the Financed Emissions Target Risk Assessment Standard, under which in-scope upstream oil/gas transactions are tested for "whether the financed emissions from a given deal will keep our portfolio aligned with the required emissions reduction pathway", with independent ESR review and challenge and very-high-risk escalation to the CRO / CEO / two NEDs [E-25]	Disclosed approach and disclosed gate	The gate is described in permissive terms ("may be reviewed", "may be managed") and **no outcome is disclosed**: no transaction declined, capped, conditioned or exited on financed-emissions grounds, no count, no volume. A described process is baseline under A-16; the reduction proof is still absent	Decision-usefulness concern · Medium	Real-economy effect unproven	Disclose the gate's outcomes with volumes, not only its existence
D8-7 *(added rev 2)*	Upstream oil/gas exposure includes pre-production producers; their emissions are excluded from both the absolute figure and the intensity metric [E-19, fn 14 p.82; p.97]	Disclosed in a footnote and in the methodology	The only fossil-fuel target's numerator and denominator cover different populations, flattering 62.0 gCO_2e/MJ and the "−6% vs baseline" progress. Pre-production financing is the decision with the largest forward emissions consequence and is invisible in both metrics	Decision-usefulness / target-integrity concern · High	Fossil target not like-for-like	Disclose pre-production exposure and its committed/forecast production emissions; publish the intensity with and without
D8-8 *(added rev 2)*	CRE methodology downgraded from property-level data to economic-intensity estimation "due to data limitations"; CRE PCAF data-quality score 3.9 → 5.0 [E-20, p.98, p.82]	Change disclosed	Method quality moved backwards in the first mandatory year, on an untargeted sector, with no like-for-like restatement of the prior year	Decision-usefulness concern · High	CRE emissions now on the weakest PCAF band	Restate the prior year on the new method; set out how property-level data will be recovered

Financed-emissions target headroom & benchmark (SEC-FI-TGT-04)

SECTOR TARGET	LATEST REPORTED	TARGET VALUE	% CHANGE PERMITTED	FLAT-LINE BENCHMARK	FOSSIL-FUEL OVERRIDE?	RULING
Upstream oil/gas (intensity)	62.0 gCO_2e/MJ (FY2025)	56.3–59.6 gCO_2e/MJ by 2030	Intensity −9 to −14% vs FY2020; **does not cap absolute**	N/A: intensity, not absolute	Oil/gas exposure: heightened scrutiny	Intensity target; absolute oil/gas emissions rose 5.3→6.2 Mt. No absolute headroom calc possible (T-14).

SECTOR TARGET	LATEST REPORTED	TARGET VALUE	% CHANGE PERMITTED	FLAT-LINE BENCHMARK	FOSSIL-FUEL OVERRIDE?	RULING
Residential mortgages (intensity)	32.6 $kgCO_2e/m^2$ (FY2025)	11.6–19.3 $kgCO_2e/m^2$ by 2030	Intensity −50 to −70% vs FY2021; **does not cap absolute**	N/A: intensity	No	Intensity target (S1&2 only); absolute rose 0.7→0.8 Mt.
Aggregate absolute financed-emissions target	13.2 Mt (FY2025)	**None disclosed**	Unbounded: no absolute target exists	Cannot benchmark: no absolute target	—	**Serious target-integrity concern**: absolute footprint uncapped and +16% YoY; intensity targets can be met while absolute grows.

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 **(corrected rev 2)**	Physical-risk assessment of Australian home-loan and business-banking portfolios (third-party property-level annual expected damage cost, high-warming scenario, insurability-risk threshold). **The AASB S2 vulnerable-asset metrics ARE disclosed and quantified: rev 1 recorded none of them**: physical $A2.3–7.4bn of $A248.4bn (1–3%) on 77% population coverage (p.90); transition $A21.5bn of $A354.9bn (6%) on 99% coverage (p.89) [E-23, E-10]	Disclosed and quantified	Better than rev 1 stated. What remains absent is an expected-loss / PD / VaR quantification, which Macquarie itself flags ("not a forecast of expected credit losses, probability of default or value-at-risk"), and any physical-risk quantification for the market-facing businesses, where "the methodology remains in its early stages of development"	Minor limitation · Medium	Physical-risk transparency partial, not absent	Quantify the expected-damage-cost financial effect; extend beyond the 77% BFS population
D9-2	Nature & biodiversity flagged as material topic; not the focus of this climate review	N/A	—	N/A, not assessed in detail ·,	—	—

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

BASE ISSUE	CHAINS TO	RULE + EVIDENCE IDS	ESCALATED SEVERITY
Intensity-only financed targets (D6-1)	"Reducing intensity of financed emissions" ambition (C-03) + absolute +16% (E-05)	T-14 → SEC-FI-TGT-04 → G-BAU; E-05, E-06	Decision-usefulness → serious target-integrity concern
No portfolio-coverage % (D8-1)	PCAF "guided by" claim (C-03) used in targets/strategy	SEC-FI-PCAF-03A → SEC-FI-PCAF-13A; E-05, E-08	Decision-usefulness → potential compliance/misleading-risk concern
AUM + facilitated emissions excluded (D8-2/D8-3)	Group climate-footprint completeness; MAM 2040 claim (C-04)	SEC-FI-PCAF-09 + SEC-INV-LT-17; E-08, E-09	Decision-usefulness (footprint understated for reader)
~~Unexplained Scope 1 fall (D2-1)~~ **chain withdrawn rev 2**	~~Own-ops net-zero claim time-series (C-01)~~	G-06 → S2-26; E-01	~~Decision-usefulness~~ → **Minor limitation**: the underlying figures were misread (rev 2 correction C1); only the −17% FY25→FY26 driver remains open
Disclosure withdrawals in the first mandatory year (F-12, F-13, F-15) *(added rev 2)*	Financed-target coverage claim (C-03); Scope 2 reduction attribution (D3-2, F-21); PCAF data quality (D8-1)	YOY-05 + G-BAU → SEC-FI-PCAF-02/03A; E-17, E-18, E-20	Individually minor → **collectively a decision-usefulness concern**: three separate quantifications that existed voluntarily in FY2025 were withdrawn in the year they became statutorily framed
Pre-production exclusion (D8-7) *(added rev 2)*	Oil/gas intensity target progress (C-03, D6-1); "reducing the intensity of our financed emissions" ambition	SEC-FI-PCAF-12 → T-14 → SEC-FI-TGT-04; E-19, E-06	Decision-usefulness → **target-integrity concern** (the only fossil target is measured across mismatched populations)
"No effect on decision-making" vs disclosed decision gates (F-17) *(added rev 2)*	AASB S2 Strategy disclosure (D1-1); ESR/FETRAS gate (D8-6)	DR-02 + S2-14 → A-01C; E-22, E-25	Decision-usefulness → **cross-source/internal-consistency concern inside the statutory statement**

BASE ISSUE	CHAINS TO	RULE + EVIDENCE IDS	ESCALATED SEVERITY
Met-coal appetite expansion (D8-5)	Thermal-coal exclusion credit (C-05); Paris-alignment framing	SEC-FI-05/06 + A-18; E-07	Qualifies the positive; not escalated to compliance
Financing-side commitment narrowing over time (F-10)	Group financing net-zero destination (D6-2); "reduce intensity" ambition (C-03)	YOY-06 + A-18 → T-14 → A-17; E-13, E-05	Decision-usefulness → reinforces (does not raise) the target-integrity ceiling; current-period-derived (SEC-SF-11)
~~Scope 1 restatement break (N5)~~ **CHAIN WITHDRAWN (rev 2)**	~~Own-ops net-zero series (C-01)~~	YOY-04 + G-10 → G-06; E-01, E-13	~~Decision-usefulness (series confidence)~~: **no break exists**; only the FY25→FY26 movement driver remains cannot-verify (A-05, F-20)

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

SCREEN	OUTPUT	BASIS
Required Interventions Schedule	Standard review item	Absolute-trajectory and untargeted-sector interventions identified (§5); not a NoCO2 conformance determination.
Clean Alternative Assessment	Potentially applicable: evidence required	Met-coal expansion appetite and gas transition-fuel support warrant clean-alternative testing (SEC-FI-06).
Prohibited Activities Schedule	Not apparently applicable	No prohibited-activity trigger from reviewed materials; thermal-coal exposure is $A0.

