



Australian Government
Indigenous Business Australia

Sustainable • Inclusive • Ethical Responsible

Indigenous Business Australia's approach to
ESG compliance, risk management, and impact



Indigenous Business Australia's ESG strategy 2024 to 2028

A note on terminology

The United Nations Permanent Forum on Indigenous Issues estimates there are more than 370 million Indigenous people spread across 70 countries worldwide.

In considering the diversity of Indigenous people, an official definition of 'indigenous' has not been adopted by any United Nations (UN) system or body. According to the UN, the most fruitful approach is to identify, rather than define, Indigenous people. This is based on the fundamental criterion of self-identification as underlined in several human rights documents.

Australia's Indigenous people are two distinct cultural groups made up of Aboriginal and Torres Strait Islander people. But there is great diversity within these two broadly described groups exemplified by more than 250 different language groups spread across the nation.

Indigenous Business Australia (IBA) uses the primary term of Aboriginal and Torres Strait Islander people to refer to our customers, in line with the Aboriginal and Torres Strait Islander Act 2005 (ATSIA Act), which acknowledges the distinct cultural differences and diversity across Australia. In recognition of the societal shifts occurring in Australia, IBA has adopted the secondary term of First Nations.

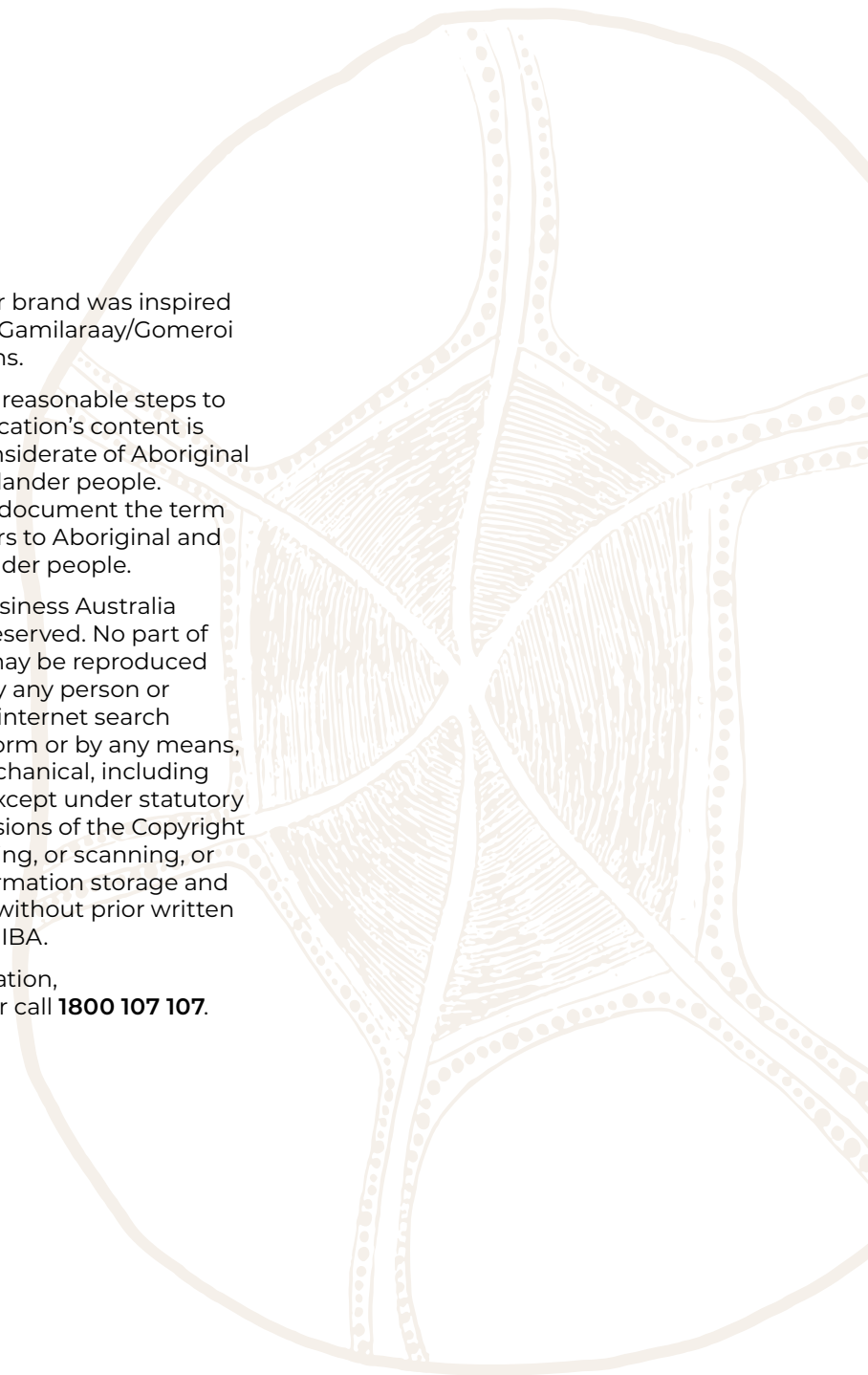
Disclaimer


The design of our brand was inspired by artwork from Gamilaraay/Gomerioi artist Penny Evans.

IBA has taken all reasonable steps to ensure this publication's content is sensitive and considerate of Aboriginal or Torres Strait Islander people. Throughout this document the term 'Indigenous' refers to Aboriginal and Torres Strait Islander people.

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For more information, visit iba.gov.au or call **1800 107 107**.





IBA acknowledges the continuing connection of Aboriginal and Torres Strait Islander people to their law, land, waters, community, and culture.

We pay our respects to those who have paved the way for change.

We acknowledge those who continue to lead from a place of strength, resilience and courage.

We look to the future with hope while keeping our eyes on the present. We honour those who are no longer with us – it is on their shoulders we stand.





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Message from the Chair

For more than a decade IBA has been measuring the impact of its products and services. Our studies have confirmed that IBA has a positive impact on the lives of many Aboriginal and Torres Strait Islander people.

