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Will van de Pol - [will@marketforces.org.au](mailto:will@marketforces.org.au)

Julien Vincent - [julien@marketforces.org.au](mailto:julien@marketforces.org.au)

Kyle Robertson - [kyle.robertson@marketforces.org.au](mailto:kyle.robertson@marketforces.org.au)

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## Shareholder proposals: Climate Risk Safeguarding

**Australia and New Zealand Banking Group (ANZ) - Commonwealth Bank (CBA)  
National Australia Bank (NAB) - Westpac Banking Corporation (WBC)**

**ANZ, CBA, NAB and WBC's current fossil fuel lending policies and practices are undermining their stated commitments to the goal of net-zero emissions globally by 2050.** Each bank continues to finance projects and companies that are incompatible with the [International Energy Agency's \(IEA\) Net Zero by 2050 scenario](#) (NZE2050), and the Paris climate change agreement. None currently have policies that would stop this practice in the future.

Most recently, all four banks were involved in a [US\\$1 billion loan to Santos](#) in August 2022, refinancing and extending a [2020 deal](#) related to the new Barossa gas field Santos is currently developing, which one economist has [described as](#) "a CO<sub>2</sub> emissions factory with an LNG by-product". Barossa is one of multiple projects Santos includes in plans to increase oil and gas production by at least [17% from 2020 to 2030](#).

ANZ and WBC also contributed to a \$1.2bn deal for Australia's largest gas producer, Woodside, in July. Woodside's increasing production plans include the Scarborough gas and Pluto LNG project, which independent analysis has concluded "[represents a bet against the world implementing the Paris Agreement](#)" and "[is not competitive even in the \[IEA's 2.7°C warming scenario\] STEPS – that is, a world that utterly fails to decarbonise](#)".

With the IEA confirming "There is no need for investment in new fossil fuel supply in our net zero pathway", ANZ, CBA, NAB and WBC must ensure their policies and practices do not undermine this imperative by financing additional fossil fuels. **Investors are therefore urged to vote in favour of the following resolution at ANZ, CBA, NAB and WBC's upcoming annual general meetings.**

### **Resolution: Climate Risk Safeguarding**

Shareholders recognise the substantial transitional and physical risks of climate change and their potential financial impacts on our company. We also note our company's support for the Paris climate change agreement and the goal of net-zero emissions by 2050. Shareholders therefore request the company disclose, in subsequent annual reporting, information demonstrating how the company's financing will not be used for the purposes of new or expanded fossil fuel projects.

## Expanding fossil fuels incompatible with net-zero

In clear contradiction of their commitments to net-zero by 2050, ANZ, CBA, NAB and WBC have continued providing finance for new fossil fuel developments and the companies pursuing them, and have failed to rule out this activity moving forward.

In May 2021, the IEA confirmed that achieving net-zero emissions in the global energy sector – with just a 50% chance of limiting global warming to the 1.5°C goal of the Paris Agreement – requires no further expansion, and a rapid decline in fossil fuel supply.



***Beyond projects already committed as of 2021, there are no new oil and gas fields approved for development in our pathway, and no new coal mines or mine extensions are required”***

**“Also not needed are many of the liquefied natural gas (LNG) liquefaction facilities currently under construction or at the planning stage” - [IEA, May 2021](#)**

Despite the IEA’s conclusions, ANZ, CBA, NAB and WBC continue to fund new fossil fuel projects and/or the companies developing them. Along with the recent Santos and Woodside loans outlined above, further examples of lending to enable fossil fuel expansions since the IEA released NZE2050 include:

- ANZ, NAB and WBC financing Global Infrastructure Partners to purchase 49% of the planned Pluto 2 LNG project, enabling Woodside to go ahead with Pluto 2 and its associated new Scarborough gas field. The entire Scarborough-Pluto 2 project will facilitate an [estimated 1.37 billion tonnes](#) of CO<sub>2</sub>-e lifetime emissions.
- ANZ, CBA, NAB and WBC contributing to a \$2.4 billion loan to Origin Energy, which is seeking to develop three new gas basins in Australia including the Beetaloo basin. Origin’s is one of several Beetaloo sub-basin projects, which together could emit up to an [estimated 1.35 billion tonnes of CO<sub>2</sub>-e](#) over their lifetimes.
- ANZ, CBA and NAB contributing to a ~\$16 billion loan to Glencore, the largest producer of coal in Australia, which is [pursuing several new or expanded coal mines](#) including the Valeria greenfield mine with plans to operate until 2067.
- CBA lending to Noreco to help facilitate the [Tyra Redevelopment Gas Project](#) in the North Sea, aiming to increase gas production and open up additional gas reserves.

## Fossil fuel lending undermining banks' Paris commitments

ANZ, CBA, NAB and WBC's latest lending to facilitate fossil fuel expansion continues their history of heavy financing for coal, oil and gas. This lending has undermined the banks' stated commitments to the Paris Agreement since late 2015, at which point it was already [well established](#) that the vast majority of fossil fuel reserves must remain unburned in order to limit warming to 2°C, let alone 1.5°C.

From the beginning of 2016 to the end of 2020 ANZ, CBA, NAB and WBC [loaned at least \\$6.3 billion to 37 projects that expand the fossil fuel industry](#), enabling the release of 10 billion tonnes of CO<sub>2</sub>, equivalent to 19 times Australia's 2020 [national emissions](#).

The figures outlined below show ANZ, CBA, NAB and WBC's total lending to the fossil fuel industry between 2016 and 2020. We have also provided data on fossil fuel deals CBA has contributed to since January 2021, noting the total figure is likely to be higher due to deal reporting lag times. We will provide data on the fossil fuel lending of ANZ, NAB and WBC since January 2021 as it comes to hand.

Bank	Commitment	Lending activity according to <a href="#">data</a> compiled by Market Forces
ANZ	"We support the <b>Paris Agreement's</b> goal of transitioning to <b>net zero</b> emissions by 2050 and are committed to playing our part." - <a href="#">ANZ</a>	Between 2016 and 2020, \$13.9B loaned to fossil fuels, including \$2.4B for new or expanded coal, oil or gas projects. Over their collective lifetimes, these projects enable 4.6 billion tonnes of CO <sub>2</sub> , equivalent to 9 times Australia's 2020 greenhouse gas emissions.
CBA	"We are committed to playing our part in limiting climate change in line with the goals of the <b>Paris Agreement</b> and supporting the responsible global transition to <b>net zero</b> emissions by 2050." - <a href="#">CBA</a>	Between 2016 and 2020, \$14.2B loaned to fossil fuels, including \$3.06B for new or expanded coal, oil or gas projects. Over their lifetime these projects enable 5.83 billion tonnes of CO <sub>2</sub> , equivalent to 12 times Australia's 2020 greenhouse gas emissions.  Since the start of 2021 CBA has been involved in <i>at least</i> 11 more fossil fuel deals, including the Santos, Origin Energy, Noreco and Glencore deals flagged above.
NAB	"We are aligning our business with the goals of the <b>Paris Agreement</b> : to keep global warming to less than two degrees Celsius, striving for no more than 1.5 degrees Celsius above pre-industrial levels and supporting a just transition to a <b>net zero</b> emissions economy by 2050." - <a href="#">NAB</a>	Between 2016 and 2020, \$9.5B loaned to fossil fuels, including \$1.4B for new or expanded coal, oil or gas projects. Over their collective lifetimes, these projects enable 3.6 billion tonnes of CO <sub>2</sub> , equivalent to 7 times Australia's 2020 greenhouse gas emissions.
WBC	"We are committed to managing our business in alignment with our support for the <b>Paris Climate Agreement</b> and the need to transition to a <b>net zero</b> emissions economy by 2050." - <a href="#">WBC</a>	Between 2016 and 2020, \$6.6B loaned to fossil fuels, including \$860M for new or expanded coal, oil or gas projects. Over their collective lifetimes, these projects enable 2.3 billion tonnes of CO <sub>2</sub> , equivalent to 5 times Australia's 2020 greenhouse gas emissions.

