

# Bigger Picture

**Sustainability Report** 

# **Acknowledgement of Country**

We recognise and acknowledge the existing, original and ancient connection Aboriginal and Torres Strait Islander peoples have to the lands, waterways and sky country across the Australian continent. We pay our respects to their Elders and Ancestors.

At Telstra, we are enriched by Aboriginal and Torres Strait Islander peoples' contribution to our organisation and we commit to working together to build a prosperous and inclusive Australia.



#### About the artwork 'Connection'

Created by Bobbi Lockyer, a passionate Aboriginal artist hailing from Kariyarra Country in Port Hedland. This artwork represents Telstra's commitment to its customers, community, and the power of connection. The artwork combines the hand painting storytelling and symbols of the oldest continuous culture in the world with the modern digital graphic design of the satellite sky.

#### Terms used

Throughout our 2025 Bigger Picture Sustainability Report, the terms Aboriginal and Torres Strait Islander and First Nations are used interchangeably to reference Australia's First Peoples. The term Indigenous is used where it relates to a program name or is a preferred term.



# **About Telstra**

Telstra is Australia's leading telecommunications company.

We offer a full range of products and services across a customer base that includes consumers, small businesses, large enterprises and government organisations.

We have around 265 stores in Australia



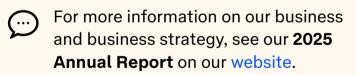
We provide around 24.9 million retail mobile services

and 3.4 million

consumer and small business bundle, data and voice only services

As of 30 June 2025

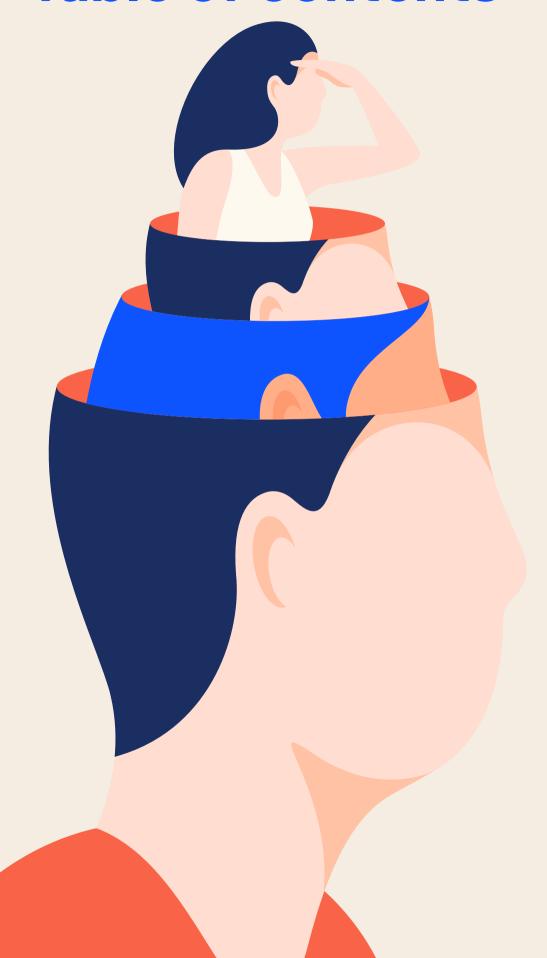
We connect to points of presence in close to 200 countries and territories around the world





Subscribe to our sustainability newsletter

# **Table of contents**



2	2
10	9
DZ	ZØ

## **Sustainability at Telstra**

Statement from our Chair and CEO	.5
FY25 sustainability highlights	8
FY25 progress against targets	9
Our strategy	.10
Material impacts identified through stakeholder assessment	_11
Management approach and governance	_13
Leadership	14
About this report	15



## Doing business responsibly

FY25 progress against targets	16
Approach	17
Leading conduct and governance	17
Whistleblowing	18
Fair and transparent products and services	18
Human rights	21
Ethical supply chain	23
Reconciliation	24
Our people	26



For more information on our sustainability approach and performance, Glossary, Data Pack, Content Index and other associated reports see our website.



For more information on our climate and nature disclosures, see the 'Acting on climate and nature' section in our 2025 Annual Report on our website.

# Creating a better digital world

FY25 progress against targets	33
Approach	34
Connecting regional, rural and remote communities	35
Closing 3G to improve our network	36
Building responsible tech skills	38
Supporting people in vulnerable circumstances	40
Advancing online safety, privacy and security	43
Telstra Foundation	46

# Sustaining our planet

FY25 progress against targets	47
Approach	48
Taking climate action	48
Decarbonise the grid	54
Protecting nature and biodiversity	55
Progressing a circular economy	58
Enabling the transition for our customers	64
Al and climate	65
Environmental compliance	66
Environmental advocacy	66

# Building resilient connectivity

The importance of resilient connectivity	67
Prioritising resilient connectivity before,	
during and after outages	69

# Statement from our Chair and CEO

# We are delighted to share our 2025 Bigger Picture Sustainability Report

Operating sustainably and responsibly is fundamental to supporting our overall ambitions, delivering value to shareholders over the longer term, and to supporting the prosperity of Australia. Sustainability creates ongoing value for our business and positive impact for our customers, our stakeholders, our communities and our environment.

This year we completed our T25 strategy and are proud that we have met and exceeded many of our ambitions. We again surpassed our target to help 1 million customers in vulnerable circumstances stay connected, this year supporting more than 1.9 million customers and introducing expanded means of support. We have increased digitally active customers by 2 million and helped build digital skills for more than 677,000 people over the past four years, which is critical to helping reduce the digital divide as technologies advance. We have also continued to make good progress against our climate targets, including to reduce our absolute scope 1+2 emissions by 70 per cent and scope 3 emissions by 50 per cent by 2030, and to enable renewable energy generation equivalent to 100 per cent of our consumption by the end of this calendar year.

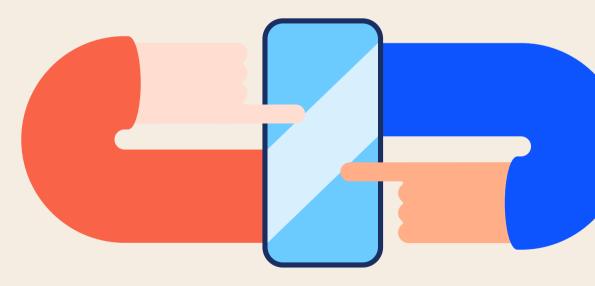
Energised by what we've achieved and inspired by what's ahead, we are excited to move into the next phase of our journey with a new five-year strategy - Connected Future 30. Telstra's purpose is to build a connected future so everyone can thrive. Our new strategy will see us heighten our engagement with our customers and communities to deliver reliable, resilient, secure and environmentally responsible connectivity in ways that work best for them. This is why we are investing in rolling out high speed, low latency fibre across Australia, enhancing our mobile network

across the country and investing in new products and services for our customers such as satellite-to-mobile services.

This new strategy will also see us focus on our country's need to increase productivity and prosperity. The telecommunications connectivity that we provide will play a critical role in Australia's future and in realising the benefits of transformative technologies, including AI. There is no AI without connectivity, and to realise its potential we need to get the foundations right. Earlier this year we entered a seven-year joint venture with Accenture to build upon our AI foundations and develop specialised AI capabilities. This will see us tap into the global best to complement these leading AI capabilities, enabling our teams to work smarter and faster.

We are also investing in our people and the way we operate to ensure that we develop leading AI capabilities. For example, our Data and AI Academy offers personalised learning experiences that enable our people to make confident data driven decisions, embrace emerging technologies responsibly and be prepared to operate in a workforce that will continue to be transformed by these technologies. This year we launched Career Connect, enabling deeper development conversations and integrated performance planning. This AI-enabled talent marketplace aims to drive a new era of skills-based development to help our teams find meaningful work, learn, experiment and grow.





#### Our achievements this year

#### Supporting our communities

We know that many people are feeling the impacts of cost-of-living pressures, and we remain committed to keeping our customers connected regardless of location or circumstance. To do our best for these customers, we work to understand their circumstances and have various specialised support available to help address needs. We also offer a range of programs to help people afford our services when they are experiencing financial hardship. These include concession offers and payment assistance, and we have expanded some services such as our Top Up program to make it easier for people experiencing financial hardship to access products and services they need.

Our Chief Customer Advocate prepares an independent report that summarises initiatives Telstra has in place to support customers in vulnerable circumstances. Each year we review the Chief Customer Advocate Report and consider how our strategy and programs respond to the matters raised. For example, the 'Chief Customer Advocate Report on Customer Vulnerability 2024' noted that there was still more work to be done to provide payment flexibility to existing customers migrating to our new in-market plans. All customers on our new digital platform now have access to those flexible payment terms - by the end of FY25 this equated to around 98 per cent of our consumer customers, with a plan to complete the migration to the new digital platform in the first half of FY26. In addition, the 2024 Chief Customer Advocate Report noted the important role that free payphones play as a lifeline for Australians in need. We have now upgraded over 1,000 payphones with free Wi-Fi and backup power in disaster prone areas. We will consider this year's Chief Customer Advocate Report and continue to report on actions taken.

We know for someone experiencing domestic, family and/or sexual violence (DFSV), a mobile phone is an essential lifeline, and our customers have access to specialised support like our Enhanced Care team who are trained to support victim-survivors. We also offer more than 6,000 smart phones every year with pre-paid credits to victim-survivors through our community partner WESNET.

Telstra is a long-time supporter of reconciliation and has strong connections with First Nations people through our employees, customers, stakeholders and communities across the country. This year we completed the third and final year of our FY23-FY25 Stretch Reconciliation Action Plan (RAP) and recently launched our new three-year FY26-FY28 Stretch RAP. Our achievements over the three-year RAP include delivering new infrastructure to over 30 regional or remote First Nations communities, expanding scope of our First Nations Connect team members, delivering face to face cultural learning for over 1,750 of our people and (in FY25) creating over 480 employment opportunities for First Nations people through the Indigenous Workforce Program.

In late 2024 we closed our 3G network. Closure of our 3G network was a critical step to make spectrum available to further improve 5G services, with flow on benefits to 4G services. By repurposing spectrum used for 3G, we've also been able to expand capacity and improve speeds at over 4,300 existing 5G mobile sites and activate new 5G at another 631 sites. The total volume of customer data usage flowing through these sites is now more than 50 per cent higher which would not have been possible without the closure of 3G. That means more emails sent, photos uploaded, apps used, webpages browsed and videos streamed. Despite ongoing growth in demand for data on our mobile network, our expansion of 5G and use of additional spectrum has helped increase the average speeds our mobile customers enjoy by around 11 per cent since the closure of our 3G network.

We started talking to our customers about our plans to close our 3G network in October 2019, to make sure they had time to prepare for the change. To help support customers with the transition, we created a '3G Helpline', which routed calls from customers in relation to the 3G shutdown to a specialised customer service team. We also put in place a hypercare program to support customers transition from 3G and provided nearly 19,000 free phones to customers in vulnerable circumstances across Australia who had not yet transitioned to a 4G device.

We upgraded more than 11,000 4G mobile sites in preparation for 3G closure, and we are investing in technology innovations, such as fixed, mobile and satellite connectivity to provide better experiences, including for our regional, rural and remote communities. We are committed to addressing 3G coverage issues identified by customers and our efforts to address customer concerns are ongoing.

We also engage with Government on policy that creates the conditions for the economic sustainability of our industry and delivers better experiences for consumers.



For more information on the 3G closure, see the Closing 3G to improve our mobile network section of this report.

# Mitigating environmental impacts and adapting to a changing environment

In addition to our progress on emissions and renewable energy generation, we have exceeded our FY25 circular economy targets to reuse or recycle 650,000 devices and to increase our network waste recycling rate to 90 per cent. We have also continued to use sustainable packaging for all Telstra-branded products, so that valuable materials and minerals can be kept in circulation for longer, reducing waste.

Our teams work all year round to ensure we're as prepared as we can be for when extreme weather or disaster strikes, and we have stepped up our response when it does. We have provided disaster support in the form of additional data to more than 1 million services, and as noted above, upgraded over 1,000 payphones in disaster prone areas. We also expanded our use of portable Starlink kits for priority locations like evacuation centres, mobilised more than 3,000 of our people to repair critical equipment or answer calls on our 24/7 disaster assistance line, and supported digital training for disaster preparedness to help people securely digitise and store their essential documents.

# Investing in online safety, privacy and cyber security

We recognise our responsibility to safeguard our customers' data and privacy and continue to make substantial investments in cyber security to help protect them from scams and online threats. We expanded our Scam Indicator product with the Commonwealth Bank to cover both landlines and mobiles, and we extended this collaboration with a new product called Fraud Indicator to help prevent identity theft for our joint customers. We also launched Device Security Essentials to help protect mobile phones from online threats and introduced Scam Protect to alert mobile customers to suspicious incoming calls. Through our Cleaner Pipes initiative, we blocked more than 18 million scam calls and 8 million scam SMS messages from reaching our customers every month during the year.

We also ensure we have robust recovery protocols to restore operations in the case of any security incidents, acknowledging that not every potential threat can be mitigated. These improvements enable us to manage existing and emerging cyber security risks and to help ensure the integrity and resilience of our systems.

We want to help all our customers and their families stay safe online. Our Online Safety and Wellbeing Hub provides resources to help protect people from harmful online content and includes information on reporting content to the eSafety Commissioner.

We also have robust Responsible AI Policy and Governance practices on the safe use of AI tools and services, and we participate in international forums such as the UNESCO Business Council for Ethics and the GSM Association (GSMA) to help ensure our operations meet global and emerging standards.

# Promoting the health, safety and wellbeing of our people

Tragically, in July 2025 a Telstra team member lost his life when a bird struck a chartered helicopter in which he was travelling as a passenger. We offer our sincere condolences to his family, friends and colleagues, and acknowledge the enormous contribution he made to Telstra over many years. The incident is currently under investigation and we expect to include further information in our FY26 reports.

We are a global employer with complex operations across a range of diverse locations and environments, from retail stores, call centres and offices, to construction, maintenance and emergency works in cities and remote locations. We are committed to provide our people and service delivery partners in each of these environments a safe workplace, and to connect and empower them to deliver industry-leading, successful, and safe work. This is supported by our Safety Connected Vision developed during FY25 and built on the fundamental pillars that our people are 'empowered' to engage and learn with curiosity, 'enabled' to learn from success and prioritise safety and productivity through effective controls, and 'accountable' for safe work.

Core to this, we work together to identify, prevent or mitigate harm, and emphasise the importance of reporting as an essential mechanism to continually learn from experiences across our operations. We use multiple data points and a combination of leading and lagging indicators to assess our performance, identify trends, and initiate preventative programs of work. We continue to observe a stronger reporting culture with an increase in the number of low severity incidents reported which enables effective implementation of risk management interventions and early intervention injury management strategy. Pleasingly, during FY25 we have not observed a proportionate rise in the number of serious incidents. Our Global Diversity, Equity and Inclusion (DEI) strategy underscores the importance of mental wellbeing by creating a workplace that respects and celebrates differences. We believe a safe and inclusive culture and workplace is essential for our people to do their best work, and our teams need to represent the diversity of the customers we serve. Finally, in implementing any necessary organisational changes that impact our people we are committed to acting with care and transparency.

#### Leadership and transparency

During the year, the Board reviewed its committee structure. From 1 March 2025, we replaced the Audit & Risk Committee with two separate committees, being the Audit Committee and the Risk & Sustainability Committee. The formation of the separate Risk & Sustainability Committee highlights our focus on sustainability across all areas of the organisation, including managing the risks and opportunities associated with these topics.

Climate-related disclosures in our Annual Report are guided by the International Sustainability Standards Board (ISSB)'s climate disclosure standard (International Financial Reporting Standard (IFRS) S2). We were early adopters of the recommendations of the Taskforce on Nature-related Financial Disclosures (TNFD) and have also published our second disclosure guided by those recommendations in our Annual Report. This outlines how we manage nature-related dependencies, risks, impacts and opportunities. We also work to help ensure that we as well as our partners and suppliers operate with respect for human rights and report our progress in our annual Modern Slavery Act Statement.

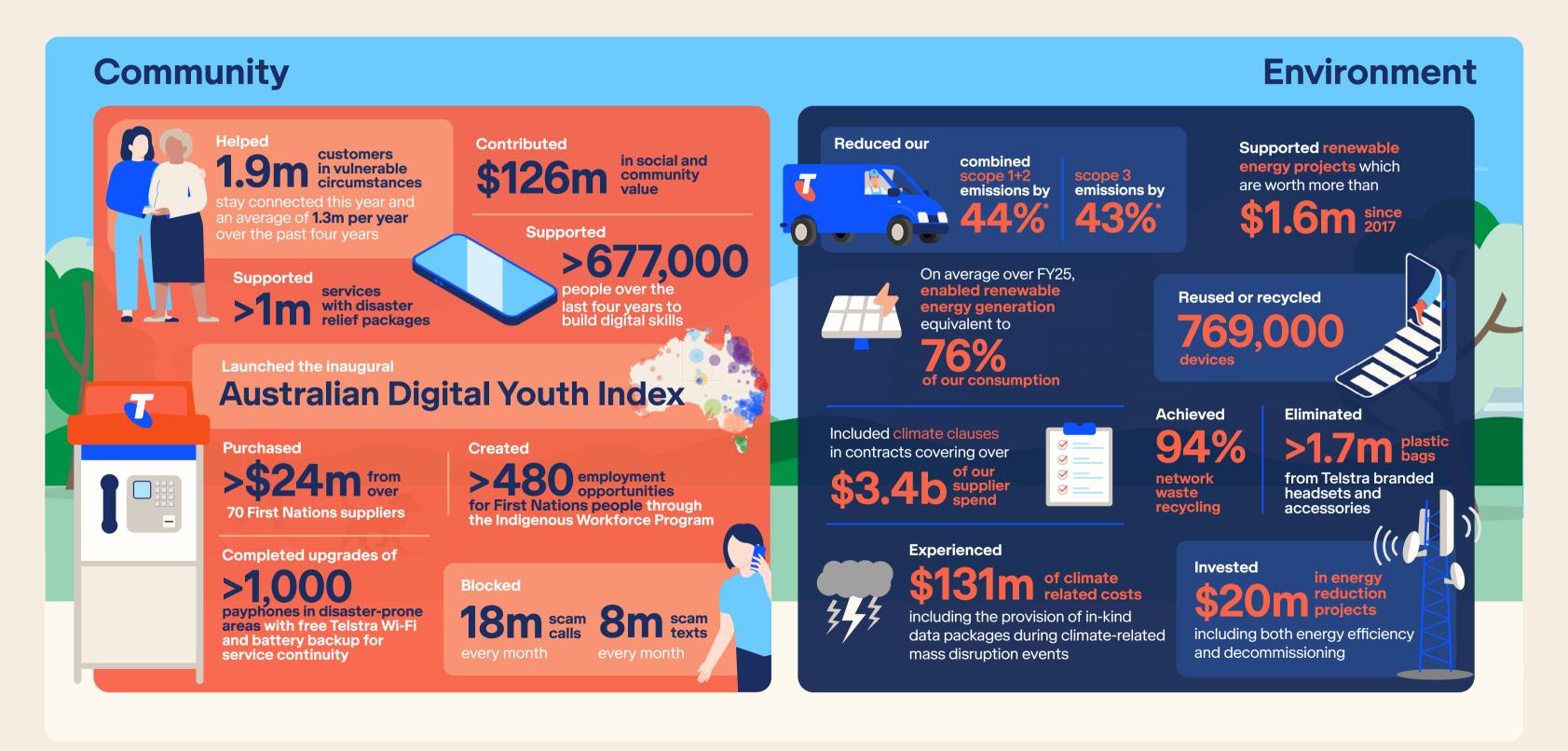
As the world around us continues to shift and change, we acknowledge our responsibility and opportunity to have a positive impact with our operations, and leadership on issues that are important to our customers. We will continue to face into challenges and remain committed to achieving our sustainability ambitions.

Thank you for your interest in this report on our progress, and we welcome any feedback.

Vicki Brady – CEO and Managing Director

Craig Dunn – Chair

# FY25 sustainability highlights



# FY25 progress against targets

•	On track for delivery
•	Progress made but below target
	Not on track
<u></u>	Completed

	Focus area	Target	SDG <sup>1</sup>	Prog	ress	More info
	Leading conduct and governance	Achieve 100% annual completion of Business Essentials refresher conduct training course	SDG 16	9	8.3% of our total target audience completed the mandatory refresher training	page 17
responsibly	Fair and transparent products	Achieve a 50% reduction in Telecommunications Industry Ombudsman (TIO) consumer and small business complaints by FY25	SDG 8 SDG 10	✓ R	Reduced our TIO referral complaints by more than 70% since FY21	page 20
ess	Ethical supply chain	Continue to conduct independent third-party supply chain audits	SDG 8	✓ <sup>g</sup> p	3 sites across 21 suppliers audited using the Joint Alliance for Corporate Social Responsibility (JAC) uidelines. <sup>2</sup> Closed 204 corrective actions relating to priority and major findings identified in this or previous years' audits, including 106, or 65%, of corrective actions relating to priority and major findings identified in FY25's audits	2025 Modern Slavery Act Statement
Doing busin	Our people	Remain at 90th per centile employee engagement (equivalent to high-performance norm)	SDG8		schieved our target for FY25 with a score of 79, which places us above Glint's Global 75th per centile benchmark. This is three points below our 90th per centile stretch target	page 26
	Our people	Achieve 40:40:20 gender balance by 2030 across our executive leadership and the global workforce	SDG 5 SDG 10		by the end of FY25 women made up 40% of the CEO team (including CEO), 36.8% of the global workforce, this is on track to meet our 2030 target	page 27
world	Connecting regional, rural and remote communities	~95% population coverage for 5G by FY25	SDG9	/	G now covers ~95% of the Australian population assisted by reuse of spectrum made possible by the losure of our 3G network in November 2024	2025 Annual Report
$\sigma$		Expand regional coverage by 100,000 km² by FY25		<b>√</b> 30	60,000 km² regional coverage added since FY21 – more than triple our goal of 100,000km²	2025 Annual Report
a better	Building responsible tech skills	Increase digitally active customers by 2 million, by FY25, including building digital skills for 500,000 Australians by FY25			ncreased digitally active customers by 2 million by the end of FY25 and supported over 254,000 <sup>3</sup> australians to build digital skills in FY25 (677,000 over the past four years)	page 38
Creating a	Supporting people in vulnerable circumstances	Help keep 1 million customers in vulnerable circumstances connected each year from FY22-FY25	SDG 9 SGD 10	<b>/</b>	delped more than 1.9 million customers in vulnerable circumstances stay connected in FY25, and naverage of 1.3 million per year over the past four years	page 40
		Reduce our absolute scope 1+2 emissions by 70% by 2030 (from an FY19 baseline)		<ul><li>R</li></ul>	Reduced our combined scope 1+2 emissions by 44% from an FY19 baseline (excluding Digicel Pacific)	page 48
ᅓ		Reduce our absolute scope 3 emissions by 50% by 2030 (from an FY19 baseline)		<ul><li>R</li></ul>	Reduced our scope 3 emissions by 43% from an FY19 baseline (excluding Digicel Pacific) <sup>5</sup>	page 52
$\odot$		Enable renewable energy generation equivalent to 100% of our consumption by 2025	SDG 13	• C	nabled renewable energy generation equivalent to 76% of our consumption on average over FY25. Contracted renewable energy generation equivalent to more than 100% of forecast consumption at he end of this calendar year	page 54
		Net-zero greenhouse gas (GHG) emissions by 2050 <sup>6</sup>			Reduced our combined scope 1+2 emissions by 44% and our scope 3 emissions by 43% from FY19 baseline <sup>7</sup>	page 48
S		Reuse or recycle 650,000 mobile phones, modems and other devices each year to 2025 <sup>9</sup>	SDG 12	✓ R	Reused or recycled over 769,000 mobile phones, modems and other devices in FY25	page 59
		Increase our network waste recycling rate to 90% by 2025		✓ A	chieved 94% network waste recycling rate in FY25	page 61

Targets are baselined to FY21 unless otherwise stated.

- 1. See the Management approach and governance section for more information on the Sustainable Development Goals (SDGs).
- 2. Telstra led 11 site audits and JAC peers led 42 audits. Telstra reports the number of audits Conducted by Telstra and JAC peers under the JAC guidelines on suppliers relevant to Telstra.
- 3. Figure includes FY24 digital skills project data from Telstra Foundation, however final data was not available until FY25.
- 4. Digicel Pacific has been excluded from reporting against FY25 emissions targets, Digicel Pacific emissions are reported separately below and further details can be found in the 2025 Data Pack on our website.
- 5. This is ahead of the trajectory required to reach our target of a 50 per cent reduction by 2030, however there is still some risk relating to our scope 3 target For more information, see the Managing our scope 3 emissions section of this report.
- 6. We are committed to achieving net-zero greenhouse gas (GHG) emissions by 2050, through the Business Ambition for 1.5°C campaign. During FY25 our net-zero target was validated by the Science Based Targets initiative (SBTi) as aligning to their Corporate Net-Zero Standard.
- 7. See the Our use of carbon credits section of this report for more information on our use of carbon credits and our GHG emissions targets.
- 8. Digicel Pacific has been excluded from Telstra's circular economy reporting in FY25 as we are still working to compile timely and suitable data. A multi-year program has commenced with the aim to progressively report relevant Digicel Pacific circular economy data in future periods.
- 9. From FY26 we have set a new target to donate, reuse, repair or recycle one connected devices (phones, tablets, modems, streaming devices, wearables, IoT devices, etc.). For more information, see the Devices section of this report.



