DECISION USEFUL DIAGNOSIS 002 — FY2026

National Australia Bank Limited (NAB: ASX)

Improved to not decision-useful for four of five audiences, because the annual report and data pack agree on every shared figure, while eight sector targets became goals, leaving a quarter of financed emissions targeted

REPORTING PERIOD	REVIEW DATE	PROTOCOL	SECTOR
Year ended 30 September 2026	9 November 2026	Climate Disclosure Review Rules v15.23	Financial and Insurance Services

6 / 15 overall score · sum of the five audience ratings, for ranking



This review tests NAB'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
National Australia Bank Limited (NAB: ASX)	1	1	1	1	2

How to read this report

HOW TO READ THE RATINGS

Each audience gets its own rating.

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

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

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

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

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



6 / 15
overall score · for ranking only

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

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

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

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1. Scope & basis

1.1 What we reviewed

DOCUMENT	REVIEWED?	IF MISSING, EFFECT ON THIS REVIEW
2026 Annual Report, including the Climate-related Disclosures (folios 43 to 108, prepared under AASB S2), the directors' declaration (folio 108) and EY's independent auditor's report (folios 109 to 117)	Yes	The audited statutory disclosure and the primary evidence anchor. Its Strategic Overview (folios 3 and 17), Sustainability Disclosures and audited Remuneration Report (folios 169 to 208) were also read.
2026 Sustainability Data Pack (Indicators & Emissions, Energy, Exposures, Financing sheets)	Yes	Supporting source for the operational inventory, offsets, energy and exposure series.
FY2025 Climate Report, FY2025 Sustainability Data Pack and the 2020 to 2025 annual reports and data packs	Yes: as prior-period context	Used only for the year-over-year read (§3.4). No figure for FY2026 is taken from them.
Climate Active Public Disclosure Statements, FY2019-20 to FY2024–25	Yes: as prior-period context	Certification history. The latest is NAB's statement for 1 July 2024 to 30 June 2025, signed 6 October 2026. The Climate Active register, checked on 9 November 2026, shows NAB as "no longer certified" and lists FY2024 as the latest statement.

DOCUMENT	REVIEWED?	IF MISSING, EFFECT ON THIS REVIEW
Supplementary Climate Disclosures (published with the 2023 Climate Report)	Yes: as prior-period context	Earlier sector-target material; not relied on for any FY2026 figure.
BNZ Climate Statements (New Zealand)	Not provided	NAB's financed-emissions figures exclude BNZ, which reports separately under the New Zealand climate standards. The New Zealand share of the Group's financed emissions is therefore not in this review and is recorded as cannot verify (§4.3).
Certificate and offset registry retirement records for FY2026	Not provided	The retirement volume is within EY's limited-assurance subject matter; serial-level records and credit quality remain cannot verify.

The 2026 Annual Report is the anchor. The data pack agrees with it on every figure the two share (§5.3).

1.2 Standards the company is held to or references

STANDARD / FRAMEWORK	REFERENCED BY COMPANY?	HOW STRONGLY	SECTOR MODULE(S) APPLIED
Corporations Act / Ch 2M	Yes	Binding: mandatory, first reporting period under Chapter 2M; directors' declaration given under section 296A	Not applicable
AASB S2	Yes	In accordance with: "prepared in accordance with", strict. Two first-year reliefs taken: Scope 3 not disclosed under the standard (paragraph C4(b)) and comparatives not required (paragraph C3)	Not applicable
ASIC RG 280	No: not expressly referenced	Not referenced: applies to the statement as a regulatory guide on sustainability reporting	Not applicable
GHG Protocol (Corporate / Scope 2 / Scope 3)	Yes	In accordance with: Scope 1 and 2 measured "in accordance with" the Corporate Standard (2004) on operational control; voluntary Scope 3 "with reference to" the Scope 3 Standard, looser	Not applicable
PCAF (financed emissions)	Yes	With reference to: "methodologies aligned with the PCAF Standard"; NAB states reporting "may not fully align with PCAF guidelines where data and/or methodology limitations exist". EY's criteria name PCAF Part A (2022) and Part B (2023)	FI / PCAF
SBTi	Yes: reference pathways	With reference to: the operational target is "aligned to a Science Based targets initiative (SBTi) 1.5°C pathway", set with SBTi V1; NAB states its targets and goals have not been validated by a third party unless stated. Three real-estate goals use SBTi Buildings (Australia) pathways	Not applicable
Climate Active / other carbon-neutral framework	No: FY2026	Not referenced: not in the 2026 Annual Report or data pack. The data pack still reports "Net carbon emissions" of zero for the operational boundary, now a self-declared position	Not applicable
Certificates (GreenPower / LGC / ACCU / REC)	Yes	With reference to: renewable energy certificates, power purchase agreements, NZECS and international certificates relied on for the 100% renewable electricity position	Not applicable
Other (company-referenced): IEA NZE 2050, IAI GHG 2050, IPR 1.5°C RPS, ATAG Waypoint 2050, Poseidon Principles; Climate Bonds Standard; NGER Act; UK SECR	Yes	With reference to: sector reference pathways; eligibility criteria for environmental finance; NGER compliance statement; UK SECR voluntary	Not applicable

Module applicability: NAB is a bank disclosing financed and facilitated emissions, so the financial-institution module, the financed-emissions target-headroom benchmark and the portfolio-composition test are applied. The investment look-through module is not triggered (no holdings data). The year-over-year module is applied (seven reporting periods and four report types). NoCO2 clause-level mapping is applied (§6.1).

1.3 Review basis & limitations

A full evidence-led review of NAB's first mandatory climate statement, with the financial-institution module, a physical-risk overlay and a year-over-year read against the FY2025 Climate Report and earlier periods. Three things bound the conclusions. The financed-emissions figures are one year in arrears and exclude BNZ, so the Group's full financed position, including the New Zealand dairy and drystock book, cannot be assembled from the documents reviewed. NAB changed its operational reporting year from June to September and rebased its operational target baseline accordingly without republishing the baseline's Scope 1 and Scope 2 split, so the Scope 1 movement against the baseline is stated on the last published split. And serial-level offset and certificate records were not provided. The detailed working is in the annexes.

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2. Verdict

2.1 Decision-usefulness by audience

Across the five audiences the disclosure meets **9 of the 19 load-bearing criteria**, partly meets **3**, and does not meet **7**. The per-audience split is in the Criteria column below; the full criterion-by-criterion enumeration, with the basis for each verdict, is at Annex L.

1	**Carbon / supply-chain emissions accounting** 3 met · 0 partial · 1 not met	The figures that are published are clean and liftable: Scope 1 and both Scope 2 bases are audited to reasonable assurance, seven operational Scope 3 categories are itemised with every restatement explained, and the operational totals reconcile across the annual report and data pack. What cannot be lifted is a complete inventory. Category 1 is "limited to emissions associated with paper, water and cloud services. All other goods and services are excluded in 2026", a residual NAB's FY2025 Climate Report described as material, and capital goods are excluded; neither is bounded. `§3.1, §3.2, Annex B`
1	**Institutional investors** 2 met · 2 partial · 2 not met	Physical and transition risk are sized (vulnerability metrics in dollars and shares of exposure), and the headroom in every sector target and goal is printed. Two things defeat this row. **The operational target's 69% is market-based:** the Scope 2 component is zero through contractual instruments while Scope 1, at 7,288 tCO_2e, is above its 2022 level of 6,619 and above the whole 2030 target level of about 6,680 for Scopes 1 and 2 together. **Customer Scope 3 enters only the thermal coal, oil and gas and metallurgical coal boundaries**, so the emissions NAB inherits from the companies it finances are neither captured nor bounded anywhere else. `§3.2, §3.3, §3.4, §4`

1 Consumer / retail investors

1 met · 0 partial · 3 not met

The climate headline a shareholder meets on the "2026 at a glance" page is "Climate action: $34.7bn cumulative towards $80bn by 2030". The largest part of it, $13.1bn, is mortgage lending on homes built since October 2023 to a 7-star energy rating, which is the minimum the building code requires of new homes; that basis is stated only in the methodology appendix. Eight of twelve sector decarbonisation targets were relabelled as goals, which NAB defines as dependent "largely on factors outside NAB's direct control", so **only 25.8% of financed emissions now sits under a target**, and agriculture, the largest single sector at 29.4%, has neither. NAB's FY2025 statement that its "climate ambition is to achieve net zero across our financed and facilitated emissions as well as our operations by 2050" does not appear in the 2026 report, and the change is not addressed.

§3.2, §4.2, §3.4

1 Consumers & public

2 met · 0 partial · 1 not met

Each statement NAB makes is accurate within its own terms, and there is real action to see: no lending to thermal coal mining, oil and gas extraction exposure down 42% in a year, and more than four in five dollars of power-generation lending going to renewables. The impression the report leaves is that NAB's climate position held steady ("We have maintained our climate-related risk and policy settings ... while preserving our direction and strategy"). Absent from that impression: the bank's own net zero ambition is no longer stated, two-thirds of its sector commitments were downgraded to goals, and the 69% operational reduction is certificates while direct emissions are higher than in 2022.

§4.2, §5

2 Regulators

1 met · 1 partial · 0 not met

A complete first mandatory statement: all four pillars, both reliefs declared, a directors' declaration, reasonable assurance over Scope 1 and 2, and every figure shared by the annual report and data pack agreeing. The one open standards question is executive pay: NAB says the share of executive remuneration linked to climate "is not separately quantifiable", where the standard asks for a percentage. The row cannot reach the top band while four other audiences sit at 1.

§2.3, §5.3, Annex L

What the company should fix first: state plainly whether NAB still holds a net zero commitment for its own financed emissions and operations, and if it does, say which targets carry it after the relabelling; then set a target or goal over agriculture, the largest single source in the financed book.

2.2 Scorecard

Headline claim ↔ evidence match	●●○○○	Disclosure quality	6 / 15
Inventory completeness (Scope 1/2/3)	●●○○○	Financed-emissions completeness (if FI)	●●●○○
Target credibility	●●○○○	Real reduction vs accounting movement	●●○○○
Offset / certificate / renewable integrity	*N-V*	Assurance coverage vs claim	●●●○○
Standards / compliance confidence	*Broadly compliant; one open question*	Comparability (like-for-like only)	●●○○○
Reader accessibility	●●○○○	Evidence limitations	*Moderate*

DIMENSION	RATING	JUSTIFICATION
Headline claim ↔ evidence match	2/5	The FY2026 climate headline is "$34.7bn cumulative towards $80bn by 2030 environmental finance ambition", labelled "Climate action". Its largest component counts new-home mortgages that meet the building-code minimum. "More than four in every five dollars that we lend to power generation goes to renewables" is accurate (82.3% of power-generation exposure). The operational 69% carries a co-located note that the Scope 2 component rests on contractual instruments.
Disclosure quality	6 / 15 overall	First AASB S2 statement is complete in structure; methodology appendix is detailed. The FY2025 net zero ambition and the five-year emissions table are not carried forward, without comment.
Inventory completeness (Scope 1/2/3)	2/5	Scope 1, both Scope 2 bases and seven operational Scope 3 categories reported. Category 1 is limited to paper, water and cloud; capital goods excluded; neither bounded.
Financed-emissions completeness (if FI)	3/5	17.1 $MtCO_2e$ across the lending book (excluding BNZ, JBWere, derivatives, sovereigns, financial institutions and facilitated emissions), with exposure and emissions for every target, goal and excluded sector. Agriculture's methodology was corrected upward (5.0 Mt, 29.4%). The "Other" 2.0 Mt is still estimated by extrapolating from the mortgage book. Customer Scope 3 flows through in three sectors only.
Target credibility	1–2/5	Four targets remain: power is a flat line (0.14 → 0.14), oil and gas permits about +213% from the latest reading (0.8 → 2.5 $MtCO_2e$), iron and steel permits about four times the latest reading (1.2 → 4.8), and only thermal coal requires a fall to zero. Eight sectors were relabelled goals. The oil and gas commitment moved from reducing exposure to reducing a cap that sits at about four times actual exposure.
Real reduction vs accounting movement	2/5	The 69% is market-based; Scope 1 is above its 2022 level; the 2026 fall in Scope 1 is a refrigerant reporting change while fleet fuel rose 10%. Location-based Scope 2 fell 6.6% with electricity use down 5.5%. Most sector-level falls are attributed by NAB itself to data and model changes or grid factors.
Offset / certificate / renewable integrity	N-V	96,473 offsets reported as retired, 96% avoidance credits; the data-pack footnote describes them as retired "in advance for the 2027 financial year", so which retirement covers 2026 is not stated. Serial-level records not provided.
Assurance coverage vs claim	3/5	Reasonable assurance over Scope 1 and 2; limited assurance over financed and facilitated emissions, coverage ratios, environmental finance, operational Scope 3, offsets and the operational target; limited review of governance and risks and opportunities.
Standards / compliance confidence	Broadly compliant; one open question	First mandatory year; reliefs properly declared; the remuneration percentage is answered with "not separately quantifiable".
Comparability (like-for-like only)	2/5	Three breaks in one year: the operational year moved from June to September, the operational baseline was rebased, and the agriculture method change lifted total financed emissions without a restated prior year. Each is disclosed.
Reader accessibility	2/5	The relabelling is stated prominently; the eligibility basis of the climate headline, the BNZ exclusion and the Scope 1 trend need the methodology appendix or prior reports.

DIMENSION	RATING	JUSTIFICATION
Evidence limitations	Moderate	BNZ Climate Statements and registry records not provided; baseline split not republished.