We know and recognize the important and inseparable links between Country and Aboriginal and Torres Strait Islander people. It is our responsibility and obligation to care for Country to ensure sustainability for future generations.

We are witnesses to the urgency for a coordinated national and global effort to improve monitoring, evaluation, reporting and rehabilitation across a range of environmental, social, and governance (ESG) areas.

IBA's purpose is clear. We are here to assist and benefit Aboriginal and Torres Strait Islander people. Global and domestic economic pressures on cost of living, housing prices, interest rates along with climate change and more frequent natural disasters are changing the context and escalating the urgency for sound decision-making.

In light of this, we are charged with considering a range of factors when making prudent investment and lending decisions. We share this information with customers wherever possible.

Our core purpose is undertaken in complex and changing economic conditions. IBA began a rapid transition because we have a very important role and responsibility to facilitate access to finance and capital that allows Aboriginal and Torres Strait Islander people and communities to meaningfully participate in the changing economic and ESG landscape.

It's predicted that business disruptors in the year ahead will be Artificial Intelligence and technology adoption. How we recognise, understand, prioritise, and respond will define the work we do and the world we live in. This adoption will be core to our ESG business settings.

We will seek to share jointly the evolution of business operations from what we used to be to a more agile and adaptable entity that values our most human skills for the benefit of our communities. Our objective is to evolve a modern IBA through transformation and change leadership.

As the accountable authority, the IBA Board is committed to leading edge governance. We seek the incorporation of ESG objectives upholding the knowledge and value of Aboriginal and Torres Strait Islander people. We do this to enhance the financial wellbeing of customers. We believe that this will assist in IBA customer value creation as well as managing ESG risks.

IBA is committed to the integration of ESG principles to support the aspirations of customers and co-investment partners. On behalf of the Board of Directors, the Executive team and all who work within the IBA family, we look forward to adding greater value and the realisation of new opportunities for Aboriginal and Torres Strait Islander people, their businesses and the communities to whom we serve.

Eddie Fry
Chair of the IBA Board

Executive summary

IBA seeks to have a positive impact in the lives of Aboriginal and Torres Strait Islander people. The wellbeing of customers and the prosperity of the communities we work with is fundamental to delivering our purpose and activities.