# **Our strategy**

#### Our purpose is to build a connected future so everyone can thrive

Operating sustainably is crucial to achieving our purpose and is a key component of our Connected Future 30 strategy. By operating sustainably, we can create ongoing value for our business and positive impact for stakeholders, communities and the environment. We create positive impact by harnessing technology

to create a better digital world, minimising our impact on the planet and helping our customers, our suppliers and Australia do the same. We also continue to engage with our customers and stakeholders to understand the challenges they may face and how we can support them by building more resilient communities.



#### Our ambition is to be the number one choice for connectivity in Australia

#### Our three layers and goals



#### **Customer Engagement**

To lead in how we anticipate and deliver on the connectivity needs of our customers



#### **Network as a Product**



#### **Digital Infrastructure**

To be Australia's leading digital infrastructure provider

#### Our four enablers



People & culture



Technology leadership



**Sustainability** 



Financial discipline

The section below outlines the material sustainability activities and topics that will create value and positive impact under our Connected Future 30 strategy.

# Material impacts identified through stakeholder assessment

At Telstra, we regularly review our most significant sustainability impacts, informed by the Global Reporting Initiative (GRI) Standards. We apply a double materiality approach, considering both impact materiality (the outward-facing impact that Telstra can create on people and the environment) and financial materiality (the inward-facing risks and opportunities which may impact Telstra's value). Our impact materiality assessment informs the content of this report and is a key consideration

in how we continue to evolve our sustainability ambitions. We assess financial materiality through our finance and risk management process. We use a combination of key external and internal stakeholder assessments (including surveys and desktop reviews of external assessments such as peer company reports and industry reports) to determine priority topics.

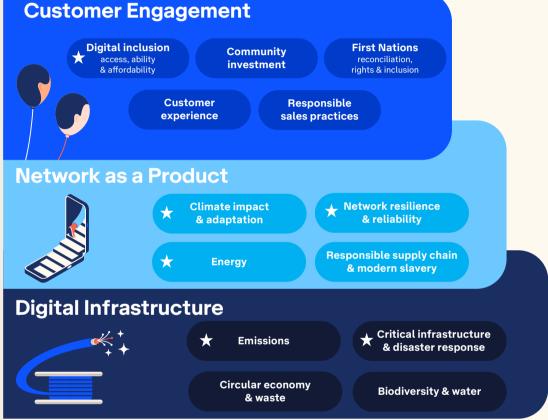
The outputs of that impact materiality assessment for FY25 are shown in the infographic below.

Creating a better digital world Sustaining our planet Doing business responsibly Employee health, safety and wellbeing • Cyber security, privacy and data protection Energy Highest materiality • Consumer health, safety and welfare Network resilience and reliability Emissions Ethical business practices Critical infrastructure and disaster response • Climate impact and adaptation Digital inclusion • Responsible supply chain Responsible sales practices Circular economy and waste materiality Digital ethics, rights and responsibilities Leadership and good governance Engaging, developing and enabling people Customer experience Wages, benefits and freedom of association Online safety and misinformation Modern slavery and exploitation Affordability Innovative tech solutions for good Moderate • Diversity, equity and inclusion • Digital transformation enablement materiality ESG regulation and compliance Community investment Low Political engagement, social issues First Nations rights, reconciliation Water materiality and advocacy and inclusion Biodiversity

That materiality assessment is an input in determining our sustainability priorities. We consider it in the context of our purpose and our Connected Future 30 Strategy to determine whether there are other topics apart from those rated 'Highest' or 'High' on which Telstra should focus. For example, First Nations reconciliation and inclusion was rated 'Low' priority in the materiality assessment. However, we know through the Australian Digital Inclusion Index and Mapping the Digital Gap research that many First Nations communities in remote areas have some of the highest levels of digital exclusion. We also know that focusing on activities that increase the level of digital inclusion will make a meaningful difference to people living in these communities and is consistent with our purpose of building a connected future so everyone can thrive. Water and biodiversity were also rated 'Low'. However, we know that we need to better understand the impact of our business on biodiversity and water as well as the role that improved biodiversity may have in addressing climate change. Starting the work to better understand these matters will put us in a better position to understand them as risks and opportunities for our business and also help us prepare for future reporting requirements on nature. This report and related reports in our annual reporting suite (including our 2025 Modern Slavery Act Statement) highlight the sustainability topics we have chosen to prioritise.

The infographic below shows how we are responding to those materiality topics in our broader Connected Future 30 strategy.







Sustainability-related activities are present in all parts of our Connected Future 30 strategy. For example:

- We are contributing to maintaining financial discipline (an enabler of our Connected Future 30 strategy) through our focus on:
  - reducing energy consumption
  - assessing climate risk and implementing adaptation measures
  - reusing materials as part of our circular economy and waste programs.
- We are also contributing to customer engagement (a layer in our Connected Future 30 strategy) and our broader social objectives through our focus on digital inclusion (access, ability and affordability).



2025 Report Glossary on our website.

uli

For more information on how we engage and create value for our stakeholders, see our In focus: Sustainability at Telstra paper and 2025 Content Index on our website.

# Management approach and governance

At Telstra, we consider telecommunications as an enabler of social and environmental solutions that contribute to the Sustainable Development Goals (SDGs). We are managing sustainability at Telstra by:

• Doing better as a business – delivering on our commitment to do business responsibly and being transparent, ethical and accountable wherever we operate.











**Doing better for communities** – technology connects us all. We create a better digital world by helping make sure Australians, of every background and ability, have the skills and confidence to safely take part in the online world.





**Doing better for the environment** – we take climate action, protect nature and biodiversity and contribute to a circular economy. We work with our customers and suppliers to minimise the impact of climate change and enable the transition to a low-carbon future.







Our governance arrangements are essential for the long-term performance and sustainability of our company. They provide the structure through which our strategy and business objectives are set, our performance is monitored and our risks are managed.



For more information about how we are contributing to the SDGs through our work, see our In focus: Sustainability at Telstra paper on our website.



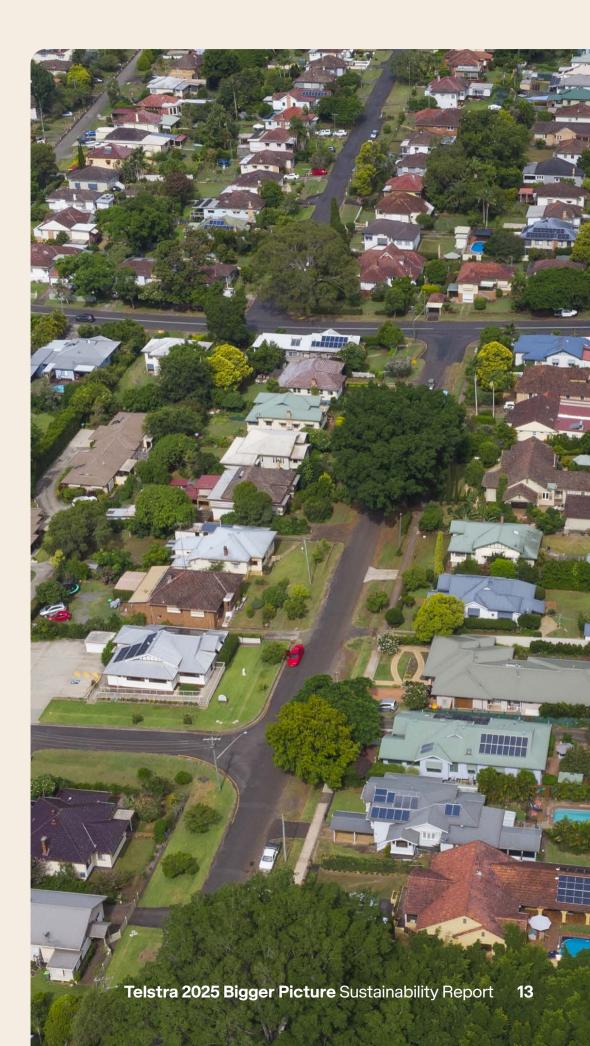
For more information see our 2025 Corporate **Governance Statement** on our website.

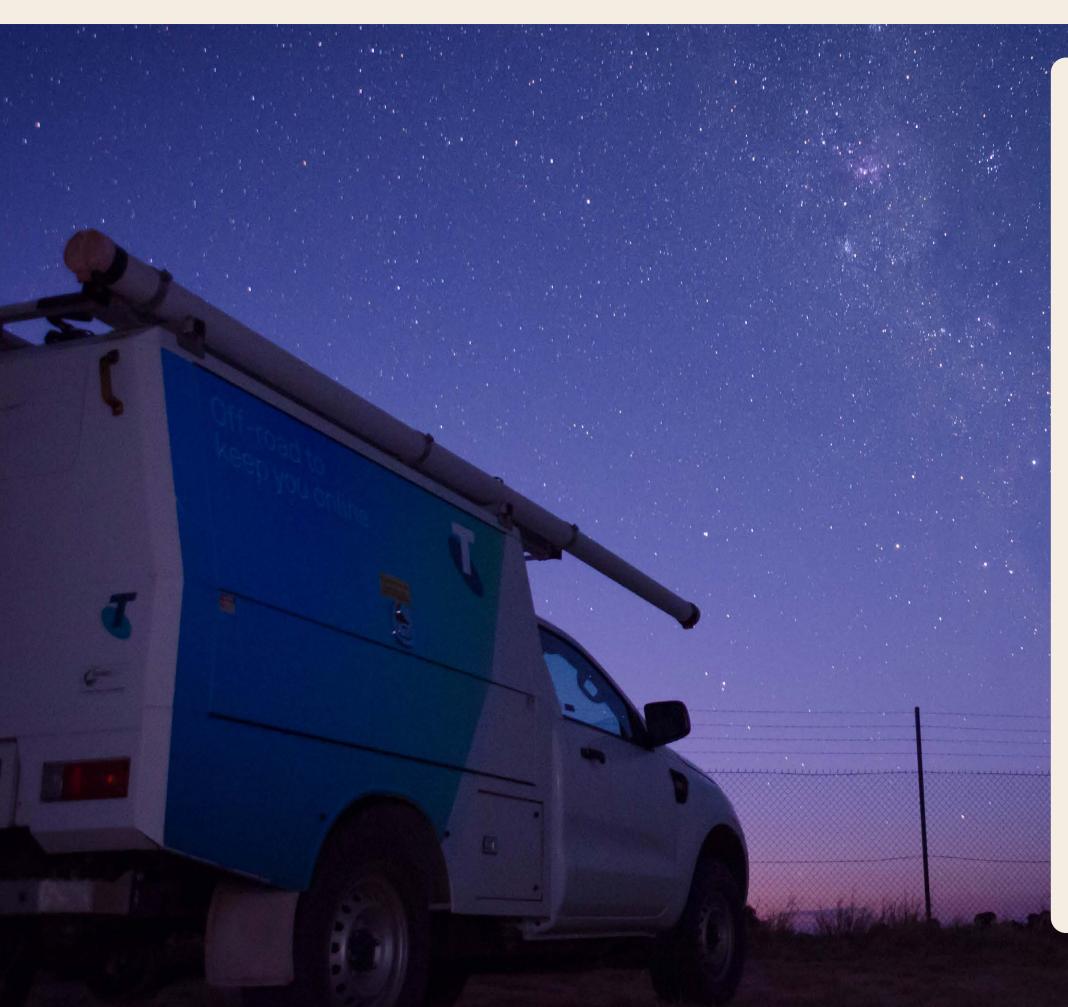


For an overview of sustainability governance at Telstra, see our In focus: Sustainability at Telstra paper on our website.



For specific information about governance in relation to climate and nature, see the 'Acting on climate and nature' section in our 2025 Annual Report on our website.





# Leadership

In FY25, our sustainability ambition continues to be recognised in the industry.

- We were recognised with a CDP A- rating, as well as being recognised with an A in the 2024 CDP Supplier **Engagement Leaderboard.**
- We were a finalist for the 2024 Australasian Recycling Label **Excellence Award** providing consumers with easy-to-understand recycling information on packaging. This award celebrates the organisations who have used the program to educate consumers on responsible packaging disposal and improve the recyclability of packaging.
- Telstra and its partner Justice Connect were **finalists in the ANZ** Partnership Brokering Awards. This recognised the partnership established to create the Get ePrepared digital online learning tool, which supports people with low digital skills to safely store their essential documents ahead of natural disasters and personal crises.
- Telstra Health also won Research Australia's Health and Medical **Research Award for Digital and Data Health Innovation for** 2024 in partnership with RMIT University and in collaboration with the Digital Health Cooperative Research Centre, for a tool using natural language processing and machine learning to monitor deterioration in aged care residents.
- We were recognised at the 31st National Safety Awards of **Excellence for 'Best Solution for Management of Psychosocial** Hazards at Work' for our program supporting our Australian Triple Zero team who respond to emergency situations daily.
- We were listed in The Financial Times Asia-Pacific Climate **Leaders 2025** list highlighting our work to reduce emissions and take action on climate change.
- We were also listed in **TIME Magazine's World's Most** Sustainable Companies 2025 list.

# **About this report**

#### Our annual reporting suite

Our reporting suite for 1 July 2024 to 30 June 2025 (FY25) includes:		
2025 Telstra Annual Report	Describes our strategy and our financial performance and remuneration practices. It also includes climate and nature-related disclosures guided by ISSB IFRS S2 and the recommendations of the TNFD.	
2025 Bigger Picture Sustainability Report (this report)	Provides an in-depth look at our approach and performance in relation to our most material sustainability impacts.	
2025 Corporate Governance Statement	Provides information about governance at Telstra.	
2025 Modern Slavery Act Statement	Explains how we identify, manage and mitigate the specific risks of modern slavery in our operations and supply chains.	
2025 Data Pack	Provides more information about our sustainability performance.	
2025 Content Index	Maps the information in our sustainability-related reporting to frameworks including GRI, United Nations Global Compact (UNGC), IFRS and TNFD.	
2025 Glossary	Provides definitions of terms used throughout this report.	
2025 In Focus: Sustainability at Telstra Paper	Offers further details on our materiality approach, strategy, alignment with the SDGs, stakeholder engagement and partnerships.	



These documents are on our website.

#### Reporting scope

This report covers the activities of Telstra Group Limited and its controlled entities (together referred to as we, us, our, Telstra, the Telstra Group or the Group) for the financial year 1 July 2024 to 30 June 2025 (FY25), unless otherwise stated. Information regarding the controlled entities in the Telstra Group can be found in the 'Consolidated Entity Disclosure Statement' in our 2025 Annual Report on our website.

Digicel Pacific has been excluded from reporting against our FY25 emissions targets. Digicel Pacific emissions are reported separately below in the Sustaining our planet section of this report and further details can be found in the 2025 Data Pack on our website.

Where possible and relevant, we have extended the scope of this report to include discussion of broader impacts across our value chain.

#### **Assurance**

Deloitte provides limited assurance in accordance with ASAE 3000 over a selection of disclosures in our 2025 Bigger Picture Sustainability Report, including GHG emissions results, and the 2025 Modern Slavery Act Statement.



For an overview of the metrics that underwent assurance this year, see **Deloitte's Assurance** Statements on our website.





# FY25 progress against targets

	On track for delivery
	Progress made but below target
	Not on track

✓ Completed

Focus area	Target	SDG	Progress	More info
_	Achieve 100% annual completion of Business Essentials refresher conduct training course	SDG 16	<ul> <li>98.3% of our total target audience completed the mandatory refresher training</li> </ul>	page 17
Fair and transparent products	Achieve a 50% reduction in Telecommunications Industry Ombudsman (TIO) consumer and small business complaints by FY25		√ Reduced our TIO referral complaints by more than 70% since FY21	page 20
Ethical supply chain	Continue to conduct independent third-party supply chain audits	SDG 8	√ 53 sites across 21 suppliers audited using the Joint Alliance for Corporate Social Responsibility (JAC) guidelines.¹¹ Closed 204 corrective actions relating to priority and major findings identified in this or previous years' audits, including 106, or 65%, of corrective actions relating to priority and major findings identified in FY25's audits	2025 Modern Slavery Act Statement
Our people	Remain at 90th per centile employee engagement (equivalent to high-performance norm)	SDG 8	<ul> <li>Achieved our target for FY25 with a score of 79, which places us above Glint's Global 75th per centile benchmark. This is three points below our 90th per centile stretch target</li> </ul>	page 26
	Achieve 40:40:20 gender balance by 2030 across our executive leadership and the global workforce	SDG 5 SDG 10	<ul> <li>By the end of FY25 women made up 40% of the CEO team (including CEO) and 36.8% of the global workforce, this is on track to meet our 2030 target</li> </ul>	page 27

Targets are baselined to FY21 unless otherwise stated.

<sup>10.</sup> Telstra led 11 site audits and JAC peers led 42 audits. Telstra reports the number of audits conducted by Telstra and JAC peers under the JAC guidelines on suppliers relevant to Telstra.

## **Approach**

#### How we do business responsibly

At Telstra, we are committed to acting responsibly, transparently and being accountable wherever we operate. Our long-term success depends on maintaining the trust of our customers, community and partners.

We do business responsibly by:

- continuously improving our products and services so they are sustainable, inclusive and sold responsibly
- driving transparency of our supply chain and upholding the highest standards in human rights
- maintaining trust with our stakeholders by conducting business fairly and transparently
- being a diverse, inclusive, safe and flexible workplace that enables the full potential of our people.

# **Leading conduct** and governance

Across our operations, we promote a fair and responsible culture through the Telstra Group Code of Conduct (Code), Group Policies, mandatory compliance training and by recognising employees who demonstrate our behaviours and habits. Our behaviours and habits (known as our 'Big Three' of 'Look Beyond', 'Work as One' and 'Make a Difference'), Code and supporting Group Policies and Standards guide our people and partners to uphold our expectations to act fairly, ethically and in accordance with the law.



For more information, see the 'Acting lawfully, ethically and responsibly' section in our 2025 Corporate **Governance Statement** on our website.



For how we govern our supply chain relationships, see our 2025 Modern Slavery Act Statement on our website.



#### **Training**

Mandatory Business Essentials training supports our commitment to acting ethically and responsibly and adherence to our Code. All of our Telstra team members including contingent workers, partners and internal staff are required to complete Business Essentials each year. In FY25, we achieved a 98.3 per cent total completion rate with 100 per cent of internal employees and 97.5 per cent for external team members.

## Whistleblowing

Our Code further fosters a culture where our people are encouraged to speak up and raise concerns with confidence.

We aim to ensure our people know how to raise concerns through various channels, including Telstra's Whistleblowing Policy (Policy). This Policy and relevant legislation protect directors, current and former employees, their relatives, dependants and suppliers who report illegal, unethical or improper conduct at Telstra.

Our Policy includes a confidential process that offers protection for those reporting concerns, an anonymous whistleblowing service and professional investigators and case managers for eligible reports. We have a confidential Whistleblowing Service where people can report concerns anonymously via phone or webform. The service is supported by our Whistleblowing Policy. Professional investigators and case managers investigate eligible reports. Telstra's Whistleblowing Committee, chaired by the Group Company Secretary, receives whistleblowing disclosures, oversees investigations and reports to the People & Remuneration Committee of the Board.

We received 217 whistleblowing reports in FY25, an increase of two per cent compared to FY24. Of these reports 155 were eligible whistleblowing disclosures. We completed 144 investigations in FY25, with the allegations being substantiated in whole or in part for 48 reports, noting that one report might cover multiple matters and the types of issues being reported vary in terms of the seriousness of the allegation. The nature of matters reported in eligible whistleblowing disclosures includes people and workplace culture issues (around 49 per cent),



To report a matter, visit Telstra's Whistleblowing Service.

ethical behaviour (around 27 per cent), fraud and theft (around 13 per cent) and a small number of reports on other issues such as misuse of systems and financial reporting and expenses. The core allegations cover topics such as bullying, poor leadership, conflicts of interest and unethical recruitment practices.

# Fair and transparent products and services

We're committed to helping Australians get the most out of their connectivity, whether at home, at work or on-the-go, and are dedicated to delivering customer-focused products and services that are sustainable, inclusive and sold responsibly. We consult with our customers regularly to understand their needs and incorporate their feedback to improve existing products and services and to develop new ones.

#### Product and service design

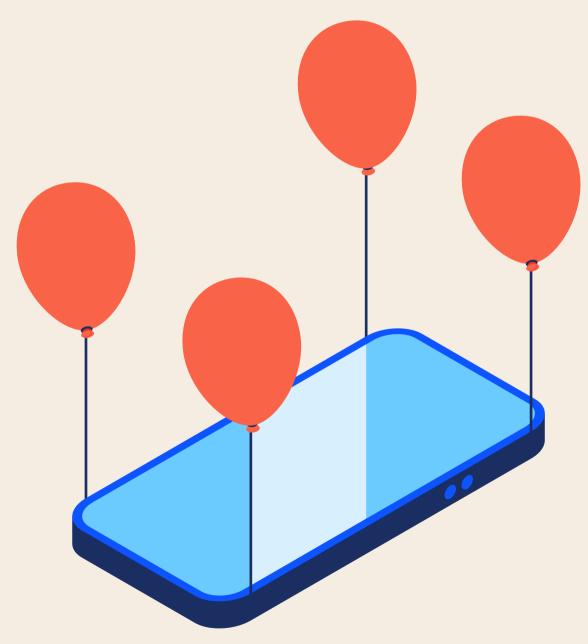
Telstra's Customer Experience (CX) Design Framework (Framework), comprising 16 principles, guides product development based on good, better and brilliant customer experiences. The Framework emphasises sustainability and accessibility to ensure customer-centric design of products and services. Regular updates and integration into governance processes continually evolve the Framework. This year's focus has been on elevating our standards around product exits.

Operationalising the Framework with a CX assessment tool enables teams to evaluate activities against CX principles, a mandatory step for customer-impacting initiatives. Telstra's Product Excellence program applies the Framework to all product releases and uses it to inform improvement plans for existing products. In FY25 we continued to consolidate our CX resources making it easier for our people to access tools, resources and insights to design better customer experiences.

#### **Customer experience**

We remain committed to improve the experience of all our customers.

For more information on our approach to customer experience and how we measure it, see the Building a better, faster customer experience section under 'Strategy and Performance' in our 2025 Annual Report on our website.



# Design and accessibility excellence

Telstra's accessibility program demonstrates our commitment to improve the customer experience for all Australians living with disability.

The accessibility of our digital assets is measured against an internal Accessibility Maturity Score based on the international Web Content Accessibility Guidelines (WCAG) and expressed as a percentage of identified versus fixed defects. This year, our customer digital assets met our target Accessibility Maturity Scores of Band 1 (>90 per cent), however our employee assets were at Band 4 (0-49 per cent), requiring uplifts to meet our target in the future. Additionally, our Telstra.com website and My Telstra app again received third-party certification to the WCAG Level A/AA standard.

A key area of work this year has been preparing for the FY26 Telecommunications Consumer Protection Code requirements including an incremental increase to the Level AA standard, containing 20 additional success criteria for specified customer digital assets. In addition to this work, the program is continuously expanding to other areas such as accessible packaging, an inclusive modem and retail experiences.

In FY25, we signed the new Inclusively Made charter. The charter sets the standard for inclusion in advertising, empowering people with disability to thrive in the creative industry. We continue to partner with our vendors to better promote the accessibility features and products available to customers, making it easier to find the relevant products based on their communication needs and assistive technology.

#### **Trust and reputation**

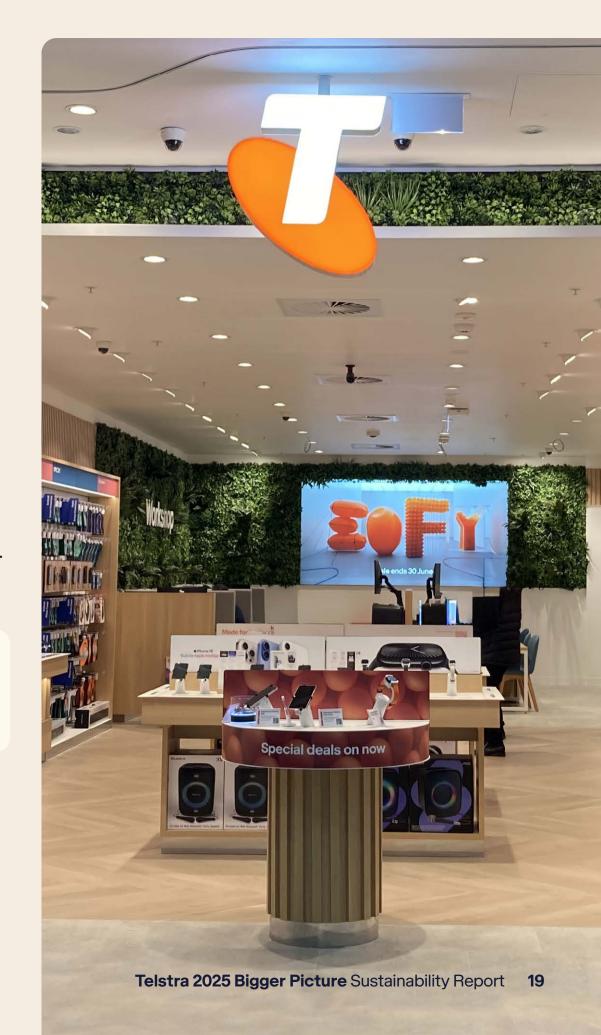
Our goal to grow trust and operate responsibly is one of the foundations of our reputation. We use the reputation measurement platform RepTrak to understand how customers and the broader community think and feel about us. In FY25, we increased our annual RepTrak reputation score by 1.1 points from 63.7 to 64.8, for a total uplift of 3.5 points from our FY21 baseline of 61.3.