2.3 Standards & compliance snapshot

AREA	RATING	BASIS
Corporations Act / Ch 2M	Appears broadly compliant: minor limitations	First mandatory period. Directors' declaration under section 296A; EY audit opinion on Scope 1 and 2 and review conclusion on governance and on risks and opportunities, both unmodified.
AASB S2	Appears broadly compliant: minor limitations	All four pillars; Scope 3 and comparative reliefs declared; vulnerability and capital-deployment metrics given; internal carbon price disclosed ($24.85 per tonne). Open point: the percentage of executive remuneration linked to climate is stated as "not separately quantifiable".
ASIC RG 280	No apparent issue	Reliefs, judgements and measurement uncertainties are set out at the front of the statement.
GHG Protocol / Scope 2 / Scope 3	Appears broadly compliant: minor limitations	Scope 1 and 2 on operational control with both Scope 2 bases. Operational Scope 3 is voluntary and expressly "does not represent a complete Scope 3 GHG emissions inventory"; the residual purchased goods and services and capital goods remain outside it.
PCAF / financed emissions	Appears broadly compliant: minor limitations	Asset-class methods and data-quality scores stated by sector; NAB itself notes reporting may not fully align with PCAF where data is limited; customer Scope 3 included for three sectors only; BNZ outside the figures.
Carbon-neutral / net-zero framework	Cannot verify: material evidence missing	No longer Climate Active certified (register checked 9 November 2026); operational "net carbon emissions" of zero is self-declared, on a defined boundary, with offsets described as retired in advance for the following year. No NAB net zero commitment is stated in the 2026 report.
Certificates / credits	Cannot verify: evidence not provided	Renewable electricity sourcing split by instrument (54,822 MWh certificates, 14,961 MWh PPA, 1,228 MWh on-site solar, 452 MWh retail); serial-level retirement records not provided.
Other company-referenced framework (SBTi; NGER; Climate Bonds)	Appears broadly compliant: minor limitations	Operational target "aligned to" an SBTi 1.5°C pathway, not validated; EY's assurance appendix still titles the subject matter "Science-based Emissions Target". The Group states it complies with the NGER Act but publishes no NGER-basis figure in the 2026 report. Environmental finance eligibility "linked to" Climate Bonds criteria.

3. What this means for a reader

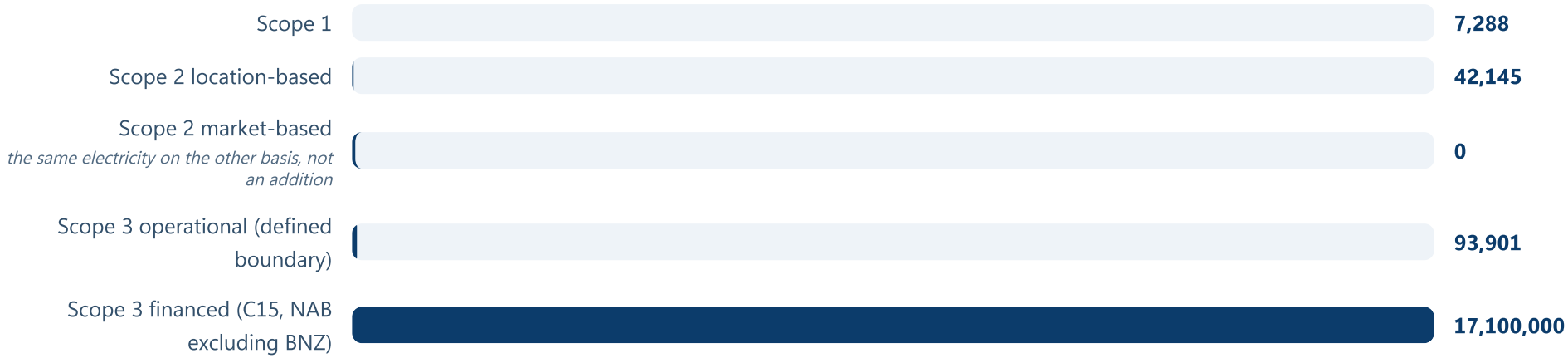
3.1 What is counted / not counted

Reporting basis: operational figures are for the year ended 30 September 2026 (Climate-related Disclosures folio 69), on operational control; financed and facilitated emissions are for 1 July 2024 to 30 June 2025, one year in arrears, which is NAB's own reporting basis for that metric and not a substitution. Every figure in this table is the reviewed year's figure on the basis stated for that row; where none exists the row says so, and no earlier year is substituted. Financed emissions of 17.1 $MtCO_2e$ are the dominant footprint and are broken out in §3.2. Prior-year figures are in §3.4 and Annex K.

Emissions composition

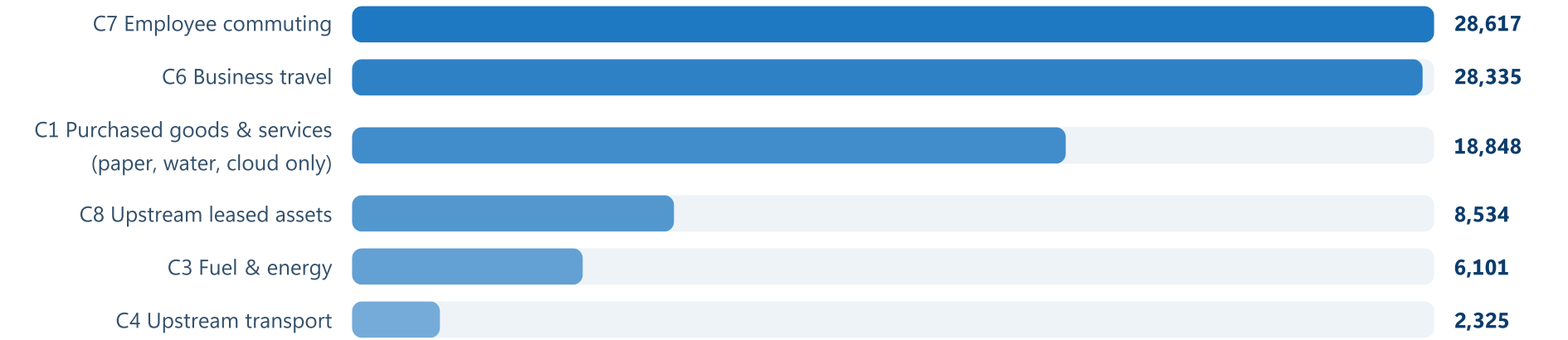
Values as reported (tCO_2e). Bars are independent magnitudes, not a stack. Scope 2 is shown on both bases: they measure the same electricity two ways and are alternatives, not additions, so they are never added together.

Source: 2026 Annual Report, Climate-related Disclosures folio 69 (Scope 1 and 2 audited, operational Scope 3 voluntary) and folio 86 Table 8 (financed emissions for 1 July 2024 to 30 June 2025, excluding BNZ, JBWere, derivatives, sovereigns and financial institutions). The two Scope 2 bars are the same electricity measured two ways and are never summed; market-based is nil through certificates and PPAs



Scope 3 by category (largest first)

Source: 2026 Annual Report, Climate-related Disclosures folio 69, operational Scope 3 by category, year to 30 September 2026. Category 1 is limited to paper, water and cloud services; category 2 is excluded. Financed emissions (C15) are in the composition chart and section 3.2



C5 Waste 1,142

What is counted

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

Source: 2026 Annual Report, Climate-related Disclosures folios 69, 71, 86 and 93; 2026 Sustainability Data Pack, Indicators & Emissions sheet

Scope 1: combustion / fugitive / fleet
7,288
REPORTED

Scope 2: electricity (location-based)
42,145
REPORTED

Scope 2: electricity (market-based)
(0)
SAME ELECTRICITY, MARKET-BASED MEASURE

Scope 3 C1 Purchased goods & services
18,848
PARTLY COUNTED

Scope 3 C2 Capital goods
EXCLUDED

Scope 3 C3 Fuel- & energy-related
6,101
REPORTED

Scope 3 C4 Upstream transport & distribution
2,325
REPORTED

Scope 3 C5 Waste
1,142
REPORTED

Scope 3 C6 Business travel
28,335
REPORTED

Scope 3 C7 Employee commuting
28,617
REPORTED

Scope 3 C8 Upstream leased assets
8,534
REPORTED

Scope 3 C9 Downstream transport & distribution
NOT RELEVANT

Scope 3 C10 Processing of sold products
NOT RELEVANT

Scope 3 C11 Use of sold products
NOT RELEVANT

Scope 3 C12 End-of-life of sold products
NOT RELEVANT

Scope 3 C13 Downstream leased assets
EXCLUDED

Scope 3 C14 Franchises
NOT RELEVANT

Scope 3 C15 Investments / financed & facilitated
17,100,000
PARTLY COUNTED

Reported / counted
Counted, but not additive: inside another line, or the same emissions on the other Scope 2 basis
Partly counted (a figure is given, the category is not complete)
Not counted (excluded or unquantified)
Not relevant or not applicable

SCOPE / CATEGORY	STATUS	QUANTIFIED (tCO_2E)	MATERIAL?	NOTE
Scope 1: combustion / fugitive / fleet	Reported	7,288	Yes	Stationary combustion 342, fugitive 1,479, mobile combustion 5,467. Audited to reasonable assurance.
Scope 2: electricity (location-based)	Reported	42,145	Yes	Includes co-location data centres, reclassified from Scope 3 this year. 71,463 MWh consumed. Not additive with the market-based row: same electricity, two measures.
Scope 2: electricity (market-based)	Reported	0	Yes	Zero because 100% of electricity is "sourced or matched" from renewable sources through certificates, PPAs and on-site solar. Same electricity as the row above; the cause of the gap is in §3.3.
Scope 3 C1 Purchased goods & services	Partial	18,848	Yes	"Limited to emissions associated with paper, water and cloud services. All other goods and services are excluded in 2026." Cloud services carry most of it after a supplier's method change. NAB's FY2025 Climate Report described the excluded residual as material; it is not bounded.
Scope 3 C2 Capital goods	Excluded	Not disclosed	Yes	"Not reported in 2026. The Group is reviewing this exclusion and plans to expand the reporting boundary for 2027." Unquantified.
Scope 3 C3 Fuel- & energy-related	Reported	6,101	Yes	Transmission and distribution losses and well-to-tank for diesel, gas and electricity.
Scope 3 C4 Upstream transport & distribution	Reported	2,325	Yes	Courier, freight and postage, Australia and New Zealand.
Scope 3 C5 Waste	Reported	1,142	Yes	Landfill and wastewater.
Scope 3 C6 Business travel	Reported	28,335	Yes	Air travel includes a radiative-forcing uplift; rental cars for personal leisure removed this year.
Scope 3 C7 Employee commuting	Reported	28,617	Yes	Commuting and working from home. Network staff now assumed to commute 60% of the week, from 100%; the 2025 comparative is not restated for it.
Scope 3 C8 Upstream leased assets	Reported	8,534	Yes	Base-building energy.
Scope 3 C9 Downstream transport & distribution	Not relevant	Not applicable	No	"Sells intangible products."
Scope 3 C10 Processing of sold products	Not relevant	Not applicable	No	As above.
Scope 3 C11 Use of sold products	Not relevant	Not applicable	No	Emissions from lending are captured under C15.
Scope 3 C12 End-of-life of sold products	Not relevant	Not applicable	No	As above.
Scope 3 C13 Downstream leased assets	Excluded	Not disclosed	No: stated	"An immaterial number of downstream leased assets ... leased or sub-leased to tenants, who have operational control." A stated, plausible exclusion.
Scope 3 C14 Franchises	Not relevant	Not applicable	No	No franchise business.
Scope 3 C15 Investments / financed & facilitated	Partial	17,100,000	Yes	Financed, 2025 data year. The dominant footprint, broken out in §3.2. Excludes BNZ, JBWere, derivatives, sovereigns and financial institutions; facilitated emissions are reported separately for three sectors. Outside the operational "net carbon emissions" position.

3.2 Financed-emissions detail (financial institutions)

Financed emissions 17.1 MtCO_2e for 1 July 2024 to 30 June 2025 (one year in arrears), across $754.5bn of exposure at default, plus facilitated emissions reported for power generation (0.6 Mt), thermal coal (0.0) and oil and gas (0.06), each a three-year rolling average. The figure excludes BNZ and JBWere, derivatives, sovereign and financial-institution exposures (Table 8, folio 86). It is outside the operational "net carbon emissions" position. Of the 17.1 Mt, **sector targets cover 25.8%** (4.4 Mt: power 11.4%, thermal coal 3.2%, oil and gas 4.2%, iron and steel 7.0%) and **1.0% of exposure**; sector **goals** cover a further 26.8% (4.7 Mt) and 59.7% of exposure, most of it the mortgage book; and **47.1% (8.1 Mt) is covered by neither**. The excluded book is agriculture 5.0 Mt (29.4%), "Other" 2.0 Mt (11.9%, estimated "by extrapolating the Scope 1 and 2 emissions per dollar of EAD from RRE"), other commercial real estate 0.8 Mt (4.7%) and heavy vehicles 0.2 Mt (1.1%). Agriculture rose from 1.5 Mt as reported in FY2025 because NAB corrected an attribution factor that had used farm capital "that included farms both with and without debt"; NAB states the increase "reflects a higher attribution factor rather than a significant change in underlying agricultural emissions". PCAF data-quality scores are published for every sector for both years (from 1.3 for oil and gas to 4.0 for the mortgage book).

SECTOR / ASSET CLASS	IN FINANCED INVENTORY?	CUSTOMER SCOPES INCLUDED	COVERED BY A SECTOR TARGET?	NOTE
Residential real estate (mortgages)	Yes	Scope 1 and 2	No: goal only, intensity 31.9 (2025) → 15.4 $kgCO_2e/m^2$ (2030)	Largest book ($411.5bn, 54.5% of exposure, 2.7 Mt, 15.6%). The fall from 32.0 is grid factors. NAB "does not intend to manage its goal by restricting lending" and says achievement depends on the government's 82% renewable target.
Commercial real estate, office and retail	Yes	Scope 1 and 2	No: goal only, intensity (office 52.2 → 29.6; retail 73.0 → 32.6 $kgCO_2e/m^2$)	The falls "largely attributable to enhancements in data quality" and building-level data, with a marginal grid-factor effect.
Power generation	Yes	Scope 1 and 2: only	Yes: target, intensity 0.14 (2025) → 0.14 (2030); baseline 0.17	Flat line for the second year. Financed 1.9 Mt (from 2.4) and facilitated 0.6 Mt (from 0.3); exposure $7.0bn.
Oil and gas	Yes	Scope 1, 2 and 3	Yes: target, absolute 0.8 (2025) → 2.5 Mt (2030); baseline 3.4	The target permits about +213% from the latest reading. NAB states that "where the portfolio remains aligned with the target, NAB may increase exposure to customers in this portfolio".
Thermal coal	Yes	Scope 1, 2 and 3: category 11	Yes: target, absolute 0.6 (2025) → 0.0 by 2030; baseline 4.9	The rise from 0.3 is one customer's data moving from estimated to reported; NAB says it "does not reflect a change in the customer's underlying emissions". Exposure $0.06bn.
Iron and steel (incl. metallurgical coal)	Yes	Scope 1 and 2: plus Scope 3 for metallurgical coal	Yes: target, absolute 1.2 (2025) → 4.8 Mt (2030); baseline 6.1	Rose from 0.9 on "higher exposures to certain customers and reductions in customer enterprise values". The target sits four times above the latest reading.
Aluminium	Yes	Scope 1 and 2	No: goal only, intensity 2.0 → 5.0 tCO_2e/t (upper bound)	Rose from 1.8 as exposure to smelters increased, which NAB describes as "consistent with this strategy".
Cement	Yes	Scope 1 and 2	No: goal only, intensity → 0.46 tCO_2e/t	Figures withheld for customer confidentiality; NAB states the portfolio is within 10% of the reference pathway.
Transport: road	Yes	Scope 1 and 2: tailpipe and charging	No: goal only, intensity 206.2 → 133.0 gCO_2/vkm	The fall from 212.8 "partially reflects a higher proportion of lower emissions vehicles captured through improved data". Above the pathway.
Transport: aviation	Yes	Scope 1 and 2	No: goal only, intensity 88.2 → 77.0 gCO_2e/pkm	Offsets permitted in this sector only; a facility removed from scope lowered intensity by about 2%.
Transport: shipping	Yes	Scope 1: only	No: goal only, alignment delta +4.4% → 0.0%	Moved from below the pathway (−1.6%) to above it (+4.4%) as exposure fell and modelled data replaced actual data. Calendar-year basis.
Agriculture	Yes	Not disclosed: not separately stated	No target: and no goal	**5.0 Mt, 29.4% of financed emissions, $48.5bn (6.4%) of exposure**: the largest single sector. Estimated top-down from national agriculture emissions; Very High nature impact and dependency in NAB's own assessment.
"Other" (residual)	Yes	Scope 1 and 2: extrapolated	No	$198.6bn (26.3% of exposure), 2.0 Mt (11.9%), estimated from the mortgage book's emissions per dollar.
BNZ (New Zealand) lending	No	Not applicable	No: not in these figures	BNZ "has its own climate strategy" and reports separately. The Group's New Zealand agriculture exposure is NZ$16.9bn, 44% dairy.
Facilitated (capital markets) emissions	Partly	Not disclosed: fossil sectors only	Partly: merged into the power, thermal coal and oil and gas targets	Three-year rolling average; NAB counts only deals where it is lead bookrunner.