**Amount loaned to ASX300 companies pursuing plans consistent with the failure of the Paris Agreement (2016-2020)**



Source: [Market Forces](#)

**Clearly, these are not the actions of banks committed to aligning their lending with the goals of net-zero emissions by 2050 or the Paris Agreement. All four banks' policies allow them to continue financing these and other companies developing new fossil fuel projects.**

## **Failure to address key risks**

Recognising the unacceptable financial risks global warming poses, investors managing more than US\$61.3 trillion in assets [have committed](#) to the goal of net-zero emissions by 2050. Globally, 136 countries representing 90% of global GDP have [committed](#) to net-zero emissions, with the vast majority aiming to reach that goal by 2050 or sooner.

ANZ, CBA, NAB and WBC's inadequate approach to climate change leaves the banks and their investors exposed to not only physical and transitional climate change risks, but also to the reputational, legal and regulatory risks associated with failure to act in line with community expectations.

### **Reputation risk**

As long as their fossil fuel financing undermines global climate goals, ANZ, CBA, NAB, WBC and their investors can expect increased climate-related reputational risk. Climate change [protests](#) are gathering pace and disquiet will only increase as long as Australia's major banks continue funding new fossil fuel projects and the companies pursuing them.

In May 2022, a 15-year-old protester [confronted CBA and NAB's CEOs](#) over their approach to climate change. This followed a [rally](#) in October 2021 involving thousands of young 'school strikers' in Australia, who with the support of Market Forces placed a [full-page advertisement](#) in the country's largest financial newspaper with the message: *"We will not choose financial institutions that continue to fund climate destruction"*.

Communities impacted by fossil fuel projects are also increasingly speaking out against the banks funding them. In October 2021, NAB faced a [public backlash](#) from Traditional Owners over its funding for the Coastal Gaslink Pipeline in British Columbia, Canada.

*"Should you choose to invest or continue to maintain your investment in this project, you do so against the law and our express demands, and you are complicit in illegally interfering with our rightful exercise of authority and jurisdiction."* - [representatives of the Gidimt'en Clan, Wet'suwet'en Nation, 19 October 2021](#).

In August 2021, former NAB Chief Economist Robert Henderson [told Australia's largest financial newspaper](#) *"It's high time that banks like NAB decided not to lend any more to new projects in fossil fuels"*.

**These factors, combined with ongoing fossil fuel lending, place the banks' reputations in danger, representing a significant financial risk in light of their large consumer-facing business segments.**

### **Legal risk**

ANZ, CBA, NAB and WBC's failure to align their financing activity with the goal of net-zero by 2050 presents legal risks. In April 2021, barristers Noel Hutley (SC) and Sebastian Hartford Davis [opined](#):

*"Companies making net zero commitments require "reasonable grounds" to support the express and implied representations contained within a net zero commitment. Moreover, reasonable grounds are required at the time of making a net zero commitment. That is, companies wishing to commit to net zero must have a reasonable basis now for believing that they can achieve that commitment."*

*"It is foreseeable that a company (and its directors) could be found to have engaged in misleading or deceptive conduct by not having had reasonable grounds to support the express and implied representations contained within its net zero commitment"*.

Warnings about the legal risks of greenwashing are already playing out as stakeholders increasingly seek to hold companies to account over their climate-related commitments and actions. In November 2021, Australia's federal court gave a Commonwealth Bank of Australia shareholder [access](#) to confidential documents to check whether the bank complied with its own climate change policy in lending to new and

expanded oil and gas projects. Santos is facing [legal action](#) – launched in 2021 and [expanded](#) in August 2022 – over claims it produces “clean fuel” and plans to reach net-zero emissions by 2040.

ANZ, CBA, NAB and WBC’s continued funding for new fossil fuel activities inconsistent with net-zero by 2050 raises similar issues to those investigated by Hutley and Hartford Davis, and those being pursued in Australian courts.