#### Responsible selling

We continuously improve our responsible sales practices by actively addressing customer issues, listening to feedback and monitoring sales behaviour. We require our frontline employees to undertake mandatory training and restrict their access to Telstra systems if they do not complete this satisfactorily and on time. We undertake credit assessments and seek information about affordability of our services. Our approach is supported by tools and systems and includes communicating affordability outcomes to customers and offering alternatives when necessary. We offer a wide range of devices at different prices to enable customers to have a broad range of affordable choices.



For more information on affordability and how we support customers in vulnerable circumstances, see the Supporting people in vulnerable circumstances section of this report.



#### When we don't get it right

We aim to treat our customers fairly and offer them products and services that are safe, easy to understand and meet their underlying needs. Our Chief Customer Advocate listens to our customers and helps us ensure their voice is considered in the design of products, services, systems and processes.



For more information on our Chief Customer Advocate, see the **Chief Customer Advocate Report on Customer Vulnerability 2025** on our website.

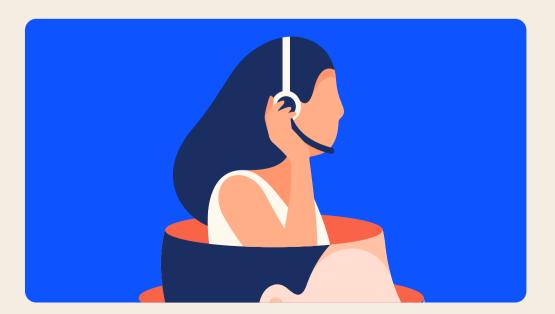
Sometimes things do not go as planned. In some instances, even small errors can have a significant impact on a group of customers. This can be especially serious when it impacts customers in vulnerable circumstances.

We continue to focus on preventing issues from occurring, and when they do, we aim to detect and address them quickly. Where we identify a significant issue, we proactively self-report to regulators in line with community expectations and our obligations. For example, in October 2024 we self-reported to the Australian Communications and Media Authority (ACMA) after we found that we had sent 10.4 million texts with unsubscribe arrangements in breach of the law over a 21-month period from 2022 to 2024, most of which required recipients to provide personal information to opt out. In March 2025, following the ACMA's investigation of the issue, we paid a \$626,000 fine and entered into an enforceable undertaking. A key learning from this was the need to do things differently when it comes to handling complex data sets across multiple platforms with a mix of short term and systemic interventions. These interventions include improving visibility of communications being sent out to customers by various functions, tightening and expanding our approval process on content and moving accountability of the program closer to the teams driving communications work.

We also aim to resolve complaints effectively and respectfully, with a focus on resolving issues quickly and in consideration of their merits. In addition to the enforcement noted above, we faced the following enforcement action by regulators this year:

- we paid a \$3,004,800 infringement notice to the ACMA arising from failures in March 2024 to transfer calls to Emergency Service Organisations (ESOs) which was managed by providing caller's details to relevant ESOs via email and phone calls, and to provide caller's digital location information to the ESOs which was managed by using the backup phone list
- we paid a \$18,780 infringement notice to the ACMA arising from a failure in July 2024 to maintain the proper and effective functioning of the 106 emergency number
- in February 2025, the Federal Court found that we made false or misleading representations relating to the upload speed of internet services supplied to nearly 9,000 Belong customers, following proceedings brought by the Australian Competition and Consumer Commission (ACCC). We are remediating customers and a hearing to determine the penalty will take place later this year.

We take breaches seriously and review them at a group-wide level to ensure the learnings are embedded and consequently improve our ability to comply with regulations.



Some of our ongoing responses include:

- moving to new digital platforms that will make the customer experience better
- improving visibility of volume and type of communication being sent out to customers by various functions, with control points testing effectiveness of activity, (data) brief quality, creation and coding quality and testing
- uplift of our standards on compliance, particularly in how we test the design and operating effectiveness of all the documented controls to support compliance with legal obligations
- standardising an approach for root-cause analysis for material compliance breaches to help ensure that we are able to properly analyse and address process failures that lead to a compliance breach as well as share lessons to minimise the risk of recurrence.

Our Risk Management Policy and risk management framework ensure we are prepared to navigate any challenges that may arise. The Risk Management Policy and framework align our risk approach with our Big Three behaviours and habits and ISO 31000 Risk Management Standard 2018.

#### **Telecommunications Industry Ombudsman complaints**

If things go wrong, we work with customers to resolve issues as quickly as possible. If the customer remains dissatisfied with the response, external dispute resolution can be accessed through the industry-funded TIO.

In FY25, we have continued a yearly reduction in TIO referral complaints after exceeding our original T25 ambition to halve FY21 volumes. We have now achieved a more than 70 per cent reduction in complaints as we have simplified our products and services and improved the time to resolve complaints managed internally. We recognise we still have more to do, and our teams are focused on the key issues we need to improve.



# **Human rights**

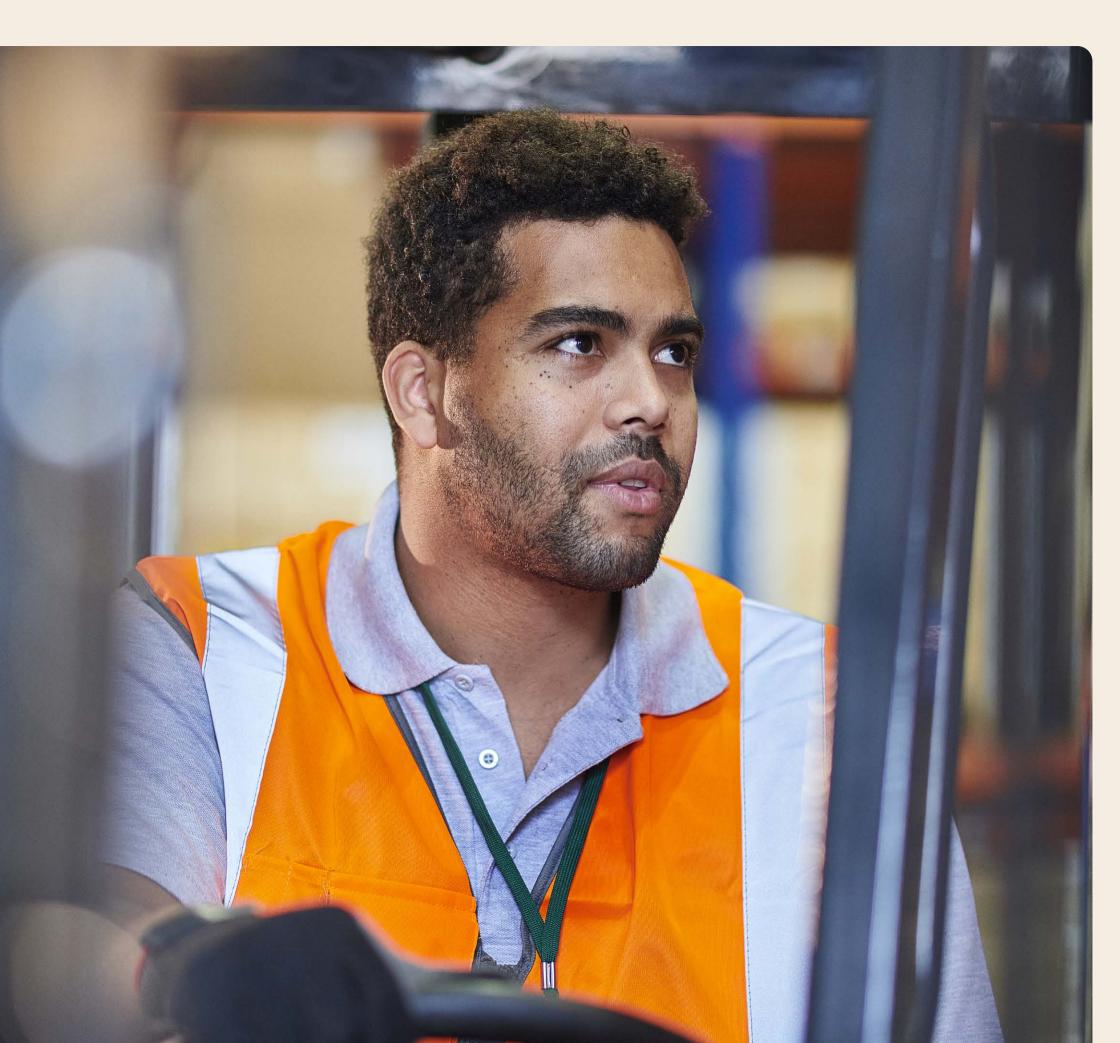
Our Human Rights Policy outlines our commitment to respect and support human rights as set out in the International Bill of Human Rights, the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work and the ten principles of the UN Global Compact, in line with the UN Guiding Principles on Business and Human Rights.

Last year, we refreshed our assessment of Telstra's salient human rights issues. These have been determined by identifying potential human rights risks present across Telstra's value chain and assessing their saliency according to the UN Guiding Principles on Business and Human Rights.

Telstra's salient human rights issues		Further info on how Telstra manages the issue
Labour rights in the supply chair	STIDDIV CHAIN AND ANDADING OUR STIDDINGS TO ANSITE TO	_
Fair and inclusive workplace	Providing a fair and inclusive workplace free from discrimination and harassment, where all people can bring their best selves to work	Our people section of this report
Health, safety and environmer	Ensuring the health and safety of our people and communities and minimising our impact on the plane	Our people and Sustaining our planet sections of this report and the 'Acting on climate and nature' section of the 2025 Annual Report on our website
Indigenous peoples' rights	Preventing impacts on cultural and cultural heritage rights of indigenous people	Reconciliation section of this report
Digital and customer rights	Connecting people to information, services and each other, building digital inclusion, supporting vulnerable customers and advancing online safety	
Privacy and free of expression	Keeping personal information of customers and employees safe and secure and protecting customer freedom of expression and access to information fro unacceptable restrictions, surveillance or interference	m ·

We monitor, manage and report progress on a range of indicators used to assess the effectiveness of our actions to support and ensure respect for human rights. These include:

Telstra's salient human rights issues Indicators		Further info on how Telstra manages this issue	
Labour rights in the supply chain	<ul> <li>Number of supplier site audits conducted (including number of tier 2 and 3 supplier audits)</li> <li>Number and type of supplier audit findings</li> <li>Number of corrective actions closed</li> <li>Feedback from workers in worker voice surveys in relation to their work conditions</li> </ul>	2025 Modern Slavery Act Statement on our website	
Fair and inclusive workplace	<ul> <li>Employee engagement score</li> <li>Number of complaints made to the Australian Human Rights Commission</li> </ul>	Our people and Advancing online safety, privacy and security sections of this report	
	<ul> <li>Number of discrimination and sexual harassment complaints</li> <li>Number of employee discrimination complaints</li> <li>Gender pay equity compa-ratio</li> <li>Diversity of employees by gender</li> <li>Percentage of disability representation level in workforce</li> <li>Progress against 40:40:20 Vision goal by 2030</li> </ul>	2025 Data Pack on our website	
Health and safety	<ul> <li>Lost Time Injury or Illness Frequency Rate</li> <li>Total Recordable Injury or Illness Frequency Rate</li> <li>Work Related Fatalities</li> <li>Employee Assistance Program utilisation rate</li> <li>Prosecutions</li> <li>Fines</li> </ul>	2025 Data Pack on our website	
Environment	<ul> <li>Percentage reduction per year of absolute scope 1+2 and scope 3 emissions (from FY19 baseline)</li> <li>Percentage increase in network waste recycling</li> </ul>	2025 Data Pack on our website	
Indigenous peoples' rights	100% of identified employees to undertake structured cultural e-learning	Telstra RAP Year 2 Report	
Digital and customer rights	Percentage of Australian population reached by Telstra's mobile network	2025 Annual Report on our website	
	Number of customers in vulnerable circumstances helped to stay connected each y	Supporting people in vulnerable circumstances section of this report	
	Number of community members supported in building digital skills	Supporting people in vulnerable circumstances section of this report	
	Number of scam texts and calls to customers identified and blocked	Advancing online safety, privacy and security section of this report	
Privacy and freedom of expression		Advancing online safety, privacy and security section of this report	
	<ul> <li>Number of privacy incidents requiring notification to the Office of the Australian Information Commissioner</li> </ul>	Data provided to the ACMA and published in aggregate in their Annual Report	
General	Number of whistleblowing reports and number of substantiated reports	Leading conduct and governance section of this report	
	<ul> <li>Percentage of employees and contractors who complete their mandatory compliance training, on the Telstra Group Code of Conduct (which includes modules on human rights, ethical behaviour and health, safety and wellbeing)</li> </ul>	Leading conduct and governance section of this report	



## **Ethical supply chain**

We have an obligation to respect human rights and to influence others in our value chain to do the same.

Telstra is a member of the JAC, a global alliance of over 30 telcos, with a seat on the board of directors. JAC members are committed to improving the global supply chain. Through the JAC, Telstra can assess, verify and implement corporate social responsibility in the global supply chain, whilst sharing resources and best practice to develop long term supply chain sustainability.

We also work with our suppliers and partner with CDP (previously known as the Carbon Disclosure Project) to gain better insights into our emissions and identify reduction opportunities. For more information, see the Taking climate action section of this report.

To improve our use of resources, reduce waste going to landfill and create more innovative solutions that reduce our environmental impact, we work with various partners across the lifecycle of our networks and products. For more information, see the Progressing a circular economy section of this report.

Reflecting the diversity of our customers and communities, we are also committed to elevating First Nations peoples as suppliers to our businesses. For more information, see the Reconciliation section of this report.



For more information on how we manage labour rights in our supply chain, see our 2025 Modern Slavery Act Statement on our website.

#### Reconciliation

Our vision for reconciliation is an inclusive Australia where Aboriginal and Torres Strait Islander peoples are connected and empowered to thrive.

Our vision will be achieved by embedding reconciliation outcomes and system changes into our organisation, as outlined in our RAP. This involves working with First Nations people and harnessing the strengths of our organisation to build digital futures, providing employment opportunities to lift economic participation and making Telstra a culturallyresponsive and engaged organisation.

In FY25, we completed our three-year FY23-FY25 Stretch RAP and developed our next Stretch RAP for FY26-28. The 93 actions in our FY23-FY25 RAP cover activities that include improved infrastructure in remote Australia (access). delivery of on-the-ground digital literacy programs in remote communities (digital ability) as well as targets for employment, procurement and cultural competency within our organisation.

In FY25, we identified an error in our reporting of First Nations procurement spend. We had previously reported spend at the tier 1 level instead of tier 2. This error has now been corrected. and the updated figures are reflected in both our 2025 Data Pack and our FY23-25 RAP Annual Report. We remain committed to transparency and have reported this to Supply Nation and Reconciliation Australia.



For more information on our commitment and action towards reconciliation, visit our Engaging First Nations Communities webpage.

# FY25 performance highlights



established and maintained

#### 30+ partnerships with First Nations communities and organisations

through our programs, partnerships and collaboration opportunities including: Reconciliation Australia. Yothu Yindi Foundation, National NAIDOC Committee, CareerTrackers and Indigenous Desert Alliance



Completed the

#### **Overland Telegraph Line** truth-telling project

in partnership with the National **Communications Museum and** creative First Nations story -telling agency GARUWA



Launched our new

#### First Nations artwork 'Connection'

by Bobbi Lockyer, an Aboriginal artist from Kariyarra Country in Port Hedland. The artwork combines the hand painting storytelling and symbols of the oldest continuous culture in the world with the modern digital graphic design of the satellite sky



employees attended face-to-face cultural learning over the course of the FY23-25 RAP. This training was aimed at enhancing cultural awareness and understanding of First Nations cultures



learning in FY25



#### **Opportunities**



<del>م</del> 480+

employment opportunities created for First Nations people through the Indigenous Workforce Program



~\$24 million

70 First Nations businesses



## (💢) Digital Inclusion

Partnered with the ARC Centre of Excellence for Automated Decision-Making and Society (ADM+S) Centre to launch the second



#### **Mapping the Digital Gap**

Outcomes Report which tracks the progress of digital inclusion against Closing the Gap target 17



## Land access and cultural heritage

Ensuring the respectful management of land access and cultural heritage is of utmost importance to us.

This is especially relevant as we build and service our telecommunication assets across the country and is achieved through engagement with First Nations communities and thorough assessments of cultural heritage. By valuing culture and protecting heritage sites, we not only comply with legal requirements but also work towards building enduring relationships with First Nations people. These relationships are vital to achieving wider goals of societal and environmental sustainability.

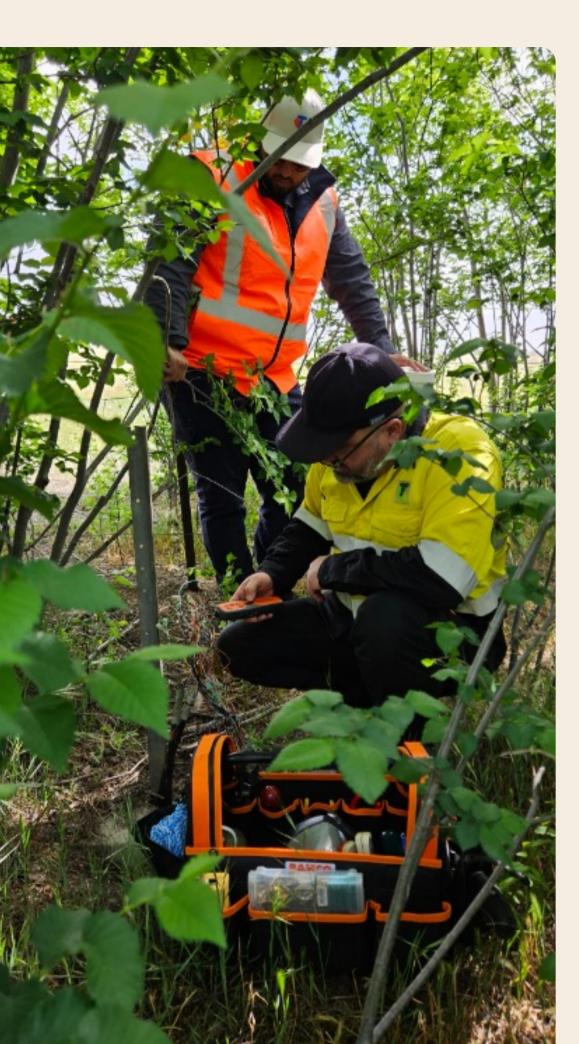
As part of the Intercity Fibre Network build, we have engaged with more than 200 stakeholders, including Traditional Owners. This aims to ensure our construction methods through environmentally sensitive and culturally significant areas are conducted respectfully and appropriately with a focus on minimising any environmental and cultural site disturbance.



## **Overland Telegraph** truth-telling project launch

In November 2024, The Truth about the Telegraph, a truthtelling research project, was launched in partnership with the National Communications Museum. Created by First Nations storytelling agency GARUWA, the project documents the powerful and largely unacknowledged First Nations perspective of the construction of the historic Overland Telegraph line.

Watch the short film here.



## Our people

#### Sustainable engagement

Telstra's workplace culture, essential for realising our purpose and business strategy, centres on our Big Three behaviours and habits that guide how we perform in our roles. Our FY25 employee engagement score was 79 which places us above Glint's Global 75th per centile benchmark. We achieved our FY25 target of 79, however this places below our 90th per centile stretch target. Our score and targets reflect our ongoing focus on employee engagement.

#### Learning and capability development

To build the capability to deliver our ambitions for a workplace where people are engaged, productive and collaborative, we invested over \$18 million in training and development in FY25, with more than \$3.5 million invested in technology training and \$3.1 million in leadership training (including our FutureReady leadership curriculum and industry masterclasses).

We invested just over \$2.2 million in developing other critical capabilities that support us to improve performance, reduce waste and deliver consistent value to customers, such as operational excellence, sales, behaviours and habits, and the Connect,

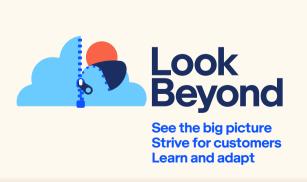
Understand and Execute (CUE) program for frontline staff. A further \$0.9 million for company-wide access to LinkedIn Learning, with an additional \$1.6 million invested into technical learning platforms or libraries such as Udemy, Cybrary and Redhat.

We have also invested \$1 million into Career Connect: an AI-enabled Talent Marketplace platform that will support our transition to a skills-based organisation. The platform connects our people to opportunities across Telstra based on skills, experience and career goals, while also enhancing informed strategic workforce planning and capability development requirements.

We also invested \$1.7 million into a variety of Compliance and Health, Safety & Wellbeing related training programs, to support our people, their safety and our risk and compliance obligations.

#### **Continued investment** in technical skills

In the past year, we've invested over \$3.5 million in blended learning solutions to upskill our workforce in data and AI, software engineering, network engineering (including 5G, Core and Radio Access Networks), cyber security and cloud engineering. Over 400 employees received micro-credentials in various domains including product management, data analytics, data engineering and security fundamentals. An additional \$1.6 million investment in digital learning platforms provided over 43,000 hours of skill-building in cloud, data, analytics, AI, machine learning,





**Listen first** Align and commit



Do what matters Act with care

cyber security, software engineering and network skills. We further invested approximately \$0.9 million in specialised technical certifications, including iBwave and ones related to cyber security (such as Certified Information System Security Professional (CISSP), open digital architecture, open APIs, eTOM and SID), with another \$0.4 million spent on upskilling our technical workforce in the field through product vendor training such as satellite and wireless technologies.

#### **Building a high-performance** organisation

We utilise an annual and quarterly planning and performance approach to deliver on company level objectives and key results (OKRs). Company level OKRs provide clarity of prioritised work so we can better respond to customer needs, stop or pause work that doesn't align to our strategic priorities and focus on work with the greatest impact. We allocate work to our people based on their skills, capabilities and development needs. In addition to our cyclical performance and development reviews, we encourage our people to have regular conversations with their leaders about their performance, development and career needs as well as obtaining peer feedback. We invest in our leaders' capability to ensure these conversations are meaningful and effective.

Our pay-for-performance philosophy means that at the end of the financial year our people receive an individual performance rating based on their outcomes and behaviours. In addition to Telstra's overall performance, these individual performance ratings, which take into account how they carry out their roles, are an important aspect for Fixed and Incentive pay outcomes for the majority of our people.



For more information on our remuneration, see our 2025 Remuneration Report which forms part of our 2025 Annual Report on our website.

#### Diversity, equity and inclusion

We are building a safe, respectful and inclusive workplace where everyone can thrive and reach their full potential. This allows us to reflect and better serve the diverse needs of our customers. We believe everyone deserves to be respected for their differences. valued for their contribution and celebrated for being their best self.

Our DEI Policy provides the framework for achieving measurable DEI objectives. This is complemented by our Discrimination. Bullying, Harassment and Victimisation Policy which outlines our commitment to providing a safe and inclusive working environment where we treat each other with respect.

We continue to work towards increasing the representation of women in executive leadership, as pledged under the 40:40:20 Vision last year. We extended this ambition to our overall global workforce, seeking 40 per cent female representation, 40 per cent male and 20 per cent any gender by 2030. As of 30 June 2025, women made up 40 per cent of the CEO team (including CEO), and 36.8 per cent of the global workforce. We maintained gender-balanced hiring practices and deepened our focus on retention and career pathways for women in tech and leadership. We continue to embed accountability via our DEI Council and Executive scorecards. In October 2024, we joined T-EDI Standards (Tech-Equity, Diversity, and Inclusion) as a Founding Partner to boost women's participation in tech careers and promote inclusivity and innovation. In addition, we maintained our focus on closing the gender pay gap and our average compa-ratio for women reached 1.00 for the first time since 2020.

We are committed to fostering an inclusive environment for neurodivergent team members. We have developed a comprehensive Neurodiversity Support Framework and launched a Neurodiversity Hub, which provides resources, tools, support and education for all employees and aims to build a neuro-inclusive workplace culture to help neurodivergent employees thrive at work.

In addition to our focus on gender and neurodiversity, we are committed to building equity and inclusion across a broad range of diversity dimensions. This includes supporting LGBTQ+ inclusion, First Nations representation, disability access, cultural and racial equity, embedding inclusive capability through learning, employee-led groups and accessible design—for both our people and our customers.