SECTOR / ASSET CLASS	IN FINANCED INVENTORY?	CUSTOMER SCOPES INCLUDED	COVERED BY A SECTOR TARGET?	NOTE
Undrawn / committed exposure	Partly	Not applicable	No	Exposure at default includes off-balance-sheet guarantees and overdrafts but excludes undrawn committed mortgages.

3.3 Real reduction vs accounting movement

REPORTED CHANGE	DRIVER	REAL-WORLD REDUCTION?
Operational Scope 1 and 2 (market-based) "decreased by 69%" since 2022	**Certificates**: market-based Scope 2 is zero through contractual instruments; NAB states it "does not have a gross emissions reduction target for the Scope 2 (market-based) component" and "relies on contractual instruments".	**No**: not for the reduction as stated; decomposed, the whole fall is the Scope 2 certificate effect.
Scope 1 against the 2022 baseline	**Cannot** verify: 7,288 tCO_2e in FY2026 against 6,619 in the year to June 2022 (the last published split; NAB rebased the baseline to the year to September 2022, 23,856 tCO_2e, without republishing the split).	**No**: Scope 1 is about 10% above its 2022 level. It is also above 6,680 tCO_2e, the level the 72% target implies for Scopes 1 and 2 together in 2030, so the rest of the target can only be met by cutting fleet fuel and refrigerants.
Scope 1 fell 1,071 tCO_2e in the year (8,359 → 7,288)	**Mixed**: NAB says "driven by improved reporting on fugitive emissions and a reduction in diesel consumption". Fugitive emissions fell 1,487 after an updated asset register; stationary combustion fell 76; **mobile combustion (fleet fuel) rose 492, or 9.9%**.	**Partly**: largely no; the reporting change exceeds the whole fall, and fleet emissions rose. The two years also cover different twelve-month periods.
Location-based Scope 2 fell 6.6% (45,135 → 42,145)	**Mixed**: electricity consumption fell 5.5% (75,651 → 71,463 MWh); grid factors account for the rest. Over the longer series consumption has fallen from 128,883 MWh in 2019.	**Yes**: mostly; the fall tracks lower physical consumption. The two years cover different periods.
Financed emissions in targets and goals fell 10.4 → 9.0 Mt (2024 → 2025)	**Mixed**: exposure falls in oil and gas and shipping; model and data changes in commercial real estate and road; grid factors in residential; a facility removed from aviation; offset by data-driven rises in thermal coal and exposure-driven rises in iron and steel and aluminium.	**Partly**: mixed, and not quantified as a bridge. NAB's sector narratives attribute most falls to data, models or grid factors rather than customer abatement; the oil and gas exposure reduction is a real portfolio change.
Total financed emissions 15.2 Mt (FY2025 report) → 17.1 Mt	**Method** or factor: agriculture methodology corrected (1.5 → 5.0 Mt); the prior year is not republished on the new method.	**No**: not comparable; a method change, not an emissions change.
"Net carbon emissions" zero	**Offsets**: 96,473 offsets reported as retired (wind 35%, savanna burning 34%, solar 27%, forestry 4%) against the market-based operational total.	**No**: no physical reduction; neutralisation, on a defined operational boundary that excludes the financed book.

3.4 Trajectory over time

NAB's reporting is long-running and its operational series runs back more than a decade; that continuity is the baseline expected of a large discloser and is not credited. The physical trend in its own operations is real and modest: electricity use has fallen every year, from 128,883 MWh in 2019 to 71,463 MWh in FY2026, and location-based Scope 2 has fallen with it, roughly two-thirds own consumption and one-third grid decarbonisation over the four years to FY2025 (§3.3). The market-based headline is a different story: Scope 2 market-based reached zero in FY2025 and has stayed there through certificates, while Scope 1 has climbed from 6,619 tCO_2e in the year to June 2022 to 7,288 in FY2026, after peaking at 8,359 in FY2025. Three changes in FY2026 break the series. **The reporting year moved** from June to September, so the 2025 comparative and the 2026 figure cover different twelve months; NAB says so and publishes 15-month figures to bridge the gap. **The operational baseline was rebased** from 23,018 to 23,856 tCO_2e to match, with its reason given but its scope split not republished. **The agriculture financed-emissions method was corrected**, raising total financed emissions to 17.1 Mt without a restated prior year, so the 15.2 Mt published for 2024 and the 17.1 Mt for 2025 are not a trend. On the financing side, oil and gas extraction exposure fell from USD$1.68bn (March 2024) to USD$0.56bn (September 2026) and power-generation exposure to renewables rose from $6.47bn to $9.36bn, both real portfolio changes. **Four commitments changed without the same prominence as**

the relabelling (detail in §4.2 and Annex K): the FY2025 net zero ambition across financed, facilitated and operational emissions is not restated; the oil and gas commitment moved from reducing "our exposure" to reducing "the cap"; the five-year emissions table and the operational-target progress table are no longer in the data pack; and the Climate Active statement that NAB "is certified by Climate Active for Australian business operations" is gone, consistent with the register, which shows NAB as no longer certified. The trajectory is context for, and does not change, the current-year verdict.

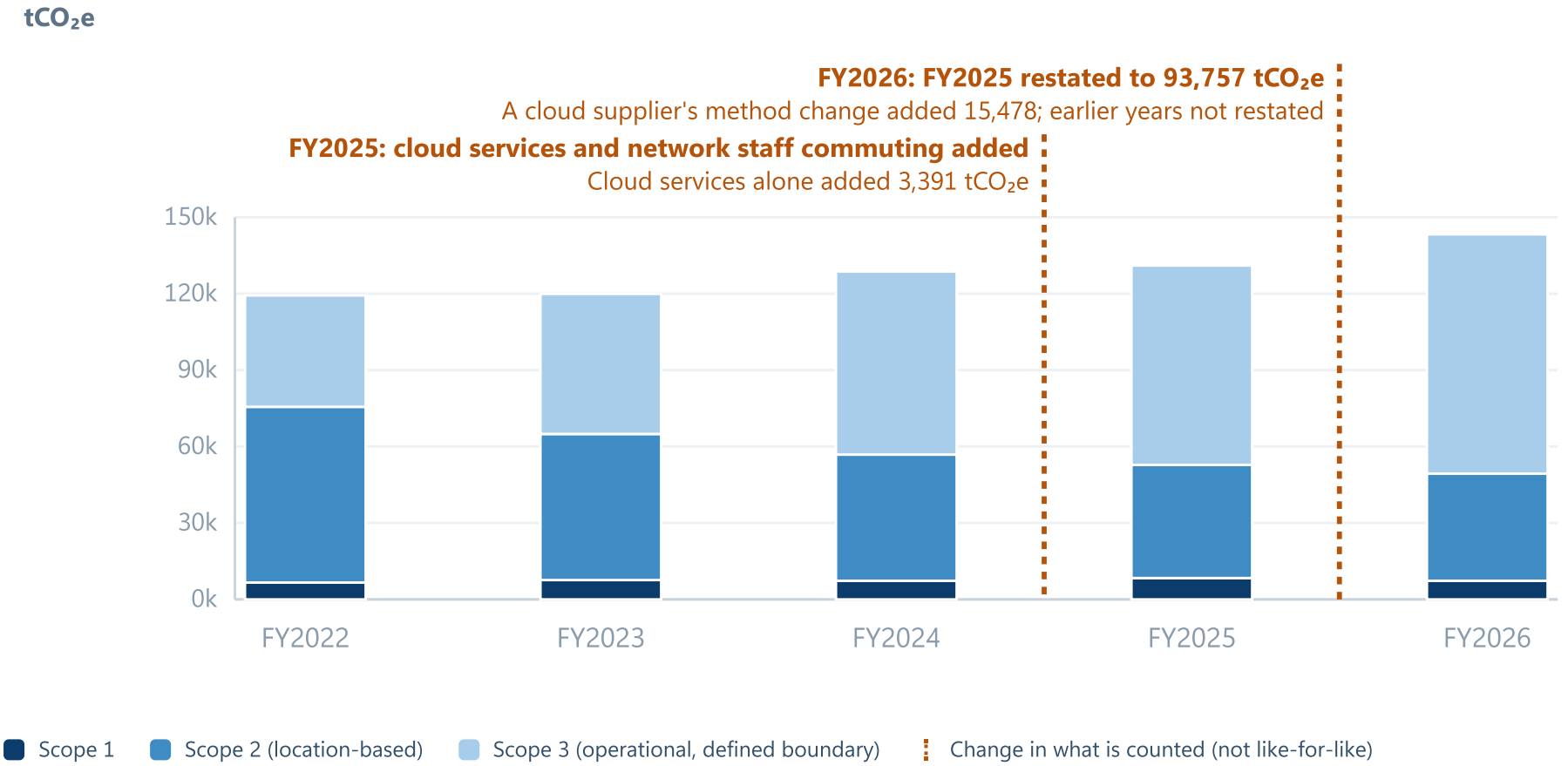
No financed-emissions trajectory chart is drawn: the two published totals are on different agriculture methods and NAB has not restated the earlier one, so a line between them would show a method change as growth.

Metrics over time

Trajectory over time

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

Source: FY2025 Sustainability Data Pack, GHG Emissions sheet, for FY2022 to FY2025 (years to 30 June, as first published); 2026 Annual Report, Climate-related Disclosures folio 69, for FY2026 (year to 30 September). Scope 2 is charted location-based; market-based is nil from FY2025 and is set out in section 3.3. Operational Scope 3 is charted as first published. The 2025 Climate Report attributes the FY2025 rise to commuting now including network staff and to cloud services for Australia (3,391 tCO_2e). The 2026 Annual Report restates FY2025 to 93,757 tCO_2e for a cloud supplier's method change (+15,478) and does not restate earlier years. The bars either side of each dotted line are not like-for-like



METRIC	FY2022	FY2023	FY2024	FY2025	FY2026	MOVEMENT	DRIVER	NOTE
Scope 1 (tCO_2e)	6,619	7,590	7,313	8,359	7,288	Mixed: up on 2022; down on 2025	**Method** or factor: the 2026 fall is a refrigerant reporting change; fleet fuel rose	FY2022 to FY2025 on June years; FY2026 on a September year
Scope 2 location-based (tCO_2e)	69,015	57,320	49,565	45,135	42,145	Down: falling	**Mixed**: mostly lower consumption, part grid	FY2025 as restated in the 2026 report for co-location data centres (+691); 44,444 as first published
Scope 2 market-based (tCO_2e)	16,399	7,451	2,567	0	0	Down: at zero from FY2025	**Certificates**	FY2022 and FY2023 derived from the published Scope 1 + market-based Scope 2 series less Scope 1
Scope 3 total (tCO_2e)	43,712	54,990	71,821	93,757	93,901	Up: rising	**Method** or factor: boundary and method changes each year	Operational Scope 3 on a defined boundary, excluding Category 15 (financed emissions below and in section 3.2). FY2025 restated +15,478 for a cloud supplier's method change; 78,259 as first published
Emissions intensity (power generation financed, tCO_2e/MWh)	Not disclosed	0.18	0.14	0.14	Not disclosed	Down: flat at 0.14 for the last two data years	**Cannot** verify	Labelled by data year, as the financed row below; 2026 data due 2027. Baseline 0.17; 2030 target 0.14 (see F-8). The 2022 data year sits in a climate report not in the reviewed corpus
Renewable electricity (% of consumption)	72%	88%	95%	100%	100%	Up: at 100% from FY2025	**Certificates**: certificates and PPAs	—
Certificates and offsets retired (tCO_2e)	78,358	64,776	76,837	81,267	96,473	Mixed: rising since FY2023	**Offsets**: neutralisation; rises track boundary changes	FY2026 footnote describes the volume as retired "in advance for the 2027 financial year" (see F-12). FY2022 is the Group figure from the 2025 data pack; FY2023 and FY2024 are as first published in that year's Climate Active statement, and the 2025 data pack shows FY2024 as 76,818 after a 19 tCO_2e emissions correction that does not restate the offsets retired
Financed emissions in targets and goals ($MtCO_2e$)	Not disclosed	11.4	10.4	9.0	Not disclosed	Down: falling	**Mixed**: mostly data, model and grid; oil and gas exposure is real	One-year lag; the year shown is the data year; 2026 data due 2027. No comparable 2022 figure: the sector targets were built up from 2022

Targets and claims over time

TARGET OR CLAIM	AS FIRST STATED (PERIOD)	AS STATED FOR FY2026	CHANGE	EXPLAINED?	NOTE
Operational target, 72% by 2030 (Scope 1 + market-based Scope 2)	72% by 2030 from a 2022 baseline of 23,018 tCO_2e (FY2023)	"decreased by 69%", baseline rebased to 23,856 tCO_2e; "aligned to a Science Based targets initiative (SBTi) 1.5°C pathway"	**Rebased**: baseline 23,018 → 23,856 for the new reporting year	Partly: the reason is given; the scope split is not republished	Progress −57% (FY2024), −64% (FY2025), −69% (FY2026), a certificate effect; Scope 1 is above its 2022 level (see F-10)
Sector commitments	Sector targets built up from 2022 to twelve targets by FY2025 (FY2022)	Four targets and eight goals	**Weakened**: eight of twelve targets relabelled as goals; the 2030 values are unchanged	Yes: dependence on grid decarbonisation and policy, stated prominently	See F-5
Net zero by 2050 (financed, facilitated and operations)	Stated (FY2022); FY2025 wording: "NAB's climate ambition is to achieve net zero across our financed and facilitated emissions as well as our operations by 2050"	Not stated	Withdrawn: not restated in FY2026, without comment	No	See F-6

TARGET OR CLAIM	AS FIRST STATED (PERIOD)	AS STATED FOR FY2026	CHANGE	EXPLAINED?	NOTE
Oil and gas commitment	"has capped oil and gas EAD at USD$2.28 billion and will reduce our exposure from 2026 through to 2050" (FY2025)	"will reduce the cap from 2026 through to 2050"; "EAD may fluctuate within that cap"	**Weakened**: from reducing exposure to reducing a cap at about four times actual exposure	No	See F-9
Climate Active certification (Australian operations)	Certified (FY2022)	No longer certified; NAB's last statement covers the year to 30 June 2025	Lapsed	No	Register checked 9 November 2026, which lists FY2024 as the latest statement; NAB's FY2024–25 statement was signed 6 October 2026. The data pack still reports "net carbon emissions" of zero, now self-declared

In this table the FY2025 column is the year of NAB's FY2025 Climate Report, and the financed row is labelled by the data year one year earlier (the FY2026 report carries 2025 data).