Annex G: Rule-application table

RULE FAMILY	APPLIED?	RESULT
Applicability gate (L / S2-01..06)	Yes	First mandatory AASB S2 year; in scope.
GHG inventory foundation (G / GHG-STD)	Yes	Own methodology guided by GHG Protocol; boundary (excl. OSS) disclosed.
Scope 1 (G-06 / S2-26)	Yes	430 tCO_2e; series continuous (FY20 restated 471, FY25 restated 518); −17% FY25→FY26 driver undisclosed (D2-1 basis withdrawn rev 2).
Scope 2 & renewables (E / S2-28)	Yes	Location + market both disclosed; ~46% unbundled certificates (D3-1).
Scope 3 (S3 / S3A / G-15)	Yes	Operational Cat 1–6, 8 partial; C7 gap; supplier engagement = process metric.
Offsets / net claims (E-08..22 / G-11)	Yes	Credits named/registry-identified/assured; removal vs avoidance mix (D5-1).
Targets & transition (T / S2-14/15/40)	Yes	Intensity-only, narrow coverage, no absolute, unvalidated, no standalone plan (D6).
Governance / remuneration / assurance (GOV / A-11)	Yes	Limited assurance only; governance baseline (D7).
Sector (SEC-*)	Yes	FI / PCAF module applied throughout.

RULE FAMILY	APPLIED?	RESULT
SEC-FI-TGT-04	Yes	No absolute target → serious target-integrity concern (headroom table).
SEC-FI-05A	Yes	Portfolio composition (thermal-coal $A0) weighed as scoped positive; no rating hit on composition alone.
SEC-SF / SEC-INV-LT	Yes	MAM asset-owner/manager module; inherited-growth exposure raised, cannot-verify.
SEC-FI-REL-01	Considered: **not triggered**	Macquarie discloses financed emissions (13.2 Mt) and does not exclude them via a voluntary certification's relevance/materiality test (it holds no Climate Active certification). The AUM/facilitated exclusion is a PCAF-scope/methodology choice, carried by SEC-FI-PCAF-09 + SEC-INV-LT-17 (D8-2/D8-3), not a relevance-test omission.
Disclosure-risk & cross-source (DR-01..07 / A-01C)	Yes	§5 + Annex J; NGER not a controlling corporation for FY2024-25.
Year-over-year & cross-period (YOY-01..08)	Yes	7 periods × 3 report families FY2020–FY2026; §3.4 + Annex K. Financing-side commitment narrowing (F-10) plus two in-year MAM target removals (F-11), renewable-split drop, target-coverage quantification drop (F-12), energy-use drop (F-13), CRE method downgrade (F-15), silent Cat 1 comparative change (F-16), motor-vehicle target withdrawal, coal-commitment arc. ~~Scope 1 restatement break (N5)~~ withdrawn rev 2.
NOCO2-MAP-01/02	Yes	Findings mapped in §6.1.
Nature / physical risk (N)	Partly	Home-loan physical-risk analysis noted; nature not assessed in detail.

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

ID	ITEM	PACK	EVIDENCE REQUESTED	STATUS
K-1	AUM & facilitated emissions	PCAF / financed emissions	Absolute managed-portfolio (facilitated) emissions with coverage %	Open (F-18)
K-2	Portfolio-coverage % / denominator	PCAF	Total loans-and-investments denominator; coverage % by asset class	Open (F-19)
K-3	Scope 1 driver	Target progress / inventory	Note explaining the restated FY2025 (**518**) → FY2026 (430) movement ~~5,105 → 430~~	Open (F-20)
K-4	Scope 2 location driver split	Renewable electricity	kWh consumption trend vs grid emission-factor: **restore the 42.6 GWh / 159 TJ series dropped in FY2026** (F-13)	Open (F-21)
K-8 *(added rev 2)*	Financed-target coverage	PCAF / target progress	Restore the FY2025 "80% of carbon-intensive dollar exposure / nearly two-thirds of carbon-intensive absolute financed emissions" quantification (F-12)	Open
K-9 *(added rev 2)*	Pre-production oil/gas	PCAF / financed emissions	Pre-production EAD, and committed/forecast production emissions; intensity with and without (F-14)	Open
K-10 *(added rev 2)*	Scope 3 Cat 1 FY2025 comparative	Inventory / assurance	Which of 164,983 and 164,893 is correct, and why the change was not footnoted (F-16)	Open
K-11 *(added rev 2)*	Financed-emissions gate outcomes	ESR / credit	Transactions declined, capped, conditioned or exited under the Financed Emissions Target Risk Assessment Standard, with volumes (D8-6)	Open
K-5	Inherited-growth look-through	PCAF / investments	Holding weights + investee headroom vs Macquarie targets	Open (F-22)
K-6	Renewable bundled/unbundled split	Renewable electricity	FY2026 building-owner/utility vs EAC split	Open

ID	ITEM	PACK	EVIDENCE REQUESTED	STATUS
K-7	Target validation	Target progress	Any third-party validation of targets/methodologies	Open

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

CHAIN ID	TRIGGER	FOLLOW-UP SCANS RUN	EVIDENCE IDS	FINAL LABEL
M-1	"Net zero Scope 1&2 own operations"	Boundary, offsets, renewable, residual, assurance, prior claims	E-01, E-02, E-11, E-12	Substantiated at scope; offset/cert-dependent
M-2	"100% renewable electricity"	Location vs market, EAC/PPA, retirement, residual mix	E-01, E-12	Substantiated; ~46% unbundled
M-3	PCAF / financed emissions	Asset-class + portfolio coverage %, denominator, exclusions, data quality, movement, target boundary	E-05, E-08	Coverage % missing → potential compliance/misleading-risk
M-4	Target progress / on-track	Baseline, current, intensity vs absolute, offsets, assurance, validation	E-05, E-06	Intensity-only; absolute +16%; serious target-integrity
M-5	Reduction claim (BAU decomposition)	Scope 2 grid vs kWh vs certificates; financed volume vs intensity	E-01, E-05	BAU/own-action split undisclosed → cannot-verify (some)
M-6	Entity holds material investments (MAM AUM + equity)	Cat 15 look-through; investee headroom; own-target compatibility	E-09	Inherited-growth exposure raised; cannot-verify (no weights)
M-7	SBTi / "science-based" / "Paris-aligned"	Validated wording, validation status, halo	E-02, E-04, E-06	"Considers SBTi guidance"; no validated target
M-8	Assurance statement	Subject matter, level, exclusions, S3 completeness	E-11	Broad but limited-level; targets unvalidated
M-9	Coverage % claim (supplier 75%)	Numerator/denominator; engagement vs reduction	E-04	Process metric, not measured reduction

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). Values are recorded as stated; a divergence is flagged only after boundary/period normalisation, otherwise cannot-verify (A-05).

CLAIM / METRIC	FY2026 ANNUAL REPORT	FY2025 SUSTAINABILITY REPORT	FY2025 BASIS OF PREPARATION	NGER / CLEAN ENERGY REGULATOR	BOUNDARY / PERIOD NORMALISATION	DIVERGENCE?
Scope 1 FY26 **(corrected rev 2)**	430 tCO_2e; FY25 restated to **518**; FY20 baseline restated to **471**	Voluntary reports carried 477/465/343/385/415/482 tCO_2e FY20–FY25	Assured-metric method (FY25 assured at 482)	Not on register (no NGER entry)	NGER not applicable (not a controlling corporation); restatements are −1.3% (FY20) and +7.5% (FY25), both footnoted with a cause; disclosure excludes OSS	~~Cross-report type-series break (~10×)~~ **No divergence.** The apparent break was a PDF footnote-superscript artefact; corrected 3 Aug 2026. Residual: the FY25→FY26 movement (−17%) is unreconciled (F-20)