For more information on the broader range of DEI initiatives, see the 'Diversity, Equity and Inclusion (DEI) at Telstra' section in our 2025 Corporate **Governance Statement** on our website.





## **Providing leading** employment conditions

Telstra's objective is to retain and promote a constructive relationship with our employees and their union representatives. We consult with our people before we implement any significant changes to the way we work. We regularly engage with Telstra's three unions: the Communications, Electrical and Plumbing Union of Australia (CEPU), the Community and Public Sector Union (CPSU) and Professionals Australia (APESMA). Our people have the freedom to form or join a trade union, to bargain collectively and to engage in trade union activities.

In FY25, we conducted 18 formal consultation meetings with unions and Telstra employees.

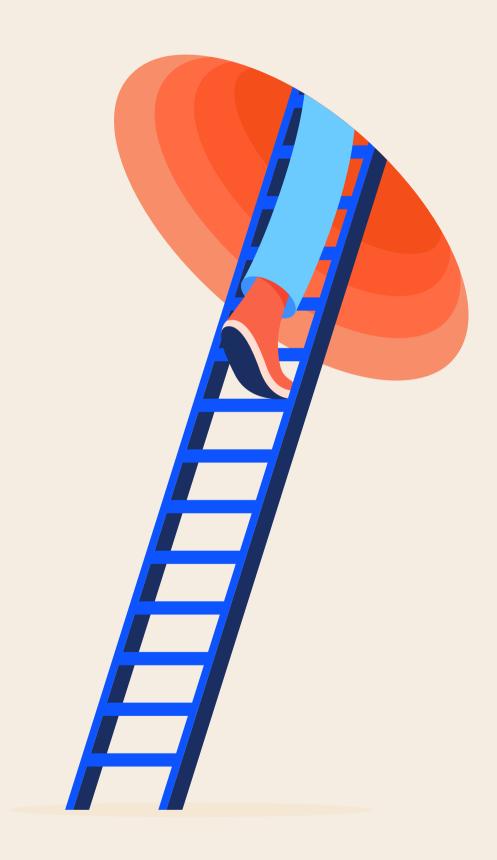
In Australia, we have four enterprise agreements (EAs) covering all our workforce, other than senior managers and lawyers. Our current EAs were approved by Fair Work Australia in 2024 and came into effect on 1 October 2024. They provide guaranteed salary increases or pay pool arrangements in 2024, 2025 and 2026 and maintain our range of industry-leading terms and conditions, such as 15 days' personal leave, a 36.75 hour working week, 16 weeks' parental leave for all new parents, flexible working arrangements, gender affirmation leave and 20 days' paid leave for employees experiencing the effects of family and domestic violence. If our employees are impacted by job losses (redundancies), Telstra offers up to 80 weeks' pay and has a commitment to redeploying people where there is opportunity.

We also uplifted our international paid parental leave entitlement to a minimum of 16 weeks for all employees regardless of location. This covers all new parents, regardless of gender, including those welcoming a child from birth or adoption.

Telstra's Flexible Working Policy encourages Telstra employees to work where, when and how they are most engaged, safe and productive. We believe all roles can be performed flexibly in some way to deliver a great experience and outcomes for us and our customers.

#### **Promoting health, safety** and wellbeing (HSW)

Telstra is committed to the health, safety and wellbeing of our people, partners, customers and the communities in which we operate. Our global operations are complex and our people work in a range of diverse environments (e.g., field and construction work, network sites, pits and enclosed spaces, contact centres, retail shops, offices and work-from-home). Connecting and empowering our people and service delivery partners to deliver industry-leading, successful and safe work is core to our health and safety approach.





#### **Our 'Safety Connected' vision**

In FY25, we reviewed our approach to further advance the safety of our people and service delivery partners.

Our 'Safety Connected' Vision is built upon the following fundamental pillars that underscore our commitment to drive continuous improvement across Telstra's operations:

- **empowered:** Utilising the solutions provided by our people, engaging with curiosity and learning from the frontline about what truly matters
- **enabled:** Increasing capacity by learning from success, matching resources with demand efficiently while prioritising safety and productivity through effective controls
- accountable: Sharing responsibility and maintaining a shared understanding of accountability for safe work, building and sustaining trust through thoughtful engagement.

## Health, Safety, Wellbeing and Environment (HSWE) **Management System**

This year we completed a multi-year review of our HSWE Management System to implement a human-centered approach to document design. By extensively consulting with our frontline teams, we developed systems that more accurately reflect HSWE risk management associated with their customer work. This collaborative approach is now our standard approach, reinforcing our commitment to continuous improvement and empowering our frontline teams. Our proactive engagement was recognised during an inspection by the national regulator for workplace health and safety in the Commonwealth jurisdiction which found our HSWE Management System was robust and well established to effectively manage employee consultation, coordinating and cooperation.

In FY26, we will enhance our management system by implementing an uplifted critical risk framework to strengthen our approach to the management of our critical risks, with a focus on preventing severe injuries.

#### Licences, accreditations and compliance

Telstra Limited, Telstra InfraCo and Amplitel are self-insured under the Safety Rehabilitation and Compensation Act (Cth). The Telstra Group is also accredited by the Office of the Federal Safety Commissioner (OFSC) to work on federal government building contracts. Our HSWE Management System is applicable globally to all Telstra-controlled entities and is certified to international standards ISO 45001:2018 and ISO14001:2015.

#### **Risk management**

Our HSWE risk management process provides a consistent organisational approach with risk profiles that define respective controls. This includes controls that manage risk of Telstra's potential impact to the public or persons outside Telstra's direct control.

Telstra assesses critical HSWE risks as those with potential to result in severe health, safety or environmental outcomes. All businesses areas with critical HSWE risks must prepare an annual first line assurance plan; the design and operational effectiveness is assessed through an annual second line assurance plan.

Stakeholder communication and consultation is integral to our approach, keeping all relevant parties engaged throughout the lifecycle. In FY25, our teams responded to over 5,550 work-related incident reports. Our robust reporting culture reinforces our risk management processes to identify potential emerging hazards and mitigation strategies. Investigations are conducted based on the severity of the incident and led by trained personnel to identify root causes, contributing factors and help ensure corrective actions prevent reoccurrence.



In FY25, the primary causes of recordable injuries were body stressing, including manual tasks and ergonomics. The principal cause of all reports of incidents that might result in illness was psychological stressors mostly relating to unacceptable customer behaviour (verbal), and the top high potential incident category was vehicles and driving.

We are actively implementing initiatives to reduce their incidence and severity as described below:

- driver safety: our operational field teams travel millions of kilometres to help our customers stay connected. This year we partnered with Safer Australian Roads and Highways (SARAH) and road safety advocate Peter Frazer OAM, who established the group in honour of his daughter Sarah. Leveraging SARAH's broader work with road safety organisations and government, we have developed driver safety campaigns to address critical driver behaviours such as speed awareness, driver distraction and safety checks. Telstra's vehicle standards mandate that all Telstra operational vehicles adhere to rigorous safety requirements, including a five-star ANCAP rating, reversing aids, Bluetooth connectivity (hands-free) and in-vehicle GPS monitoring systems capable of tracking vehicle movements, location and speed. All vehicles are regularly inspected and maintained in accordance with the manufacturer's requirements.
- unacceptable customer behaviour: unacceptable customer behaviour, which may include workplace aggression, is a psychological hazard our retail and contact staff face every day and we have commenced a multi-year plan to uplift our processes to further address this hazard. We enhanced our training including offering face-to-face training, introduced a specialised team to respond to incidents, reviewed and enhanced retail store emergency procedures and launched a comprehensive policy on unacceptable customer behaviour. Telstra stores display signage stating that aggressive behaviour will not be tolerated and that premises are monitored by 24-hour video surveillance and alarm systems, with security guards allocated as required.



#### **Early intervention**

Equitable access to timely treatment is the foundation of Telstra's early intervention program for work-related and personal injury and illness. Through access to occupational rehabilitation, general practitioners, psychology and physiotherapy services as well as financial support for a range of diagnostics and aides, our people can focus on their recovery while they remain at (or return to) safe and sustainable work. Telstra recognises employees may engage in manual or repetitive tasks and be at risk of degenerative injuries. In addition to implementing more effective controls to safeguard against these injuries, employees can access health care services proactively through our early intervention team before a serious injury occurs.

We use internal and external training to effectively implement health and safety strategies and meet legislative requirements. In FY25, we improved our training by including firsthand experiences of our frontline team on manual tasks such as working with ladders, pits and manholes. This significantly boosted engagement in training as well as an observed 17 per cent decrease in recordable body stressing injuries.

#### Our mental health approach

Our approach to mental health focuses on maturing a positive mental health and safety culture, increasing mental health literacy, strengthening our reporting culture, managing psychosocial risks and demonstrating a culture of care beyond legislative requirements.

We support our people throughout periods of organisational change and remain cognisant of the impact to our people as we rebuild successful teams. Our risk mitigation strategy includes control measures that assess the relationship between the transformation and work demands. We also support our leaders by providing resources to design work and establish role clarity and priorities.

In October 2024, Telstra won the 31st National Safety Awards of Excellence for 'Best Solution for Management of Psychosocial Hazards at Work' for our program supporting our Australian Triple Zero team who respond to emergency situations daily. Mental Health and Safety specialists, along with Triple Zero Centre leads, conducted psychosocial risk assessments through surveys and focus groups, trained team leaders as Mental Health First Aiders, provided regular mental health supervision sessions and encouraged frontline agents to adopt self-care plans.

#### **Positive duty**

We have zero tolerance for sexual harassment and discrimination and continue our commitment to eliminate it from our workplace. We focus on leadership messaging for safe and respectful behaviours and offer discrimination, bullying, harassment and victimisation training to support a strong reporting culture. Telstra has taken proactive steps to meet our positive duty to eliminate (as far as possible) sexual harassment, sex-based discrimination and hostile work environments on the grounds of sex. This includes a detailed implementation plan that is communicated annually to our Board and leadership team. Our positive duty commitments are also in place across Telstra-controlled subsidiary companies. Reports of sexual harassment are investigated by a specialist case management team, and those reporting concerns are provided dedicated trauma-informed support from Positive Duty Specialists and HSWE mental health leads.

#### Supporting our employees during significant weather events Following an extensive privacy impact assessment and cyber

security assessment, our emergency response team onboarded the Everbridge system. This technology enables our teams to send global mass communications to impacted Telstra permanent and fixed-term employees before or after an event, enabling the prompt distribution of emergency preparedness and messages that ensure our employees are provided with essential support.



For more information on our disaster management including employee support, see the Building resilient connectivity section of this report.





#### Wellness at work

Telstra understands that employee wellness has a significant impact on safety and their ability to thrive. We promote employee wellness through the following comprehensive initiatives:

- Mental health and wellbeing hub: To support our employees' health and wellness, Telstra has created a hub that provides tools and resources for self-assessing mental health. This hub helps employees connect to various support services for prevention, recovery and enhanced wellbeing
- Employee Assistance Program: In FY25 Telstra provided confidential support services via MyCoach, offering 24/7 assistance to employees and their families on various aspects of wellbeing, including mental health, relationship challenges and financial counselling. Employees can access support via phone, video, online chat or face-to-face sessions. From 1 July 2025, Telstra transitioned to MyWellbeing delivered by Converge International offering enhanced support and resources for all Telstra employees and their immediate families
- health promotion events including Movember, Laps for Life and R U OK? Day
- ergonomics in our home and office spaces including provision of home office equipment to support flexible work
- specialist programs such as health assessments, pre-employment screening and industry-defined medical assessments.

#### Health, safety and wellbeing performance

We continue to actively campaign on the importance of reporting as an essential mechanism to prevent harm, as well as accessing appropriate supports from our safety and health management teams. We use multiple data points and a combination of leading and lagging indicators to assess our performance.

In FY25, there were no workplace fatalities or regulatory fines or prosecutions. Telstra's Total Recordable Injury or Illness Frequency Rates (TRIFR) and Lost Time Injury or Illness Frequency Rates (LTIFR) were comparable with FY24. We continue to observe a stronger reporting culture with an increase in the number of incidents reported which enables effective implementation of risk management interventions and early intervention injury management strategy. Though we have observed an increase in the reporting of low severity incidents following a program of encouraging all incidents to be reported, we have not observed a proportionate rise in the number of serious incidents or injuries.

We measure our culture of care using a 'Manager Care' metric, which tracks timely support from leaders when their people report incidents or hazards. Leaders are provided with scenario-based resources and guidance from incident response teams. We exceeded our target of 90 per cent, successfully responding to 91 per cent of in-scope incidents (6,166), including both work-related and non-work-related cases, within 48 hours. This represents our strongest performance since the metric was introduced in 2020 and reflects our continued commitment to timely and effective incident management.

To deepen our understanding of employee sentiment about safety and wellbeing at Telstra, targeted health, safety and

wellbeing measures were introduced into this year's Employee Experience Survey. The results reflect a strong safety culture, with 92 per cent of employees confident in raising HSW concerns and 87 per cent expressing trust in their immediate leaders when responding to those concerns. These outcomes reinforce our commitment to fostering a workplace where safety and wellbeing are prioritised, and where employee feedback drives continuous improvement.





To view our performance, see the **2025 Data Pack** on our website.

<sup>11.</sup> In accordance with GRI Standard 403: Occupational Health and Safety (2018), we now report work-related injuries and illnesses separately to improve transparency and analytical accuracy. Definitions have been updated to align with industry standards. FY24 data has been restated to support year-on-year comparison.

<sup>12.</sup> This includes injuries or illnesses that result in fatalities or lost time. The metric is measured as the number of total recordable injuries per 1 million hours worked. It is calculated for Telstra employees only and is measured on a rolling 12-month basis.

<sup>13.</sup> This includes injuries or illnesses that result in fatalities, lost time, restricted work, and medical treatment cases. The metric is measured as the number of total recordable injuries per 1 million hours worked. It is calculated for Telstra employees only and is measured on a rolling 12-month basis.

<sup>14.</sup> Injury refers to any harm sustained by an employee due to a physical hazard encountered during a single traumatic event.

<sup>15.</sup> Illness refers to any health case or mental health illness. A mental health illness is not considered work related if it relates to reasonable management action.





# FY25 progress against targets

	On track for delivery
--	-----------------------

Progress made but below target

Not on track

✓ Completed

Focus area	Target	SDG	Progress	More info
Connecting regional, rural and remote communities	~95% population coverage for 5G by FY25	SDG 9	√ 5G now covers ~95% of the Australian population assisted by reuse of spectrum made possible by the closure of our 3G network in November 2024	2025 Annual Report
	Expand regional coverage by 100,000 km <sup>2</sup> by FY25		360,000 km² regional coverage added since FY21 – more than triple our goal of 100,000 km²	2025 Annual Report
Building responsible tech skills	Increase digitally active customers by two million by FY25, including building digital skills for 500,000 Australians by FY25	SDG 9	✓ Increased digitally active customers by 2 million by the end of FY25, and supported over 254,000 <sup>16</sup> Australians to build digital skills in FY25 (677,000 over the past four years)	page 38
Supporting people in vulnerable circumstances	Help keep 1 million customers in vulnerable circumstances connected each year from FY22-FY25	SDG 9 SGD 10	√ Helped more than 1.9 million customers in vulnerable circumstances to stay connected in FY25, and an average of 1.3 million per year over the past four years	page 40

Targets are baselined to FY21 unless otherwise stated.

In FY25, we worked with The Salvation Army to showcase the ways our iconic Telstra Payphones support and connect communities across Australia. We collaborated with Salvos to authentically portray the important and varied stories of the people who use our payphones in times of need.

<sup>16.</sup> Figure includes FY24 digital skills project data from Telstra Foundation, however final data was not available until FY25.

## **Approach**

As a leading telecommunications company, we are dedicated to creating a better digital world by leveraging our advanced network and technology capabilities to connect people, businesses and communities. We strive to make sure everyone has the skills and tools to get the most out of their tech and stay safe online.

#### We do this by:

- connecting regional and remote communities through network leadership and investment
- building responsible tech skills to increase digital inclusion safely and help close the digital divide
- supporting customers in vulnerable circumstances, including those experiencing financial stress, DFSV, natural disasters and human conflict
- advancing online safety, privacy and security.

Our approach is informed by data and insights from the Australian Digital Inclusion Index (ADII). It provides a comprehensive picture of Australia's online participation by measuring three key dimensions of digital inclusion: access, affordability and digital ability. To read the ADII report and view the interactive dashboards, please visit the ADII website.





To view the breakdown of our community contribution, see the **2025 Data Pack** on our website.



Connecting regional, rural and remote communities

As the digital world continues to reshape our lives and work environments, having access to reliable telecommunications is critical. We are consistently investing in new technologies to improve our network experience for customers including fixed, mobile and satellite connectivity. We continue to be the largest telecommunication partner in Government co-investment programs. For example, 81 projects were delivered through co-funding under the Regional Connectivity Program Rounds 1 and 2, as well as 42 as part of the Mobile Black Spot Program. Since 2013 we have invested \$38 million as part of the Northern Territory Government co-investment programs to deliver advanced telecommunications infrastructure expanding mobile network coverage and data connectivity, with an emphasis on connecting First Nations communities.

In 2025 we announced a collaboration with Starlink to bring satellite-to-mobile technology to our customers in Australia. As a result, we have now launched Telstra Satellite Messaging, which enables the sending and receiving of text messages via Starlink Direct to Cell satellites when beyond the range of Telstra's mobile network coverage. Telstra Satellite Messaging is available from most outdoor areas across mainland Australia with a direct line of sight to the sky. The service is included in all Telstra Upfront Mobile Plans and requires a compatible phone with the latest software.



For more information on how we work to keep our customers connected, see the Building resilient connectivity section of this report.



For more information on our network, see the Maintaining our network leadership and planning for the future section under 'Strategy and Performance' in our 2025 Annual Report on our website.

As satellite-to-mobile technology develops, we anticipate that it will provide a more consistent messaging experience, and in the future we expect that voice calling and low speed data will become available. The availability of satellite-tomobile technology does not change our commitment to continue enhancing our mobile network to meet the growing demands and increasing data usage of our customers, which includes our continued roll out of 5G.



For more information and to find out what devices are compatible visit the Satellite texting and messaging now available from Telstra webpage.

## Regional, rural and remote engagement

We have maintained our focus on connecting with regional, rural and remote communities across the country. This year, key priority areas for our engagements included our 3G network closure, Universal Service Obligation (USO) modernisation, the emergence of new technologies and performance of regional networks. We also had a presence at key regional events across the country, including sponsoring the inaugural CommsDay Regional and Remote Forum held in Canberra in February 2025.

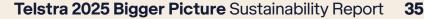
In addition, our CEO met with stakeholders and customers on the Eyre Peninsula (SA), Doomadgee and Mt Isa (QLD) as well as in Bunbury and Greenbushes (WA). Our CEO also met with the Regional Telecommunications Independent Review Committee (RTIRC) in the first half of FY25 and attended a Telstra regional workshop that involved almost 50 key regional stakeholders from across Australia.

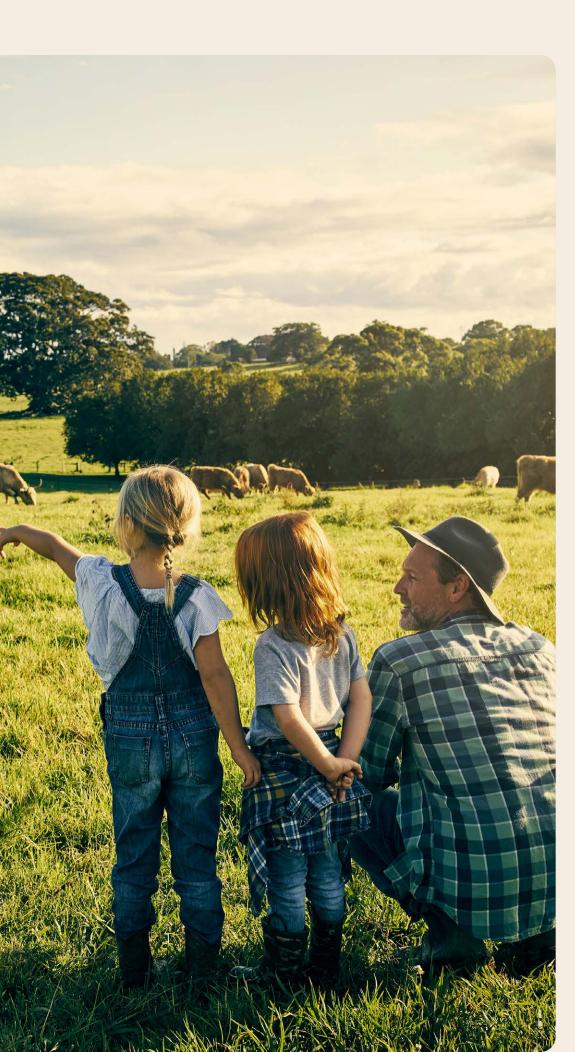
Other members of our Executive Leadership Team also travelled to and met with stakeholders and customers as part of our commitment to connect with regional communities in locations including Aurukun (QLD), Wagga Wagga (NSW), Mildura (VIC), Wheatbelt (WA) and King Island (TAS).

In the first half of FY25, we attended all the remaining regional community forums held by the 2024 RTIRC to listen and respond to questions from those communities. Coupled with our work in the second half of FY24, it meant we attended all community forums held by the RTIRC as part of their 2024 review. Their report was released by the Minister for Communications on 13 December 2024 and we are committed to working with the Government as they respond to the 14 recommendations contained in the report.



This year we announced round two recipients of the Telstra Connected Communities grant program. To see the recipients, visit Telstra Exchange.





#### Disaster preparedness and response

We work year-round, preparing for and responding to emergency and disaster threats. In FY25, our priorities continued to be ensuring the safety of our people, protecting and maintaining our infrastructure, keeping our customers connected and providing short and long-term assistance measures.

We also respond to global events such as political unrest or natural disasters. This year, we continued to make free calls available to Israel and Palestinian territories as well as free calls available to Vanuatu following the December 2024 earthquake.



For more information on disaster preparedness and response see the Building resilient connectivity section of this report.

# **Closing 3G to improve** our mobile network

#### Why we closed our 3G network

Reliable and high-quality connectivity is important to all, including people living in regional, rural and remote Australia. Retiring outdated technology is key to our commitment to provide Australians with modern, high-performance connectivity. Closure of our 3G network was a critical step to release 850MHz spectrum, enabling us to repurpose it to invest in more 5G coverage.

By repurposing spectrum used for 3G, we've also been able to expand capacity and improve speeds at over 4,300 existing 5G mobile sites and activate new 5G at another 631 sites. The total volume of customer data flowing through these sites is now more

than 50 per cent higher which would not have been possible without the closure of 3G. That means more emails sent, photos uploaded, apps used, webpages browsed and videos streamed. Despite ongoing growth in demand for data on our mobile network, our expansion of 5G and use of additional spectrum has helped increase the average speeds our mobile customers enjoy by around 11 per cent since the closure of our 3G network.

When we launched our 3G network in Australia in 2006, our customers used mobile devices for calls, texting and accessing very basic information online. Almost 20 years later, mobile devices are used for many tasks, and data is central to them. Demand for mobile data is growing every year and has tripled in the last five years on our network. 3G didn't have the speeds and capacity to meet that ever-increasing demand and deliver services that require more bandwidth. That's why we have continued to upgrade our mobile network.

Repurposing the spectrum used by 3G, as well as our expanded 4G coverage, has enabled us to deliver faster speeds, enhanced resilience and much greater capacity for managing ever-increasing demand. 4G and 5G technologies are also significantly more secure and energy efficient based on data throughput compared to 3G.

#### Our approach to 3G closure

We started talking to our customers about our plans to close our 3G network back in October 2019 to make sure they had enough time to prepare for the change. This included extensive customer contact and media campaigns, attending more than 2,000 regional town and community events, and engaging with local councils and regional organisations. We analysed more than 14 billion call records and eight million Triple Zero emergency calls to identify impacted devices. We developed an SMS tool, which allowed customers to check if their device would be impacted by the closure. We also created a recorded voice announcement, which played on outbound calls made by impacted mobiles, to alert customers if they needed to upgrade their device.

We acknowledged the importance of upgrading and expanding our 4G coverage to an equivalent size and reach to our 3G footprint. We upgraded more than 11,000 4G mobile sites. This included the optimisation and installation of modern equipment on our existing sites, and the build of new towers to improve and expand our 4G coverage.

We participated in an industry working group established by the Australian Mobile Telecommunications Association (AMTA) and engaged with Optus and TPG Telecom to share information on known impacted devices to help ensure that all mobile network operators had the best possible understanding of impacted devices on their networks.

We provided 19,000 free phones to customers in vulnerable circumstances across Australia who were active 3G users but who had not yet transitioned to a 4G device. Prior to decommissioning our 3G network, we also took the actions required under a government emergency call service determination, including blocking devices that weren't compatible with our network because they depended on 3G for Triple Zero calls.

We conducted a six week public safety campaign via TV, radio, print and social media to increase awareness that the 3G network was closing and customers had to take action to prepare.

A specific subset of this campaign was targeted at Culturally and Linguistically Diverse (CALD) Australians.

We extended the 3G closure date twice, from 30 June 2024 to 31 August 2024 and again to 28 October 2024. The 3G network was officially turned off on 4 November 2024.