4. Findings

4.1 What stands up (genuine / qualified positives)

▲ F–1

Fossil-fuel exposure is falling, under binding settings. NAB "no longer has any (a) corporate lending to thermal coal mining customers or (b) project finance in respect of thermal coal mining assets", met its 2019 goal to halve thermal coal mining exposure by 2026, has "no direct lending to coal-fired power generation assets" and "no direct lending to oil extraction projects". Oil and gas extraction exposure fell from USD$0.96bn (September 2025) to USD$0.56bn (September 2026), and from USD$1.68bn in March 2024. The lending prohibitions on new thermal coal mining, new coal-fired power, greenfield oil and offshore and Arctic projects are carried forward (Table 4, folio 63).

WHY IT MATTERS

These are constraints on what NAB may finance, with dated and verifiable positions, not statements about what it has measured. Portfolio composition is a positive in its own right for a bank.

QUALIFICATION (IF ANY)

Scoped and not netted against the target findings. Greenfield gas in Australia, and the infrastructure dedicated to it, remain open "where it plays a role in underpinning National Energy Security", decided by members of the Executive Leadership Team with no disclosed threshold or record of use.

▲ F–2

Thermal coal target to zero by 2030, an absolute target over financed and facilitated emissions including customers' Scope 3, from a 4.9 Mt baseline.

WHY IT MATTERS

The one sector commitment that caps absolute emissions and requires a fall to nothing.

QUALIFICATION (IF ANY)

The latest reading rose 0.3 → 0.6 Mt on a change from estimated to reported customer data, which NAB states.

▲ F–3

Renewables are more than four in five dollars of power-generation lending. Renewable exposure rose from $6.47bn (September 2024) to $9.36bn (September 2026), 82.3% of power-generation exposure, and gas-fired generation exposure fell from $0.49bn (March 2024) to $0.06bn.

WHY IT MATTERS

A real shift in what NAB finances in the sector that most drives Australia's emissions.

QUALIFICATION (IF ANY)

Gentailers with coal assets sit in "Other/mixed fuel" ($1.95bn), so indirect exposure to coal-fired power remains; the power target itself is a flat line (F-8).

▲ F–4

Physical electricity use keeps falling: 71,463 MWh in FY2026, from 75,651 in FY2025 and 128,883 in 2019, with location-based Scope 2 falling alongside it.

WHY IT MATTERS

Lower consumption is performance, not accounting, and it is the part of the operational story that does not depend on certificates.

QUALIFICATION (IF ANY)

NAB does not publish the split between its own demand reduction and grid decarbonisation, and the FY2026 year covers a different twelve months from FY2025.

4.2 What does not stand up (negatives)

▼ F–5

Eight of twelve sector targets were relabelled as goals. From 2026, commercial real estate (office and retail), residential real estate, road, shipping, aviation, cement and aluminium are "goals", defined as reflecting "a direction of travel towards an outcome, but achievement will depend largely on factors outside NAB's direct control or influence". Targets remain for power, thermal coal, oil and gas and iron and steel, which cover 25.8% of financed emissions and 1.0% of exposure. The 2030 values themselves are unchanged. NAB discloses the change prominently and gives its reason (dependence on grid decarbonisation and policy), and the Board discussed it.

WHY IT MATTERS TO A READER

The relabelling states openly what NAB's FY2025 disclosure left implicit, that most of the sector pathways rest on others. Its effect is that three-quarters of financed emissions, including the mortgage book and the whole of agriculture, carry no commitment NAB says it can deliver.

WHAT WOULD FIX IT

For each goal, state what NAB will do if the dependency fails, and what share of the book it expects to be on pathway by 2030 on its own levers.

▼ F–6

NAB's own net zero ambition is not restated, and the change is not addressed. The FY2025 Climate Report said: "NAB's climate ambition is to achieve net zero across our financed and facilitated emissions as well as our operations by 2050." The 2026 Annual Report and data pack contain no equivalent statement. The strategic priority reads "to support our customers as we move together to a resilient net zero economy", and the leadership message says "Our aim is to support the national 2050 emissions reduction ambitions of both Australia and New Zealand". The same leadership message says NAB has "maintained our climate-related risk and policy settings … while preserving our direction and strategy".

WHY IT MATTERS TO A READER

Ceasing to state a net zero ambition is a choice NAB is entitled to make, and it is not a finding in itself. What a reader cannot see is that it happened: a commitment over the bank's own financed emissions has become support for national ambitions, in a year the report describes as preserving direction. The bank's Customer Transition Plan framework, meanwhile, scores customers on whether they have a "net zero target against a science-based Paris-aligned pathway".

WHAT WOULD FIX IT

State whether NAB still holds a net zero commitment over its financed and operational emissions, and if not, say so beside the strategy.

▼ F–7

The climate headline counts new-home lending built to the code minimum. The "2026 at a glance" page reports "Climate action: $34.7bn cumulative towards $80bn by 2030". Energy-efficient residential lending is the largest component ($13.1bn cumulative, $8.7bn of the $16.9bn in 2026). The methodology appendix (folio 104) shows it includes "mortgage lending and short-term facilities for all homes … built from 1 October 2023 onwards which have a minimum 7-Star NatHERS (or equivalent) energy efficiency rating", counted from each state's implementation of the National Construction Code. A 7-star rating is the minimum the National Construction Code 2022 requires of new homes.

WHY IT MATTERS TO A READER

A reader takes "climate action" to mean finance NAB directs to climate outcomes. A material part of the largest component is ordinary lending on new homes meeting the legal minimum, which would be written whatever NAB's climate strategy. How much of the $13.1bn is code-minimum lending rather than the top 15% of homes is not disclosed.

WHAT WOULD FIX IT

Split energy-efficient residential lending between homes above the code minimum and homes built to it, and report the headline on the first basis.

▼ F–8

The four remaining targets permit the position to stay flat or grow. Power generation is a flat line for the second year (0.14 in 2025, 0.14 in 2030), over the largest targeted sector. Oil and gas permits about +213% from the latest reading (0.8 → 2.5 $MtCO_2e$), and NAB states it "may increase exposure to customers in this portfolio" while aligned with the target. Iron and steel permits four times the latest reading (1.2 → 4.8). Of the goals, aluminium is an "upper-bound" of 5.0 against 2.0, and NAB describes its increased smelting exposure as "consistent with this strategy". Only thermal coal requires a fall.

WHY IT MATTERS TO A READER

The sectors that remain targets, the ones NAB says it controls, are the ones where the targets demand least. The headroom is printed in the performance summary (folio 71) but never described as headroom.

WHAT WOULD FIX IT

Re-set power below the latest reading; justify or tighten oil and gas and iron and steel; state the headroom in words beside each target.

▼ F-9

The oil and gas commitment moved from exposure to the cap. FY2025: the Group "has capped oil and gas EAD at USD$2.28 billion and will reduce our exposure from 2026 through to 2050". FY2026: it "will reduce the cap from 2026 through to 2050", and "EAD may fluctuate within that cap". Actual extraction exposure is USD$0.56bn, so the cap sits at about four times actual exposure.

WHY IT MATTERS TO A READER

A commitment to reduce exposure binds the portfolio; a commitment to reduce a ceiling four times above it does not, for years. The change is not explained.

WHAT WOULD FIX IT

Publish the cap's glide path, and state the year it first falls below current exposure.

▼ F-10

The operational "69%" is certificates, and Scope 1 is above its 2022 level. See §3.3. The note beside the target says the Scope 2 component "relies on contractual instruments"; it does not say that Scope 1 has risen since the baseline, or that the year's fall in Scope 1 is a refrigerant reporting change while fleet fuel rose 9.9%. The target is described as "aligned to a Science Based targets initiative (SBTi) 1.5°C pathway".

WHY IT MATTERS TO A READER

A reader is shown a 69% fall on a 1.5°C-aligned pathway while the emissions NAB directly controls are higher than in 2022 and already above the 2030 level for the whole target.

WHAT WOULD FIX IT

Report Scope 1 against the baseline beside the 69%; republish the rebased baseline's split; state the fleet transition plan that the remaining reduction depends on.

▼ F–11

Most of the financed book has no target at all. 47.1% of financed emissions (8.1 Mt) sits outside both targets and goals. Agriculture is the largest single sector at 5.0 Mt (29.4%) after the method correction and has neither; "Other" (2.0 Mt) is still estimated from the mortgage book's emissions per dollar. Customer Scope 3 is included only for thermal coal, oil and gas and metallurgical coal. BNZ's book, including NZ$16.9bn of New Zealand agriculture (44% dairy), is outside the figures.

WHY IT MATTERS TO A READER

The sector a reader would most expect a lender to Australian farming to address is untargeted, and its weight in the book is now plain.

WHAT WOULD FIX IT

Set a goal or target over agriculture; disclose what "Other" contains; extend customer Scope 3 beyond three sectors; state the BNZ financed total beside the NAB figure.

▼ F–12

The offset row describes a different year from the column it sits in. The data pack's 2026 column reports "Carbon offsets retired 96,473" and "Net carbon emissions 0", and its footnote says "The Group has retired 96,473 carbon offsets in advance for the 2027 financial year … The quantity of offsets retired is the same as our 2026 operational GHG emissions total". A second note says that "for the 2026 financial year, the Group has retired further carbon offsets to address the variance identified in prior reporting years", without a figure.

WHY IT MATTERS TO A READER

The netting that produces "net carbon emissions 0" for 2026 cannot be traced: the number in the 2026 column is described as a 2027 forward purchase, and the 2026 true-up is unquantified.

WHAT WOULD FIX IT

Show, for each year, the offsets retired against that year's actual emissions, separately from any forward purchase.

▼ F–13

The five-year emissions table and the target-progress table are no longer in the data pack. The FY2025 pack carried a "GHG Emissions" sheet (Scope 1, 2 and 3 by activity, 2021 to 2025), a progress table for the 2030 operational target, and the Climate Active certification statement. The FY2026 pack carries a two-year SECR extract and directs readers to the annual report, which shows two years.

WHY IT MATTERS TO A READER

The long series is what lets a reader see Scope 1 rising against the baseline; without it, the 2026 report shows only a one-year fall.

WHAT WOULD FIX IT

Restore the multi-year table on a consistent basis, with the reporting-year change marked.

4.3 What cannot be verified

? F–14

The Group's financed emissions including BNZ

WHY IT IS OPEN

NAB's figures exclude BNZ, which publishes separate Climate Statements not provided for this review. The New Zealand agriculture book (NZ$16.9bn, 44% dairy) is likely to carry material emissions. Nothing here implies the BNZ figure does not exist.

WHAT WOULD RESOLVE IT

BNZ's FY2026 Climate Statements, or a Group total stated in NAB's report.

? F–15

The Scope 1 and Scope 2 split of the rebased 2022 baseline (23,856 tCO_2e)

WHY IT IS OPEN

NAB rebased to a September year but republished only the total. The comparison in §3.3 uses the last published split (year to June 2022).

WHAT WOULD RESOLVE IT

The rebased baseline by scope.

?

F–16

The offset retirement that covers FY2026, and credit quality

WHY IT IS OPEN

See F-12. The retirement volume is inside EY's limited-assurance subject matter (Appendix E); serial-level records, vintages and the removal share (4% forestry) are not provided.

WHAT WOULD RESOLVE IT

Registry extracts by year of claim, separating forward purchases from true-ups.

?

F–17

The share of energy-efficient residential lending that is code-minimum

WHY IT IS OPEN

NAB does not split the $13.1bn between homes in the top 15% and homes meeting the 7-star minimum.

WHAT WOULD RESOLVE IT

The split, by year.

?

F–18

The percentage of executive remuneration linked to climate

WHY IT IS OPEN

NAB states climate considerations are assessed holistically and "the proportion of executive remuneration linked specifically to them is not separately quantifiable". Whether that answer meets the standard's request for a percentage is a question for the regulator; the review does not decide it.

WHAT WOULD RESOLVE IT

A stated percentage, including zero if no portion is formulaically linked.