CLAIM / METRIC	FY2026 ANNUAL REPORT	FY2025 SUSTAINABILITY REPORT	FY2025 BASIS OF PREPARATION	NGER / CLEAN ENERGY REGULATOR	BOUNDARY / PERIOD NORMALISATION	DIVERGENCE?
Scope 2 location-based FY26	18,953 tCO_2e	Prior-year series	Assured-metric method	Not on register	NGER not applicable	**No divergence; consumption-vs-grid driver not split (F-21, D3-2)**
Scope 2 market-based FY26	0 tCO_2e (100% renewable)	0 (100% renewable)	Method disclosed	N/A (NGER is location-based)	—	**No divergence (consistently reported); renewable composition regression (see below)**
"100% renewable electricity"	"100%"; bundled/unbundled split dropped	53.8% building-owner/utility + 46.2% energy attribute certificates	Method disclosed	N/A	Same claim, different disclosure depth year-on-year	**Framing regression (DR-04): FY2025 disclosed the ~46% unbundled share; FY2026 does not (D3-1)**
Financed emissions total	13.2 Mt / $247.7bn EAD (as at 31 Mar 2025)	11.4 Mt (prior; FY2024 lag)	PCAF method; one-year lag	Outside NGER (no financed-emissions statutory metric)	Financed emissions not in NGER scope; on-balance-sheet only, excl. AUM/facilitated	**No cross-source divergence; the risk is target framing: intensity down while absolute +16% (D6-1), not audience arbitrage**
MAM AUM net-zero targets **(corrected rev 2)**	NZIF asset alignment: **68%** (Real Assets) / **66%** (Real Estate) of in-scope holdings aligning or aligned, against 100% by 2030 from a 0% 2019 baseline; investee S1&2. ~~20% / 14% of AUM with a net-zero goal~~: that is the "Committed to aligning" band	NZAM reference	—	N/A	Alignment-share metric on in-scope holdings (92% / 64% of the two AUM pools), not emissions	**No divergence across own docs; AUM absolute emissions unquantified (F-18, D8-3); two sibling 2030 targets removed in FY2026 (F-11)**
Scope 3 Cat 1 FY2025 comparative * (added rev 2)*	164,893 tCO_2e (FY26 AR p.81, FY2025 column)	**164,983** tCO_2e (FY25 Sust. Report p.68)	**164,983** tCO_2e (assured metric list)	N/A	Same year, same boundary, same category	**Divergence (DR-02)**: 90 tCO_2e, unfootnoted, on a table where the other two FY2025 restatements are footnoted (F-16)
Energy use / electricity consumption * (added rev 2)*	Not disclosed anywhere in the FY2026 AR climate section	42.6 GWh electricity (−34% vs FY2014 baseline 64.2 GWh); 159 TJ total energy; explicit promise to re-baseline in FY2026	Assured-metric method	N/A	Same boundary; simply absent in the later year	**Disclosure withdrawal (DR-04 / YOY-05)**: the activity denominator was removed in the mandatory year (F-13)
Financed-target coverage *(added rev 2)*	Not disclosed	"Around 80% of its dollar exposures to carbon-intensive sectors, and nearly two-thirds of … absolute financed emissions from carbon-intensive sectors" (p.70)	—	N/A	Same target set (minus motor vehicles)	**Disclosure withdrawal (DR-04 / YOY-05)**: the only coverage quantification Macquarie ever published was dropped (F-12)

CLAIM / METRIC	FY2026 ANNUAL REPORT	FY2025 SUSTAINABILITY REPORT	FY2025 BASIS OF PREPARATION	NGER / CLEAN ENERGY REGULATOR	BOUNDARY / PERIOD NORMALISATION	DIVERGENCE?
"No effect on decision-making processes" * (added rev 2)*	FY26 AR p.72 (AASB S2 Strategy, statutory)	FY26 AR p.69 ("sector-specific risk appetite settings and review processes"), p.77 (financed-emissions gate at deal origination), p.83 (coal appetite changed FY2025)	—	N/A	Same document, same reporting period	**Internal contradiction (DR-02)**: unreconciled within the statutory statement (F-17)

O.2 NGER statutory reconciliation (A-01C): lookup run for "MACQUARIE" against the FY2024-25 register (data as at 27/02/2026).

METRIC	DISCLOSED (REPORT, GLOBAL OWN-OPS)	NGER REGISTER (AU)	BOUNDARY DIFFERENCE	RECONCILED?	LABEL
Scope 1	430 tCO_2e	No entry	—	No external anchor	**Not an NGER controlling corporation for FY2024-25** (below threshold / no operational control). Absence ≠ zero emissions.
Scope 2 (location-based)	18,953 tCO_2e	No entry	—	No external anchor	NGER could not serve as an external Scope 1/2 anchor for this review.
Financed emissions (Cat 15)	13.2 $MtCO_2e$	Outside NGER scope	NGER covers operational Scope 1/2, Australian facilities only: never Scope 3 / financed	n/a	**Financial-institution note:** even where an FI is on the NGER register, operational Scope 1/2 is immaterial to the real (financed, Scope 3 Cat 15) footprint. A small or absent NGER number must not be read as a small climate footprint; the material cross-source interest is financed-emissions and fossil-fuel-financing claims across audiences (O.1, O.3).

O.3 Disclosure-risk register (DR-01 / DR-03..DR-07): risk-labelled with confidence; every row cites its driver.

#	LENS	EXPOSURE & CONFIDENCE	DRIVER (FINDING / EVIDENCE IDS)	CROSS-SOURCE LINK (DR-02)	WHAT WOULD REDUCE IT
R-01	Legal (DR-03)	Moderate misleading-conduct exposure · Medium	"Reducing the intensity of our financed emissions" framing against absolute +16% and exclusion of AUM/facilitated from the 13.2 Mt (F-5, F-7, D6-1, D8-2/3; E-05, E-08, E-09)	Financed figure internally consistent; risk is framing/completeness, not audience divergence	Absolute financed-and-facilitated trajectory (or disclosed headroom); quantify AUM + facilitated emissions
R-02	Regulatory (DR-04)	Low–moderate ASIC/ACCC/AASB S2 exposure · Medium	No portfolio-coverage % / denominator (D8-1); facilitated emissions omitted (D8-2); unvalidated targets (F-8, D6-3); first mandatory AASB S2 year (E-05, E-08, E-11)	PCAF "guided by" claim (C-03) used in targets/strategy	Disclose coverage % and denominator; disclose facilitated emissions; pursue third-party validation; second-year AASB S2 uplift
R-03	Technology (DR-05)	Low–moderate exposure · Medium	Own-ops net zero via retired biochar removal credits + ~46% unbundled certificates rather than gross abatement (F-8, F-3, D3-1, D5-1; E-01, E-02, E-12)	Renewable-composition regression FY25→FY26 (O.1)	Prioritise gross Scope 1 abatement; removal-vs-reduction split; restore bundled/unbundled renewable disclosure
R-04 **(revised rev 2)**	Physical (DR-06)	Low–moderate exposure · Medium	Vulnerable-asset metrics **are** quantified ($A2.3–7.4bn / 1–3% physical on 77% coverage; $A21.5bn / 6% transition on 99% coverage: E-23); what is absent is an expected-loss quantification (a limitation Macquarie itself states) and scenario outputs for the most exposed portfolios, plus any physical quantification for the market-facing businesses (F-9, D9-1; E-10, E-23)	Consistent across own docs	Quantify expected-damage-cost financial effect and scenario outputs; extend physical coverage beyond the 77% BFS population; disclose thresholds that would change strategy