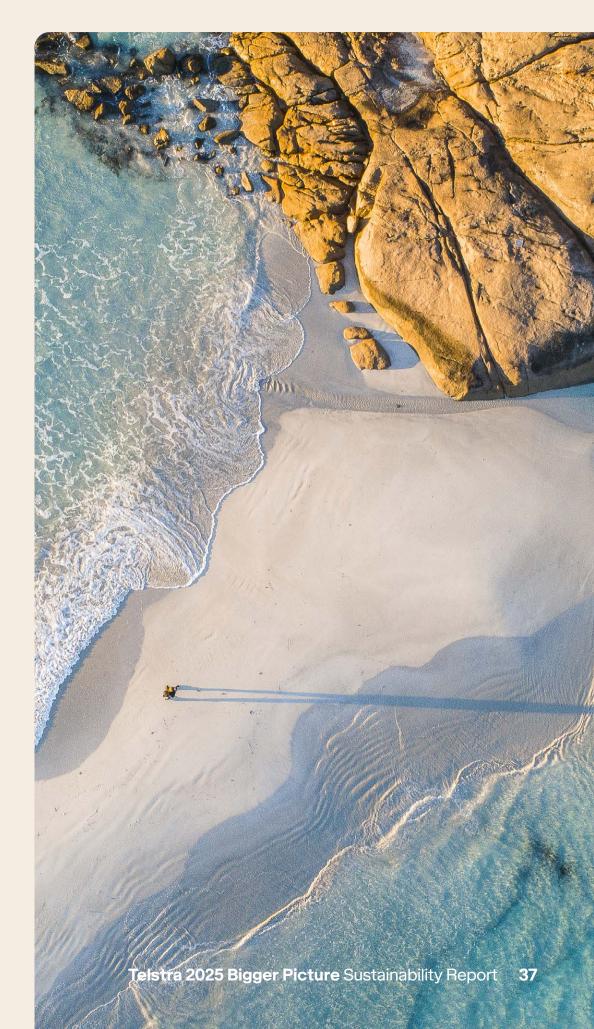


For more information on our 3G network closure, visit our website.

# How we supported customers through and after the closure

While the transition from 3G has delivered a better experience for most of our customers, we know this hasn't been the case for some customers. From 28 October to 20 December 2024, we put in place a hypercare program to support customers to transition from 3G.

We are committed to addressing 3G coverage issues identified by customers and our efforts to address customer concerns are ongoing. We have been working with customers one-on-one at their homes, businesses or our Telstra Stores. We encourage customers to contact us so that we can work with them to find the best solution to address their concerns. Customers with mobile voice or data issues relating to the 3G closure can engage us via our dedicated 3G Helpline (1800 990 853), Telstra Retail (in-store, online or on the phone) or our Regional Australia Team. We have also arranged for Telstra field technicians to attend select stores offering both customer support as well as upskilling our retail staff.





## **Building responsible** tech skills

Our purpose is to build a connected future so everyone can thrive. We recognise the importance of building responsible tech skills and have implemented initiatives to promote ethical and responsible use of technology. We collaborate with industry partners, government and academic institutions to share knowledge and best practices for responsible tech skills. We also work with our customers to co-create solutions that address ethical and social issues. We deliver digital literacy programs with our community partners to help people of all ages and backgrounds develop the skills and knowledge they need to use technology safely and responsibly.

As part of our T25 strategy, we have supported more than 677,000 Australians to build digital skills over the past four years and more than 254,000 in FY25. We achieved our T25 target to build digital skills for 500,000 Australians by FY25 in December 2025, six months ahead of our end of financial year goal.

We are excited to expand our commitment to digital inclusion in our new Connected Future 30 strategy through a new target to support the digital inclusion of 1 million people by 2030, with at least 200,000 in the Northern Territory, South Australia or Tasmania. We aim to support the three digital inclusion pillars ability, access and affordability—through this strategy. According to the ADII, the Northern Territory, South Australia and Tasmania have the lowest rate of digital inclusion and thus our targeted focus reinforces our commitment to bridge the digital divide.

Our digital inclusion approach will sit alongside our programs to support customers in vulnerable circumstances, including Access for Everyone and other programs as outlined in the Supporting people in vulnerable circumstances section of this report.

#### **Older Australians**

Adults aged over 65 are the least digitally included age group in Australia. 17 We continue to support older Australians through our digital literacy programs, offering them the opportunity to develop the skills and confidence to safely embrace digital technology. This year, we provided 9,817 digital literacy training places for older Australians through the Tech Savvy Seniors program, delivered in partnership with NSW Government and State Library of NSW.



For more information on how we support older customers, see the Supporting people in vulnerable circumstances section of this report.

## **Remote First Nations** communities

Telstra advocates for digital inclusion in remote First Nations communities and is a member of the expert panel supporting the First Nations Digital Inclusion Advisory Group.

Telstra has contributed alongside industry, research and government partners to the publication of the First Nations Digital Inclusion Roadmap.

Telstra invests in research to support First Nations digital inclusion, including the Mapping the Digital Gap research a supplementary project of the ADII. Now in its fifth year, the research is conducted by the Australian Research Council Centre of Excellence for Automated Decision Making and Society in partnership with Telstra. Data collected in twelve remote communities from 2022 to 2024 aims to accurately measure digital inclusion and use of digital services including news and media. This data is informing national and state policy and programs to address critical barriers.

The project's second outcomes report was launched in December 2024 Mapping the digital gap: 2024 outcomes report. Of the three dimensions of digital inclusion (access, affordability and ability), most progress has been in the area of access. This is largely due to expanded 4G, 5G, Wi-Fi and satellite infrastructure plus a high uptake of mobile devices.

#### **Digital Sisters Al for Good**

This year, we continued our partnership with Microsoft and Good Things Australia on the Digital Sisters AI for Good program. This initiative equipped women from migrant and refugee backgrounds with skills to use AI for navigating online services, writing resumés, finding employment and thinking critically about the information AI generates. AI for Good also helped us understand the needs and barriers these women face, enabling us to make strategic business decisions to help ensure AI is used ethically and responsibly for all our customers and communities. More than 620 women participated in the program and 88 per cent said it helped increase their AI knowledge. For more information, visit Telstra Exchange.

Telstra has responded to feedback from customers and stakeholders on the affordability of pre-paid mobile plans through remote customer trials to better understand usage patterns and address needs. Through our community checkin program and our service delivery partners, we explored bestowing extra data for customers requiring frequent recharges, expanding Boost Mobile marketing in select remote communities and increasing awareness of mobile plan options and network accessibility parity. As a result, Telstra developed a new pre-paid remote community mobile plan offering 25 GB for \$25. This 14-day plan, introduced in October 2024, is available to customers living in remote communities and is available for purchase in select remote community stores and via Telstra contact channels.

## **Technology innovation for good**

We continue to invest and incubate with strategic partners and start-ups that are aligned to Telstra's growth focus areas. Telstra muru-D Labs is on a mission to explore and validate the latest technologies that will shape the future. This includes 5G slicing, AI, Internet of Things (IoT), spatial computing (VR/AR) and energy harvesting.

Our commitment to innovation helps ensure that we are not only advancing technology but also contributing to a connected future that is inclusive and environmentally resilient so everyone can thrive. For example, muru-D is exploring solutions to leverage Telstra's advanced connectivity to power the future of autonomous robot workers. These innovative robots can transform into autonomous, mobile sensors and data platforms by using Telstra's core connectivity, dedicated networks, network slicing, edge computing and APIs. This technology has the potential to revolutionise industries like agriculture, emergency response and mining. In agriculture, robotics can enhance productivity and the sustainable use of precious resources like water by providing real-time data and precision farming capabilities. In emergency situations, they offer critical support by accessing hazardous areas and providing live data to first

responders. In mining, robotics can improve safety and efficiency by performing tasks in dangerous environments.

We established a Public Safety Experience Centre to showcase the latest technology used by police and emergency services in disaster scenarios. Situated at Telstra's Innovation Centre on the Gold Coast, an area increasingly affected by severe weather. the Centre demonstrates new technology that allows emergency response agencies to communicate as if they are using a radio, but with priority on our commercial network. It also features a simulation of Telstra LANES® 3, a world-first mobile broadband data capability designed specifically to give emergency services prioritised access on our commercial 4G network.

Our engagement with the startup ecosystem this year continues, with innovative projects and follow-on investments in sectors like agritech, insuretech and supply chain. Highlights include active trials and participation in Commonwealth grants with Zetifi and Farmbot. Farmbot offers farmers smart, affordable and easy-to-use technology to manage their most valuable resource—water. Zetifi provides connectivity for public and essential services via Wi-Fi in rural farming areas where mobile coverage is not available.

Finally, on the IoT front, we have been exploring ultra-low power technologies such as battery-less Bluetooth stickers as a longer range, lower cost alternative to Radio Frequency Identification (RFID) scanning used in logistics operations. These stickers eliminate the need for batteries by utilising Bluetooth Low Energy, which harvests ambient energy from the surrounding environment as needed. Environmentally, this new technology needs less infrastructure than RFID (for example, no batteries or RFID scanners) to operate.



For more on our technology growth see the Extending digital leadership section of our 2025 Annual Report on our website.

#### **Justice Connect**

Through our ongoing collaboration with Justice Connect, we continued to enhance digital inclusion and legal resilience for those affected by disasters and crises.

Since the program began in 2024, our free self-help tool, Get ePrepared, has supported 13,775 people in identifying. capturing and storing essential documents digitally. This helps ensure that they can prove their identity, residence and property ownership during emergencies. For more information visit Telstra Exchange. We have also helped train 'SmartAssist', a digital tool that diagnoses legal problems using everyday language and assists people in finding the right legal help. 'SmartAssist' has helped 47,103 people understand, identify and use safe, ethical AI.

#### **Telstra Health**

Telstra Health won the Digital and Data Health Innovation Award for 2024 for developing Australia's first electronic screening and risk prediction tool for aged care residents, in collaboration with RMIT University and the Digital Health Cooperative Research Centre.

This innovative tool uses natural language processing and machine learning to monitor deterioration, significantly enhancing health and safety in aged care facilities by enabling early detection and intervention. For more information, visit the Aged care digital health tool.

# Supporting people in vulnerable circumstances

We believe that everyone should have access to the digital world, regardless of their location, circumstance or socio-economic status. We help keep communities connected by providing affordable and accessible connectivity options and supporting our customers in a way that meets their individual needs.



This year, we helped

## 1.9 million

customers in vulnerable circumstances stay connected, and an average of

## 1.3 million

per year over the past four years.

The increase from 1.4 million in FY24 was largely driven by the provision of disaster relief support and growth in customers taking up the support options in the new digital platform.



For more information on the programs and services included in FY25, see our **2025 Data Pack** on our website.

## **Customers needing extra care**

We are committed to helping those facing cost-of-living pressure and experiencing vulnerability by offering a range of products, services and programs to improve digital inclusion outcomes for our customers and communities.

Our Access for Everyone package includes:

- concession offers for those on a low income
- various payment assistance options for those experiencing financial hardship, including access to safe and secure communications for victim-survivors of DFSV
- the Telstra Top Up program which offers up to 6 months of free pre-paid credit
- free Telstra mobile calls to crisis lines and unmetered mobile data access to Ask Izzy, a mobile website that connects people in crisis with the support services they need
- free calls to standard national numbers from all Telstra payphones and free Wi-Fi access available at designated payphones
- the ability to pay bills via Centrepay for those receiving welfare payments.

Our dedicated contact centre teams provide specialised support and assistance to customers in vulnerable circumstances, including those recently bereaved, experiencing DFSV or life-threatening medical conditions.

We also offer multilingual services over the phone and in select stores to customers whose first language is not English. Deaf and hearing-impaired customers can contact Telstra through the National Relay Service.



## One Stop One Story (OSOS)

OSOS is a cross-sector platform developed by Thriving Communities Australia designed to streamline support for individuals facing challenges such as DFSV or financial hardship. The OSOS Hub allows people to share their story once and gain access to comprehensive support from multiple service providers. As a participating organisation in FY25, Telstra supported:

- 1,106 total OSOS cases
- 71 per cent DFSV OSOS cases
- 28 per cent hardship OSOS cases.

Among the many people helped was a woman escaping a DFSV relationship who moved into a private rental with her children but struggled to pay rent and bills. Diagnosed with a life-ending illness, she sought emergency relief with little left for food. A worker referred her to various services through the OSOS Hub, including financial counselling and Telstra, which helped address her overdue telecommunications bill.

## **Belong**

Telstra's Belong brand participated in the Australian Government's School Student Broadband Initiative, to deliver nbn services at no cost to eligible low-income families without home internet access. Since the program began, Belong has connected 6,295 families who will continue to benefit from no cost nbn until 30 June 2028.

For more information visit the Belong website.

## **Telstra Top Up expanded**

In October 2024, Telstra extended its Top Up program, to provide \$3.7 million in pre-paid phone credit for those in need. The program was a \$160 recharge and now provides a \$180 recharge with 70GB of data and unlimited calls and texts for six months. Telstra Top Up can be accessed by contacting Telstra or over 1,000 state-based organisations, including Safe Steps, Anglicare, The Salvation Army, Save The Children and Uniting Care. For more information visit Telstra Exchange.

## **Payphones**

In August 2021, Telstra made all standard national and mobile calls from payphones free as a way of stepping-up support, especially for those in need. Since that change, payphone usage has more than tripled. In FY25 25.5 million free calls were made, including more than 350,000 to Triple Zero and other emergency/ support services. That's over 1,000 daily calls for critical support. Now, over 4,450 Telstra payphones also provide free Wi-Fi access. This includes over 1,000 in disaster-prone areas which were upgraded with free Telstra Wi-Fi and backup power over the past two years.

The data usage on these payphones is substantial. It is used by a variety of people for a range of reasons including helping those in remote First Nations communities stay connected to essential services, enabling communities to stay connected in power outages and supporting those experiencing homelessness or fleeing DFSV by providing access to safety and support services. The average use per connected device in First Nations communities is 10 times greater than the national average, demonstrating its value in providing affordable access to broadband connectivity for many people living in those communities.



'More and more Australians are being impacted by the cost-of-living crisis and reaching out for our support. Every day, we hear about people having to make difficult decisions and sacrifices to stay afloat. Providing our clients with the Telstra Top Up program is helping more Aussies stay connected to loved ones and maintain access to important services and information so they can focus on getting back on their feet.'

#### **Kasy Chambers**

**Anglicare Australia Executive Director** 

## **Additional support for First Nations customers**

Telstra runs First Nations Connect, providing specialised, culturally appropriate support for our most remote and First Nations customers who may have specific language and access requirements. Telstra has a First Nations Connect team that is staffed predominantly by First Nations agents in Darwin, Townsville, Palm Island and Jumbun, with some calls answered by specially trained, non-First Nations agents to help cover peak periods. Our Palm Island and Jumbun centres are run by the local community, helping to create jobs and career pathways for First Nations people in remote communities. Our First Nations Connect team also has access to interpreter services with approximately 50 different First Nations languages and dialects, to help support customers where English is a second or third language. Calls to the hotline are whitelisted for Telstra pre-paid customers, meaning calls from pre-paid accounts can be made free of charge even if the account is out of credit.

## **Accessibility**

We aspire to enable all Australians to enjoy a more connected and accessible future so everyone can thrive. In June 2025, we published our latest Accessibility and Inclusion Action Plan (AIAP) Progress Report, outlining in detail how we tracked against our FY23-25 AIAP. Of the 40 actions outlined, we are proud to have achieved 35 actions in the original timeline of the plan. Two are partially complete and three are not yet complete, however we will continue to work towards fulfilling them.

Since implementing this plan our digital assets have improved in accessibility scores and we have better ways for customers living with disability to get in touch with us through our enhanced feedback process, supported by a network of accessibility specialists.

Although we have delivered several key initiatives this year, we don't always get it right. In FY25 we received 10 complaints of disability discrimination from the Australian Human Rights Commission and one from the TIO. Of these complaints, nine have been closed and one is in progress. Complaints that have uncovered any systemic issues are escalated and are used for continuous improvements to our customer service.

We continue to maintain our commitment to the Disability Enquiry Hotline, Directory Assistance Helpline and Disability Equipment Program. For more information visit our website.



For more information on our aspiration to enable a more connected and accessible future, see the Accessibility and Inclusion Action Plan Progress Report on our website.



For more information on our digital accessibility, see the Design and accessibility excellence section of this report.

## Safety

The tech safety of customers is not just a responsibility but an important aspect of how we do business. Our Online Safety and Wellbeing Hub provides resources to help protect users from cyber bullying and harmful online content, and provides guidance on how to stay safe online. It also provides information on how users can report harmful online content and behaviour to the eSafety Commissioner.

Continuing to help customers experiencing DFSV remains a priority for Telstra. Our dedicated Enhanced Care team is specially trained to help victim-survivors of DFSV stay safely connected to their Telstra services.

The ACMA released its industry standard intended to protect individuals affected by DFSV on 11 June 2025: Telecommunications (Domestic, Family and Sexual Violence Consumer Protections) Industry Standard 2025 - Federal Register of Legislation. Telstra provided input into the consultation process and the new legislation came into effect from 1 July 2025.

#### **Safe Connections**

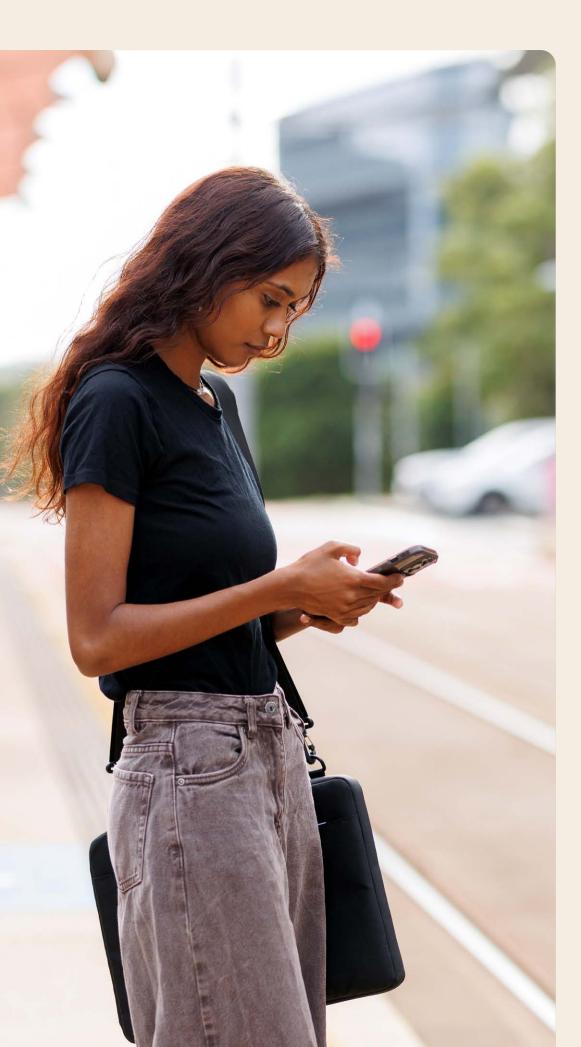
We also provide devices to those experiencing DFSV. Delivered in partnership with WESNET, the Safe Connections program has distributed more than 50,000 smart phones with pre-paid credit since its inception in 2014, including more than 6,900 smart phones with pre-paid credits in FY25. Research<sup>18</sup> on the social return on investment indicates that every \$1 spent on Safe Connections generates \$3.50 in social value.



For more information on how we support customers experiencing DFSV, visit our website.



For more information on how we support customers, see the Chief Customer Advocate Report on **Customer Vulnerability 2025** on our website.



# **Advancing online** safety, privacy and security

As more of our lives move online, online safety and cyber security are becoming increasingly important. We take our role as custodian of customer data seriously and invest heavily in cyber security measures to help protect our customers' data and privacy. We also invest in cyber security training for our employees and educational resources for our customers to help them understand the risks associated with using technology and how to better protect themselves and their data.

## **Privacy**

We are committed to being transparent with our customers about how we collect, use and manage their personal information. We take a global approach to privacy management and apply the Australian Privacy Act, the European Union General Data Protection Regulation and local legislation where applicable.

We manage privacy and data access through our Code of Conduct, Privacy Statements and other relevant policies and security controls. These strict standards relating to privacy and confidentiality protect customer data from interference, misuse, unauthorised access and disclosure.

We may use or disclose personal information in accordance with our Privacy Statements, consumer expectations and the Privacy Act. We may also be required by law to share personal information in certain situations such as providing assistance to emergency services organisations in life-threatening and

time-critical situations or assisting government agencies with enforcement-related activities.

We acknowledge the role our products and services can play in enabling the free exchange of ideas and access to information. Our commitment to privacy guides our respect for the right of freedom of expression and how we respond to requests by government agencies for data we hold. In these circumstances we consider the legality of the request, balancing against peoples' privacy and criteria such as reasonableness, proportionality and necessity. We undertake regular reviews of our Privacy Statements to help ensure they remain fit-for-purpose and consider customer privacy and data protection in the design and development of our organisational processes, products and initiatives. We complete Privacy Impact Assessments to help ensure that privacyrelated risks are considered and assessed from the outset of every concept, project, product, service, program and IT system enhancement or development.

In line with Telstra's Compliance Framework, Risk & Sustainability Committee, of the Board, our CEO and Executive Leadership Team are committed to meeting all our legal and regulatory obligations. They are accountable for ensuring everyone at Telstra understands and complies with these requirements within jurisdictions Telstra conducts business. Accountable Executives within our business units are also responsible for specific privacy compliance requirements related to functions they perform.

This year, we had one privacy incident requiring notification to the Office of the Australian Information Commissioner. In that case, we contacted those impacted offering to discuss concerns and provide solutions such as referral to third-party identity and cyber support services. We also took action to manage or remediate the incidents, including reviewing policies and procedures, and implementing additional controls.

## **Cyber security**

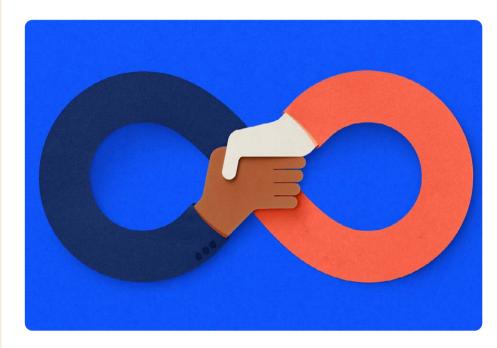
Over the past year, we have bolstered our cyber security capabilities to address the increasingly sophisticated threat landscape. While comprehensive preparations and robust defence mechanisms are essential, it is important to recognise that not every potential threat can be entirely mitigated. Our efforts encompass advanced measures to effectively identify and detect potential threats, implement robust protection strategies and swiftly respond to incidents. We have also enhanced our recovery protocols to help ensure rapid restoration of normal operations following any security breaches. These improvements enable us to manage a diverse array of cyber security threats and vulnerabilities more efficiently, helping to ensure the integrity and resilience of our systems against both known and emerging risks.

#### Our approach

- policy and governance: our approach to safeguarding Telstra from cyber threats is driven by our Cyber Security Strategy and supported by Group Policies and standards. Oversight is provided by our Chief Information Security Officer, with regular reports presented to Telstra's Risk & Sustainability Committee.
- risk management, supply chain and third-party risk: we adhere to rigorous standards, including the Payment Card Industry Data Security Standard (PCI DSS), the US National Institute of Standards and Technology Cybersecurity Framework (NIST CSF), and the Factor Analysis of Information Risk (FAIR) model to guide our risk management practices. Our commitment to compliance extends to relevant cyber security regulations and standards, such as ISO 27001:2022, the Australian Privacy Principles and the Essential Eight mitigation strategies developed by the Australian Cyber Security Centre. Our cyber security framework includes extensive cyber assurance activities, such as third-party assessments, to fortify information security within our supply network.

- threat intelligence: we have a mature threat intelligence capability and actively engage in threat intelligence sharing to build a holistic view of the landscape in which we operate. We continue to invest in our Cleaner Pipes Initiative to help protect our network and our customers from scams and fraud.
- building a security culture: we invest in employee training and awareness programs to help our employees understand their role in protecting Telstra, our network and our customers. Our innovative Cyber Security Influence program builds our security culture and behaviours in the organisation and includes security news, advisories, videos and gamified learning. Our program also has a large, highly engaged employee community for security enthusiasts and we conduct regular simulated phishing campaigns to test and improve employee awareness.
- monitoring and incident response: our state-of-the-art Security Operations Centre (SOC) provides continuous 24/7 monitoring and incident response. Staffed by highly skilled security professionals, the SOC uses advanced tools like Security Information and Event Management (SIEM), Endpoint Detection and Response (EDR), and Network Traffic Analysis (NTA) solutions. We maintain a comprehensive incident response plan and playbooks detailing procedures for incident reporting, containment, analysis, remediation and mitigation. This plan is regularly tested and updated to help ensure its effectiveness in countering emerging threats.
- industry collaboration: Telstra collaborates with a number of organisations globally to strengthen our cyber security capability and share our expertise with others. The collaboration between Commonwealth Bank of Australia and Quantium Telstra to develop scam and fraud prevention products, such as Scam Indicator, continues to deliver results. The initiative leverages data science to detect phone scams in real-time, significantly improving fraud prevention and enhancing protection for consumers. Since inception, Scam Indicator has detected and prevented millions of dollars in scams. Its expansion to include landlines and Boost Mobile customers has helped protect even more Australians from scams.