The health of Country - land, water, and the governance of all that is contained within - faces increased uncertainty. As a result of IBA's activities and who we serve, a range of external threats and opportunities exist. It is important to take a structured, systematic, and strategic approach to considering these, and how best to respond.

The objective of our ESG strategy is to embed and uphold the rights of Aboriginal and Torres Strait Islander people, culture and Country through environmental stewardship, responsible risk management, and values-based governance practices that align with First Nations ways of knowing, being and doing.

This aligns with Australia's growing domestic policy agenda, and international commitments including the United Nations Declaration on the Rights of Indigenous Peoples and the United Nations Sustainable Development Goals.

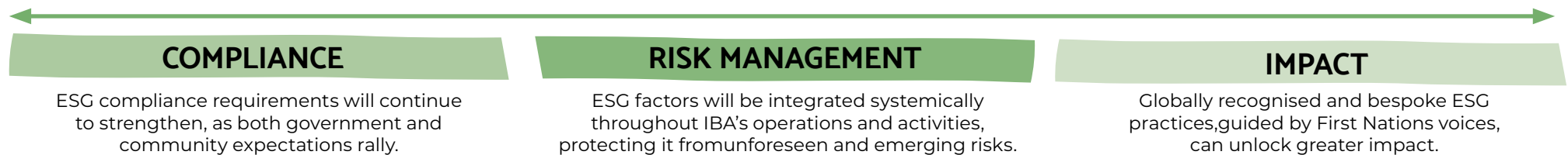
Climate change creates uncertainty, presents significant risks, as well as new opportunities. The Australian Government's Commonwealth Climate Disclosure Initiative will assist agencies to prepare and address these risks and opportunities.

Under the initiative, corporate Commonwealth entities, including IBA, will be required to disclose their exposure to climate risks and opportunities, and actions being taken to manage them, according to national and international standards.

The mandatory climate disclosures are in addition to existing environmental, social, and institutional compliance and reporting requirements that IBA already complies with. It reflects the evolving and multi-faceted sustainability and ESG landscape and increased community expectations.

Our ESG strategy will help us meet these evolving compliance obligations and allows us to adopt progressive risk and opportunity management practices to unlock greater impact.

IBA's approach to ESG compliance, risk management, and impact



Initially, we will focus on five priority areas, outlined below, identified through a materiality assessment in 2024.

1. Climate change and resilience
2. Customer and data security
3. Human rights and labour
4. Business ethics
5. Responsible investment.

These areas closely align with the goals and objectives in IBA's 2028 Strategy and are areas that present significant risk and opportunity in the short and medium term.

We will establish ESG performance metrics to measure our exposure and performance with respect to immediate and longer term ESG issues and will review the strategy and materiality assessment after three years.



Introduction

The Australian Government has made clear its ambitions towards Net Zero. In addition, organisations providing financial products and services have an increased requirement to ensure those products and services are affordable, accessible, and support people to achieve their life goals and aspirations and improve their wellbeing.

Organisations that consider ESG are generally more resilient as they can face financial risks in a structured and systematic way. Inaction means they are less likely to achieve overall results in the medium to longer term.

Given our role as a corporate Commonwealth entity and a provider of financial services, we already have strong controls in place including data protection and cyber security, staff engagement and modern slavery risk management, integrity and ethical practices.

At IBA, we have matured our understanding of the economic, social, and cultural impacts and, through the launch of this, our first ESG strategy, have expanded this to now include environmental and intergenerational elements.

The extensive rights and interests of Aboriginal and Torres Strait Islander people over land and waters, and intrinsic understanding and cultural knowledge of the landscape, means they are best placed to protect and restore Country and build resilience to climate change as well as other systemic and societal issues.

Our approach to ESG aims to go further than mandatory compliance and reporting requirements to incorporate, where possible, the lived experiences of Aboriginal and Torres Strait Islander people.

We are exploring new partnership opportunities for climate action and investing responsibly alongside Aboriginal and Torres Strait Islander people.

Further embedding ESG considerations into our decision-making, performance, and risk management frameworks will help us support more Aboriginal and Torres Strait Islander people and expand our impact.