#	LENS	EXPOSURE & CONFIDENCE	DRIVER (FINDING / EVIDENCE IDS)	CROSS-SOURCE LINK (DR-02)	WHAT WOULD REDUCE IT
R-05 **(revised rev 2)**	Other: market / commercial (DR-07)	Low–moderate exposure · Medium	Met-coal appetite loosened to allow mine expansion (re-entered 0.8 Mt) alongside thermal-coal exclusion; the only fossil target excludes pre-production emissions from a denominator that includes pre-production exposure (F-14, D8-7; E-19); a named deal-level financed-emissions gate exists (E-25) but **no outcome is disclosed** (D8-5, D8-6; E-07)	Consistent across own docs	Limits/phase-out on met-coal expansion appetite; publish the intensity with pre-production included; disclose capped/declined/exited fossil-fuel finance with volumes
R-07 * (added rev 2)*	Regulatory / legal (DR-03 / DR-04)	Low–moderate exposure · Medium	A statutory AASB S2 Strategy statement that climate has had "no … effects to … related decision-making processes" (p.72), against the same document's description of climate decision gates and appetite settings (pp.69, 77, 83): F-17, E-22	Internal contradiction within the statutory statement	Qualify the statement to what it means (no quantified financial-statement effects), or describe the decision effects the risk-management section already evidences
R-08 * (added rev 2)*	Regulatory (DR-04 / A-01C)	Low exposure · High	A prior-year assured figure changed without a footnote in a statutory climate statement (Cat 1 FY2025 164,983 → 164,893) on a table that footnotes its other two restatements: F-16, E-21	FY25 Sust. Report / FY25 Basis of Preparation vs FY26 AR	State which figure is correct and footnote the change on the same basis as footnotes 8 and 9
R-06	Regulatory: Clean Energy Regulator / NGER (DR-04 / A-01C)	Low exposure · High	Not an NGER controlling corporation for FY2024-25; no external Scope 1/2 anchor, but operational Scope 1/2 is immaterial to the financed footprint (O.2)	NGER vs AR: no register entry	No action for NGER itself; the material anchor is financed-emissions completeness and coverage (R-01/R-02)

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

Working layer for §3.4. Seven reporting periods (FY2020–FY2026) across three report families were reviewed as longitudinal context: FY2020 & FY2021 TCFD Implementation Progress & Scenario Analysis reports; the 2022 (FY2022) & 2023 (FY2023) Net Zero & Climate Risk reports; and the FY2024/FY2025 Sustainability reports and FY2026 Annual Report Climate Statements (primary). Prior-year reports are **context, not current disclosure** (SEC-SF-11); the rating is derived from the current period (A-01B). A change is recorded only after boundary/method/period normalisation; an undisclosed reconciling item is **cannot-verify (A-05)**, not a discrepancy. The TCFD reports do not carry the absolute Scope 1/2/3 inventory (they refer readers to the contemporaneous ESG reports), so those cells are "not in this report".

P.1 Multi-period headline series (YOY-02): *value AS STATED, with the source it came from. Macquarie FY ends 31 March. Voluntary-basis rows (sustainability/net-zero reports) and mandatory-basis (FY2026 AASB S2) are shown together; the boundary column flags where they are not on the same basis.*

METRIC / CLAIM	FY2020	FY2021	FY2022	FY2023	FY2024	FY2025	FY2026	SOURCE(S) PER CELL	BOUNDARY/METHOD NORMALISATION
Scope 1 (tCO_2e)	477	465	343	385[1]	415[1]	482	**430**	2022/2023 NZ&CR; FY24/FY25 Sust; FY26 AR	**Corrected rev 2:** FY26 AR restates FY20 baseline→**471** (fn4) and FY25→**518** (fn5) ~~4,714 / 5,105~~. Restatements are −1.3% and +7.5%; the series is **like-for-like** (P2-1 revised).
Scope 2 **market** (tCO_2e)	29,767	22,121	0	0	0	0	0	Sust reports (FY25 SR fn 9: all own-ops Scope 2 stated on the market-based method unless otherwise stated); FY26 AR	**Corrected rev 2:** the 29,767 / 22,121 chart bars are **market-based**, not location-based; FY20 baseline restated 29,767→**29,213** (AR fn6). Zero since FY2022.
Scope 2 **location** (tCO_2e)	31,370 (baseline, first published FY2026)	n/d	n/d	n/d	n/d	22,363	18,953	FY26 AR	**Corrected rev 2:** 31,370 is a *newly published* FY2020 location-based baseline carrying **no restatement footnote**: it is not a restatement of 29,767. ~~FY2024 – 22,121~~ **removed: no FY2024 location-based figure exists in the corpus** (the FY24 Sustainability Report chart carries the same 29,767 / 22,121 / 0 / 0 / 0 market-based bars).

METRIC / CLAIM	FY2020	FY2021	FY2022	FY2023	FY2024	FY2025	FY2026	SOURCE(S) PER CELL	BOUNDARY/METHOD NORMALISATION
Scope 3 operational total (tCO_2e)	222,364[3]	n/d	n/d	216,018	223,010	227,896	203,607	NZ&CR 2022/2023; FY24/FY25 Sust; FY26 AR	**Corrected rev 2:** FY20 baseline restated **222,364→218,310→208,337→211,900** (AR fn8: Cat 3 scope expanded to gas/diesel Scope 3 and T&D well-to-tank); **FY25 comparative restated to 224,960**, so the like-for-like FY25→FY26 move is **−9.5%**, not −10.7%. Cat 1 baseline **149,454→147,003→137,030** (P2-2).
– Cat 1 purchased g&s	149,454	—	—	155,097	156,018	164,983 → **164,893** (silently changed in the FY26 AR, F-16)	148,182	as above	Absorbs C2/C4/**C8** in later years (**not C5**: corrected rev 2).
– Cat 3 fuel- & energy-related	4,054 → **7,617** (restated)	—	—	—	—	3,526 → **4,570** (restated)	3,946	FY25 Sust; FY26 AR	*Added rev 2:* both FY2020 and FY2025 restated upward under fn8 (expanded scope).
– Cat 5 waste	112	—	—	—	—	223	119	FY25 Sust; FY26 AR	*Added rev 2:* separately quantified and separately assured in every year: never folded into C1.
– Cat 6 business travel	68,744	—	—	56,872	63,122	59,164	51,360	as above	Offset each year.
Financed emissions absolute ($MtCO_2e$)	n/d	n/d	n/d (sector only)	n/d (sector only)	**11.4**	**13.2**	(lag)	FY25 Sust (FY24 data); FY26 AR (FY25 data)	Dated by the year the data covers, like every financed row in this table (*re-dated 16 Nov 2026; was shown under the publishing report*). Group total first disclosed in the FY2025 report (added disclosure, P3-1); one-year lag; on-balance-sheet only.
Portfolio EAD ($Abn)	~	~	167.1	191.5	216.3	247.7	(lag)	NZ&CR 2022/2023; FY25 Sust; FY26 AR	Rising ~15%/yr; real estate/mortgages dominant.
Oil/gas upstream intensity (gCO_2e/MJ, S1-3)	66.2→65.8[4]	—	—	61.9	62.3	62.0	(as FY25)	NZ&CR; FY25 Sust; FY26 AR	Baseline restated 66.2→65.8 with reasons (P2-3); above 2030 target 56.3–59.6.
Resi-mortgage intensity ($kgCO_2e/m^2$, S1-2)	—	38.7	—	34.1	33.2	32.6	(as FY25)	NZ&CR 2023; Sust; FY26 AR	FY2021 baseline; target 11.6–19.3 by 2030; absolute rose 0.7→0.8 Mt.
Motor-vehicle intensity (gCO_2e/km, S1-2)	221	—	221	220	(target)	**withdrawn**	withdrawn	NZ&CR 2022/2023; FY25 Sust	Target 147 by 2030 withdrawn FY2025 (BFS car-loan wind-down) (P4-2).
Renewable electricity % (+ split)	target only	target only	100%; 43% util / 57% EAC	100%; 46.5% / 53.5%	100%; 47% / 53%	100%; 53.8% / 46.2%	100%; **split dropped**	NZ&CR; Sust; FY26 AR	Unbundled (EAC) share falling 57%→46.2% (improving); split not disclosed FY2026 (P3-2).
Offsets retired: residual S1 (units)	n/q	n/q	n/q	411	~	482	430	NZ&CR 2023; FY25 Basis of Preparation; FY26 AR	Removal credits (biochar/Puro.earth) in recent years. *Rev 2:* the offset volume tracks the low-hundreds Scope 1 series exactly: an independent confirmation that the corrected 471/518/430 reading is right and the "4,714 / 5,185" reading was an artefact. Equality of credits and gross Scope 1 is **prescribed** by p.80, not a coincidence.
Supplier science-aligned share (Cat 1 / Cat 6)	—	—	—	—	—	39% / **89%**	47% / **83%**	FY25 Sust p.69; FY26 AR p.81	*Added rev 2:* Cat 1 improving, **Cat 6 deteriorating 6 points**: the review as first written reported only the FY2026 pair (D4-3).