## Regulatory Risk

In November 2021, the Australian Prudential Regulation Authority (APRA) published the Prudential Practice Guide ‘[CPG 229 Climate Change Financial Risks](#)’, “designed to assist APRA-regulated entities in managing climate-related risks and opportunities”. APRA’s Guide states:

*“Where an institution has identified material climate risks, a prudent institution would establish and implement plans to mitigate these risks and manage its exposures, as well as regularly review and assess the effectiveness of those plans.”*

*“Where climate risks are found to be material, the institution’s risk appetite framework incorporates the risk exposure limits and thresholds for the financial risks that the institution is willing to bear.”*

*“where the institution considers this engagement [with customers] will not result in the climate risks being adequately addressed, an institution may need to consider standard risk mitigation options such as... applying limits on its exposure to such an entity or sector; or... **considering the institution’s ability to continue the relationship.**” [emphasis added]*

Given all four banks have recognised that exceeding the Paris Agreement’s warming limits is a risk they are unwilling to bear, ANZ, CBA, NAB and WBC should adopt comprehensive and effective measures to ensure their financing does not facilitate new or expansionary fossil fuel projects, including ending relationships with clients developing such projects.

The [Reserve Bank of Australia \(RBA\)](#) and [ASIC](#) have also called for robust climate risk disclosure and management from financial institutions. ANZ, CBA, NAB and WBC are also subject to international regulatory regimes, including the OECD Guidelines for Multinational Enterprises. The [Dutch National Contact Point for the OECD Guidelines](#) in April 2019 concluded the guidelines require commercial banks to formulate concrete goals for aligning their financial services with the Paris Agreement.

## Physical risk

In its 2022 [Climate Report](#), CBA assessed that 3% of its home loan portfolio, representing some [~\\$31.2 billion](#), is highly exposed to the acute physical risks from climate change, including cyclones, floods and

bushfires. CBA is Australia's largest home loan lender, while approximately [two-thirds](#) of all Australian major bank lending is for residential mortgages.

The concentration of ANZ, CBA, NAB and WBC's lending portfolio in residential mortgages exposes the banks to significant financial risk as the physical impacts of climate change increase with every fraction of a degree of further warming. The RBA noted in a [2021 assessment](#), "if current values do not fully reflect the longer-term risks of climate change, housing prices could decline, leaving banks with less protection than expected against borrower default." The RBA [forecasts](#) numerous climate change related risks associated with housing value in affected regions, including an increase in the number of properties at risk to climate-related disasters, declining local incomes, and sizable declines in property values, noting "housing prices could decline, leaving banks with less protection than expected against borrower default". A May 2022 [Climate Council study](#) found one in 25 Australian homes would be uninsurable by 2030 due to increasing extreme weather and climate change risks.

All of this is occurring whilst ANZ, CBA, NAB and WBC continue to fund companies and projects that are expanding the fossil fuel industry, worsening climate change and ultimately exacerbating the physical risks facing their biggest lending asset, their home loan portfolio.

CBA has also [drawn attention to](#) climate risks in agriculture, reporting in 2019 that grain growing regions risk productivity declines of up to 50% below the 2018 baseline by 2060, attributed to changes in rainfall.

The banks' exposures to physical risk through property and agriculture lending, as well as economy-wide climate risks, mean they are on the front lines of climate impacts. For companies so widely exposed to physical and transitional climate risk to be willing to worsen the problem by enabling fossil fuel expansion amounts to shooting themselves in the foot.

### **ANZ, CBA, NAB and WBC lagging behind**

Financial institutions are placing more effective restrictions on finance to companies and projects expanding fossil fuels, leaving ANZ, CBA, NAB and WBC's clearly ineffective policies behind.

In August 2022 industry super fund [NGS divested](#) from numerous oil and gas producing companies due to the risk of stranded assets, while some of Australia's largest pension funds, including AustralianSuper and UniSuper, have [significantly reduced holdings](#) in major oil and gas producers.