What is ESG?

In the context of ESG, IBA must consider the following areas to ensure it has a positive overall impact.



ENVIRONMENT

'Environment' refers to ecological and nature related matters which organisations either rely on or impact. IBA may rely on or impact those matters, including but not limited to toxic emissions and waste, climate change, biodiversity and land use, deforestation, and water stress. Accordingly, there are opportunities to support Aboriginal and Torres Strait Islander people to pursue climate change response and adaptation initiatives, reforestation and biodiversity restoration, and Indigenous water rights.



SOCIAL

'Social' refers to social based matters which organisations either rely on or impact. IBA contributes to a range of positive social outcomes including through its activities including its home ownership and business support programs. But social matters also include privacy and data security, health and safety, human rights, child labour, and labour management. It is important that IBA has strong controls in place to ensure risks in these areas are minimised. There are also opportunities to further support and build First Nations prosperity and wellbeing.



GOVERNANCE

'Governance' refers to the governance structure of organisations, and their business ethics, which are crucial to the successful operation of businesses. This spans matters such as board composition and diversity, executive remuneration, ethical conduct, regulatory compliance, transparency and disclosure, risk management, and conflicts of interest. There are opportunities to demonstrate genuine partnerships, collaboration, and shared decision-making with Aboriginal and Torres Strait Islander people.

Embedding ESG into our 2028 strategy

The objective of our ESG strategy is to embed and uphold the rights of Aboriginal and Torres Strait Islander people, culture and Country through environmental stewardship, responsible risk management, and values-based governance practices that align with First Nations ways of knowing, being and doing.

IBA exists to enable Aboriginal and Torres Strait Islander people to engage in economic and wealth-building activities they choose. To achieve our purpose, we must understand and balance a range of considerations when making decisions and deploying our resources to benefit Aboriginal and Torres Strait Islander people.

Our first ESG strategy focuses on integrating ESG considerations into IBA's decision-making, performance, and risk frameworks, progressing towards a holistic and integrated view and approach of ESG and impact.

Connection to Country, culture, and community are inherent to First Nations values, worldviews and genealogy, providing a blueprint for sustainable development. We have been at the forefront of understanding the economic, social and cultural impacts of our activities.

However, technological advances, climate change, biodiversity loss, and more frequent natural disasters create uncertainty, and risk to both IBA and customers. We must continue to evolve our approach to incorporate environmental and intergenerational aspects into our approach to impact.

Our approach to ESG aligns with the goals outlined in our 2028 Strategy, especially the focus on impact, maximising wellbeing, and providing culturally responsible financial pathways to economic inclusion and prosperity.

The framework laid out in this strategy provides a structured, systematic, and strategic approach to addressing emerging compliance obligations and other emerging ESG-related reporting requirements. It allows us to adopt progressive risk and opportunity management practices to unlock greater impact over time.

OUR VISION IS FOR A NATION IN WHICH ABORIGINAL AND TORRES STRAIT ISLANDER PEOPLE ARE ECONOMICALLY INDEPENDENT AND AN INTEGRAL PART OF THE AUSTRALIAN ECONOMY.



Compliance

As a corporate Commonwealth entity and a provider of financial services, we comply with a range of laws and regulations. Many of these requirements tie into our approach to ESG, including the *Privacy Act 1988*, *Public Interest Disclosure Act 2013*, *Anti-Money Laundering and Counter Terrorism Financing Act 2006*, and the Commonwealth Risk Management Policy.

We have a range of safeguards and controls in place to maintain compliance. Safeguards are the foundational activities to establish the policies, processes, and procedures to effectively manage ESG-related risks. They ensure the integrity, accountability, and effectiveness of IBA's activities.

We are also subject to rigorous reporting and disclosure requirements, particularly across our governance and operations. Over the next few years, environmental compliance will be a particular focus as regulatory requirements shift.



ENVIRONMENTAL COMPLIANCE

We report annually on a range of environmental aspects, including how our activities accord with the principle of ecologically sustainable development, its environmental impacts and mitigation measures, and scope 1 and 2 (and selected scope 3) emissions.