METRIC / CLAIM	FY2020	FY2021	FY2022	FY2023	FY2024	FY2025	FY2026	SOURCE(S) PER CELL	BOUNDARY/METHOD NORMALISATION
CRE PCAF data-quality score	—	—	—	—	**3.9**	**5.0**	(as FY25)	FY26 AR p.82	*Added rev 2:* deteriorated to the weakest band on a method downgrade "due to data limitations" (p.98; F-15).
Electricity use / total energy	—	—	—	—	39.9 GWh	42.6 GWh / 159 TJ	**dropped**	FY24/FY25 Sust; FY26 AR	*Added rev 2:* withdrawn in the mandatory year despite an explicit FY2025 promise to re-baseline in FY2026 (F-13).
Financed-target coverage quantification	—	—	—	—	—	80% of carbon-intensive dollar exposure; ~2/3 of carbon-intensive absolute financed emissions	**dropped**	FY25 Sust p.70; FY26 AR (absent)	*Added rev 2:* no equivalent anywhere in the 345-page FY2026 AR (F-12).
Own-ops carbon-neutral / net-zero claim	CN since 2010	CN since 2010	CN since 2010	CN; NZ S1&2 "on track"	NZ S1&2 "progressing"	NZ S1&2 **"achieved"**	NZ S1&2 maintained	all	Self-declared throughout (no external cert); offset/cert-based (YOY-08).
Group financing net-zero commitment	none	**new: align financing w/ NZ by 2050**	2050 alignment	2050 alignment	2050 alignment; NZBA member	**left NZBA**	**2050 financing-alignment pillar not stated**	TCFD FY21; NZ&CR; Sust; FY26 AR	Financing-side ambition narrowed (P4-1). MAM net-zero-2040 retained.

[1] FY23 Scope 1 restated 411→385 (FY24 report); FY24 restated 392→415 (FY25 report). [2] ~~FY24 chart axis figure unlabelled by scope in the extract: treated as location-based, low materiality.~~ **Resolved rev 2:** re-reading the FY2024 and FY2025 Sustainability Report charts shows the bars are 29,767 (FY20) and 22,121 (FY21) with zeros for FY22–FY25, all market-based per FY25 SR fn 9. There is no FY2024 location-based figure; the cell has been removed rather than estimated. [3] FY2020 Scope 3 baseline as stated in the 2022 report; later restated three times (see P2-2, revised). [4] Oil/gas FY2020 intensity baseline restated between the 2022 and 2023 reports (absolute 3.88→4.59 Mt). n/d = not disclosed in that report; n/q = disclosed but not quantified.

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
P2-1 **(corrected rev 2)**	Scope 1 FY2020 baseline / FY2025	477 (FY20) / 482 (FY25): voluntary reports	**471 (FY20) / 518 (FY25)**: FY2026 AR fn 4 and 5 ~~4,714 / 5,185~~	Disclosed with a stated cause for each (new SaaS platform emission factors; estimated→actual activity data); scale is −1.3% and +7.5%, consistent with the causes and with p.92 ("no material impact on previously reported Scope 1 and 2 historical emissions")	None: the restatements do not alter the net-zero position or any target progress	**Acceptable (disclosed, proportionate). The earlier "~10× / basis break" label was an extraction error; withdrawn 3 Aug 2026. Only the FY25→FY26 movement driver remains open (F-20)**
P2-2 **(extended rev 2)**	Scope 3 FY2020 baseline (Cat 1 / Cat 3 / total)	149,454 / 4,054 / 222,364 (2022 report)	137,030 / **7,617** / **211,900** (FY2026 AR): via 218,310 and 208,337	Disclosed at each step: FY2025 as an inflation-error correction on Cat 1/2/4/8; FY2026 under fn 8 as an expanded Cat 3 scope (gas and diesel Scope 3; T&D well-to-tank)	Cat 1 correction lowered the baseline (adverse to the company); the Cat 3 expansion *raises* it, enlarging the reported reduction vs baseline from −2.3% to −3.9% (favourable to the company): but it is applied to FY2020, FY2025 and FY2026 alike, so it is like-for-like	**Acceptable (disclosed, applied consistently). The review as first written used the superseded 208,337, understating the reduction: corrected rev 2**

#	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
P2-4 * (added rev 2)*	Scope 3 Cat 1 FY2025 comparative	164,983 (FY25 Sust. Report p.68; PwC-assured Basis of Preparation)	**164,893** (FY26 AR p.81)	**No**: no footnote, while the Cat 3 and Cat 6 FY2025 restatements on the same table each carry one (fn 8, fn 9)	Immaterial in size (90 tCO_2e); material as a restatement-discipline defect on an assured figure in a statutory document	**Decision-usefulness / cross-source concern (DR-02, YOY-04): F-16**
P2-5 * (added rev 2)*	Commercial real estate methodology	Property-level emissions data plus energy consumption, floor area and emission factors (to FY2024)	Economic-intensity estimation "due to data limitations" (FY2026 AR p.98)	Disclosed as a change, **but no like-for-like restatement of the prior year** and no quantification of the effect	PCAF data-quality score fell 3.9 → 5.0; CRE emissions now on the weakest band, on an untargeted sector	**Decision-usefulness concern (YOY-04): F-15**
P2-3	Oil/gas FY2020 intensity baseline	66.2 gCO_2e/MJ (absolute 3.88 Mt): 2022 report	65.8 gCO_2e/MJ (absolute 4.59 Mt): 2023 report	Disclosed (product-scope change, added clients, NGL factor)	Slightly changes the % reduction basis of the 2030 target	**Acceptable (disclosed)**

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

#	ITEM (METRIC / CATEGORY / TARGET / CLAIM / LIMITATION)	PRESENT IN	ABSENT/ADDED IN	EXPLAINED?	LABEL
P3-1	Group absolute financed-emissions total ($ / $MtCO_2e$)	Added in the FY2025 report (11.4 Mt, data to 31 March 2024) → FY2026 report (13.2 Mt, data to 31 March 2025)	Absent FY2022–FY2024 (sector EAD only)	Added as PCAF disclosure matured	**Neutral–positive (added; credited on own evidence, not continuity)**
P3-2	Renewable-electricity bundled/unbundled split	FY2022–FY2025 (57%→46.2% EAC)	Dropped FY2026	Not explained	**Decision-usefulness concern (transparency regression, YOY-05)**
P3-3	Employee commuting (Scope 3 Cat 7)	"methodology in development" every year	Still not reported FY2026	Explained (data/method)	**Decision-usefulness concern (persistent gap)**
P3-4	"Net Zero Plan by end of 2022" (promised FY2021)	Promised FY2021	Delivered as the 2022/2023 NZ&CR reports; no standalone costed plan by FY2026	Partly	**Decision-usefulness concern (no standalone transition plan)**
P3-5 * (added rev 2)*	Financed-target coverage quantification (80% of carbon-intensive dollar exposure; ~2/3 of carbon-intensive absolute financed emissions)	FY2025 Sust. Report p.70	**Dropped FY2026**: no equivalent anywhere in the 345-page AR	Not explained	**Decision-usefulness concern (transparency regression in the first mandatory year, YOY-05): F-12; directly causes F-19 / D8-1**
P3-6 * (added rev 2)*	Electricity consumption (GWh) and total energy use (TJ)	FY2022–FY2025 (FY2025: 42.6 GWh, −34% vs FY2014; 159 TJ)	**Dropped FY2026**, despite an explicit FY2025 statement that Macquarie "will re-baseline electricity consumption in FY2026"	Not explained	**Decision-usefulness concern (YOY-05): F-13; removes the activity denominator behind F-21 / D3-2 and retires the FY2014 electricity commitment silently**
P3-7 * (added rev 2)*	Pre-production upstream oil/gas emissions	Never disclosed	Exposure counted, emissions excluded (fn 14 p.82; p.97)	Explained (zero production) but the effect on the metric is not quantified	**Target-integrity concern (YOY-05 / T-14): F-14**