## **Blocking scams**



This year we successfully blocked:

- 18 million scam calls
- 8 million scam SMS messages
- tens of millions of malicious domains
- tens of millions of incoming scams and potentially unwanted BigPond emails on average every month.

We have also recently launched 'Telstra Scam protect', a new feature that warns our retail and wholesale customers when an incoming call is suspicious. This feature, just one of several recent initiatives to help protect our customers, is automatically activated for compatible devices and comes at no cost.

#### **Ethical Al and data**

Telstra's vision to be an AI-fuelled organisation can help create better outcomes for our customers and communities. We aim to be a leader in responsible AI and are guided by ethics and responsible AI adoption to enhance our services for customers.

Telstra has a Responsible AI Policy that outlines a set of principles, practices, accountabilities, standards and expectations intended to govern the development, deployment and use of AI systems, which is closely aligned to Australia's AI Ethics Framework. We also participate in international forums on responsible AI adoption including UNESCO's Business Council for Ethics of AI and in working groups of the GSMA. Our policy is brought to life by robust governance practices and guardrails, including our AI Risk Oversight Council (AIROC) that provides a single dedicated body to provide advice and endorsement for AI use cases. AIROC is a cross-functional body with experts from across Telstra's business, including our Legal, Data and AI, Cyber security, Privacy, Risk and Communications teams.

This year, we made further refinements to our policies and practices around responsible AI, including:

- adapting the Responsible AI policy to refine and outline the specific accountabilities of AI system owners from the responsibilities of users of AI Systems (such as a staff member)
- launching new responsible AI training and making this
  a requirement for all staff who wish to have a licence for
  M365 Copilot. Over 21,000 Telstra staff members completed
  the training
- refining the AIROC processes and AI System register based on several leading global AI governance and impact frameworks to include an updated set of questions AI system owners use to identify risks.

Earlier this year we entered into a seven-year joint venture with Accenture to build upon our AI foundations and develop specialised AI capabilities, enabling our teams to work smarter and faster. In addition to driving value through initiatives such as improved call-routing to our call centres or gaining better customer insights, this venture will continue to enhance our responsible AI practices. Telstra retains accountability for responsible AI, with our Data and AI executive leaders and our Responsible AI Lead remaining Telstra employees.

# Mobile health and communications

In FY25 we continued our rollout of 5G technology around Australia. We are committed to sharing information on our real-world tests of 5G Electromagnetic Energy (EME) levels and demonstrating compliance with the EME safety standards. Our focus includes working with local communities, providing safety reassurance by demonstrating live EME testing where mobile facilities have been installed to improve mobile reception, and this year included the new 5G mobile frequencies for the Easter Surfing Competition special event at Bells Beach Victoria. For more information, visit Telstra Exchange.

We also continue to contribute to the development of international EME testing standards and global EME testing programs for 5G. This year we were appointed as Australia's representative on the International Electrotechnical Commission (IEC) Standards Management Board. Each year we also support the Australian Government's mobile network deployment and EME compliance priorities and in FY25 we demonstrated the safety of the proposed new 6GHz spectrum for future mobile technologies to members of the ACMA at a trial in Anglesea Victoria. This trial enabled Telstra to compare existing mobile frequencies to new frequencies and the potential benefits for customers in coverage, capacity and quality of the mobile services. For more information, visit our website.



## **Telstra Foundation**

## **Empowering children and** young people in a digital world

Backed by Telstra for more than two decades, Telstra Foundation is an Australian charity that's part of a movement to make Australia one of the best places in the world for children and young people to go online.

Young Australians are the first generation to 'grow up digital' and their online interactions and digital relationships play an increasingly important role in their lives. While technology offers countless benefits, we know it also poses challenges and that some young people are being left behind. We create impact by tackling issues that come from digital connectivity itself—like digital exclusion, online bullying and exposure to harmful content. At the same time, we back the game-changing opportunities that digital connectivity can bring.

To guide and strengthen our impact, we also generate insights, share knowledge, support our partners and foster collaboration. We work closely with young people, youth-focused non-profits and key stakeholders that share our mission. Together we Look Beyond, Work as One and Make a Difference.

By 2030, the Telstra Foundation aims to empower 1 million children and young people to thrive in safe, inclusive digital spaces and to shape their own futures. We focus on driving social impact for children and young people in Australia across two key areas:

- universal access: we're supporting equal access to devices. connectivity, skills and support needed to thrive in a digital world and shape future access
- meaningful connectivity: we're empowering safe, inclusive and enriching digital spaces and improving quick and easy access to evidence-based online mental health services, where and when they're needed.

In FY25, we committed \$6 million through the Foundation and \$808.288 from Telstra shareholder and customer donations to our partners and programs. We partnered with 25 for-purpose organisations to drive direct impact for underserved, vulnerable or disadvantaged children and young people in Australia. In addition, we also lead research and stakeholder engagement initiatives such as the Technology & Wellbeing Roundtable with ReachOut, and Code Club Australia with teachers and librarians across Australia. Central to our work is supporting children and young people to have their say in shaping their digital world and we foster this via youth co-design and participation, our Youth Advisory Council and our Australian Youth Digital Index initiative. Read about our progress here.



Donate your Telstra Plus points to our partner PROJECT ROCKIT here and help tackle online bullying.

## **Australian Youth Digital Index**



In FY25, Telstra Foundation launched its inaugural Australian Youth Digital Index to explore the use, attitudes and relationship Australian young people have with digital technology.

Guided by our Youth Advisory Council and built on responses from more than 4,700 people aged 8 to 25, the Index shares their reflections on digital access and connectivity, safety and wellbeing and skills. It shows important differences and nuances across age brackets, gender, location and income, and while the overall picture is one of optimism, many young people still lack the essential technology needed to thrive online. Access our first Australian Youth Digital Index report findings, blogs and free online data dashboard to learn more.





## FY25 progress against targets

	On track for delivery	
--	-----------------------	--

Progress made but below target

Not on track

✓ Completed

Focus area	Target	SDG	Progress	More info
Taking climate action <sup>19</sup>	Reduce our absolute scope 1+2 emissions by 70% by 2030 (from an FY19 baseline)	SDG 13	Reduced our combined scope 1+2 emissions by 44% from an FY19 baseline (excluding Digicel Pacific)	page 48
	Reduce our absolute scope 3 emissions by 50% by 2030 (from an FY19 baseline)		Reduced our scope 3 emissions by 43% from an FY19 baseline (excluding Digicel Pacific) <sup>20</sup>	page 52
	Enable renewable energy generation equivalent to 100% of our consumption by 2025		<ul> <li>Enabled renewable energy generation equivalent to 76% of our consumption on average over FY25.</li> <li>Contracted renewable energy generation equivalent to more than 100% of forecast consumption at the end of this calendar year</li> </ul>	page 54
	Net-zero greenhouse gas emissions by 2050 <sup>21</sup>		Reduced our combined scope 1+2 emissions by 44% and our scope 3 emissions by 43% from an FY19 baseline <sup>22</sup>	page 48
Progressing a circular economy <sup>23</sup>	Reuse or recycle 650,000 mobile phones, modems and other devices each year to 2025 <sup>24</sup>	SDG 12	Reused or recycled over 769,000 mobile phones, modems and other devices in FY25	page 59
	Increase our network waste recycling rate to 90% by 2025		✓ Achieved 94% network waste recycling rate in FY25	page 61

Targets are baselined to FY21 unless otherwise stated.

<sup>19.</sup> Digicel Pacific has been excluded from reporting against FY25 emissions targets. Digicel Pacific emissions are reported separately below and further details can be found in the 2025 Data Pack on our website.

<sup>20.</sup> This is ahead of the trajectory required to reach our target of a 50 per cent reduction by 2030, however there is still some risk relating to our scope 3 target.

<sup>21.</sup> We are committed to achieving net-zero GHG by 2050, through the Business Ambition for 1.5°C campaign. During FY25 our net-zero target was validated by the Science Based Targets initiative (SBTi) as aligning to their Corporate Net-Zero Standard.

<sup>22.</sup> See the Our use of carbon credits section of this report for more information on our use of carbon credits and our GHG emissions targets.

<sup>23.</sup> Digicel Pacific has been excluded from the scope of Telstra's circular economy commitments and our reporting in FY25 as we are still working to compile timely and suitable data.

<sup>24.</sup> From FY26 we have set a new target to donate, reuse, repair or recycle one connected devices sold by FY30. It applies to connected devices (phones, tablets, modems, streaming devices, wearables, IoT devices, etc). See the Devices section of this report for more information.

## **Approach**

We believe that operating sustainably creates ongoing value and positive impact for our business, stakeholders, communities and the environment. We seek to minimise our impact on the planet through action on climate, circularity and nature.

These focus areas are interrelated – for example, reducing emissions and improving circularity can reduce the consumption of natural resources (including water) and hence our impact on nature and biodiversity.

#### We are:

- reducing the emissions and energy across the design, build and operation of our network, infrastructure and our value chain
- providing customers with technology, devices and service options that are more environmentally sustainable
- working to provide our customers and communities with resilient connectivity services and support them through natural disasters.



For more information on our key environment metrics, see the 2025 Data Pack on our website.

## Taking climate action

Addressing climate change is an urgent global challenge that we believe is critical to ensuring long-term sustainability. Our action includes taking ambitious steps to decarbonise our business and our supply chain and support Australia's energy transition. It also means preparing, adapting and responding to the present and increasing impact of climate change on our business and our customers.

We are committed to achieving net-zero by 2050 including scope 1, 2 and 3 emissions, and our net-zero target was validated to the Science Based Targets initiative (SBTi) Corporate Net-Zero Standard in FY25.<sup>25</sup> To help ensure progress, we have set the following near-term emissions reduction targets aligned to a trajectory to limit global warming to 1.5°C:

- reduce our absolute scope 1+2 emissions by at least 70 per cent by 2030 (from an FY19 baseline)
- reduce our absolute scope 3 emissions by at least 50 per cent by 2030 (from an FY19 baseline).

To meet these targets we are dependent on decarbonisation of the Australian electricity grid. For our scope 2 emissions modelling, we use the latest estimates of Australia's GHG emissions issued by the Australian Energy Market Operator (AEMO) in its Integrated System Plan out to 2050.

For our 2030 target we assume that Australia will meet the current national renewable energy target of 82 per cent by 2030. We have conducted scenario analysis considering a delay of up to two years for the decarbonisation target for the Australian grid. If that scenario occurred, we would consider mitigation options such as the use of Renewable Energy Certificates.

To support the decarbonisation of the Australian electricity grid, we have also set a target to enable renewable energy generation equivalent to 100 per cent of our consumption by the end of this calendar year. We are on track to achieve this target.

In 2024, we joined the Australian Climate Leaders Coalition (CLC), a cross-sectoral group of Australian CEOs supporting the Paris Agreement commitments and the road to decarbonisation. In FY25, we participated in two working groups: Solving for Nature and Climate Together and AI for Climate. We participated in these groups to share our knowledge and experience to support Australian industry in considering these important topics and to inform our own climate-linked nature and AI activities.

This year, we were recognised by CDP for our climate leadership receiving an A- rating for our performance in 2024.<sup>26</sup>



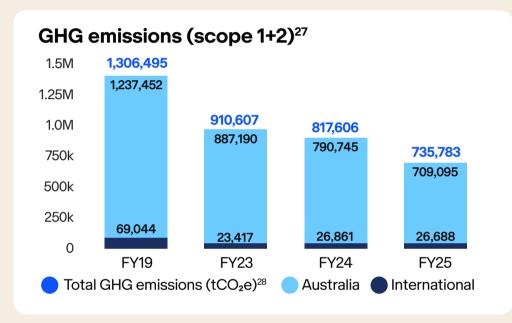
For more information on our Sustainability partnerships, see our In focus: Sustainability at Telstra paper on our website.

<sup>25.</sup> Our net-zero target was validated by SBTi following changes to increase our 2030 target ambition and to re-baseline our emissions profile following changes to our business.

<sup>26.</sup> Due to CDP reporting periods, this score is in relation to our FY24 disclosure period.

#### **Decarbonise Telstra**

In FY25, we achieved a 10 per cent reduction in our scope 1+2 emissions compared to the previous year, and a cumulative 44 per cent reduction against our baseline year of FY19. We achieved this by decommissioning legacy technology, improving the energy efficiency of our network and infrastructure, and benefitting from the reduction in emissions intensity of the grid electricity we consume.



# Reducing scope 1 emissions by investing in electric and hybrid vehicles

Telstra has an overall fleet of almost 6,250 assets, consisting of 3,000 operational vehicles, 800 plant, trucks and trailers and 2,450 staff salary-sacrificed vehicles. Telstra operational fleet vehicles made up approximately three per cent of our FY25 scope 1+2 emissions. Over the past five years, we have transitioned over 22 per cent of our operational fleet to hybrid models to reduce our fleet emissions. Driven by the Australian Government's Fringe Benefit Tax (FBT) exemption on Electric Vehicles (EVs), we have also seen an uptake of EV and Plug-in Hybrid Electric Vehicles (PHEVs) in our salary sacrifice fleet, growing to almost

750 vehicles in FY25 and making up 30 per cent of our entire salary sacrifice program. Telstra's partnership with Greenfleet continued in FY25 with all salary sacrificed fleet vehicle deductions including a contribution to Greenfleet.

We are continuing testing of EVs within our operational Field Services teams, enabling onsite chargers and piloting a number of electric SUV vehicles in the field. We are also exploring installation of EV chargers at network sites. For employees in Melbourne and Sydney, we have EV chargers and EV pool cars at four of our major office locations.

#### Managing our electricity consumption

Electricity consumption across our network sites (including our fixed and mobile infrastructure), data centres, offices and other buildings represents around 96 per cent of our total FY25 scope 1+2 emissions, making it our single largest emissions source.

In FY25, we invested \$20 million in energy reduction projects, including both energy efficiency and legacy equipment decommissioning within our operations in Australia.

In FY25, our energy efficiency programs delivered a collective annualised saving of 9,034 MWh electricity and 7,137 tCO<sub>2</sub>e. In addition to our infrastructure energy efficiency projects, we saved a further 107,482 MWh and 66,086 tCO<sub>2</sub>e annualised through decommissioning legacy network equipment and network energy efficiency enhancements. Across FY20 and FY25, and based on current electricity prices, savings from our energy efficiency and decommissioning programs would equate to around \$92 million in gross electricity savings and a net power consumption reduction of 26 per cent.



For a detailed breakdown of our emissions and energy consumption, see our **2025 Data Pack** on our website.

<sup>28.</sup> GHG emissions are calculated using the latest emission factors for fuel and electricity use at the time of reporting. They are measured in tonnes of carbon dioxide equivalent emissions (tCO<sub>2</sub>e). The emissions inventory encompasses Telstra's Australian and international operations (other than Digicel Pacific).



<sup>27.</sup> The National Greenhouse Gas and Energy Reporting (NGER) determination is used for calculating Australian based scope 1+2 emissions, while the GHG Protocol is used for calculating international based scope 1+2 emissions. All scope 2 calculations use a location-based accounting methodology.

#### FY25 energy efficiency and decommissioning initiatives

Initiative	Description	Annualised energy savings (MWh)	Annualised emissions savings <sup>29</sup> (tCO <sub>2</sub> e)
Decommissioning legacy network	We are actively rationalising and decommissioning our legacy network equipment, reducing both direct energy consumption from the equipment as well as associated energy for cooling. This includes our legacy 3G network.	106,748	65,344
HVAC optimisation	We conduct physical inspections of our network sites to identify faults affecting power consumption and review equipment performance to identify optimisation opportunities, including decommissioning surplus or redundant plant.	5,519	4,540
Building services energy efficiency upgrades	Our capital works program includes the installation of fresh air cooling systems, high-efficiency air conditioners, improved cooling control strategies and building management and electronically commutated fans.	2,990	2,231
Network energy efficiency enhancements	We are driving energy efficient technology enhancements with our strategic partners. We modernised selected mobiles sites and several technology trials are in progress across the Mobiles, Transport and IP entities, trialling various sleep modes, coherent pluggable optics and liquid cooled technologies.	1,094	741
LED lighting	We are currently undertaking a large multi-year program to remove over 100,000 old fluorescent lights across hundreds of our facilities and install new LED lights with inbuilt motion sensors and auto-shut off capabilities.	524	367
Total		116,876	73,223



## **Emissions impact of** switching off 3G

Telstra closed our 3G mobile network in FY25. In doing so we achieved emissions savings of 22,030 tCO<sub>2</sub>e this year, contributing to our 2030 commitment. This was achieved by turning off legacy energy-intensive equipment at over 9,000 sites remotely and 6,215 physical sites, removing approximately 40,317 MWh of power load.

## **Reducing emissions** associated with our core connectivity services

Our Fixed Engineering team has collaborated with vendors to improve energy use and reduce emissions in the Telstra Internet Direct (TID) Core Platform which provides internet access to customers domestically in Australia.

Key initiatives include leveraging observability to establish baseline power usage, developing energy efficiency metrics, creating joint roadmaps with vendors, deploying new capabilities without impacting customer experience and proving benefits through in-house dashboards. We have upgraded TID Core with 40 Next Generation Cisco Line cards which we expect to reduce power usage by 14,720 kWh per year. We have also deployed Cisco's NPU Power Optimisation feature, expected to further reduce power usage by 17,520 kWh per year.

#### Trialling renewable hydrogen fuel cells and generators to reduce our demand on the grid

The Renewable Hydrogen Fuel Cell Generator Pilot at Mobile Sites was supported by the Victorian Government through the Renewable Hydrogen Commercialisation Pathways Funding Agreement. Telstra accessed \$1,115,185 towards the trial of renewable hydrogen fuel cells as backup power in place of diesel generators at five mobile sites. The fuel cells use renewable hydrogen fuel which is generated from renewable energy sources. The project aims to demonstrate the technical and commercial viability of renewable hydrogen as a zero-emissions fuel for generator backup power.

The project deployed a 10 kW renewable hydrogen fuel cell generator at five sites across Victoria that suffered outages after the 2021 storms: Coldstream, Kinglake, Christmas Hills, Chum Creek and Neerim North. Installation at these sites was completed in 2024. These fuel cell generators can provide an additional 72 hours of backup power — a significant increase from existing battery backup power at these sites.

In FY25, our focus has been on monitoring the performance of the renewable hydrogen fuel cell generators, performing regular routine service and maintenance to learn more about operating this technology, understanding the logistics of the renewable hydrogen fuel supply chain network and assessing the effectiveness and any limitations of the system in a real-life scenario. As part of further trials, we are planning to pilot the use of a renewable hydrogen fuel cell generator to reduce our network's power demand during periods of peak electricity use. We hope that these pilots will provide valuable insights in the adoption of renewable hydrogen throughout Australia.

We have also commenced work on a 100 per cent renewable energy Stand Alone Power System (SAPS) under the Federal Government's Telecommunications Disaster Resilience Innovation (TDRI) program. This project will trial technologies that replace diesel generators at off-grid telecommunications sites by using excess solar photovoltaic energy to produce hydrogen onsite, which can then be stored and used when battery reserves are low. Completion is expected in FY26.

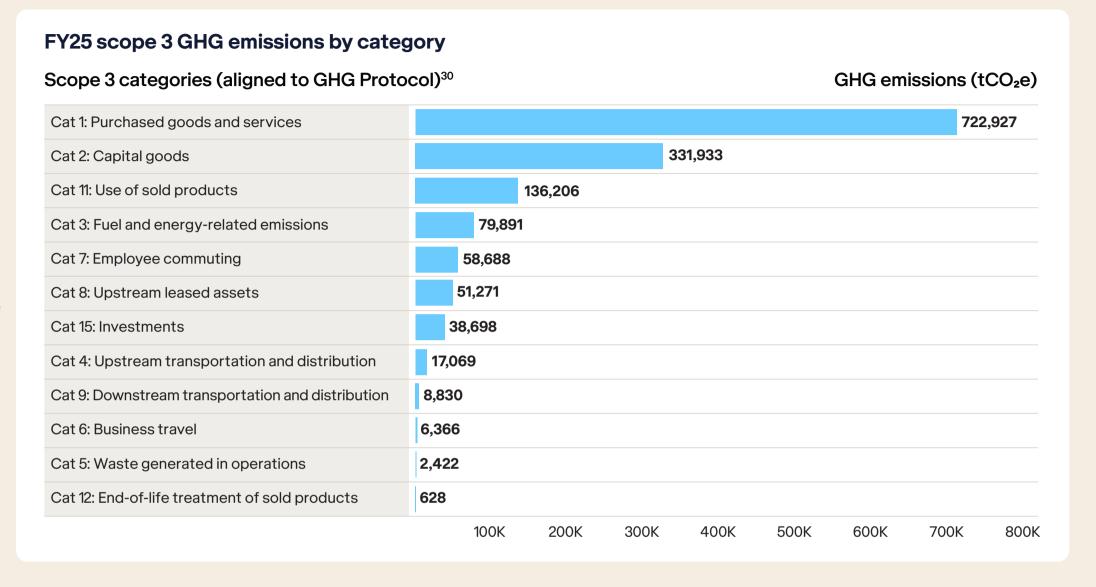


## Managing our scope 3 emissions

Scope 3 emissions are the largest part of our carbon footprint, accounting for 66 per cent of our total emissions. We believe we have a responsibility to contribute to reducing the emissions of the activities, products and businesses we rely upon and are committed to reducing our scope 3 emissions by at least 50 per cent by 2030 (from an FY19 baseline). At the end of FY25 we have achieved a 43 per cent reduction towards this target.

While we have made progress, there is still some risk to achieving this target by 2030. This is in part due to potential emissions from the broad adoption of AI across the economy, satellite services and other product growth, as well as dependence on key suppliers decarbonising. We continue to assess these potential impacts and to develop mitigation strategies.

We are also embedding our emissions reduction commitments into business processes to drive greater action. As part of this, we incorporated our scope 1, 2 and 3 emissions reduction targets into our FY25 Executive Variable Remuneration program and the FY25 Short Term Incentive program for most Telstra Group staff. We have also incorporated our scope 1, 2 and 3 emissions reduction commitments into our annual financial planning process to better align investment decisions with those commitments.



<sup>30.</sup> The GHG Protocol is used for calculating Telstra's scope 3 emissions. They are measured in tonnes of carbon dioxide equivalent emissions (tCO<sub>e</sub>). The emissions (tCO<sub>e</sub>). The emissions inventory encompasses Telstra's Australian and international operations (other than Digicel Pacific). NOTE: Category 10: Processing of sold products, category 13: Downstream leased assets, and category 14: Franchises of the GHG Protocol Scope 3 Standard are not applicable to Telstra's operations and are therefore not quantified. For more information, see our 2025 Data Pack available on our website.

#### Working together to reduce scope 3 emissions

Reducing scope 3 emissions requires significant and ongoing collaboration across sectors and value chains. This is particularly true for industries with complex supply chains such as the information and communications technology sector. Of our total scope 3 emissions, approximately 74 per cent comes from our supply chain (categories 1, 2 and 4). This means we are closely dependent on the commitments and actions of our suppliers to achieving their own decarbonisation goals.

At Telstra, we are working with suppliers to identify, prioritise and execute emissions reduction opportunities and drive improvements in environmental practices throughout the global supply chain. This includes providing training and support to suppliers on how to measure and reduce their emissions footprint, adding our climate commitments in commercial agreements and considering emissions reduction opportunities in the delivery of their goods and services to us.

We continue to embed climate clauses in contracts with our major suppliers. By the end of FY25, 168 supplier contracts now include these clauses, which contractually commit them to disclosing and reducing their absolute emissions. This is an increase of 41 per cent from FY24, representing over \$3.4 billion of our FY25 spend now being linked to suppliers with climate clauses embedded in our contracts.

We are also working towards further understanding the scope 3 emissions profile across Telstra's functional units. A material source of Telstra's scope 3 emissions is the manufacturing of devices provided to our customers to connect to our network, including modems and mobile phones. This year, we further developed our eco-design standards, communicated these standards to our suppliers and embedded them in the sourcing process for the devices we sell to market.

As part of this ongoing collaboration, we engage with industry associations to drive collective, industry level action on climate challenges. We continued our partnership with the CDP Supply Chain program, where 345 suppliers disclosed their CDP questionnaire to Telstra in FY25.

Our efforts to engage our suppliers on scope 3 emissions were recognised through an A rating in the 2024 CDP Supplier **Engagement Assessment Leaderboard.** 

This year we led a subgroup of the JAC to develop standard climate clauses for our industry. We are also signatories to the Supplier Engagement Program (SEP) through JAC. This program uses predominantly CDP data to assess the maturity of suppliers against five categories which range from 'getting started' to 'best practice' and delivers supplier capacity and capability training tailored to suppliers' maturity rating. The program tracks the development of suppliers up the maturity ladder on the journey to best practice. This is in an additional activity to our JAC site audits which are performed by independent third-party auditors.

For more information, see the JAC website.