5. Disclosure risk exposure

5.1 Risk read

NAB's FY2026 disclosure most exposes the company, and a reader relying on it, in **what changed and how the change is presented**. In its first mandatory statement NAB relabelled eight of twelve sector targets as goals, stopped stating its own net zero ambition, and moved its oil and gas commitment from exposure to a cap four times above actual exposure. Only the first of these is presented as a change, and the leadership message frames the year as one of maintained settings and preserved direction. Beneath that sit the same target-architecture questions as before: a flat-line power target, an oil and gas target permitting growth, and an agriculture book that is now the largest single source of financed emissions with no target or goal. The climate headline on the front of the report counts new-home lending built to the code minimum, and the operational 69% rests on certificates while Scope 1 is above its 2022 level. Because NAB is a bank, its operational footprint is immaterial beside the 17.1 $MtCO_2e$ it lends against, so the exposure that matters is in the financed book and the headline claims made about it. None of this is an allegation of misconduct; each is a forward risk a 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 against the FY2025 Climate Report and data pack

Legal (misleading-conduct / disclosure / director-duty)	Moderate	Medium confidence
Regulatory (ASIC / ACCC / Clean Energy Regulator / AASB S2)	Low to moderate	Medium confidence
Technology (dependence on unproven abatement)	Moderate	Medium confidence
Physical (physical-risk disclosure consistency)	Low to moderate	Medium confidence
Other: financed-emissions target integrity (commercial / transition)	High	High confidence

LENS	EXPOSURE	CONFIDENCE	WHAT DRIVES IT	WHAT WOULD REDUCE IT
Legal (misleading-conduct / disclosure / director-duty)	Moderate	Medium	A "Climate action" headline whose largest component includes code-minimum home lending; a leadership message describing preserved direction in the year a net zero ambition stopped being stated; a 69% reduction on a 1.5°C-aligned pathway while Scope 1 is above its baseline.	Split the environmental finance headline; address the net zero position in terms; report Scope 1 beside the 69%.
Regulatory (ASIC / ACCC / Clean Energy Regulator / AASB S2)	Low to moderate	Medium	First mandatory statement, reliefs properly taken, reasonable assurance over Scope 1 and 2. Open: the remuneration percentage answered as "not separately quantifiable"; no NGER-basis figure published this year; the assurance appendix still titles the operational target "science-based".	State the remuneration percentage; publish the NGER-basis figure; align the target label across the report and its assurance.
Technology (dependence on unproven abatement)	Moderate	Medium	Seven of the goals depend on grid decarbonisation in line with the 82% renewable target, technology uptake or policy; iron and steel depends on scrap and enabling technologies; offsets are 96% avoidance credits.	For each goal, a fallback NAB controls; removal share and permanence evidence for credits.
Physical (physical-risk disclosure consistency)	Low to moderate	Medium	Physical risk is sized (under $25bn, under 5% of property-secured exposure in the riskiest 5% of locations; under $1.5bn of Australian farm lending in the worst-affected areas), but New Zealand agriculture has no equivalent metric and the chronic model's climate data is "approximately 5 years old".	A New Zealand farm metric; refreshed chronic modelling.
Other: financed-emissions target integrity (commercial / transition)	High	High	Only 25.8% of financed emissions under a target; power flat; oil and gas +213% permitted; agriculture (29.4%) untargeted; customer Scope 3 in three sectors; BNZ outside the figures.	Target agriculture; re-set power; tighten oil and gas and iron and steel; extend customer Scope 3; state the Group total including BNZ.

5.3 Consistency across audiences

CLAIM / METRIC	TO THE REGULATOR	TO INVESTORS / PUBLIC	CONSISTENT AFTER NORMALISING BOUNDARY?
Operational GHG footprint	The annual report states the Group "is subject to and complies with" the NGER Act (reporting year July to June). NAB does not appear in the published FY2024-25 NGER register, which indicates below-threshold publication, not non-reporting. No NGER-basis figure is published in the 2026 report.	Scope 1 7,288 and Scope 2 location-based 42,145 tCO_2e (October to September); 15-month figures of 9,091 and 53,218 bridge to July 2025.	Cannot verify: the periods differ and no NGER-basis figure is published to reconcile against. The annual report and data pack agree on every operational figure they share.
"Net carbon emissions" zero	No Climate Active certification (register: "no longer certified")	Data pack and EY Appendix D report "Net carbon emissions (carbon neutral)" of zero; the annual report does not use the term	Yes: consistent in what is said; the year the netting covers is not clear (F-12).
Operational target	EY Appendix F: "NAB's reduction against Science-based Emissions Target (SBT)"	Climate statement: "aligned to a Science Based targets initiative (SBTi) 1.5°C pathway"; targets "have not been validated by a third-party" unless stated	Yes: the substance (self-assessed, not validated) is the same; the wording differs between the statement and its assurance appendix.
Net zero ambition	—	FY2025 Climate Report: stated for financed, facilitated and operational emissions by 2050. FY2026 Annual Report: not stated.	Not testable: a change over time, not a divergence between audiences within FY2026 (F-6).
Financed emissions 17.1 $MtCO_2e$; coverage 52.9%	Outside NGER; NAB's coverage method uses customers' NGER-reported emissions as its first data source	Annual report Table 8 and the performance summary agree; EY Appendix A covers the same sectors and the whole portfolio	Yes: consistent within NAB's documents; BNZ excluded from the Group figure.

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
D4-1	Residual Cat 1 and Cat 2 unbounded	Inventory completeness	4.4 Inventory Boundary; 4.5 GHG Emission Categories; 4.5.3; 4.5.4	Bounding estimates per excluded category	Non-conformance until bounded
D4-2, D8-4	Customer Scope 3 three sectors; BNZ outside	Influence-based inventory	4.5.5.8 Investments (cat 15a/15b); 4.5.6 Influence Based Inventory; Annex B Net Zero Attribution	Group total incl. BNZ; customer Scope 3 by sector	Non-conformance for a net zero claim
D8-3	"Other" extrapolated	Data quality	4.6 Data Quality; 4.6.4 SSEF Assessment; 5.1.14 Data Quality & Scope 3 Improvement	Measured basis	Improvement item
D6-2	Net zero ambition not stated	Net zero claim conditions	4.7.5 Net Zero Status Requirements; 4.9.1.2 Net Zero Claims	A stated commitment with boundary and date	Cannot claim Net Zero Committed without it
D6-1, D8-1, D8-5	Relabelling; flat and growth targets; cap re-scoped	Reduction obligations	4.7 Reduction Obligations; 4.7.4 Accelerated Reduction Timeline; 4.9.2 Metrics & Targets	Pathway per sector; cap glide path	Non-conformance
D6-3, D6-4	Headline built partly on BAU; certificate-driven 69%	Claim wording at point of use	4.9.1 Use of Claims and Statements; 4.9.4 Public Reporting & Disclosure; 5.1.7	Above-minimum split; Scope 1 beside the 69%	Claim restriction

FINDING	REVIEW FINDING (WHY IT MATTERS)	NOCO2 MECHANISM	DOCUMENT / CLAUSE	REQUIRED EVIDENCE	LIKELY NOCO2 OUTCOME
D3-1, D3-2	Market-based zero; serials missing	Contractual instruments	4.5.5; 5.1.13 Contractual Instruments for Purchased Energy	Retirement records	Cannot verify
D5-1, D5-3	Netting by year unclear; 96% avoidance	Credit retirement and residuals	4.8.1–4.8.4; 5.1.12 Carbon Credit Reporting	Year-of-claim retirements; removal share	Cannot verify
D2-1	Scope 1 above baseline	Inventory table and required interventions	5.1.8 GHG Inventory Table; 4.7.1 Required Interventions	Fleet transition schedule	Potentially applicable
Annex F	Fleet	Clean alternatives	4.7.2 Clean Alternative Assessment	Cessation year	Potentially applicable
D7-1, D7-2	Pay percentage; assurance labels	Governance and assurance	6.1 Assurance Requirements; 6.2 Conformance Requirements; 5.1.15	Percentage; aligned labels	Minor
D8-6	Fossil exposure falling; renewable lending	Portfolio composition	standard review item: no direct clause	Exposure series	Positive for readiness, not scored as conformance
D9-1	Physical risk sized	standard review item: no direct clause	—	NZ farm metric	Not a conformance item

7. Conclusion & next steps

Not decision-useful for four of five audiences, and usable with one limitation by a regulator. NAB's first mandatory statement is complete in form and its operational figures are clean and well assured. Two things in its record are genuine: fossil-fuel exposure is falling under binding settings, with thermal coal mining lending gone and oil and gas extraction exposure down 42% in the year, and renewables are more than four in five dollars of its power-generation lending. What holds the rating down is the commitment architecture. Eight of twelve sector targets became goals NAB says it largely cannot deliver, leaving only a quarter of financed emissions under a target; agriculture, the largest single source, has neither; the targets that remain are flat or permit growth; and the bank's own net zero ambition is no longer stated, in a report that describes its direction as preserved.

The single most valuable fix is to state NAB's net zero position in terms, and to show which commitments carry it now that most sectors are goals. From there: set a target or goal over agriculture and say what the "Other" book contains; re-set power below the latest reading and give the oil and gas cap a glide path that binds actual exposure; report the environmental finance headline above the building-code minimum; report Scope 1 beside the 69% and republish the rebased baseline by scope; show offsets retired against each year's actual emissions; and bring BNZ's financed emissions into the Group figure when Scope 3 enters the statement in 2027. CRI's Decarbonisation Strategies, Carbon Inventories, Mandatory Climate Reporting and Assurance services map directly onto that work.

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.

AI tools help locate, extract and organise material from the source documents against a fixed rule set. Every rating and conclusion is reviewed and confirmed by CRI analysts; the rules, not the model, determine the outcome.

Organisations may contact CRI at robc@noco2.com.au to identify an error, provide relevant public information or request review of updated disclosures. Where a correction affects a finding, the diagnosis is updated and the change is noted. Further information about the review method is at noco2.com.au.

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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)

In-scope corpus selected explicitly from the flat `Input Reports/NAB/` folder: FY2026 documents and earlier only. No document for a period later than FY2026 exists.

DOCUMENT	STATUS	CRITICALITY	NOTES
`2026-annual-report.pdf` (NAB 2026 Annual Report, 333 pp; identity confirmed from body text: "Climate-related Disclosures have been prepared for National Australia Bank Limited ... for the year ended 30 September 2026", folio 44)	Reviewed; downloaded 9 Nov 2026 from nab.com.au/content/dam/nab/documents/reports/corporate/	Critical	Statutory climate statement folios 43–108; EY report folios 109–117; Remuneration Report folios 169–208. PDF page = folio + 4.
`2026-sustainability-data-pack.xlsx` (identity: sheets carry "2026 / September year end")	Reviewed; downloaded 9 Nov 2026	Material	Indicators & Emissions, Energy, Exposures, Financing sheets.
`2025-climate-report.pdf` , `2025-sustainability-data-pack.xlsx` , `2025-annual-report.pdf`	Reviewed as prior period	Context	Source of the FY2025 net zero ambition wording and the multi-year series.
2020–2024 annual reports/reviews and data packs	Context	Context	Annex K series.
Climate Active PDS FY2019-20, FY2020-21, FY2023, FY2024, FY2024–25 (`NAB Climate Active PDS EY2025 Signed.pdf` ; identity from body text p.2: NAB Ltd, organisation, 1 July 2024 – 30 June 2025, arrears report, signed 6 October 2026; added 16 Nov 2026)	Context	Context	Certification chain; register shows "This brand is no longer certified" and "Climate Active certification is ending" (climateactive.org.au, retrieved 9 Nov 2026).
`supplementary-climate-disclosures.pdf` (read with the 2023 Climate Report; Last-Modified 17 Sep 2025)	Downloaded 9 Nov 2026; context only	Useful	Not relied on for any finding.
BNZ FY2026 Climate Statements	Not provided	Material	BNZ excluded from NAB's financed figures; cannot verify (K-01).
FY2026 registry retirement records (offsets, certificates)	Not provided	Material	K-03.
NGER register FY2024-25	Checked (`ngers-lookup.ps1` , name and ABN 12004044937)	Context	No match: below publication threshold for the period; absence is not zero.

The FY2026 Climate-related Disclosures replace the standalone Climate Report: no FY2026 climate report is linked from NAB's performance-reporting page (checked 9 Nov 2026), which lists the 2026 annual report and data pack only.

Annex B: Evidence table (AI-02)

EVIDENCE ID	SOURCE (DOC · PAGE/TABLE)	WHAT IT SHOWS	LINKED CLAIM / FINDING	RULE IDS	STATUS
EV-01	AR26 f44 Basis of Preparation	Prepared under AASB S2; reliefs C4(b) (Scope 3) and C3 (comparatives); financed data 1 Jul 2024 – 30 Jun 2025; shipping CY2025	D1-1	S2-01..06, L-01	Found
EV-02	AR26 f45, f70	Targets vs goals defined; eight sectors relabelled goals "from 2026 reporting and going forward"	D6-1, CL-05	T-DEP-04, YOY-06, S2-41	Found
EV-03	AR26 f47 leadership message	"maintained our climate-related risk and policy settings, while reclassifying some interim 2030 sector decarbonisation targets as goals ... preserving our direction and strategy"; "Our aim is to support the national 2050 emissions reduction ambitions of both Australia and New Zealand"	D6-2, CL-02	YOY-05, OUT-TB-02	Found
EV-04	CR25 (FY2025 Climate Report) "Reducing emissions" panel; FY25 data pack GHG sheet note 1	"NAB's climate ambition is to achieve net zero across our financed and facilitated emissions as well as our operations by 2050"; data pack: "align its ambition to be net zero by 2050"	D6-2	YOY-05, A-18	Found (prior period)
EV-05	Full-text search of AR26 (pdftotext and PyMuPDF) and DP26	No NAB net zero commitment statement; "net zero" appears only as "resilient net zero economy", national/AEMO pathway references, CTP criteria and reference-scenario names	D6-2	YOY-05, A-05	Found (absence, searched 9 Nov 2026)
EV-06	AR26 f3 "2026 at a glance"; f17	"Climate action(3) $34.7bn Cumulative towards $80bn by 2030 Environmental finance ambition"	CL-01, D6-3	A-17, OUT-TB-02	Found
EV-07	AR26 f52 Table 2	2026 $16.9bn; cumulative $34.7bn: large-scale renewables 9.1, green business lending 3.8, energy-efficient RRE 13.1, capital markets 8.6, ACCU <0.1; climate-aligned financing $14.8bn, 1.4% of lending exposure	D6-3	A-19, G-BAU	Found
EV-08	AR26 f104 eligibility	Energy-efficient RRE includes "all homes ... built from 1 October 2023 onwards which have a minimum 7-Star NatHERS (or equivalent)", counted from NCC implementation per state	D6-3	A-19	Found. External reference: NCC 2022 sets 7-star NatHERS (or equivalent) as the new-home minimum (ABCB); not in corpus
EV-09	AR26 f68 Table 7 and notes	72% by 2030, Scope 1 + Scope 2 MB; baseline rebased 23,018 (Jun-22) → 23,856 (Sep-22); "aligned to a ... SBTi 1.5°C pathway", SBTi V1; "does not have a gross emissions reduction target for the Scope 2 (market-based) component ... relies on contractual instruments"; "decreased by 69% ... additional 1,071 since 2025 ... driven by improved reporting on fugitive emissions and a reduction in diesel consumption"	D2-1, D3-1, CL-03	T-MI-06, A-19, YOY-04	Found
EV-10	AR26 f69	S1 2026 7,288 (342 / 1,479 / 5,467); 2025 8,359 (418 / 2,966 / 4,975); S2 LB 42,145 (2025 restated 45,135); MB 0/0; 15-month S1 9,091, S2 LB 53,218, S3 118,157; S3 by category 2026 93,901, 2025 restated 93,757	D2-1..3, D4-1	G-06, G-07, G-10	Found
EV-11	FY25 DP GHG Emissions sheet	S1 2021–2025: 10,821 / 6,619 / 7,590 / 7,313 / 8,359; S2 LB 74,850 / 69,015 / 57,320 / 49,565 / 44,444; S3 47,324 / 43,712 / 54,990 / 71,821 / 78,259; S2 MB 2024 2,567, 2025 0; 2022 MB S2 16,399 (23,018 − 6,619)	D2-1, P.1	YOY-02	Found (prior period)
EV-12	AR26 f93 boundary	Cat 1 "Limited to emissions associated with paper, water and cloud services. All other goods and services are excluded in 2026"; Cat 2 "Not reported in 2026 ... plans to expand ... for 2027"; Cat 13 immaterial	D4-1	S3-25, G-08, A-21	Found
EV-13	CR25 relevance table (printed p.71)	"Size: Emissions from other purchased goods and services is material"	D4-1	S3-25	Found (prior period)
EV-14	AR26 f71 performance summary	Per-sector baseline, 2024, 2025, 2030; financed and facilitated emissions; EAD (detail §3.2)	D8-1..3	SEC-FI-TGT-04	Found
EV-15	AR26 f86 Table 8; f92	Total 17.1 Mt, EAD 754.5bn; covered 9.0 Mt / 52.9%, 458.7bn / 60.8%; excluded 8.1 Mt / 47.1% (agri 5.0 / 29.4%; Other 2.0 / 11.9%; CRE-other 0.8; heavy vehicles 0.2); excludes BNZ, JBWere, facilitated, derivatives, sovereigns, FIs; agriculture method corrected; Other extrapolated from RRE	D8-2, D8-4	SEC-FI-REL-01, A-05	Found