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	Align all financing activity with net zero	—	2050	Group financing	Introduced FY2021; retained FY2022–FY2024; **not stated as a group commitment FY2026**; NZBA left FY2025	**No: pillar dropped**	**Decision-usefulness / claim-quality concern (F-10); no replacement end-state (A-18)**
P4-2	Motor-vehicle financed intensity	FY2020	2030	AU motor vehicles, S1-2	Set FY2022; 221 → 220 **gCO_2e/km** FY2023 (*unit corrected rev 2 from gCO_2e/MJ*); **withdrawn FY2025** (BFS car-loan wind-down)	Retired	**Reason disclosed → acceptable retirement, but narrows coverage (A-18)**
P4-3	Whole-of-coal (thermal + met) run-off	—	end-2024	On-balance-sheet coal lending/equity	Committed FY2022; achieved (zero exposure end-2024); **met-coal appetite reopened incl. expansion** Nov 2024; re-entered book 0.8 Mt	Achieved then partly reversed	**Thermal exclusion = qualified positive; met-coal reopening = decision-usefulness concern (A-18)**
P4-4 **(corrected rev 2)**	MAM managed assets net zero	—	2040	Controlled/influenced assets, investee S1-2	Committed FY2021; retained. FY2026 metric = **NZIF asset alignment, 68% (Real Assets) / 66% (Real Estate) of in-scope holdings against 100% by 2030, from a 0% 2019 baseline re-validated in 2025** ~~% AUM with goal metric (20%/14%)~~	Maintained; measured on investee behaviour, not on tonnes	**Credited as a qualified positive (F-4): but unweighted by emissions, scoped to 92% / 64% of two AUM pools, and unvalidated by any third party**
P4-8 * (added rev 2)*	MAM 2030 asset-alignment target: fixed income and listed equities	—	2030	MAM FI + listed equities	**Removed in FY2026** following the December 2025 sale of MAM's North American and European public investments business to Nomura (p.88)	Retired	**Reason disclosed (divestment) → acceptable in principle, but progress at removal is not stated (A-18); narrows coverage (F-11)**
P4-9 * (added rev 2)*	MAM 2030 engagement-threshold target: fixed income, listed equities **and real estate**	—	2030	MAM FI, LE and real estate	**Removed in FY2026** in the same review (p.88)	Retired	**The real-estate leg is not explained by the divestment: that business was retained. Decision-usefulness / claim-quality concern (A-18, F-11)**
P4-5	Own-operations net zero S1&2	FY2020	FY2025	Own ops S1-2 (excl. OSS)	"on track" (FY23) → "progressing" (FY24) → "achieved" (FY25) → maintained (FY26)	Met via 100% renewable + offset residual S1	Instrument/offset-based (YOY-08)
P4-6	Oil/gas upstream intensity	FY2020	2030	Upstream oil/gas, S1-3	61.9→62.3→62.0 gCO_2e/MJ; baseline restated once	Above 2030 target 56.3–59.6; broadly flat	Intensity-only; does not cap absolute (T-14)
P4-7	Resi-mortgage intensity	FY2021	2030	AU homeowner mortgages, S1-2	38.7→34.1→33.2→32.6 $kgCO_2e/m^2$	On-track on intensity	Largely BAU (grid factor, YOY-03); absolute rose

P.5 Cross-report-type consistency over time (YOY-07 / DR-02): *does divergence between report types appear, widen or resolve across periods?*

#	CLAIM / METRIC	REPORT TYPES COMPARED	PER-PERIOD DIVERGENCE (AFTER NORMALISATION)	TREND IN DIVERGENCE	AUDITED-SOURCE PREFERENCE APPLIED (A-01B)	LABEL
~~P5-1~~ **WITHDRAWN (rev 2)**	Gross Scope 1	Voluntary sustainability reports (FY20–FY25) vs FY2026 AASB S2 statements	~~10× gap on the same years (FY20 477 vs 4,714; FY25 482 vs 5,185)~~ **No gap.** The FY2026 figures are 471 and 518: the trailing digits were footnote superscripts 4 and 5 concatenated by the PDF text layer (cf. "29,2136" = 29,213[6] on the same row and "55,2749" = 55,274[9] on the next page)	No divergence	FY26 AR preferred; restatements are −1.3% and +7.5% with stated causes	**Withdrawn: extraction artefact, not a source divergence. Only the FY25→FY26 movement driver remains cannot-verify (A-05, F-20)**
P5-4 *(added rev 2)*	Scope 3 Category 1 FY2025	FY2025 Sustainability Report + FY2025 Basis of Preparation (both assured) vs FY2026 AASB S2 statements	164,983 vs **164,893**: 90 tCO_2e, unfootnoted	New in the first mandatory year	FY26 AR preferred as the audited source, but the change is unexplained	**Cross-source divergence (DR-02)**: F-16
P5-2	Renewable-electricity composition	Sustainability reports vs FY2026 AR	Split disclosed FY22–FY25; dropped FY26	New divergence (detail lost) FY2026	AR primary; prior split earns no credit	**Decision-usefulness concern (P3-2)**
P5-3	Financing net-zero framing	TCFD/NZ&CR (2050 alignment) vs FY2026 AR (three-pillar ambition)	2050-alignment pillar present earlier, absent FY26	Narrows across periods	AR primary	**Decision-usefulness / claim-quality concern (F-10)**

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)	Not met	For a diversified financier the material category is Scope 3 Category 15, and the disclosed part of it is the smaller part. On-balance-sheet lending and equity investments are covered comprehensively: **13.2 $MtCO_2e$ on $247.7bn of exposure at default**, sector by sector, with PCAF data-quality scores from 1.0 to 5.0 and limited assurance. Excluded and unquantified are **MAM's roughly $722bn of managed funds, all capital-markets facilitation and advisory, BFS Wealth, the trading book, sovereigns and cash and derivatives**, with no portfolio-coverage percentage and no total-loans-and-investments denominator. On the operational side **Category 7 (employee commuting) is not reported** ("reviewing methodology and data sources") and Categories 2, 4 and 8 are folded into Category 1. Macquarie states it "expects to disclose emissions associated with assets under management" once the transition relief lapses in FY2027 (p.64). **Not workable:** that is a commitment, not a figure, and no bounding estimate exists for either the managed book or the facilitated flow, so a carbon accountant cannot rule out a material exclusion and the magnitude is cannot-verify. OUT-STK-13's confirmability test fails and its rebuttal is not made.
A2	Carbon accounting	A single reconcilable footprint (no competing totals)	Pass	For the reported period there is one footprint and it reconciles on every table tested. The Scope 3 categories sum to the published operational total of 203,607; Scope 1 (430), Scope 2 location-based (18,953) and Scope 2 market-based (0) are each single figures with a single stated basis; the financed-emissions sector rows sum to 13.2 Mt against the disclosed $247.7bn exposure at default; and the FY2025 comparatives, as restated, tie internally (Scope 3 224,960). Both Scope 2 bases are disclosed, which is dual-basis reporting rather than competing totals. The one blemish is a **90 tCO_2e change to the FY2025 Category 1 comparative (164,983 → 164,893)**, which is 0.04% of that year's operational Scope 3 and both versions of which tie to their own totals: it is a restatement-discipline matter and is counted at A3 and G2, not as an unreconcilable footprint here.