#### Our use of carbon credits

In FY24, we announced that from the start of FY25 we were no longer making claims to be a carbon neutral organisation. This included stopping the purchase of carbon credits to offset the emissions from our operations. We continued to offset emissions associated with Telstra and Belong mobile phone plans and mobile broadband plans until the end of August 2024 to help ensure sufficient time to inform customers of this change. Therefore, we have not undertaken Climate Active certification in FY25 and are no longer members of this program. This was a significant change to our climate ambition driven by the need to take greater direct action to reduce our own emissions impact. As a result of this change, we redirected funding previously spent on carbon credits to our own emissions reduction activities and increased our 2030 scope 1+2 emissions reduction target from 50 per cent to 70 per cent (from an FY19 baseline).

We are not planning to use carbon credits to achieve our 2030 emissions reduction targets. However, as we approach our 2050 net-zero target we may revisit our use of carbon credits for hard-to-abate emissions. The current SBTi net-zero standard requires organisations to reduce absolute scope 1, 2 and 3 emissions by at least 90 per cent by 2050. Companies may then use carbon credits to neutralise any hard-to-abate residual emissions. If at that time we use carbon credits, it will be in accordance with the SBTi net-zero standard., and we will provide guidance on carbon credit verification and certification arrangements, the type(s) of carbon credit used, and other information to enable users of financial reports to understand the credibility and integrity of those carbon credits.



For more information, see the Science Based Targets website.



## Decarbonise the grid

We support grid decarbonisation through investment in renewable energy generation projects. In 2020 we set a target to enable renewable energy generation equivalent to 100 per cent of our consumption by 2025. To meet this target, we are supporting the development of new Australian solar and wind farms through long-term renewable energy contracts (Power Purchase Agreements, or PPAs).

These investments increase renewable energy in Australia's electricity grid for the benefit of all users. We do not claim the use of renewable energy from the projects ourselves, nor does it directly contribute to our 2030 scope 1+2 emissions reduction target. These investments also help us manage our energy costs by mitigating volatile electricity prices.

To date, we have supported investment in renewable energy projects across Queensland, Victoria and New South Wales which are worth more than \$1.6 billion.

In total, our Telstra contracted capacity as of the end of FY25 is 868 MW, not all of which is fully constructed.

On average over FY25, we had enabled renewable energy generation equivalent to 76 per cent of our consumption. This result was due to the Crookwell III and MacIntyre Wind Farms becoming operational, increased output from the Emerald Solar Park and Murra Warra Wind Farm, and reduced electricity consumption across our operations. We also increased our contracted offtake amount from the MacIntvre Wind Farm during FY25. With this in place, we have now contracted renewable energy generation which, once fully up and running, should be equivalent to more than 100 per cent of our forecast consumption by the end of 2025. As a result, while there are still some risks to the construction, grid connection and operational output of some sites, we are on track to reach our target of enabling renewable energy equivalent to 100 per cent of our consumption by the end of this calendar year.

#### **PPAs Location Map**



#### **Telstra's Power Purchase Agreements**

Site	Location	Total site capacity	Telstra contracted capacity	Year signed	Status
Murra Warra Wind Farm	Victoria	226 MW	Partially	2017	Fully operational
Emerald Solar Park	Queensland	72 MW	Fully	2017	Fully operational
Crookwell III Wind Farm	NSW	58 MW	Fully	2021	Fully operational
MacIntyre Wind Farm	Queensland	890 MW <sup>31</sup>	Partially	2022	Partly operational
Munna Creek Solar Farm	Queensland	120 MW	Partially	2023	Build/grid connection in progresss
Bundaberg Solar Farm	Queensland	78 MW	Fully	2023	Build/grid connection in progresss
Glenellen Solar Farm	NSW	200 MW	Fully	2023	Build/grid connection in progresss



Squadron Energy and Murra Warra Wind Farm 1

## **Protecting nature** and biodiversity

At Telstra, we interact with nature every day—when we construct or maintain our telecommunications network, or when we provide technology solutions to customers.

We believe it's critical to protect our natural assets—not just because we depend on them, but because we want to protect these special places and ecosystems for generations to come. We have infrastructure in most major ecosystems—from deserts to rainforests to remote islands. Nature plays a crucial role in climate change mitigation by absorbing and storing carbon dioxide from the atmosphere and regulating natural processes. Further, ecosystem services, such as local climate regulation and protection from extreme weather, provide a valuable natural barrier for our infrastructure and network assets. We also depend on resources from the natural environment, such as the metals and minerals used to manufacture technology, the wood used to make cardboard for our product packaging and water for cooling our network equipment.

As Telstra's footprint expands, the scale of our impact on natural ecosystems grows. This highlights the need for a more considered approach to nature—one that builds on the foundation of our existing sustainability efforts but pushes us to rethink how we integrate nature into each aspect of our business. Our approach to nature action is captured in Our Approach to Nature Action.

In FY24, we signed up as an early adopter of the Taskforce on Nature-related Financial Disclosures (TNFD) and have published our second nature disclosure guided by the TNFD in our 2025 Annual Report. This disclosure articulates how we have considered our nature-related risks, opportunities, dependencies and impacts, and the action we are taking to both mature our understanding and act on these where important to do so.

## **Constructing in environmentally** sensitive areas

Construction in environmentally or culturally sensitive areas is a high focus for us to ensure that there are no adverse direct impacts to nature. When conducting construction activities or major network updates, our process involves:

- planning, design and due diligence:
  - evaluation of sites for suitability, considering factors like soil type, biodiversity impacts, climate and accessibility
  - designing for these factors to be compatible with telecommunications and infrastructure requirements
  - considering alternative location or design to minimise impact
  - assessing national, state/territory and local legislative requirements
  - · seeking environment or heritage assessments and securing approvals when required
  - · engaging with stakeholders, traditional owners and land holders
- materials selection: including equipment and cable design to suit project needs and consider impact on the environment and ability to be recycled
- surveys conducting environmental and cultural heritage surveys to identify areas or species of significance and employing monitors to protect and preserve identified sites during construction where required
- enhanced construction methods: considering construction techniques (underboring or utilising existing infrastructure) to minimise the amount of disturbance or number of heavy machines required—reducing associated impacts to native flora and fauna
- quality control and testing: Telstra's first line assurance program reviews and provides feedback to construction teams on ways to improve how we work in sensitive areas. Telstra service delivery partners also support quality control and testing though the onsite supervision of works as they occur.





For more information on our Nature disclosures see the 'Acting on climate and nature' section of our 2025 Annual Report on our website.



For more information, see Our Approach to Nature Action 2025.

## Planning works in the **pristine Mount Canobolas**

Mount Canobolas in NSW is a special place, with valuable and protected areas of environment and cultural significance. We are planning to work in the area to improve location radio transmission capabilities, required to allow safe aviation operations.

One of the most significant biodiversity areas requiring protection is an endemic lichen community that occurs on all bare rock at the summit of Mount Canobolas. This forms an Endangered Ecological Community under the Biodiversity Conservation Act (NSW).

After more than two years engaging with stakeholders, we have worked through design and construction options to identify the safest, least impactful way to do the work.

Mount Canobolas is one of many projects where we work collaboratively with environment and cultural heritage specialists to construct and maintain our network with careful consideration of our impact on nature.

Work will commence in late 2025.

We considered how to:

- avoid disturbance: to work within the bounds of existing infrastructure. In this case, it wasn't possible
- optimise route: to minimise impact on biodiversity or cultural heritage values. Construction along this route presented an unacceptable risk to cultural heritage and required complex management of biodiversity issues
- design to minimise ground disturbance and impact: installing above ground cable. This was visually unappealing in a scenic and culturally important location and did not offer a reliable installation that is resistant to bushfire and storm damage
- plan for lower impact construction: installing the new fibre optic cable using underground boring with access points located within existing or recent ground disturbances
- prioritise environmental protection: consider all exposed rocks to be valuable habitat, protected by controlling the site and construction techniques used to minimise disturbance
- plan for site rehabilitation: design controls to improve colonisation potential for lichen populations to re-establish during site rehabilitation
- plan for the future: install the fibre cable in a conduit, allowing space for future works in the area to be completed without further disturbance.



## **Intercity Fibre Network**

Our Intercity Fibre Network (ICF) rollout involves the construction of high capacity, ultra-low latency fibre across Australia—connecting major capital cities from north to south and east to west, and creating access points to connect to the regional, rural and remote areas the network passes through. By the end of FY25 we had laid more than 4,400 km of fibre in the ground along our first routes. The Sydney to Canberra coastal route opened in June 2025 and Sydney to Melbourne will be open for business later in 2025. The ICF is part of a \$1.6 billion investment into our digital infrastructure assets.



For more information on our Intercity Fibre Network see the 'Acting on climate and nature' section of our 2025 Annual Report on our website.

Australia's unique environmental conditions and ecosystems present both challenges and opportunities in building and maintaining complicated networks. As part of the ICF rollout, we have engaged with more than 200 stakeholders in the process on nature considerations, including Traditional Owners, National Parks and State Forests managers, utilities companies, rail and road operators and private landowners to conduct land, flora and fauna and cultural heritage surveys. This aims to help ensure our construction methods through environmentally sensitive and culturally significant areas are conducted respectfully and appropriately with a focus on minimising any environmental and cultural site disturbance.

Examples of how we interacted with nature and cultural heritage include:

- wildflowers in WA: we delayed construction works to conduct flora surveys in the blooming season of native flora species to consider whether they are present and if so, to identify mitigation measures to avoid impacts
- lambing season in NSW: along the Cooma to Bombala section of the network, we worked with local farmers to plan works around lambing season to limit impacts to livestock
- sandhill dunnarts in SA: along the Oldea to Reid section. a native marsupial was identified during construction during the species' mating season. We halted works for approximately three months to limit any disruption to the sandhill dunnart's mating season
- southern hairy-nosed wombat in WA: between Border Village and Bookabie a population of southern hairy-nosed wombats was identified during flora and fauna surveys. We are investigating the presence and locations of wombat burrows along the route and to plan the best method to design and construct the route to limit impact on the habitat
- Yarra River crossing in VIC: this 800 metre stretch of water crossing is considered an important and sacred waterway to the Traditional Owners of the area and is a sensitive ecological area. We undertook detailed cultural heritage surveys and investigations, geotechnical surveys and soil sampling to inform our construction approach. We bored our fibre path at least 10 metres under the riverbed to avoid any impact to the waterway
- culturally significant items identified in VIC: we walked approximately 180 kms of the network pathway between Toongabbie and Orbost in Victoria with members of the Gunaikurnai Land & Waters Aboriginal Corporation to conduct cultural heritage surveys as part of Cultural Heritage Management Plan assessments. Together, we uncovered 21 culturally significant artefacts and several thousand stone artefacts which may otherwise have not been discovered. A number of these artefacts have now been appropriately registered with statutory bodies, including First Peoples State Relations Victoria.

## **Working in sensitive marine** environments on underwater cable crossings and our subsea network

Underwater cable crossings present unique and complex challenges when working in marine ecosystems.

We conduct extensive subsea and marine surveys to complete these works, and engage stakeholders on land access and environmental approvals. Data collected from our surveys helps us design the most efficient underwater cable crossing path that minimises impacts on important ecological areas and species, avoids existing infrastructure and also allows for future maintenance and monitoring of the network in a way that minimises environmental disturbance.

We plan the timings of our survey and construction work around weather, tides, wind speed and swell conditions in these environments to protect the safety of our people and our underwater cable network.

Working on or around the sea requires careful consideration of how to work best in sensitive marine environments. As an example, Darwin Harbour cables are an important part of the network, providing a geographically diverse path to Darwin via Perth. In July 2024, we worked to replace a damaged underwater cable in the Harbour. We worked across a fiveday window, navigating neap tide conditions and other environmental factors to reduce our impact and plan for the success of the work—including working around other people. animals and conditions in the water.

## **Progressing a** circular economy

Telstra is committed to embedding circular economy principles in how we design, develop, manage and operate our networks as well as the products we put out to market. This year, we have successfully delivered on our circularity targets: achieving a 94 per cent network waste recycling rate, reusing or recycling over 769,000 devices and maintaining our sustainable packaging commitment for 100 per cent of Telstra branded packaging.

To take tangible action on the circular economy, we have focused on both the resources we use and the waste generated by our operations, as well as the waste produced from the manufacturing, distribution and use of our products. By working collaboratively with our customers, suppliers, contractors and partners, we keep valuable metals and materials in circulation, reducing our reliance on extracting virgin materials and thereby protecting the natural environment.

Our approach towards progressing a circular economy is to embed sustainability across our planning, procurement and product design processes, including a focus on eco-design. With the launch of our Connected Future 30 strategy, we are focusing our efforts to move higher up the waste hierarchy (such as repair, refurbishment and reuse of devices) to unlock value across the entire value chain. We continue to engage with government and industry to collaborate and form partnerships to drive action and impact towards progressing a circular economy. This approach not only helps ensure that we continue to protect our people and planet but also drives greater social, environmental and commercial outcomes, as well as innovation within our operations and products.

## **Bringing together social** and environmental outcomes through device donation programs

Access to devices and affordable connectivity can make a big difference for people.

At a children's hospital, donated devices have been used to entertain children ahead of procedures to provide distraction and reduce stress. They have also been used to provide educational videos and step-by-step animations to help children become familiar with the procedures they are

undergoing, or to help explain exercises they need to complete as part of their recovery plans. Devices have also been used to help children who experience communication difficulties. including using speech-generating apps to express their preferences during their hospital stay. This has helped foster greater inclusion and understanding, enabling patient care teams at the Hospital to deliver patient-centred care.

Another recipient, Poli from the Asylum Seeker Centre, shares their story: 'This is an exciting and life transforming gift....The phone is very helpful for me to stay in contact with friends, family and support team. It will assist with my job search and to make calls. It is helpful to not be held back by technology. The new phone is very advanced and can help store all my documents in one place.'



#### **Devices**

Australians produce 22 kilograms of e-waste per person per year. compared to a global average of 7 kilograms.<sup>32</sup> We are helping our customers reduce the number of unwanted devices in their homes and businesses by making it easier and providing access for this technology to be reused or recycled. We are designing solutions based on circular economy principles for our products so we can keep materials in circulation for as long as possible.

Due to the changing nature of our business and customer needs, we recognise the need to scale and expand our program to offer solutions across all customer segments and the various products we put out to market. In FY24, we increased our circular economy target to reuse or recycle 650,000 mobile phones, modems and other devices each financial year to FY25. This was an increase from our previous target of 500,000 per year. We exceeded this increased target in FY25, reusing or recycling over 769,000 mobile phones, modems and other devices. Inspired by the Telstra eCycle program's success, we evolved this target to further increase our

ambition, enhance customer and store experience, and achieve better environmental and social outcomes.

Our new device target is to donate, reuse, repair or recycle one connected device for every two devices sold by FY30. It applies to connected devices (including mobile phones, tablets, modems, streaming devices, wearables and IoT devices), where there is an opportunity to expand the life of these devices. This new target is relative to the number of connected devices sold (rather than an absolute target) to better reflect our efforts to be a leader in the transition to a circular economy and shift the dial on Australia's e-waste problem. We will continue to report on the total number of devices recovered and track our progress against this new target in future sustainability reports.

Historically, we've delivered on circular economy targets as well as digital inclusion initiatives like providing free phones to customers in need – including 6,000 phones per year for victims of DFSV. Our new target also elevates donation so that we can deliver both greater digital inclusion and foster environmental sustainability.

## Making modems from modems (5G modem)

Our Telstra-branded modems are made from at least 85 per cent recycled plastics. In 2022, we successfully completed a pilot where we used plastics from end-of-life modems, recovered via our Telstra eCycle program, to build new modem enclosures. This created a full circle of materials from end-of-life modems to new modems. From these learnings, we partnered and collaborated across our modem supply chain to repeat and scale the process to use the recovered plastics sourced from end-of-life Telstra modems—making modems from modems. We now have more than 80,000 5G Meteor 2 modems made from 95 per cent recycled plastics, with 12,800 of those containing 30 per cent recycled plastics sourced from end-of-life Telstra modems.



## 'Like new' modems – giving our modems a second life

Telstra's modem return and refurbishment supports our commitment to embed circular economy principles in our products. All returned modems in this program (our Smart Modem range and 5G modems) are refurbished to factory standard or recycled. All refurbished modems are functionally tested, firmware upgraded and factory reset. Finally, new packaging and credentials are provided to give end users a 'Like New' experience. In FY25, Telstra has refurbished over 54,000 modems, saving 2,268 tCO<sub>2</sub>e emissions.



For more information about what devices you can recycle and how, visit our website.

## **Eco-design in practice**

This year we further incorporated eco-design principles in the way we design and develop modems. Examples include modular design to enable enclosure replacements and repairs, therefore prolonging the modem's life span. We're also replacing physical SIMs with eSIMs in our new Smart Modem range, enabling a 46 per cent reduction in emissions (CO<sub>2</sub>e) per eSIM.

## Sustainable packaging

We have an ongoing commitment to ensure that 100 per cent of Telstra-branded packaging is made of renewable or recycled material and is fully recyclable. We have continued to meet that commitment for all new products released in FY25. We continue to collaborate with our partners and suppliers to innovate material, design and packaging solutions.

In addition to deploying the Australian Packaging Covenant Organisation (APCO) Australasian Recycling Label (ARL) on all new Telstra-branded packaging (and rollout to Telstraowned brands), we provide our consumers with additional guidance on the packaging to inform them how to correctly dispose of packaging and end-of-life product devices. In FY25, we were a finalist for the 2024 Australasian Recycling Label Excellence Award, providing consumers with easy-to-understand recycling information on packaging. This award celebrates the organisations that have used the program to educate consumers on responsible packaging disposal and improve the recyclability of packaging.

## **Substituting packaging** materials to reduce impact

In FY25, we implemented a new packaging design for Telstra-branded mobile handsets and accessories. In some cases, we have removed up to eight plastic bags from a single product and replaced them with 100 per cent recyclable paper-based wraps and bags. In FY25, we eliminated 840,000 plastic bags across Telstrabranded handsets and an additional 870,000 plastic bags from accessories such as phone cases and screen protectors. In total, across Telstra-branded handsets and accessories, we avoided nine tonnes of plastic material from landfill.

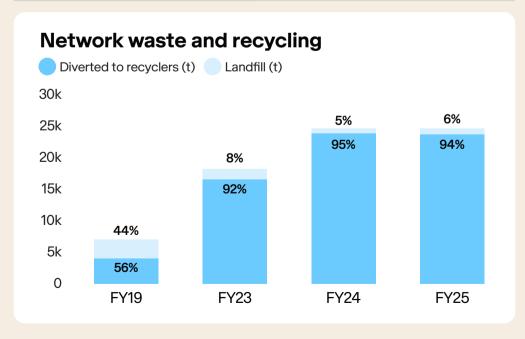


## **Network waste and recycling**

We exceeded our target to increase our network waste recycling rate to 90 per cent by June 2025. In FY25, we diverted 94 per cent of our network waste to a recycling facility. This network waste data includes our copper recovery program, battery lifecycle replacement, construction and demolition waste, e-waste and other operational waste. This result has been achieved by our improved understanding of our waste streams and the implementation of targeted initiatives to help ensure appropriate recycling and disposal options are available. Battery, active network equipment and copper recycling contributed heavily to the result.

We met our network waste target by working with industry partners and customers to recover technology and other e-waste for reuse and recycling. Acknowledging the substantial cultural

FY25	94% Network waste recycled
Total network waste	22,923 tonnes
Total diverted to recyclers	21,487 tonnes (94%)
Total to landfill	1,436 tonnes (6%)



and behavioural shifts needed within our internal and supplier workforces, we partnered with major suppliers to implement Telstra's sustainability objectives throughout the supply chain.

We are continuously reviewing the nature of waste being generated by our operations and work closely with our key delivery partners to help ensure optimal waste management practices are in place aligned with our recycling objectives. We also partnered with our national waste management provider to explore new recycling paths for materials that previously ended up in landfill.

In FY25, the Fixed Network Site Champion program continued to operate, supporting our recycling commitment. This program has included collaborating with local field technician champions at key waste-producing sites. These champions play a crucial role in overseeing waste practices at the site level and providing direct leadership in the field.

We are continuing to recover e-waste as we upgrade our network, identifying reuse opportunities for legacy technology, working with suppliers to extend the life of network technology and exploring opportunities to recycle industry-specific equipment. We expect our waste mix to materially change in the coming years as we recover the remaining legacy copper across the portfolio. We will continue reporting on the network waste recycling and work to maintain at least a 90 per cent network waste recycling rate.

We continue to identify improvement opportunities as we investigate the waste lifecycle beyond collection. Challenges include a limited number of local recycling providers for key waste streams as well as refining reporting mechanisms.

#### Recovering network technology

As technology advances and telecommunications needs evolve rapidly, the equipment required to operate our network must also adapt accordingly. To manage this transition effectively, we have

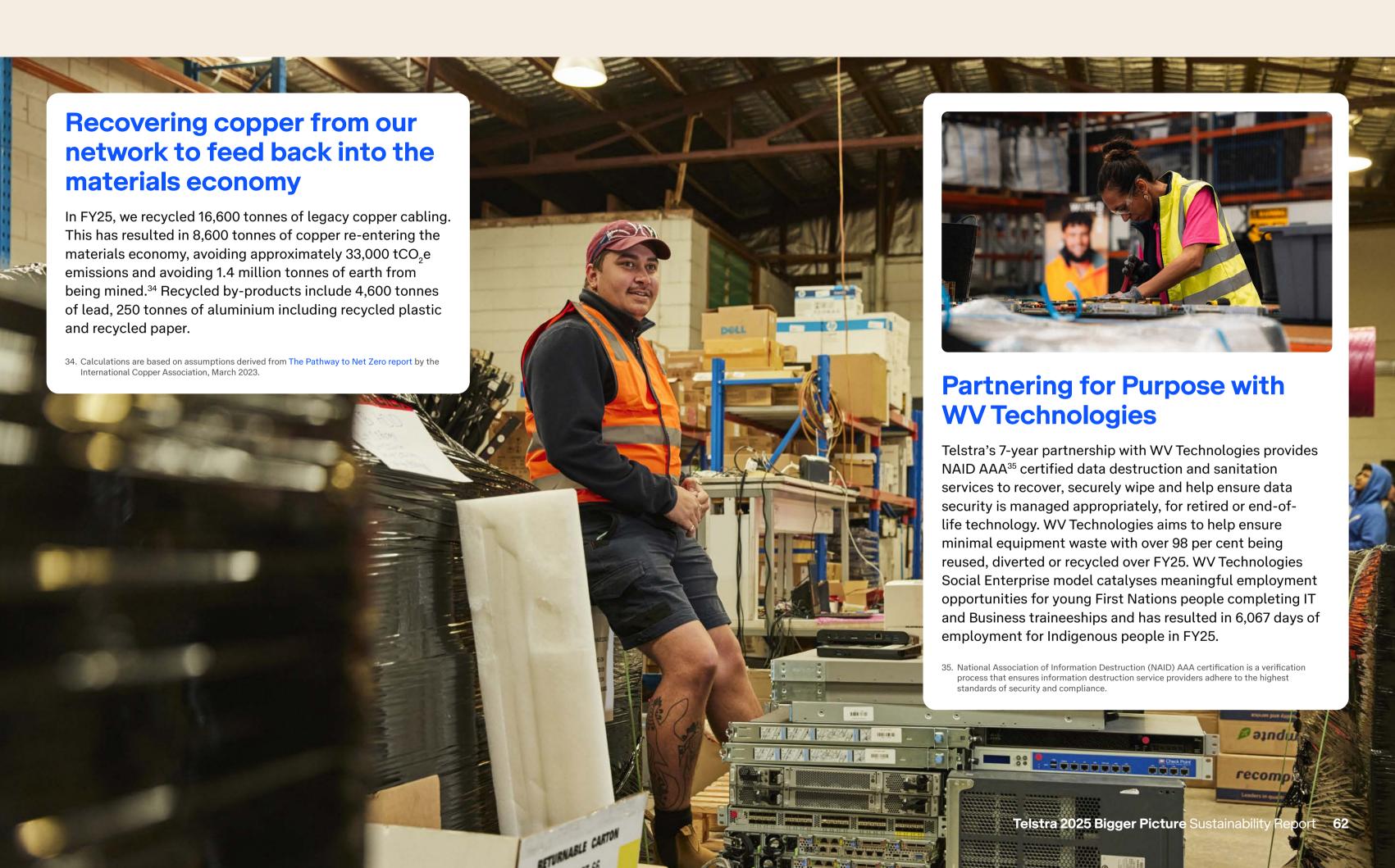
a dedicated program for recovering and recycling depowered legacy infrastructure, ensuring that our network remains efficient and sustainable. The project focusses on recycling printed circuit boards (PCBs) within Fixed Network Sites. Through this program, we determine whether there is opportunity for repurposing the legacy infrastructure in our business, reusing it in the secondary market or recycling the PCBs from the infrastructure. By refining the recovered materials to key base metals, we can reduce the metals that need to be mined. In FY25, the program has recycled 607 tonnes across 211 sites and recovered 300 parts for internal spares<sup>33</sup> reuse (approximately 358 kilograms).