EVIDENCE ID	SOURCE (DOC · PAGE/TABLE)	WHAT IT SHOWS	LINKED CLAIM / FINDING	RULE IDS	STATUS
EV-16	AR26 f63 Table 4; f64 Charts 2–3; f74 note 1	Cap "will reduce the cap(6) from 2026 through to 2050"; "EAD may fluctuate within that cap"; O&G extraction USD 1.68 (Mar-24) → 0.96 (Sep-25) → 0.56 (Sep-26); thermal coal 0.20 → 0.06 AUDbn; NES discretion	D8-5, D8-6	YOY-06, SEC-FI-05A	Found
EV-17	CR25 Table 2	"capped oil and gas EAD at USD$2.28 billion and will reduce our exposure from 2026 through to 2050"	D8-5	YOY-06	Found (prior period)
EV-18	AR26 f65 Chart 4; DP26 Exposures	Power EAD renewables 6.47 (Sep-24) → 9.36 (Sep-26); 82.3% renewables; gas 0.49 (Mar-24) → 0.06; Other/mixed 1.95	D8-6	SEC-FI-05A	Found
EV-19	DP26 Indicators & Emissions notes 5, 8, 10 and offset-mix note	96,473 offsets "retired … in advance for the 2027 financial year"; "further carbon offsets" for 2026 variance, unquantified; mix wind 35 / savanna 34 / solar 27 / forestry 4	D5-1	E-08..22, A-05	Found
EV-20	DP26 Energy sheet	Electricity 71,463 MWh (2025 restated 75,651); 100% renewable; EACs 54,822, PPA 14,961, solar 1,228, retail 452; gross energy 344,511 GJ	D3-1	E-01..07	Found
EV-21	AR26 f88; f178	Climate in individual scorecards; "not separately weighted … the proportion of executive remuneration linked specifically to them is not separately quantifiable"	D7-1	S2 29(g), GOV	Found
EV-22	AR26 f109–117 EY report	Reasonable assurance S1/S2 (ASSA 5010/5000); limited: governance ¶6, strategy 9(a)/10(a)/10(b); Appendices A (financed, all sectors and whole portfolio), B (EFA), D (SECR incl. offsets, net carbon emissions), E (offsets incl. forecast 2027), F ("Science-based Emissions Target")	D7-2	GOV-16	Found
EV-23	AR26 f53–57	Vulnerability metrics: transition <$10bn / <2% business lending; acute <$25bn / <5%; chronic agri <$1.5bn / <3%; operations <40 properties, <5 suppliers; no material ECL effect; no material capital deployed	D9-1	S2-15..22, N-04	Found
EV-24	AR26 f48	"we do not currently maintain a stand-alone transition plan"	D6-4	S2-14	Found
EV-25	climateactive.org.au NAB page, retrieved 9 Nov 2026	"This brand is no longer certified"; latest PDS FY2024; "Climate Active certification is ending"	D5-2	E-25, A-18	Found (dated check)
EV-26	DP26 Exposures	Group agri 79% AU / 21% NZ; NZ agri NZ$16.9bn, dairy 44%; AU agri $52.2bn	D8-4	A-05	Found
EV-27	AR26 f66	CTP framework scores customers on "Net zero target against a science-based Paris-aligned pathway"; "Limited" tier refusal "subject to National Energy Security considerations"	D6-2, D8-5	—	Found
EV-28	FY25 DP Position and GHG sheets vs DP26	Five-year GHG sheet, 2030-target progress table and Climate Active statement absent from DP26	D2-4	YOY-05	Found
EV-29	DP26 gas-type vs source split	"Other gases (including HFCs)" 32.9% of gross operational emissions; refrigerants 1.0% by source	K-07	A-05	Open (not reconciled)

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
CL-01	"Climate action $34.7bn Cumulative towards $80bn by 2030 Environmental finance ambition"	Environmental finance originations (lending, capital markets, ACCU)	Self-declared, NAB methodology; criteria "linked to" Climate Bonds Standard; EY limited assurance against NAB's methodology	AR26 f3, f17, f52	Strong (headline)	All	Found: Table 2, eligibility f104; missing: code-minimum split	BAU counterfactual	A-19, A-17, OUT-TB-02	Decision-usefulness concern
CL-02	"Our aim is to support the national 2050 emissions reduction ambitions of both Australia and New Zealand"; strategic priority "to support our customers as we move together to a resilient net zero economy"	NAB's role in national transition (replaces FY2025 own net zero ambition)	Self-declared	AR26 f47, f48, f17	Moderate	All	Found; FY2025 ambition absent	Withdrawn-commitment search	YOY-05, A-18	Decision-usefulness concern (unaddressed change)
CL-03	"Scope 1 and 2 (market based) emissions ... have decreased by 69%"; target "aligned to a Science Based targets initiative (SBTi) 1.5°C pathway"	Scope 1 + market-based Scope 2, Group operational control	Self-declared alignment (not validated); EY limited assurance of progress (Appendix F)	AR26 f68	Strong	Investors, public	Found; baseline split missing	Market-based headline; SBTi label	T-MI-06, T-SBTi-01, A-19	Decision-usefulness concern
CL-04	"More than four in every five dollars that we lend to power generation goes to renewables"	Power-generation EAD by fuel (82.3% renewables, Sep-26)	Self-declared; EY limited assurance (Appendix B item 6)	AR26 f47, f65	Moderate	All	Found	Composition	SEC-FI-05A	No apparent issue
CL-05	Eight sector "targets" are "goals" ("achievement will depend largely on factors outside NAB's direct control")	Sector decarbonisation commitments	Self-declared; Board-discussed	AR26 f45, f70, f88	Moderate	Investors, retail	Found	Target weakening	YOY-06, T-DEP-04	Decision-usefulness concern (disclosed)
CL-06	"Net carbon emissions (carbon neutral) 0"	Operational Scope 1, 2 MB, defined Scope 3	Self-declared (Climate Active no longer held); EY limited assurance (Appendix D items 19–20, Appendix E)	DP26 Indicators & Emissions	Moderate (data table, not headline)	Public	Found; year-of-claim netting unclear	Carbon neutral	E-25, E-08..22, A-18	Cannot verify (netting by year)
CL-07	"The Group has capped oil and gas EAD at USD$2.28 billion and will reduce the cap from 2026 through to 2050, aligned to the IEA NZE2050"	O&G extraction EAD cap	Self-declared	AR26 f63, f74	Moderate	Investors	Found; glide path missing	Exposure cap	YOY-06	Decision-usefulness concern
CL-08	"Since 2025, the Group has sourced or matched 100% of its electricity from renewable sources"	Group electricity, contractual instruments	Self-declared; EY limited assurance (Appendix D item 16)	AR26 f69; DP26 Energy	Moderate	Public	Found; serials missing	100% renewable	E-01..07, E-24	No apparent issue; certificate serials cannot verify

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	First mandatory Chapter 2M period (EV-01). Group 1 entity; directors' declaration (f108); EY ASSA 5010 audit of S1/S2 and review of governance and risks/opportunities (EV-22)	No apparent issue	Reliefs C4(b) and C3 declared at the front; voluntary disclosures marked with an icon	No apparent issue · High	—	—
D1-2	Financial effects: current none material; anticipated quantitative effects not given for medium/long term citing measurement uncertainty (EV-23)	No apparent issue (permitted with explanation)	Vulnerability metrics give magnitude ranges; ECL statement qualitative	Minor limitation · Medium	Investors size exposure from ranges	Point estimates when available
D1-3	No stand-alone transition plan (EV-24); "plans to achieve climate-related targets and goals" in the metrics section	No apparent issue	Combined with the relabelling (D6-1) and net zero absence (D6-2), no single place sets out NAB's transition commitment	Minor limitation · Medium	—	A transition plan or a statement that none will be produced

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	Scope 1 7,288 (FY26) vs 6,619 (Jun-22 baseline split, EV-11): +10.1%. Above the implied 2030 S1+S2MB level (23,856 × 0.28 = 6,680). FY26 fall −1,071 = fugitive −1,487 (asset-register update) − stationary 76 + mobile +492 (EV-10)	No apparent issue (figures audited)	Scope 1 trend against the baseline not stated beside the 69%	Decision-usefulness concern · High (direction); Medium (magnitude, rebased split not republished)	Reader cannot see direct emissions rising	Scope 1 vs baseline beside the target
D2-2	Reporting year changed to 30 September; 2025 comparatives on June year; 15-month bridge given; baseline rebased with reason (EV-09, EV-10)	No apparent issue (disclosed)	Like-for-like broken for one year	Minor limitation · High	—	Restate 2025 on the September year
D2-3	Restatements: S2 2025 +691 (co-location), S3 Cat 1 2025 +15,478 (cloud supplier) and reclass, Cat 6 +68; Cat 3 2025 +29 not explained (6,952 → 6,981); all others reconcile to FY25 published (EV-10, EV-11)	No apparent issue	Disclosed with reasons; the 29 t is immaterial	No apparent issue · High	—	—
D2-4	DP26 drops the five-year GHG sheet and target-progress table (EV-28)	No apparent issue	YOY-05 unexplained removal of a multi-year series	Minor limitation · High	Long trend hidden	Restore

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	Both bases reported (LB 42,145; MB 0); instruments split by type (EV-20); market-based note co-located beside target (EV-9)	No apparent issue	The co-located note is accurate and legible; the operational target's whole reduction is the market-based effect	Decision-usefulness concern (in combination with D2-1) · High	—	Report gross progress beside
D3-2	Certificate serials, vintages and residual-mix treatment not provided	Cannot verify, evidence not provided	—	Cannot verify · n/a	—	Registry extracts

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	Cat 1 limited to paper, water, cloud; "All other goods and services are excluded in 2026" (EV-12); FY2025 relevance table: residual "is material" (EV-13); Cat 2 excluded, review planned for 2027 (A-21: intention neutral; deficiency independent). No bounding estimate.	No compliance finding: Scope 3 relief C4(b) taken lawfully; voluntary boundary declared incomplete	Unbounded exclusion of a residual the entity itself called material; OUT-STK-13 rebuttal not met	Decision-usefulness concern · High	Carbon accountant cannot confirm completeness	Bound or quantify the residual and Cat 2
D4-2	Customer Scope 3 only in thermal coal, O&G, met coal boundaries (EV-14, f90)	No apparent issue	Inherited exposure unbounded in nine sectors	Decision-usefulness concern · High	I5 defeated	Extend customer Scope 3
D4-3	Commuting assumption changed (network staff 60% from 100%); rental leisure removed; 2025 not restated for these (f98, f100)	No apparent issue (disclosed)	Like-for-like limitation	Minor limitation · High	—	Restate

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	2026 column "Carbon offsets retired 96,473"; footnote: retired "in advance for the 2027 financial year"; 2026 variance true-up unquantified (EV-19). EY Appendix E covers both the 2026 actual and the 2027 forecast retirement, but the pack prints one figure	Cannot verify, material evidence missing (netting by year)	Year-of-claim ambiguity on the one table carrying the neutral position	Decision-usefulness concern · Medium	Netting not traceable	Report actual vs forward retirements per year
D5-2	Climate Active: no longer certified (EV-25); not claimed in FY26 documents	No apparent issue	Exit neutral (A-18); the self-declared "net carbon emissions 0" continues on a defined operational boundary excluding the financed book; not a headline	No apparent issue · High	—	—
D5-3	Offset mix 96% avoidance (wind, savanna, solar), 4% forestry	No apparent issue	Permanence and additionality cannot verify	Cannot verify · n/a	—	Project-level evidence