SOCIAL COMPLIANCE

We report annually on internal staff statistics including gender, location, executive remuneration, and prepare an annual modern slavery report. Workplace health and safety initiatives, outcomes and any notifiable health and safety incidents are also disclosed annually.



INSTITUTIONAL COMPLIANCE

As a corporate Commonwealth entity, we are subject to extensive governance requirements under our enabling legislation. These requirements range from publication of an annual performance statement, internal organisational and decision-making structures, IBA's objects functions and powers, significant non-compliance issues with finance laws and insurance.

KEY SOURCES OF ESG-RELATED REPORTING REQUIREMENTS

Public Governance, Performance and Accountability Act 2013 and the Public Governance and Performance and Accountability Rule 2014

Environment Protection and Biodiversity Conservation Act 1999

Modern Slavery Act 2018

Aboriginal and Torres Strait Islander Act 2005

Australian Public Service Net Zero Policy

Work Health and Safety Act 2011

Freedom of Information Act 1982



Compliance with climate disclosures

The Commonwealth Climate Disclosure Initiative requires us to disclose our exposure to climate risks and opportunities, and actions we are taking to manage them, according to national standards. We expect that reporting will become mandatory for IBA from 2025–26.

Climate change impacts all sectors of the economy. It creates uncertainty, presents significant risks, and reveals new opportunities. Adapting to climate change will require us to adjust the way we make decisions and deploy resources and capital.

The Australian Government is developing the national standards, which will align with the International Sustainability Standards Board (ISSB) climate disclosure standards.

The ISSB standards require reporting of specific information, including:

- **physical and transition climate risks and opportunities relevant to the entity's operations**
- **arrangements the entity has in place to manage these risks and opportunities**
- **progress the entity is making towards its climate targets and in reducing its risk profile.**

IBA will need to respond to these reporting requirements in a way that is fit for purpose, accounts for our regulatory environment, enabling legislation and impacts of other Government policies.

There will be specific tailoring to account for the differences in the structure, objectives and functions of Commonwealth entities, and account for the regulatory environments under which they operate and their interaction with other Government policies.

We anticipate reporting and disclosure requirements will be phased in over time, with verification and assurance measures introduced in due course.

Physical risks – These risks typically relate to weather events causing property and asset damage, and associated cost of repair, rebuild, or insure, or increased operational costs, such as disrupted supply chains and elevated utilities costs. Acute physical risks include floods, tropical cyclones, and bushfire. Chronic physical risks include heat stress, drought, and sea level rise.

Transition risks and opportunities – Regulation and government policy changes will present a range of risks and opportunities for First Nations people, and therefore for IBA, including reputational risks, changing consumer expectations and market demand, technological innovation and advancements, as well as carbon and nature repair markets.

Our approach to climate disclosures

We will follow the guidance from the Department of Finance on the content and structure required in a climate disclosure for an entity like IBA.

Governance

Climate risks and opportunities are overseen by IBA's Board, Audit Risk and Performance Committee, and Executive leadership team.

We will strengthen our governance and decision-making by integrating climate and ESG into policies and procedures, including lending and investments activities, and establish assurance processes to monitor effectiveness.

Strategy

Aboriginal and Torres Strait Islander people are custodians of Country, keepers of local and traditional knowledge structure, and have recognised rights and interests over more than half the Australian continent. IBA acknowledges and respects that this connection to Country is fundamental to economic empowerment, self-determination, and wellbeing.

We will seek to understand risks, mitigate where possible, and pursue opportunities in partnership with Aboriginal and Torres Strait Islander people and communities so that economic and commercial opportunities are culturally responsible and are financially and environmentally sustainable.

Risk management

Our climate disclosures will include a progress update on how we are addressing and implementing the results of our risk analysis and assessment.

We will continue to identify and manage climate risks relating to our operations and activities. We will also consider climate scenarios in assessing climate risks and undertake scenario analysis to assist in managing uncertainty.