ID	AUDIENCE	CRITERION	VERDICT	WHY
A3	Carbon accounting	Method, boundary and version transparency (incl. restatements disclosed)	Not met	The methodology disclosure is substantial (pp.92-99) and most restatements carry a stated cause: Scope 1 FY2020 restated 477 → 471 on new platform emission factors, FY2025 restated 482 → 518 from estimated to actual activity data, the market-based Scope 2 FY2020 baseline 29,767 → 29,213, and the Scope 3 FY2020 baseline to 211,900 under footnote 8 for an expanded Category 3 scope. What defeats the criterion is what happened in the mandatory year. **An assured prior-year comparative changed without a footnote:** Scope 3 Category 1 for FY2025 is 164,983 tCO_2e in the FY2025 Sustainability Report and in the PwC-assured FY2025 Basis of Preparation and **164,893** in the FY2026 statements, on a table where the Category 3 and Category 6 FY2025 restatements each carry one (footnotes 8 and 9). **A method was downgraded without a like-for-like restatement:** commercial real estate moved from property-level emissions and energy data to economic-intensity estimation "due to data limitations" (p.98), with the PCAF data-quality score falling **3.9** → **5.0**, the weakest band, and no restatement of the prior year on the new basis and no quantification of the effect. **And three quantifications were withdrawn:** the bundled-versus-unbundled renewable split (unbundled share 57% → 46.2% across FY2022 to FY2025), electricity consumption (42.6 GWh) and total energy (159 TJ) after an explicit FY2025 promise to re-baseline them in FY2026, and the FY2025 target-coverage figures. **Not workable:** no disclosed cell permits a reader to rebuild the commercial-real-estate prior year on the new method, to restore the energy denominators, or to determine which of the two Category 1 comparatives is correct.
A4	Carbon accounting	Granularity and assurance sufficient to lift into a third party's inventory	Partial	The financed table is the most liftable part: absolute emissions by sector with exposure at default and a PCAF data-quality score for each, plus the customer scopes included (Scope 1, 2 and, for oil and gas and coal, Category 11). The operational inventory gives Scope 1, Scope 2 on both bases, and Categories 1, 3, 5 and 6 as separate figures with a three-year series. **Workable:** the accountant lifts those figures and treats Category 1 as a bundle covering Categories 1, 2, 4 and 8, which p.93 defines expressly, so the bundle's contents are known even though its components are not. Assurance depth is not scored (OUT-STK-03); recorded as an improvement note, every climate metric carries limited assurance only and Macquarie states it obtains no third-party validation of its targets or methodologies. The residuals are that the folded categories cannot be split and Category 7 is absent, which is counted at A1.
I1	Institutional investors	Physical risk disclosed and financially linked or quantified (N-04)	Partial	Physical risk is quantified in dollars against a disclosed denominator. **Workable:** the investor takes the disclosed vulnerable-asset figures and coverage percentages and forms its own exposure view: **$A2.3-7.4bn of $A248.4bn of home loans and business lending (1-3%) physically vulnerable on 77% population coverage**, using third-party property-level annual-expected-damage-cost data under a high-warming scenario (p.90), and **$A21.5bn of $A354.9bn (6%) transition-vulnerable on 99% coverage** (p.89). The method and the scenarios are named and interrogable. It is a partial rather than a pass for two stated reasons: the metric is expressly "not a forecast of expected credit losses, probability of default or value-at-risk", so no expected-loss figure exists; and the assessment covers the Australian banking and financial services population, with the market-facing businesses acknowledged to be at an early stage of methodology development. Assessed for relevance and methodology transparency only, not modelling quality.
I2	Institutional investors	Transition risk: target credibility, absolute caps or visible / derivable headroom	Partial	There is no absolute cap, and the position that follows is derivable and unflattering. Both financed targets are intensity measures: upstream oil and gas at **62.0 gCO_2e/MJ against a 2030 range of 56.3-59.6**, and residential mortgages at **32.6 $kgCO_2e/m^2$ against 11.6-19.3**. An intensity target does not cap absolute emissions, and absolute financed emissions rose about **16% (11.4 → 13.2 Mt)** as exposure at default grew 14.5%. **Workable:** the investor bounds the targeted share from published cells, taking oil and gas total (6.2 Mt) plus real estate total (1.2 Mt) as an upper limit of 7.4 Mt against 13.2 Mt, and knowing that only the upstream leg and the residential leg are actually targeted, so the true covered share is materially below 56%. That derivation is the answer the disclosure no longer states: the FY2025 quantification ("around 80% of its dollar exposures to carbon-intensive sectors, and nearly two-thirds of... absolute financed emissions from carbon-intensive sectors") has no FY2026 equivalent, and its removal is counted at A3. The residual is that no third-party validation of any target or methodology exists, on Macquarie's own statement.
I3	Institutional investors	Target achievement: met with real reductions, progress stated honestly	Not met	The only target reported achieved was met with instruments, and the disclosed progress on the financed targets is business-as-usual or not like-for-like. **Own-operations net zero (FY2025)** rests on market-based Scope 2 at zero through 100% renewable electricity, roughly 46% of it unbundled certificates on the last disclosed split, plus **430 retired biochar removal credits** against a 430 tCO_2e gross Scope 1, an equality p.80 expressly prescribes. **Residential mortgages:** intensity fell 16% against baseline and Macquarie attributes the pathway itself to the grid, in terms: "the rate of reduction has been slower than our reference scenario pathway... primarily due to the slower-than-projected pace of decarbonisation of Australia's electricity grid" (p.85); absolute sector emissions rose 0.7 → 0.8 Mt. **Upstream oil and gas:** intensity eased 62.3 → 62.0 gCO_2e/MJ while absolute sector emissions rose 5.3 → 6.2 Mt, and the metric is not like-for-like, because "Exposure includes both pre-production and production upstream oil/gas producers. Pre-production producers are excluded from reported emissions" (fn 14, p.82; p.97), so the intensity is flattered by whatever pre-production exposure sits in the $2.4bn. **Not workable:** no reader action converts a certificate-and-credit position into a real reduction, and none supplies the pre-production emissions the metric omits from a denominator that includes their exposure.
I4	Institutional investors	Portfolio / financed-emissions exposure completeness	Not met	The disclosed portfolio is not the portfolio. The 13.2 Mt figure covers **on-balance-sheet lending and equity investments only**; MAM's roughly **$722bn of managed assets** and **all capital-markets facilitation and advisory** are excluded and unquantified, along with BFS Wealth, the trading book, sovereigns, and cash and derivatives. No coverage percentage against total loans and investments is given, and the FY2025 figures that would have supplied one were dropped. For an entity that is a bank, a $722bn global asset manager and a capital-markets house, the excluded layer is the larger part of the climate-relevant activity. **Not workable:** no bounding estimate is offered for either excluded layer; the FY2027 commitment to disclose managed-asset emissions is a commitment without a figure, method or coverage, and no equivalent commitment is made for facilitated emissions at all. Magnitude is cannot-verify.
I5	Institutional investors	Flow-through / look-through exposure raised and quantified	Partial	Raised, and partly measured on a behavioural rather than an emissions basis. MAM's NZIF disclosure gives, for in-scope Real Assets and Real Estate holdings, the share **aligning or aligned (68% and 66%)** against a 100%-by-2030 target from a 2019 baseline of 0% that MAM re-validated in 2025, the share "Committed to aligning" (20% and 14%) and the share with **no long-term net-zero goal (12% and 20%)**, with the in-scope denominators itemised (92% of Real Assets AUM, the 8% residual split 6% undeployed and 2% fiduciary-constrained; 64% of Real Estate AUM, split 3% / 17% / 16% by influence band). On the lending side, investee Scope 3 Category 11 is inside the oil and gas and coal financed figures. **Workable:** the investor takes those bands and denominators and computes the exposure carrying no net-zero goal at all, both inside the in-scope population and outside it. The residuals, recorded rather than treated as the defeat, are that the bands count **holdings, not tonnes**, are unweighted by emissions, cover investee Scope 1 and 2 only, and reach only two of MAM's asset classes; and that no holding weights or investee target headroom are given, so the inherited emissions-growth exposure cannot be sized (cannot-verify).