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	Eight of twelve sector targets relabelled goals (EV-02); targets cover 25.8% of financed emissions and 1.0% of EAD; goals 26.8% / 59.7% (sector rows of Table 8; the published subtotal of 52.9% differs by rounding); quantified 2030 values unchanged; reason disclosed; Board discussed (f88)	No apparent issue (AASB S2 33 disclosures provided for goals in the same form)	YOY-06: commitment status weakened, disclosed with reason. Credited as disclosure of dependency (baseline, not a positive); effect on coverage is the finding	Decision-usefulness concern · High	R2 defeated	Fallback actions per goal; NAB-lever share on pathway
D6-2	FY2025 net zero ambition (EV-04) absent from FY2026 (EV-05); replaced by national-ambition support (EV-03); not addressed. A-18: ceasing the claim is neutral; YOY-05: the unexplained removal is the finding. NZBA membership (stated in FY2025) also no longer referenced	No apparent issue (no requirement to hold a net zero target)	Fair-presentation defect: leadership message frames the year as preserving direction	Decision-usefulness concern · High (absence verified by full-text search of AR26 and DP26)	R4 and P2 defeated	State the position in terms
D6-3	Environmental finance headline (EV-06, EV-07); RRE component includes code-minimum new homes (EV-08); split undisclosed	No apparent issue (methodology disclosed, assured against own criteria)	BAU counted toward a "Climate action" headline (A-19/G-BAU); magnitude cannot verify	Decision-usefulness concern · Medium-high	R1 defeated; contributes to P2	Report above-code-minimum share
D6-4	Operational target 72% by 2030 market-based; −69%; SBTi-aligned label; Scope 1 above baseline and above implied 2030 level (EV-09, D2-1). Memory ruling (13 Oct 2026): a 1.5°C-alignment statement beside rising emissions defeats P2 even with a qualifier in the same table	No apparent issue	Reduction is a certificate effect; the remaining path is entirely Scope 1	Decision-usefulness concern · High	I3 defeated; contributes to P2	Scope 1 trajectory beside the 69%

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	29(g)(ii) percentage answered "not separately quantifiable" (EV-21); audited Remuneration Report f178 consistent with the statement (no contradiction, unlike the Codan precedent); GPI scorecard carries no climate measure; FY2025 named the environmental finance goal and sector targets as climate-linked measures	Open: whether "not separately quantifiable" satisfies 29(g)(ii) is undecided by the rules; escalated (N-1), not labelled a compliance concern	A reader cannot size the pay link	Minor limitation · Medium	G1 partial	State a percentage, including zero
D7-2	Assurance: reasonable S1/S2; limited financed, EFA, offsets, target progress, SECR; EY Appendix F titles the target "Science-based Emissions Target (SBT)" while the statement says "aligned to" and not validated (EV-22)	No apparent issue	Label mismatch only	Minor limitation · High	—	Align labels

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	Target headroom (table below): power flat; O&G +213%; iron & steel +300%; aluminium goal +150% upper bound; coal −100% (EV-14)	No apparent issue	SEC-FI-TGT-04 benchmark fails for power, O&G (fossil override), iron & steel, aluminium; headroom printed but unlabelled	Decision-usefulness concern · High	I2 partial (derivable)	Re-set / justify

ID	FINDING & EVIDENCE CHAIN	MIN-COMPLIANCE	DECISION-USEFULNESS / CLAIM-QUALITY	SEVERITY · CONFIDENCE	CONSEQUENCE	WHAT WOULD FIX IT
D8-2	Coverage 52.9% (from 68.2% as reported for 2024) mainly from the agriculture method correction; prior total not republished on the new method (EV-15)	No apparent issue (disclosed)	Comparability break; untargeted share now 47.1%	Decision-usefulness concern · High	R2 defeated	Restate 2024 on the new method
D8-3	"Other" 2.0 Mt estimated from RRE per-dollar intensity (EV-15)	No apparent issue	Circular denominator (as FY2025)	Minor limitation · High	—	Measured basis
D8-4	BNZ excluded from financed figures; NZ agri NZ$16.9bn, 44% dairy (EV-15, EV-26)	No compliance finding (Scope 3 relief; BNZ reports separately)	Group financed total not stated; magnitude cannot verify	Decision-usefulness concern · Medium	I4 partial	State Group total
D8-5	O&G commitment re-scoped from "reduce our exposure" (FY25, EV-17) to "reduce the cap" (FY26, EV-16); cap USD2.28bn vs actual USD0.56bn (4.1×); O&G target text "NAB may increase exposure"; NES discretion carried in Table 4 and CTP framework	No apparent issue	YOY-06 re-scoping, unexplained	Decision-usefulness concern · High	—	Cap glide path
D8-6	Composition positives: thermal coal mining lending exited; O&G extraction −42% in the year; power renewables 82.3% (EV-16, EV-18)	—	Positive (above baseline), SEC-FI-05A	Positive · High	P3 pass	—

Financed-emissions target headroom & benchmark (SEC-FI-TGT-04): latest = 2025 data year (AR26 f71).

SECTOR TARGET	LATEST REPORTED	TARGET VALUE	% CHANGE PERMITTED	FLAT-LINE BENCHMARK (≤80% OF LATEST)	FOSSIL-FUEL OVERRIDE?	RULING
Power generation (target)	0.14 tCO_2e/MWh	0.14	0%	Fail (100% of latest)	—	Flat line, second year
Thermal coal (target)	0.6 Mt	0.0	−100%	Pass	Yes, passes	Positive
Oil and gas (target)	0.8 Mt	2.5	+213%	Fail	Yes, fails	Growth permitted in fossil extraction
Iron and steel (target)	1.2 Mt	4.8	+300%	Fail	Met coal included	Growth permitted
Aluminium (goal)	2.0 tCO_2e/t	5.0	+150%	Fail	—	Upper bound; no absolute cap
Road (goal)	206.2 gCO_2/vkm	133.0	−35.5%	Pass	—	Intensity; no absolute cap
Aviation (goal)	88.2 gCO_2e/pkm	77.0	−12.7%	Fail (87%)	—	Offsets allowed
Shipping (goal)	+4.4% delta	0.0%	Return to pathway	Pass (requires reduction)	—	Moved above pathway
CRE office (goal)	52.2 $kgCO_2e/m^2$	29.6	−43.3%	Pass	—	Grid-dependent
CRE retail (goal)	73.0	32.6	−55.3%	Pass	—	Grid-dependent
RRE (goal)	31.9	15.4	−51.7%	Pass	—	Grid-dependent; no lending restriction
Cement (goal)	Withheld	0.46	n/a	Cannot verify	—	Confidentiality

D.9 Nature & physical risk (Section 14)

ID	FINDING & EVIDENCE CHAIN	MIN-COMPLIANCE	DECISION-USEFULNESS / CLAIM-QUALITY	SEVERITY · CONFIDENCE	CONSEQUENCE	WHAT WOULD FIX IT
D9-1	Physical risk sized by vulnerability metrics; ICAAP compound event; tools Home-ID, Farm-ID, Commercial-ID (EV-23)	No apparent issue	Relevant and transparent (N-04); NZ agriculture lacks a metric; chronic data ~5 years old	Minor limitation · High	I1 pass	NZ metric
D9-2	Agriculture: Very High nature impact and dependency; 29.4% of financed emissions; untargeted (DP26, EV-15)	—	Nature and climate exposure concentrated in the untargeted sector	Decision-usefulness concern · High	—	Agriculture pathway

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

BASE ISSUE	CHAINS TO	RULE + EVIDENCE IDS	ESCALATED SEVERITY
Target → goal relabelling (D6-1)	Coverage of financed emissions by targets (R2); retail headline of preserved direction (R4, P2)	YOY-06, T-DEP-04, OUT-TB-02; EV-02, EV-03, EV-15	Decision-usefulness concern (headline-adjacent)
Net zero ambition not restated (D6-2)	Leadership message framing (R4); public composite (P2)	YOY-05, A-18, A-17; EV-03..05	Decision-usefulness concern (headline)
Code-minimum lending in EFA (D6-3)	"Climate action" headline (R1, P2)	A-19, G-BAU, A-17; EV-06..08	Decision-usefulness concern (headline)
Scope 1 above baseline (D2-1)	Operational target progress and SBTi-aligned label (I3, P2)	T-MI-06, A-19, T-SBTi-01; EV-09..11	Decision-usefulness concern
O&G commitment re-scoped (D8-5)	Target headroom (I2)	YOY-06, SEC-FI-TGT-04; EV-16, EV-17	Decision-usefulness concern

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

SCREEN	OUTPUT	BASIS
Required Interventions Schedule	Potentially applicable; evidence required	Fleet (mobile combustion 5,467 tCO_2e, rising) and refrigerants are now the only path to the operational target
Clean Alternative Assessment	Potentially applicable; evidence required	Fleet electrification stated as an aim; no cessation year or readiness assessment
Prohibited Activities Schedule	Standard review item	Lending to oil and gas (target permits growth) and greenfield gas in Australia under the energy-security discretion

Annex G: Rule-application table

RULE FAMILY	APPLIED?	RESULT
Applicability gate (L / S2-01..06)	Yes	Mandatory FY2026; reliefs properly applied

RULE FAMILY	APPLIED?	RESULT
GHG inventory foundation (G / GHG-STD)	Yes	Reporting-year change and rebasing disclosed; baseline split not republished
Scope 1 (G-06 / S2-26)	Yes	Above 2022 baseline; YoY fall is reporting-driven
Scope 2 & renewables (E / S2-28)	Yes	Both bases; certificate serials cannot verify
Scope 3 (S3 / S3A / G-15)	Yes	Cat 1 residual and Cat 2 unbounded; customer Scope 3 three sectors
Offsets / net claims (E-08..22 / G-11)	Yes	Year-of-claim netting cannot verify
Targets & transition (T / S2-14/15/40)	Yes	Relabelling; net zero not restated; flat and growth targets
Governance / remuneration / assurance (GOV / A-11)	Yes	29(g)(ii) escalated; reasonable assurance S1/S2
Sector (SEC-*)	Yes	FI / PCAF
SEC-FI-TGT-04	Yes	Four fails among targets/goals plus aviation marginal (D.8 table)
SEC-FI-05A	Yes	Fossil exposure reduction and renewable lending credited
SEC-SF / SEC-INV-LT	No	Not triggered
NOCO2-MAP-01/02	Yes	§6.1
Nature / physical risk (N)	Yes	D9-1, D9-2

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

ID	ITEM	PACK	EVIDENCE REQUESTED	STATUS
K-01	Group financed emissions including BNZ	PCAF	BNZ FY2026 Climate Statements, or a Group total	Open
K-02	Rebased 2022 baseline by scope	Target progress	Scope 1 and market-based Scope 2 for the year to 30 September 2022	Open
K-03	Offsets retired against each year	Offsets	Registry extracts by year of claim; forward vs true-up split; vintages; removal share	Open
K-04	Code-minimum share of energy-efficient RRE lending	Target progress	Split of the $13.1bn and $8.7bn by eligibility route	Open
K-05	Remuneration percentage	Remuneration	29(g)(ii) percentage, including zero	Open
K-06	Certificate serials	Renewable electricity	Surrender records for 54,822 MWh of certificates and PPA attributes	Open
K-07	Gas-type split	Scope 1 / 3	Why "Other gases (including HFCs)" is 32.9% of gross operational emissions when refrigerants are 1.0% by source	Open
K-08	Category 3 2025 comparative +29 tCO_2e	Scope 3	Reason	Open (immaterial)

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

CHAIN ID	TRIGGER	FOLLOW-UP SCANS RUN	EVIDENCE IDS	FINAL LABEL
CH-01	Market-based target progress (69%)	Scope 1/2 decomposition against June-2022 split; YoY Scope 1 by source; implied 2030 level	EV-09..11	Decision-usefulness concern
CH-02	Target relabelling	Coverage by targets vs goals; Board minutes reference; headroom table	EV-02, EV-14, EV-15	Decision-usefulness concern
CH-03	Withdrawn-commitment full-text search	"net zero", "2050", "NZBA", "Climate Active", "science-based" across AR26 and DP26, against CR25	EV-04, EV-05	Unaddressed removal
CH-04	Headline "Climate action"	Table 2 components; eligibility criteria; NCC timing	EV-06..08	Decision-usefulness concern
CH-05	Carbon neutral (data table)	Offsets, footnotes, EY Appendix E, register	EV-19, EV-22, EV-25	Cannot verify
CH-06	Financed / PCAF	Coverage, BNZ exclusion, agriculture method, Other extrapolation, customer Scope 3	EV-14, EV-15, EV-26	Partial / concern
CH-07	Remuneration 29(g)	Climate statement f88 against audited Remuneration Report f178	EV-21	Escalated
CH-08	NGER	Register lookup; AR compliance statement; period	Annex J	Cannot verify (no figure)

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

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

CLAIM / METRIC	ANNUAL / FINANCIAL REPORT	SUSTAINABILITY / ESG	MARKETING / WEBSITE	CLIMATE ACTIVE PDS	CDP	INVESTOR PRESENTATIONS	NGER / CER / SAFEGUARD	BOUNDARY/PERIOD NORMALISATION	DIVERGENCE?
Scope 1 / Scope 2 LB	7,288 / 42,145 (f69)	Same (DP26 SECR)	Not reviewed	Not applicable (no longer certified)	Not reviewed	Not reviewed	Not published (below threshold)	Oct–Sep vs NGER Jul–Jun; 15-month figures given	**No (cannot verify against NGER)**
Operational Scope 3	93,901 (f69)	93,901 gross; 89,185 market-based (DP26 note 10)	—	—	—	—	—	Basis labelled	**No**
Offsets / net emissions	Restatement footnotes only	96,473; net 0	—	Last FY2024–25 (signed 6 Oct 2026; register lists FY2024)	—	—	—	Year of claim unclear	Internal ambiguity (D5-1)
Financed emissions	17.1 Mt; 52.9% (f86)	References AR (SASB index)	—	—	—	—	—	—	**No**
Operational target label	"aligned to … SBTi 1.5°C pathway" (f68)	—	—	—	—	—	—	EY Appendix F: "Science-based Emissions Target"	**Label only**

CLAIM / METRIC	ANNUAL / FINANCIAL REPORT	SUSTAINABILITY / ESG	MARKETING / WEBSITE	CLIMATE ACTIVE PDS	CDP	INVESTOR PRESENTATIONS	NGER / CER / SAFEGUARD	BOUNDARY/PERIOD NORMALISATION	DIVERGENCE?
Net zero ambition	Not stated (FY2026)	Not stated (DP26)	Not reviewed	—	—	—	—	FY2025: stated	Change over time (P.3)

O.2 NGER statutory reconciliation (A-01C): NAB not in the published FY2024-25 register (name and ABN searched); the annual report states the Group "is subject to and complies with" the NGER Act. Below the publication threshold for the period, not non-reporting; absence is not zero.