Metrics and targets

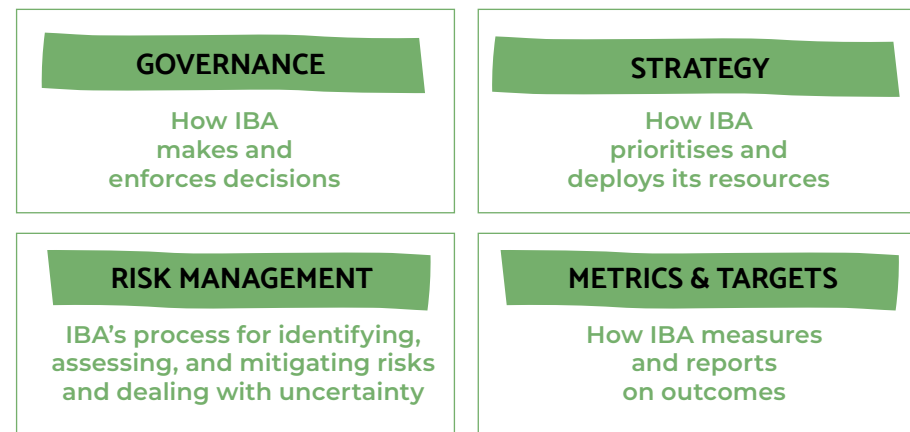
The Australian Government's APS Net Zero 2023 policy encourages corporate Commonwealth entities, including IBA, to declare their own emissions targets in due course.

We will continue to report on emissions in our Annual Report, as part of the Australian Government's APS Net Zero 2030 policy.

The framework below and opposite aligns with the new national standards and outlines how we intend to implement and embed these requirements into operations and activities and ensure compliance.

It also provides a useful model for other potential requirements in the future such as those relating to nature-related risks.

Climate disclosure framework



The ESG matters most material to IBA

We seek to have a positive impact in the lives of Aboriginal and Torres Strait Islander people. The wellbeing of customers and the prosperity of the communities we work with is fundamental to delivering our purpose and activities.

We must continue to navigate a range of external threats and opportunities. It is important to take a structured, systematic, and strategic approach to considering these, and how best to respond.

In 2024, we undertook a materiality assessment to identify and prioritise the ESG issues most material to IBA. Materiality assessments are best practice in preparing an ESG strategy and ensures that ESG risks and opportunities are considered in relation to an organisation's purpose and strategic goals.

IBA analysed these ESG issues further to focus its efforts to implement and embed ESG practices across its business operations. These priority areas represents a point in time view. IBA intends to revisit this list periodically to ensure it remains focused, relevant, and dynamic.



ENVIRONMENT

CLIMATE CHANGE AND RESILIENCE

IBA's capacity to manage risks and opportunities arising from climate risks and hazards and how it can build resilience to absorb these shocks across its portfolio.

NATURE

IBA's impact and reliance on nature as part of its operations and activities, including its understanding of its nature-related risks and opportunities.

WATER

IBA's own water consumption and access risks, and the impact of water stress on IBA's customers, such as water rights and availability in rural and remote communities.



SOCIAL

CUSTOMER AND DATA SECURITY

IBA's management of risks associated with customer data, consent, access and utilisation to ensure that customer data is handled securely and responsibly.

HUMAN RIGHTS AND LABOUR

IBA's ability to build a diverse and inclusive workforce, compliance with labour laws and standards, and ensure human rights are upheld including for IBA customers.

WELFARE AND HEALTH

IBA's management of workplace welfare and health, such as employee programs, mental health, equity, and workplace spaces to improve employee satisfaction and retention.



GOVERNANCE

BUSINESS ETHICS

IBA's strategy for navigating risks and opportunities related to conflicts of interest and ethical business conduct including risks of fraud, corruption, and bribery.

RESPONSIBLE INVESTMENT

IBA's approach to achieving competitive and sustainable results through responsible investment to reduce risks and enhance impact to the environment and community.

BUSINESS MODEL RESILIENCE

IBA's ability to adapt its business to the transition to a low-carbon economy and tapping into new markets among underserved populations.

Risk management

IBA has a comprehensive approach to risk management. Our approach is central to our purpose of advancing the commercial and economic interests of Aboriginal and Torres Strait Islander people across Australia.