ID	AUDIENCE	CRITERION	VERDICT	WHY
I6	Institutional investors	Reconstructability by a sophisticated reader	Partial	The disclosed position is genuinely reconstructable, and this review rebuilt it. **Workable:** the investor reads the financed-emissions table at p.82 (sector, absolute emissions, exposure at default, data-quality score), the target table at p.83 (baseline, current, 2030 range for each intensity metric), the operational tables at pp.80-81 with their restatement footnotes, and the NZIF bands at pp.86-88, and can rebuild the whole disclosed footprint, its year-on-year movement and the bound on target coverage. The residuals are the excluded layers, which cannot be rebuilt at all (counted at I4), and the three FY2025 quantifications withdrawn in FY2026, which made the reconstruction harder this year than last (counted at A3): without the GWh and TJ denominators the location-based Scope 2 fall of 15% cannot be decomposed into consumption change and grid-factor change.
R1	Retail investors	Headline-to-evidence match without cross-document reconstruction	Partial	The headlines are scoped on their face and the corrective figures sit in the same document. Own-operations net zero is stated as Scope 1 and 2 only; the financed targets are stated as intensity measures for two named sectors; no group net-zero-financing claim is made. **Workable:** the retail reader reads the absolute financed-emissions table at p.82, which prints 13.2 Mt against the prior year's 11.4 Mt, beside the intensity target table at p.83, and sees that the absolute footprint grew while the ratios eased; the exclusions are listed at p.95 and the FY2027 intention at p.64. No second document is needed. The residual is that the ambition statement at p.69 ("continuing to reduce the intensity of our financed emissions") carries no absolute figure beside it, so the reader has to turn thirteen pages inside a 345-page report to find the correction.
R2	Retail investors	Targets cover the material sources; achievement stated honestly	Not met	Most of the disclosed footprint carries no target, and the figure that would have told a reader how much was withdrawn. Only **upstream oil and gas and residential mortgages** are targeted. Untargeted: **transport at 2.2 Mt**, the second-largest source; **power at 0.9 Mt**; **metallurgical coal at 0.8 Mt**, re-entered from zero in FY2025 with an appetite that now permits mine expansion; commercial real estate; and agriculture, manufacturing and the other sectors. The oil and gas total is 6.2 Mt of which only the upstream leg is targeted, and the mortgage target reaches investee Scope 1 and 2 only. Above all of that sit the excluded $722bn managed book and the facilitation flow, which no target touches. On honesty, two MAM 2030 targets were **removed inside the reporting year** and the removal of the real-estate engagement-threshold target is not explained by the divestment that explains the other, because that business was retained. **Not workable:** no reader action supplies a target that does not exist, and the coverage quantification that would at least have sized the gap has no FY2026 equivalent.
R3	Retail investors	Material risks are legible	Partial	A non-specialist can see where the emissions are. The sector table prints oil and gas at 6.2 Mt as the largest single source with transport, real estate, power and coal beneath it; the disclosure states in terms that the figure covers on-balance-sheet lending and equity only; and physical and transition risk are given with named scenarios, quantified vulnerable-asset shares and stated limitations. **Workable:** the reader takes the sector table and the exclusions list and can see both the shape of the disclosed footprint and that a larger part of the business sits outside it. The residuals are density (the Climate Statements run pp.65-99 inside a 345-page report, and the "no material financial effects" and "no change to strategy" conclusions are easy to pass over) and the p.72 statement that climate has had no effect on decision-making, which the same document contradicts; that contradiction is counted at G2.
R4	Retail investors	Caveats findable, understandable and fairly presented	Partial	The load-bearing caveats are stated rather than implied: the own-operations boundary is in the claim's own words; the financed-emissions exclusions are listed at p.95; the one-year data lag is disclosed; the pre-production exclusion is footnoted at the metric (fn 14, p.82) and repeated in the methodology (p.97); and the absence of third-party validation is stated in terms. **Workable:** the reader meets footnote 14 at the oil and gas metric itself and the exclusions list beside the financed table, which is where each caveat is needed. The residual is a fair-presentation one: the pre-production caveat qualifies a number printed beside the exposure it does not cover (counted at I3), and the "100% renewable" claim now carries less qualification than it did in FY2025, because the roughly 46% unbundled share was disclosed then and is not disclosed now (counted at A3).
P1	Consumers & public	Public claims literally true within their implied boundary	Pass	Nothing here over-claims, and the wording is doing the work rather than a footnote. "Maintain a net zero emissions position across Scope 1 and Scope 2 **for our own business operations**" names its boundary inside the claim. "Sourced **the equivalent of** 100% renewable electricity" states on its face that this is a matching claim rather than physical supply, which is the formulation that avoids the enablement-versus-use ambiguity. "Continuing to reduce the intensity of our financed emissions in accordance with existing targets" is accurate: both intensity metrics eased. **No group net-zero-financing claim is made and no carbon-neutral certification is claimed**, so there is no whole-of-business assertion for the implied boundary to exceed. Each claim is true within the boundary its words imply. What the claims do not say, and what they leave a reader to infer, is dealt with at P2.
P2	Consumers & public	No greenwashing or misleading composite impression	Not met	The claims are individually true and the impression they leave together is not supported. "Net zero for our own business operations", "the equivalent of 100% renewable electricity" and "reducing the intensity of our financed emissions" read to a non-expert as a bank that is decarbonising. On Macquarie's own figures, **absolute financed emissions rose about 16%** (11.4 → 13.2 Mt); the **$722bn managed book and all capital-markets facilitation are not quantified at all**, so the number that grew is not even the whole footprint; the **metallurgical-coal appetite was reopened to permit mine expansion** and the book re-entered at 0.8 Mt after a whole-of-coal run-off was achieved at the end of 2024; the mortgage-intensity progress is attributed by Macquarie itself to the electricity grid; and the own-operations position rests on retired credits and roughly half unbundled certificates. This audience has the lowest caveat tolerance, and the caveats that reconcile the impression are spread across a 345-page statutory report. Stated as a claim-quality and misleading-risk concern; no allegation of misconduct is made.
P3	Consumers & public	Genuine climate action visible versus inaction	Partial	Two things here constrain decisions rather than describe them. The **thermal-coal exclusion** is categorical and forward-looking: $A0 exposure at default with a stated no-appetite policy for financing thermal-coal purchase, operation, development or expansion beyond twelve months. And **MAM's 2030 NZIF asset-alignment target** is measured on investee behaviour, not on MAM's own disclosure: "Aligning" requires the investee to hold science-based net-zero targets, governance and emissions disclosure, and "Aligned" additionally requires a decarbonisation plan and forecast performance at least equal to a net-zero pathway, against a 2019 baseline of 0% that MAM re-validated in 2025, with progress at 68% and 66% of in-scope holdings. **Workable:** the public reader can see both, stated plainly, with the exposure figure and the progress percentages attached. The residuals are that the same coal policy was **loosened** for metallurgical coal to permit mine expansion; that the alignment bands count holdings rather than tonnes and reach two asset classes; and that the financing-side commitment set narrowed inside the mandatory year. The exit from coal is not itself credited; only the forward constraint is.

ID	AUDIENCE	CRITERION	VERDICT	WHY
G1	Regulators	Standards compliance / readiness (AASB S2, Ch 2M, GHG Protocol)	Partial	The first mandatory year is met substantively. The Climate Statements are stated to be "prepared in accordance with AASB S2" and run pp.65-99, with governance, strategy, risk management, metrics and targets all addressed; **transition relief is applied and disclosed** (Scope 3 disclosed voluntarily in FY2026, mandatory from FY2027); scenario analysis is performed under named NGFS 1.5°C and 3°C scenarios and benchmarked against capital adequacy; the **cross-industry vulnerable-asset metrics are disclosed and quantified with coverage percentages**; and there are two PwC engagements, a statutory review and a separate limited-assurance engagement, reporting at pp.101-106. Macquarie is not an NGER controlling corporation, so no statutory Scope 1 and 2 anchor exists to test against, and its operational Scope 1 and 2 is immaterial to the financed footprint in any event. **Workable:** the regulator reads the Climate Statements against AASB S2's own structure and the two assurance reports to see exactly what has been tested and to what level. The residuals are that the PCAF portfolio-coverage percentage and denominator are omitted, facilitated emissions are omitted, no target or methodology carries third-party validation, quantitative anticipated financial effects are not disclosed (with a stated reason), and ASIC RG 280 is not addressed head-on.
G2	Regulators	Cross-source / audience consistency	Not met	The most serious item is inside the statutory statement itself. **p.72** states that the identified climate-related risks and opportunities "**have not resulted in any current or anticipated effects** to Macquarie's business model, resource allocation, strategy or related decision-making processes". The same document then describes climate entering exactly those processes: **p.69**, "implemented sector-specific risk appetite settings and review processes"; **p.77**, escalated transactions "are assessed for material environmental and social impacts... This includes considering impacts on Macquarie's financed emissions targets", and for in-scope upstream oil and gas deals "the analysis considers whether the financed emissions from a given deal will keep our portfolio aligned with the required emissions reduction pathway"; and **p.83**, the coal appetite changed in FY2025 to permit metallurgical-coal mine expansion. The two cannot both be read literally and the disclosure never reconciles them. Alongside it: an **assured FY2025 comparative changed without a footnote** (Category 1, 164,983 → 164,893) on a table that footnotes its other two restatements; and **three FY2025 quantifications withdrawn** in the year the reporting became statutory (target coverage, energy use, and the property-level commercial-real-estate method). **Not workable:** a reader cannot tell which of the two statements governs, and no other source resolves it, Macquarie being absent from the NGER register.