METRIC	DISCLOSED (REPORT)	NGER REGISTER (YEAR · AS-AT)	BOUNDARY DIFFERENCE (OP-CONTROL / AU-ONLY / METHOD / PERIOD)	RECONCILED?	LABEL
Scope 1	7,288 (Group, Oct–Sep)	Not published (FY2024-25)	Group vs AU; Oct–Sep vs Jul–Jun	No	Cannot verify
Scope 2 (location-based)	42,145 (Group)	Not published	As above; Australia 53,577 MWh of 71,463	No	Cannot verify
Net energy (GJ)	338,996 (DP26)	Not published	As above	No	Cannot verify

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

#	LENS	EXPOSURE & CONFIDENCE	DRIVER (FINDING / EVIDENCE IDS)	CROSS-SOURCE LINK (DR-02)	WHAT WOULD REDUCE IT
O-1	Legal	Moderate · Medium	D6-2, D6-3, D6-4; EV-03..09	Net zero change over time	Address the net zero position; split EFA; Scope 1 beside 69%
O-2	Regulatory	Low–moderate · Medium	D7-1, D7-2; Annex J.2	EY label vs statement	Percentage; NGER figure; labels
O-3	Technology	Moderate · Medium	D6-1, D5-3	—	Goal fallbacks; removal evidence
O-4	Physical	Low–moderate · Medium	D9-1	—	NZ metric
O-5	Other: target integrity	High · High	D6-1, D8-1, D8-2, D8-5	—	Agriculture target; re-set power; cap glide path

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

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

METRIC / CLAIM	PERIOD →	FY2022	FY2023	FY2024	FY2025	FY2026	SOURCE(S) PER CELL	BOUNDARY/METHOD NORMALISATION
Scope 1		6,619	7,590	7,313	8,359	7,288	FY25 DP GHG sheet; AR26 f69	FY26 September year
Scope 2 (location)		69,015	57,320	49,565	44,444 (restated 45,135)	42,145	As above	Co-location reclass from FY26

METRIC / CLAIM	PERIOD →	FY2022	FY2023	FY2024	FY2025	FY2026	SOURCE(S) PER CELL	BOUNDARY/METHOD NORMALISATION
Scope 2 (market)		16,399	—	2,567	0	0	FY25 report/DP; AR26	—
Scope 3 operational (defined)		43,712	54,990	71,821	78,259 (restated 93,757)	93,901	As above	Cloud method change; commuting first in FY24
Total gross operational (LB, S1+2+3)		119,346	119,900	128,699	131,062	143,334	FY25 DP; DP26 SECR	Not like-for-like
Financed emissions total (data year)		—	—	15.2 Mt (2024)	17.1 Mt (2025)	—	CR25; AR26 f86	Agriculture method change; not restated
Financed in targets and goals		—	11.4 Mt (2023)	10.4 Mt (2024)	9.0 Mt (2025)	—	CR25; AR26	Data year one behind
Renewable electricity %		72%	88%	95%	100%	100%	DP26 Energy	—
Offsets retired		78,358	64,776	76,837	81,267	96,473	FY25 DP; DP26	FY26 described as forward for FY27
Electricity (MWh)		91,151	84,483	80,508	75,651 (restated)	71,463	DP26 Energy	—

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

#	FIGURE / BASELINE	AS STATED IN REPORT OF THE PERIOD	AS RESTATED IN A LATER REPORT	DISCLOSED & LIKE-FOR-LIKE?	EFFECT ON AN ON-TRACK / PAY / FINANCING CLAIM	LABEL (CONCERN / ACCEPTABLE / CANNOT-VERIFY)
P2-1	Operational baseline 2022	23,018 (June year)	23,856 (September year)	Disclosed with reason; split not republished	The rebasing adds about 1 percentage point (68.3% on the old baseline, 69.4% on the new); the rest of the move from 64% is the year's Scope 1 reporting change	Acceptable; split cannot verify
P2-2	Scope 3 2025	78,259	93,757	Disclosed (cloud +15,478; reclass)	None (no Scope 3 target)	Acceptable
P2-3	Scope 2 LB 2025	44,444	45,135	Disclosed (+691)	None	Acceptable
P2-4	Agriculture financed	1.5 Mt (2024)	5.0 Mt (2025, new method); 2024 not restated	Method change disclosed; prior not republished	Coverage ratio falls 68.2% → 52.9%	Acceptable (disclosed); comparability cannot verify
P2-5	Group offsets-retired line FY2024	76,837 (FY2024 PDS; 2024 data pack)	76,818 (2025 data pack, GHG Emissions rows 43–44)	Disclosed (2025 data pack note 3; FY2024–25 PDS fn 12: 2024 emissions restated by 19 tCO_2e for waste incineration); the offsets retired are not restated	None	Acceptable (added 16 Nov 2026; §3.4 carries the first-published 76,837)

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

#	ITEM (METRIC / CATEGORY / TARGET / CLAIM / LIMITATION)	PRESENT IN	ABSENT/ADDED IN	EXPLAINED?	LABEL
P3-1	NAB net zero ambition (financed, facilitated, operations by 2050)	FY2025 Climate Report; FY25 DP	FY2026 AR and DP	No	Concern (D6-2)
P3-2	NZBA membership reference	FY2025	FY2026	No	Neutral (A-18); recorded
P3-3	Five-year GHG sheet; operational-target progress table	FY25 DP	FY26 DP	No	Minor concern (D2-4)

#	ITEM (METRIC / CATEGORY / TARGET / CLAIM / LIMITATION)	PRESENT IN	ABSENT/ADDED IN	EXPLAINED?	LABEL
P3-4	Climate Active certification statement	FY25 DP	FY26 DP	No (consistent with register)	Neutral (A-18)
P3-5	NGER-basis Australian Scope 1+2 figure	FY2025 AR	FY2026 AR	No	Minor
P3-6	Internal carbon price ($24.85/t, Australian buildings)	—	Added FY2026	—	Credited only on its own evidence: a disclosure requirement, narrow scope; not a positive
P3-7	Vulnerability and capital-deployment metrics	—	Added FY2026 (AASB S2)	—	Baseline

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

#	TARGET / CLAIM	BASE YR	TARGET YR	COVERAGE / SCOPE	CHANGE ACROSS PERIODS (WEAKENED / EXTENDED / REBASED / RE-SCOPED / RETIRED / REPLACED)	ON-TRACK SURVIVES SERIES?	LABEL
P4-1	Eight sector targets (CRE office/retail, RRE, road, shipping, aviation, cement, aluminium)	2019–2022	2030	Sector boundaries unchanged	Re-scoped to "goals" (status weakened; values unchanged)	n/a	Concern (disclosed)
P4-2	Oil and gas cap	2021	2050	O&G extraction EAD	Re-scoped from exposure reduction to cap reduction	Cap non-binding (4.1× actual)	Concern
P4-3	Operational 72% by 2030	2022	2030	S1 + S2 MB	Rebased (period)	Market-based yes; Scope 1 no	Qualified
P4-4	Net zero by 2050	—	2050	Financed, facilitated, operations	Not restated	—	Concern (unaddressed)
P4-5	Thermal coal exposure 50% by 2026	2019	2026	Thermal coal mining EAD	Met	Yes	Positive (composition)
P4-6	Climate Active (Australian operations)	2010	—	Operations	Ended (register)	—	Neutral

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

#	CLAIM / METRIC	REPORT TYPES COMPARED	PER-PERIOD DIVERGENCE (AFTER NORMALISATION)	TREND IN DIVERGENCE	AUDITED-SOURCE PREFERENCE APPLIED (A-01B)	LABEL
P5-1	Operational inventory	AR vs DP	FY2025: offset footnote misstated its basis; FY2026: figures agree, footnote describes a forward year	Basis error resolved; year-of-claim ambiguity remains	AR preferred	Minor
P5-2	NGER vs Group figures	AR vs NGER	FY2025 reconciled after normalisation; FY2026 no NGER figure published	Not testable in FY2026	—	Cannot verify

#	CLAIM / METRIC	REPORT TYPES COMPARED	PER-PERIOD DIVERGENCE (AFTER NORMALISATION)	TREND IN DIVERGENCE	AUDITED-SOURCE PREFERENCE APPLIED (A-01B)	LABEL
P5-3	Target label	Climate statement vs EY appendix	FY2025 both "science-based"; FY2026 statement "aligned to", EY "Science-based"	Diverged in wording	Statement preferred	Minor

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.

#	AUDIENCE	CRITERION	VERDICT	WHY
A1	Carbon accounting	No material category excluded	Not met	Category 1 is limited to paper, water and cloud and "All other goods and services are excluded in 2026"; NAB's FY2025 relevance test called the residual material; capital goods are excluded; customer Scope 3 is outside nine of the twelve sector boundaries. No bounding estimate for any of it, so the completeness rebuttal is not met and workability cannot reopen it. The planned 2027 expansion is a forward intention and neither cures nor establishes the defect
A2	Carbon accounting	Single reconcilable footprint	Pass	One operational footprint: Scope 1, both Scope 2 bases, defined Scope 3, the gross location-based and net market-based totals labelled in the data pack and agreeing with the annual report; financed emissions separately with their period stated. Restatements reconcile to the FY2025 figures (one 29 t difference in category 3, immaterial)
A3	Carbon accounting	Method, boundary and version transparency	Pass	Operational control stated; factor sets named by year; GWP source (AR6) named for refrigerants; every 2026 method change listed by category; restatements given with reasons; PCAF methods per asset class and data-quality scores; the agriculture method change explained. The reporting-year change and rebasing are disclosed with reasons
A4	Carbon accounting	Granularity and assurance sufficient to lift	Pass	Scope 1 by source and Scope 2 by basis audited to reasonable assurance; Scope 3 by category under limited assurance; financed emissions by sector with exposure and data quality under limited assurance
I1	Institutional investors	Physical risk relevant and transparent (N-04)	Pass	Physical and transition vulnerability metrics in dollars and share of exposure for the lending book, operations and suppliers; scenarios named with limitations; ECL treatment explained. Modelling quality not judged
I2	Institutional investors	Transition risk: derivable target headroom	Partial (workable)	On credibility the targets ask little: power flat, oil and gas +213%, iron and steel +300%, aluminium an upper bound, and eight sectors relabelled goals. But the criterion asks that headroom be visible or derivable, and it is. Action: the investor reads each 2030 value against the 2025 value in the performance summary. Data: folio 71 (baseline, 2024, 2025, 2030 per sector) and Table 8
I3	Institutional investors	Target achievement: real reductions, honest progress	Not met	The operational target's 69% is a market-based certificate effect; Scope 1 is above its 2022 level and above the implied 2030 level; the year's Scope 1 fall is a refrigerant reporting change while fleet fuel rose. Recorded in NAB's favour: the sector narratives attribute falls to data, model and grid effects rather than claiming them as abatement. The real-reduction limb still fails
I4	Institutional investors	Portfolio / financed-emissions completeness	Partial (workable)	All NAB lending sectors quantified with exposure, emissions and data quality, untargeted book sized (8.1 Mt, 47.1%). BNZ is outside the figures and "Other" is extrapolated. Action: the investor takes NAB's 17.1 Mt from Table 8 and adds BNZ's financed emissions from BNZ's own Climate Statements, to which the annual report points. Data: Table 8 and BNZ's statements
I5	Institutional investors	Flow-through / look-through exposure	Not met	Customer Scope 3 is included only for thermal coal, oil and gas and metallurgical coal. For the other nine sectors the emissions NAB inherits are neither in the target boundary nor quantified elsewhere, and nothing disclosed lets a reader bound them
I6	Institutional investors	Reconstructability by a sophisticated reader	Pass	The position is derivable from the annual report, with prior reports for the Scope 1 baseline split; it takes work this audience can spend

#	AUDIENCE	CRITERION	VERDICT	WHY
R1	Retail investors	Headline matches evidence without cross-document work	Not met	The "2026 at a glance" climate headline is "Climate action $34.7bn". Its largest component includes lending on all new homes at the 7-star code minimum, a basis stated only in the methodology appendix; the component split is printed (Table 2) but not the code-minimum basis, and its size is not disclosed. A retail reader cannot match the headline to its evidence. (The operational 69% is not the ground: its contractual-instrument note is co-located.)
R2	Retail investors	Targets cover material sources; achievement honest	Not met	Targets cover 25.8% of financed emissions after the relabelling; agriculture (29.4%), the largest single sector, has neither a target nor a goal; 47.1% has neither. The operational achievement rests on certificates. AMD-034 names R2 as reading down alone
R3	Retail investors	Material risks legible	Pass	Risks set out by type with value-chain location, horizon, response and a vulnerability metric each
R4	Retail investors	Caveats findable, understandable, fairly presented	Not met	Recorded in NAB's favour: the relabelling is stated in the leadership message and at folios 45 and 70, and the contractual-instrument note sits beside the operational target. The fair-presentation limb fails: the FY2025 net zero ambition is not restated and its absence is not addressed, while the leadership message describes "preserving our direction and strategy"; and the oil and gas commitment's move from exposure to cap is not flagged
P1	Consumers & public	Claims literally true within their implied boundary	Pass	Tested claim by claim: the environmental finance figure is true on NAB's stated criteria; "four in every five dollars" is 82.3%; the 69% is true on the market basis it names; "net carbon emissions 0" is true on its defined boundary subject to the netting question (cannot verify, not falsity)
P2	Consumers & public	No greenwashing or misleading composite impression	Not met	The composite a member of the public takes from the report's opening: $34.7bn of "Climate action", renewables taking most power lending, and settings "maintained" with direction "preserved". Absent: NAB's own net zero ambition is no longer stated; eight of twelve sector commitments became goals; a quarter of financed emissions is targeted; the climate headline's largest part includes code-minimum home lending; and the 1.5°C-aligned operational target's 69% is certificates while Scope 1 is above 2022. Each element is stated or derivable somewhere; the composite is not. No intent is inferred
P3	Consumers & public	Genuine climate action evidenced	Pass	Thermal coal mining lending exited; oil and gas extraction exposure down 42% in a year and 67% since March 2024; renewable power lending up to $9.36bn; physical electricity use falling. NAB is not presenting inaction
G1	Regulators	Standards compliance / readiness	Partial (workable)	First mandatory statement complete in structure, reliefs declared, directors' declaration, unmodified assurance. One open item: the 29(g)(ii) percentage answered as "not separately quantifiable". Action: a regulator reads folio 88 and Remuneration Report folio 178 and decides whether the stated basis satisfies 29(g)(ii). Data: both passages, which agree with each other. Escalated rather than labelled a compliance concern
G2	Regulators	Cross-source / audience consistency	Pass	Every figure the annual report and data pack share agrees; EY's subject matter matches the statement; the "science-based" title in EY Appendix F is a label difference with the same substance. The NGER comparison cannot be made this year (different period, no NGER-basis figure), recorded as cannot verify, not a divergence