We will continue to manage risks to minimise harm to IBA and customers from unforeseen and emerging risks. We will further integrate ESG considerations into our Risk Management Framework (opposite), and our policies and processes.

Following the materiality assessment undertaken in 2024, five high priority areas were identified.

1. Climate change and resilience
2. Customer and data security
3. Human rights and labour
4. Business ethics
5. Responsible investment

Closely aligned with the goals and objectives in IBA's 2028 Strategy, they present significant risk and opportunity in the short and medium term.

Over the next three years, we will systematically address these, ensuring we remain a responsible lender and investor.



Risk culture: IBA commits to embedding risk management in its culture, recognising that it is not possible to eliminate all risk. By accepting some degree of risk, and maintaining a low tolerance to those risks, IBA aims to maximise its impact, promote efficiencies, and foster innovation.



Risk acceptance: IBA is willing to accept higher levels of some types of risk when the opportunities outweigh the potential consequences. All IBA officers are responsible for appropriately engaging with and managing risk.



Risk oversight: The IBA Board, as the accountable authority, has effective risk oversight within IBA. This includes setting the organisation's risk appetite to understand what is acceptable risk-taking to achieve strategic priorities.



Risk Management Framework: The purpose of IBA's Risk Management Framework is to create and protect value by integrating risk management into our work and functions, including the activities set out in the corporate plan.



Guiding documents: Risk management at IBA is guided by three main documents: a Risk Management Policy and Framework (RMPF), a Risk Management Guide (RMG), and a Risk Appetite Statement (RAS).



A proactive approach: IBA aims to promote and build a risk culture that encourages an open and proactive approach to managing risk. We recognise risk as both an opportunity and a threat. Risk is part of everyday conversations and engagement with risk should promote and encourage workers to look at new ways to improve processes.

What we will do

Focused initiatives and safeguards were identified for the five high priority areas, as follows.



ENVIRONMENT

1. CLIMATE CHANGE AND RESILIENCE

Build resilience to climate change-related risks and opportunities safeguarding long-term value and contributing to a low-carbon, sustainable future, and minimise negative impacts on customers.

- 1.1 Continue to assess and mitigate climate risks across IBA's operations and activities.
- 1.2 Commence reporting of mandatory climate disclosure requirements.
- 1.3 Explore new opportunities with First Nations people such as in renewables and clean energy.



SOCIAL

2. CUSTOMER AND DATA SECURITY

Safeguard customer privacy and data security ensuring trust with customers.

- 2.1 Further strengthen our data and information management systems.
- 2.2 Implement a cyber security maturity program.
- 2.3 Adopt data governance practices aligned with First Nations data sovereignty principles.

3. HUMAN RIGHTS AND LABOUR

Uphold and promote human rights and labour standards, fostering inclusive growth, dignity and respect

- 3.1 Implement First Nations employment, professional development, and diversity and inclusion strategies.
- 3.2 Review and update our modern slavery risk and reporting procedure.
- 3.3 Develop a Reconciliation Action Plan.



GOVERNANCE

4. BUSINESS ETHICS

Maintain high ethical standards and promote integrity, transparency and accountability across all activities and investments.

- 4.1 Further strengthen governance practices, and policies and processes relating to ethical business conduct.
- 4.2 Conduct a business ethics audit and implement the findings.

5. RESPONSIBLE INVESTMENT

Integrate responsible investment principles into investment and lending decision-making processes.

- 5.1 Develop a Responsible Investment Policy.
- 5.2 Foster First Nations self-determination and free, prior, and informed consent (FPIC) principles with finance and banking sector partners such as Australian Sustainable Finance Institute and Australian Banking Association.

Ways of working

'Ways of working' provides a framework for thinking and acting through a First Nations gendered systems lens. It helps to foster change for the better and becomes more embedded the more it is discussed and practiced. They were developed by the Australian Human Rights Commission as part of the Wiyi Yani U Thangani (women's voices) initiative and are informed by the everyday systems practices developed by the Prevention Centre. IBA has supported the Wiyi Yani U Thangani initiative since its inception.

'Ways of working' helps people connect with First Nations ways of knowing, being, and doing.