In addition to our dedicated recovery program, we conducted a series of targeted projects to mine specific technologies for parts to bolster network resilience and improve fault restoration timeframes. This resulted in more than 6,400 parts with over 154 tonnes of equipment extracted for reuse or recycling. These targeted projects are important to enable placement of parts across Australia with a focus on remote, rural and regional locations, and is crucial for technology types where Original Equipment Manufacturer (OEM) parts are no longer available.

Moreover, in FY25 we completed an inventory and rationalisation of legacy spare parts stored to enable reuse for future repairs required on the network. This project identified a suite of parts no longer supported or required for reuse, resulting in 107 tonnes of additional network waste recycled. A total of over 300 items (524 kilograms) were sold to be reused by other telecommunications companies.

In alignment with our commitment to circularity, we strategically partner with certified recyclers who specialise in the safe handling and disposal of hazardous substances found in network equipment. This approach not only mitigates potential environmental risks but also reinforces our dedication to fostering a healthier ecosystem.

<sup>33.</sup> Spares are classified as parts recovered to meet demand shortfall also providing financial savings through minimising purchase or repairs



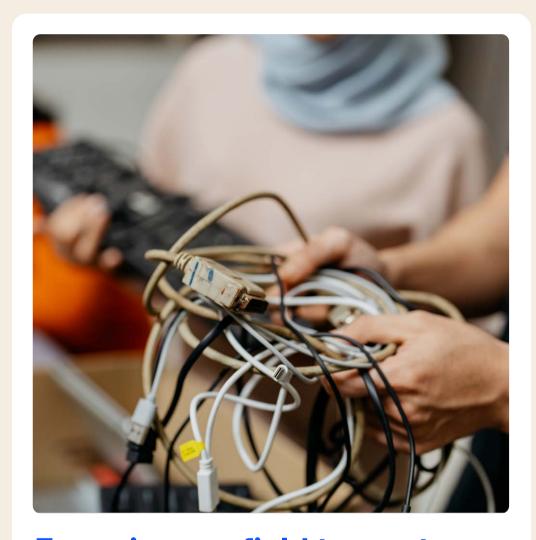
#### Recovering equipment from our Enterprise customers

Telstra Enterprise has a circular economy program to recover Telstra managed Customer Premises Equipment (CPE) that has been decommissioned at a customer site by our Field Services team. These devices are then recovered, assessed and either redeployed or refurbished for a new Enterprise customer, or as a last resort, responsibly recycled. In FY25, we redeployed, reused or recycled 3,879 devices through this program.

# Delivering on our circular economy ambition during office fit outs

During the retrofit of our corporate office in Sydney, we prioritised repurposing and reuse of end-of-life equipment, furniture and assets — retaining these resources to give them 'next life' in the newly designed office:

- 95 per cent of waste and construction materials removed from site have been recycled
- 80 per cent of workstations, 37 per cent of loose furniture and 100 per cent of ceiling tiles installed onsite are reused from the existing fit out, with no new tiles procured
- 10 per cent of loose furniture was donated to First Nations social enterprises
- 60 per cent of supplementary air-conditioning units were reused.



# **Engaging our field teams to take environmental action**

Every year we run an Eco Day organised by our Field Services team. Our focus is on reusing and recycling at our exchanges and depots. In July 2024 we recovered 100 kg of modems for recycling and 200 kg of modems for refurbishment, as well as a number of routers and other test equipment for reuse back in the field. At Eco Day in May 2025, we successfully diverted 14.9 tonnes from landfill at two sites, Nerang and Coorparoo.



## **Enabling the transition** for our customers

Digital technologies play a crucial role in helping businesses to reduce their emissions and protect the natural resources they rely on.

As Australia's leading telecommunications provider, we see a significant opportunity to help our customers and society transition to a lower carbon future by accelerating the adoption of innovative emissions-avoiding technologies.

The Enabling Positive Climate Action Report by Deloitte Access Economics analysed the impact of Telstra's products and services by looking at our enablement potential. This quantifies the emissions avoided by our customers using our products and services when compared to our own emissions. The report found that by 2030 we could help customers to reduce or avoid emissions by almost seven times the emissions we release.



For more information, see the **Enabling Positive** Climate Action Report.

In FY25, we developed a Telstra Emissions Calculator to assist our Enterprise customers to estimate emissions associated with the usage of Telstra products. We believe this is a valuable step towards supporting our business and Enterprise customers to understand and track more detailed data on our products and services for their scope 3 emissions. The tool is currently being piloted with customers to inform how the use and outputs could best drive action.

## **Partnering with Microsoft** to help customers manage sustainability data

We have partnered with Microsoft to help customers improve the way they collect, analyse and visualise data through the Microsoft Cloud for Sustainability Manager platform. This partnership builds on our expertise and learnings from managing Telstra's climate and emissions data. It provides us the ability to offer customers an end-toend solution for reporting—from IoT devices to collect data. through to systems to visualise and interrogate the data for management action and reporting. You can view more information here.

We are also proud of the role we play to help business, industry, partners and customers to think differently and to harness technology to address some of the consistent challenges facing us as we work to conserve the special places we have custodianship of, halt and reverse environmental degradation, and restore natural and biodiversity values where possible. Video or acoustic-based AI detection can process large volumes of information to identify species in wild places. Fast computing can provide quick action-reaction indicators for the public or conservation managers to take immediate steps. We are continuing to explore use cases to support greater action through technology, data and connectivity solutions.

## **Collaborating across industry** for nature protection

Collaboration is critical to the systems-level impacts we need to drive meaningful, scaled climate and nature action—while also prioritising the specific placebased outcomes necessary for the environments and communities we are operating in.



We shared our experience considerina nature risks and opportunities at the Global Nature Positive Summit in October 2024. convened by the Department of Climate Change,

Energy, the Environment and Water. We then initiated and hosted a follow-on Business for Nature Action symposium at our Sydney offices for over 150 leaders to share learnings and opportunities specifically for the private sector. We are committed to supporting greater industry action on nature and are also active members of the CLC Working Group on Nature and the GSMA Biodiversity Project Group. In addition, we have engaged directly with many business customers and stakeholders to share our approach, insights and learnings from being an early adopter of the TNFD.

## Al and climate

We see great potential for AI to support our climate commitments and broader environmental objectives. For example:

- Al-enabled networks can monitor and dynamically optimise network performance, which can reduce energy consumption and as a result also reduce emissions
- we can improve the timeliness and effectiveness of response to natural disasters and other climate events through AI-enabled digital twins.

Al also has the potential to significantly reduce the environmental impact of other sectors and industries. GSMA has progressed valuable research on the benefits of AI to address climate challenges via its 'AI for Impact' taskforce. We participated in a research project investigating the value of using mobile data to reduce transport emissions, demonstrating how our sector can help enable others to access the data they need to leverage AI for emissions reduction.



For more information on AI-enabled digital twins, visit the Telstra International website.

While we expect increased data traffic across our network related to the broad adoption of AI across the economy, this will not necessarily mean increased emissions for Telstra. We continue to invest in reducing emissions, including in part to offset expected increases in data traffic, through decommissioning legacy equipment and moving to more energy efficient hardware, as well as leveraging the transition of electricity grids to renewable energy. Historically, this has helped us manage changes to our emissions profile. For example, since FY19 we have reduced our scope 1+2 emissions by 44 per cent and scope 3 emissions by

43 per cent, despite data traffic across all our Australian networks increasing by 103 per cent over the same period and mobile data traffic having tripled over the past five years.

In FY25, we commissioned independent research to understand the impact of AI-related growth on our existing emissions profile. For scope 1 and 2 emissions, initial findings suggest the most notable increases in energy demand will occur in our data centres which represented a small part of our FY24 emissions profile (7 per cent of scope 1+2 emissions). We expect the emissions impacts of data centre growth to be further limited by ongoing electricity grid decarbonisation. In contrast, our networks (which constituted 87 per cent of our FY24 scope 1+2 emissions) are not projected to see substantial changes in energy requirements due to AI, as energy consumption largely remains stable regardless of data traffic. We do anticipate an impact to our scope 3 emissions profile via partnering with our platform providers on AI-related opportunities. The most significant impacts are expected in a small segment of our scope 3 emissions (7-12 per cent of our scope 3 profile) and we anticipate that the upstream electricity impact will be largely matched with the use of renewable energy by our platform providers by 2030.

We will continue to monitor the impact of the adoption of Al across the economy on our emissions profile. This includes the potential benefits of resource efficiencies gained through the application of AI, as well as increased energy use by our business and partners. We are also monitoring the potential impacts from increased data traffic due to streaming, gaming and new business areas.

It is critical that the increased energy demand of AI technologies be met through low or zero emissions sources of energy. Telstra has supported the renewable energy transition through investment in new wind and solar farm projects in Australia.

We will continue to work collaboratively with suppliers and partners to both leverage the benefits of AI and reduce our emissions. In 2023 we joined CDP and CO2 AI to support the



development of an AI enabled platform that allows companies to collaborate and share product level emissions data. We're continuing to monitor and manage the impact of AI on our emissions, particularly our scope 3 emissions.



For more information on our investment in renewable energy projects, see the Decarbonise the grid section of this report.

# **Environmental** compliance

As a minimum standard, Telstra seeks to comply with all operationally relevant and applicable environmental laws. We have set minimum performance standards for managing current and emerging environmental issues. Our HSWE management system is certified to the International Standard ISO14001:2015 and applies to Telstra's global operations.

We continue to review and improve our environmental management system in response to current and emerging environmental requirements, changing legislation and increasing shareholder, customer and community expectations.

Throughout the reporting period, the main category of environmental incidents were minor hydrocarbon spills. These occurrences underscore the ongoing importance of consistent environmental oversight and compliance.

Our environmental policy and control framework includes management of waterways and potential sources of pollution, minimising harm to flora and fauna, avoiding disturbance to Indigenous and other heritage sites and other general environmental risk factors. Assurance testing of our environmental controls is conducted throughout the year, contributing to the identification of areas for improvement.

We have not been prosecuted for, or convicted of, any significant breaches of environmental regulation in FY25.

# **Environmental** advocacy

We advocate on climate and nature matters directly and indirectly with government and industry. This includes through bilateral engagement with regulators, submitting responses on policy development in industry consultation, contributing to the policy work of industry groups aligned with our goals and by responding to regulatory initiatives, business developments and market practices.

Many industry associations engage on a broad range of issues and as a result our views on individual issues may differ from other industry association members from time to time. If a significant difference in views occurs that is material to our business, we consider a range of steps to manage this situation.



For more information on our approach to advocating on environment and climate policy, see our Environment Advocacy paper.



For more information on our Sustainability partnerships, see our **In focus: Sustainability at Telstra** paper on our website.





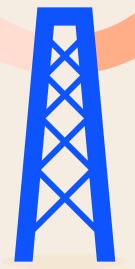


# Building resilient connectivity

# The importance of resilient connectivity

With more and more services moving online, and customers and stakeholders depending on the availability of our network, we recognise that the resilience of our network is critical for service continuity and for our role in enabling a digital world, public trust and commercial success. We also recognise the critical role that connectivity plays for all customers during natural disasters, particularly for our regional, rural and remote customers.

As outlined in the 'Acting on climate and nature' section of our 2025 Annual Report, key resilience risks include asset damage and mains power loss due to physical climate events such as bushfire, floods and cyclones. Other outage impacts may relate to non-climate linked events such as network equipment or operational failures at a single site which can have a cascading effect to create outages across a wider area of our network.



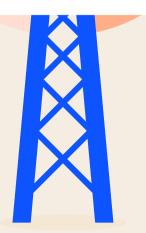


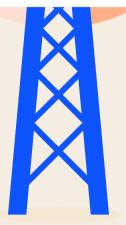
## Scale of network outages

Extreme weather events are becoming more frequent and unpredictable. We experience a significant number of events each year that interrupt power to a site. The majority of these are managed via backup power systems and thus relatively few events result in loss of service for our customers.

In FY25 we experienced over 160,000 mains power failures to sites with fewer than five per cent of those impacting customers across multiple sites. This included the impacts from around 40 climate linked mass disruption events, the most significant being:

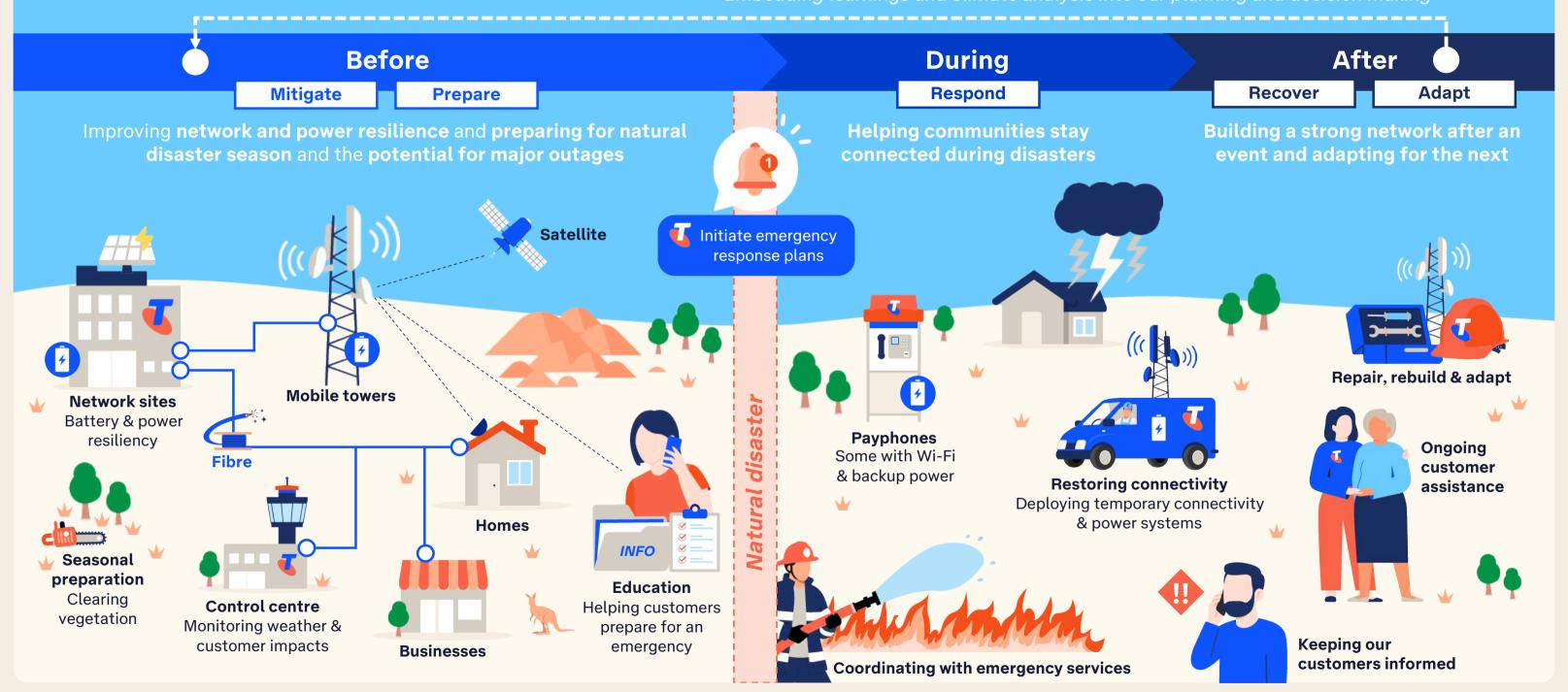
Sep 2024	VIC storms
Jan 2025	NSW severe weather and storms
Feb 2025	QLD Townsville/Ingham floods
Mar 2025	NSW/QLD Tropical Cyclone Alfred and associated severe weather
May 2025	NSW Mid North Coast floods





## Supporting our communities to stay connected during natural disasters

Improving our future response to natural disasters Embedding learnings and climate analysis into our planning and decision making



# **Prioritising resilient** connectivity before, during and after outages

We focus our efforts long before any disruption occurs through four critical stages:

- first, we proactively plan and invest in the resilience of our network and backup power systems, helping ensure that our infrastructure investments and assurance response are designed to withstand the majority of outages
- **second**, we prepare for seasonal risks such as bushfires and cyclones in advance by preparing our infrastructure and prioritising resources to vulnerable areas
- third, during a major outage, and when safe to do so, we respond quickly to support affected communities with specific services designed to maintain connectivity
- finally, after an outage, where required we repair, rebuild and learn from the experience to enhance our network's resilience during future potential outages

## Improving resilience of our infrastructure ahead of potential outages

Designing resilient infrastructure and connectivity is one of the most significant actions we can take to mitigate the impact of major outage or disaster events. Through our capital and operational investment programs we seek to improve the resilience of our infrastructure. Design of new infrastructure carefully considers the resilience needs of the region, including future climate-related impacts.

Collaboration is critical to the continuous operation of our network. We work with the electricity sector to secure reliable power to network sites. We also work with governments to find ways to provide resilient connectivity for regional, rural and remote communities, and with local emergency services to provide emergency alerts during natural disasters and other outages. This includes seeking access to better real time information about outage locations, estimated restoration times and prioritisation of energy restoration so we can restore services more quickly.

Investing in resilience covers a range of activities right across our network infrastructure including how we build, operate, maintain and upgrade our network. Our central Core Network is designed with redundancy to mitigate the impact of hardware or connectivity failure. Our designs incorporate power resilience at most of our sites with mature operational assurance processes to deploy interim power when required.

We run a continuous program to upgrade battery energy capacity, backup generators and SAPS. In addition, at sites with higher risk of mains power supply failures, we are increasing our investments in backup power systems and lifecycle upgrades. Where we can, we configure network software to automatically reroute network traffic around an outage. We are also investing in satellite connectivity solutions as alternatives when terrestrial outages occur.

In FY25, we stood up an executive level cross-business power resilience taskforce to centralise decision-making and prioritise activity. Outcomes have included enhancing our operating procedures relating to design standards, asset alarms and monitoring, conducting a comprehensive battery reserve review across our entire network, targeted investment in portable generators in high-risk areas and trialling new technology solutions including investment in SAPS. This cross-business approach has enabled new opportunities including collaboration with industry and our supply chain to improve resilience beyond our own assets and investments in data and AI to optimise our service response.

In addition to this activity, we continue to roll out our targeted program of lifecycle battery replacements to enable sites to operate through short-term mains power interruptions. delivering 2,327 battery upgrades across 1,435 sites in FY25. We also purchased an additional 38 portable generators to support our permanent generators during outages and reduce reliance on long-term hiring solutions. Our backup energy capacity includes battery, generator, solar panel and renewable hydrogen-based technology solutions.

## **Preparing for potential** major outages

While the summer months are commonly known as the peak disaster season in Australia, we prepare all year round to make sure our network and equipment are resilient to natural disasters and associated power outages. During a natural disaster our immediate work focuses on network incidents (such as faults, disruptions, loss of power or network damage), and our resources are largely geared to responsive and reactive work in this period. We then typically focus on learning, adapting our programs and ramping up our proactive maintenance and readiness activity.

Proactive disaster readiness and reactive restoration includes asset replacements, power system maintenance, fibre ground and aerial inspections, vegetation and access track clearance and operational readiness. Further, in cyclone risk areas we inspect and test primary and backup power supplies, including refuelling and servicing generators and checking thousands of batteries. We replace batteries to improve the reliability of backup power and where feasible we recycle end-of-life technology. We prepare recovery equipment like mobile Cell on Wheels and portable Starlink kits for our teams on the ground and scope supplies of critical spare parts and equipment to confirm we have the right local reserve supplies in the right locations to respond in a timely manner. We also help customers and communities understand how they can prepare and either remain connected or recover quickly through local media, blog posts and social media.





## **Supporting communities** through a major outage

We work year-round, preparing for and responding to emergency and disaster threats. However, it's not always possible to maintain continuous connectivity on our network, particularly when natural disasters or other events lead to extended periods where our network is without power. We strive to respond quickly during disaster events to provide connectivity support to emergency services, authorities, customers and communities.

Our response during a major outage prioritises supporting the safety of our people, protecting and maintaining our infrastructure, keeping our customers connected and providing short and long-term assistance measures. There are occasions where Telstra is unable to safely access our sites during major events (e.g., due to power lines on roads, flood waters, red zones). Ensuring the safety of our workforce and contractors and adhering to red and amber zone guidance from the authorities in these situations is critical.

We have a range of actions that we take to support customers, communities and our impacted employees to stay connected including upgrading payphones in disaster-prone

areas with free phone calls and Wi-Fi, and extended backup power, temporary portable connectivity infrastructure such as Cell on Wheels and providing additional data assistance packages for impacted customers and disaster relief.

We have invested \$7.5 million to upgrade over 1,000 payphones in disaster-prone areas, including backup batteries to enable continuity of payphone service when a disaster strikes. The program has delivered upgrades to payphones in all States and Territories, including more than 100 payphone upgrades in remote First Nations communities.

In FY25, we provided disaster support to customers in 213 postcodes following natural disaster events with over 1 million services receiving additional data on 824,000 post-paid services and 248,000 pre-paid services. Nearly 100 million GB of data was provisioned across all disaster events. This includes during Tropical Cyclone Alfred where we supported 895,000 customers, providing more than 70 million GB of additional data through our assistance packages.

## **Learning from major outages**

We evolve our approach to network resilience by learning from the outages we face and the natural disasters we respond to. Our review process brings together relevant stakeholders from across our business - including those directly involved in incident response and those involved in planning, design and operational processes. We also work with external stakeholders, such as governments and emergency response organisations, to understand how we can work more effectively together in supporting our customers, authorities and the broader community to maintain connectivity during natural disasters and other outages.

Telstra is also investing in a future-ready digital infrastructure to meet the expectations of our customers. This includes satellite innovations such as satellite-to-mobile messaging and Telstra Starlink kits for field technicians and evacuation centres.



## **Tropical Cyclone Alfred**

Our network was first impacted on Thursday 6 March as Tropical Cyclone Alfred crossed the coast as a low-pressure system and impacted large areas of Queensland and parts of New South Wales.

We focused on generator readiness, staff mobilisation and network resilience planning in anticipation of widespread power outages and were actively engaged with the state disaster response agencies and the National Emergency Management Agency (NEMA) to align national coordination efforts. Our teams provided initial backup power to sites where possible and over ten days worked alongside first responders, government and members of the community to successfully restore over 400 mobile sites, over 200,000 nbn services and 18,000 fixed line and ADSL services.



For more information on disaster relief, visit our website.

## The unexpected benefits of connectivity

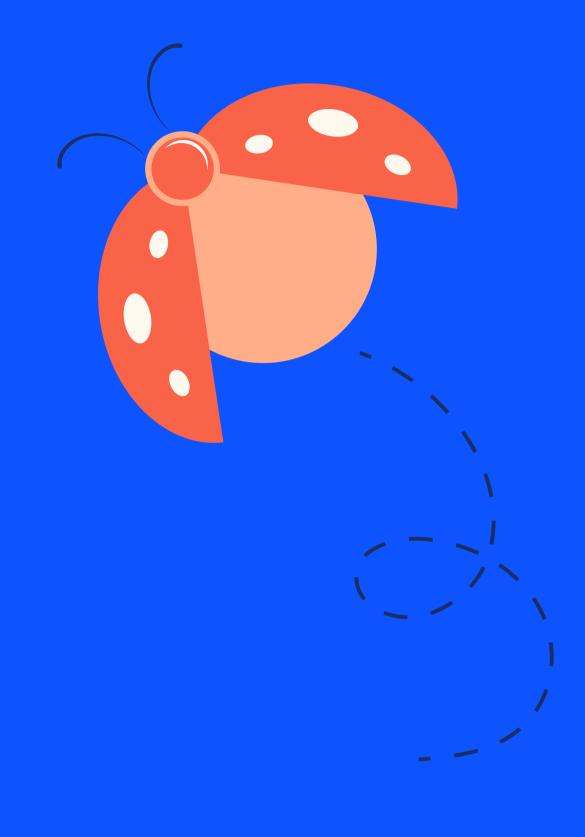
Sometimes, providing services in very remote parts of Australia can enable unexpected benefits.

In 2024. Telstra installed a network of flood sensors to measure critical water height and weather data in seven remote locations. In February 2025 a truck driver in far northwestern Australia became stranded on the edge of a floodway, surrounded by quickly rising flood waters. The sensors detected the impending flood waters, capturing images of the river including the stranded driver. It initiated an alert that led to the successful aerial rescue of the driver by the Department of Fire and Emergency Services.

## **Piloting Automatic Transfer** Units to support community disaster response capability in Western Australia

The Western Australia Telstra Automatic **Transfer Unit Pilot Deployment Program is** helping to secure critical mobile coverage for emergency services and communities during extended power outages.

Automatic Transfer Units (ATU) simplify the way portable generators are connected to our infrastructure. They enable (in a defined set of circumstances) a pre-trained and accredited community responder to transfer power generation to a portable generator supply if mains power fails, enabling mobile and other important communication services to continue. This program, jointly funded by the WA Government and Telstra, will see the rollout of 80 ATUs at key locations across the Wheatbelt and Western Goldfields across FY25 and FY26 as well as training community contractors through a support agent upskill program. In FY26 we also plan to measure the effectiveness of this program to determine if we can replicate it in other areas.





Q Telstra Sustainability