Co-design and collaborate



Think in context and relationships



Take a healing informed approach



Take a strength based approach



Engage in deep listening



Rebalance power

Impact

IBA has been at the forefront of measuring impact from the perspective of Aboriginal and Torres Strait Islander people through our Impact Framework, which focusses on maximising wellbeing. This ESG strategy complements our Impact Framework by aligning ESG considerations around achieving our purpose, that is Aboriginal and Torres Strait Islander economic self-sufficiency, self-management, and economic empowerment.

For customers, financial wellbeing means being able to manage economic, social and cultural obligations, being able to pay bills and have money to put away afterwards, without stress or worry. Prosperous communities recognises the social and economic ripple effects that can come from economic empowerment, such that the wellbeing of community reflects and supports the wellbeing of individuals and their families.

ESG


Our ESG approach expands risk management and opportunity identification processes beyond traditional metrics, acknowledging the financial implications of environmental, social, and governance risks and opportunities.



Impact

We intentionally distribute capital and capability support to generate positive, measurable social and environmental outcomes alongside a financial return, specifically for the benefit of Aboriginal and Torres Strait Islander people.





We recognise 80,000¹ years of Aboriginal and Torres Strait Islander people's unbroken connection with Country.

We honour all that exists above, within, and as part of the world views and systems that underpin Aboriginal and Torres Strait Islander people's wellbeing.

We believe in and support economic justice and self-determination as defined by customers and the importance of redefining what success means through their views and voices.

¹ <https://www.theguardian.com/australia-news/2017/jul/19/dig-finds-evidence-of-aboriginal-habitation-up-to-80000-years-ago>

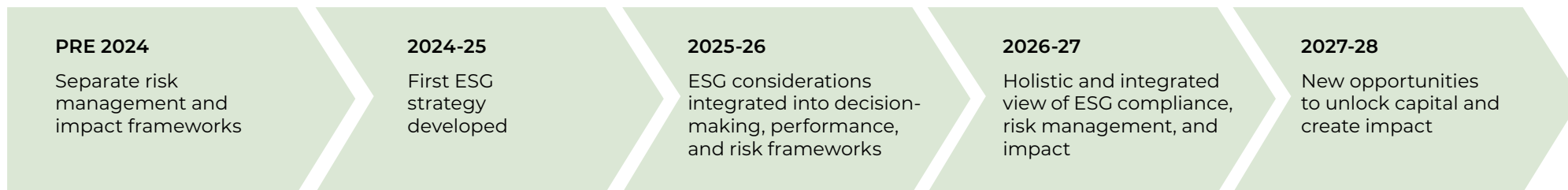
Our ESG journey

The ESG landscape is complex and evolving. Our ESG strategy is flexible, while providing a structured and systematic approach to sustainability and ESG issues. This approach aligns with our purpose and strategic goals, and First Nations ways of knowing, being, and doing.

In implementing our first ESG strategy we intend to:

- Build robust foundations with policies, standards, and governance that go beyond minimum compliance requirements and strive for best practice.
- Invest in building internal capability and clarifying roles and responsibilities for ESG-related matters.
- Promote continuous improvement and build structures to monitor and track progress against ESG metrics.

The successful implementation of this ESG strategy will lead to a broader suite of risks being managed appropriately and more opportunities being capitalised on. It will unlock future capital and create further economic opportunities and impact with Aboriginal and Torres Strait Islander people.





Monitoring progress

To monitor how effectively we integrate ESG and broader sustainability considerations into our decision-making, performance, and risk frameworks, we will:

- Establish a baseline set of metrics that align with ESG standards and Australian Government policy. Once established, we will pilot a target to measure IBA's sustainability performance at an entity level and actively manage and improve our performance over time.
- Review the effectiveness of our first ESG strategy in 2026-27.
- Review our materiality assessment and associated metrics from 2027-28 and annually thereafter.

This approach will consider our exposure and performance with respect to immediate and longer term ESG matters identified through the materiality assessment process.

The materiality assessments helps us identify sustainability topics that are deemed 'material' from an impact perspective, or a financial perspective, or both.