In March 2022:

- Dutch bank [ING announced](#) it would "restrict dedicated upstream finance (lending or capital markets) for oil and gas fields approved for development after 31 December 2021",



- European reinsurer [Hannover RE announced](#) its facultative division “will no longer take on any new covers for project policies associated with the exploration and/or development of new oil and gas reserves (upstream) or for project policies that exclusively support the transportation and storage (midstream) of new oil and gas reserves”, and
- [MAPFRE ruled out](#) insuring or investing in any coal, oil or gas company that had not committed to an energy transition plan that allows global warming to be maintained at around 1.5°C.

In October 2021, French bank La Banque Postale [committed to](#) immediately “refraining from financing oil and gas energy projects”, “no longer providing financial services” to upstream and midstream oil and gas companies, and “a complete withdrawal from fossil fuels by 2030”.

Since March 2021, [Nordea Asset Management has excluded](#) fossil fuel producers without a clear plan for complying with the Paris Agreement in 213 of its 368 funds, stating “no oil and gas producers and of course coal miners live up to these requirements at present”.

In March 2021, [Danske Bank committed](#) to immediately end direct finance for expansion of oil and gas exploration and production worldwide, while [NedBank](#), [SEB](#), and [NatWest](#) have made similar commitments.

In 2020 [Suncorp ruled out](#) underwriting new oil and gas production assets, committing to “not directly invest in, finance or underwrite... new oil and gas exploration or production” and phase out underwriting for the sector by 2025 and direct investment by 2040.

## **Policies fail to align with net-zero commitments**

In July 2021, 115 investors with US\$4.2 trillion in assets under management and/or stewardship [wrote](#) to 63 global banks, calling on them to integrate the IEA’s Net Zero by 2050 findings into their climate strategies. ANZ, NAB, WBC and CBA’s current policies and practices fall well short of this demand.

### **ANZ’s [policies](#) inconsistent with net-zero by 2050**

ANZ remains an active lender to companies engaged in the development of new thermal coal projects, and has also left the door wide open to funding new oil and gas projects directly and via corporate finance.

ANZ has not provided sufficient detail to suggest its commitment to the [Net-Zero Banking Alliance \(NZBA\)](#) will see the bank align its fossil fuel exposure with net-zero by 2050. ANZ is yet to publish financed emissions reduction targets for the oil and gas sectors, and is yet to provide any detail on which decarbonisation scenario/s they will follow.



## **CBA's [policies](#) inconsistent with net-zero by 2050**

CBA's current policies allow for ongoing lending to companies expanding oil and gas production. In the last year, CBA has provided corporate finance to **Santos, Origin Energy, Beach Energy, and Harbour Energy**, all of which are pursuing new oil and gas projects consistent with the failure of the Paris Agreement. CBA's ongoing financing of companies developing new oil and gas projects undermines its policy to only provide project finance for new or expanded oil or gas projects if they are in line with the Paris climate goals, especially in the case of Santos, where the loan was on the basis of financing the Barossa gas project.

The bank's 'financed emissions' targets for upstream oil and gas allow the bank to increase emissions (oil +12%, gas +22%) from 2021 to 2030. Most critically, the targets do nothing to stop the bank financing companies today that are developing new projects that would lock in decades of emissions. The bank is willing to give clients until 2025 before it even 'expects' them to produce transition plans.

## **NAB's [policies](#) inconsistent with net-zero by 2050**

The proliferation of loopholes and allowances in NAB's oil and gas lending commitments suggest these commitments may not materially change the bank's ongoing funding for oil and gas at all:

- The 'exclusions' only cover 'direct finance', which isn't defined by NAB and is often used interchangeably with 'project finance'. This is particularly concerning as much of NAB's funding for oil and gas is via corporate finance. NAB also has a record of apparently [breaching](#) its 'exclusion' on funding new thermal coal mining projects, most notably by lending to New Hope Corporation in 2018, which New Hope stated was sufficient to pursue a new thermal coal mining project.
- Under its oil and gas commitments, NAB can continue funding most types of new and expanded oil and gas infrastructure including transport (e.g. pipelines, shipping), refining (e.g. LNG refineries and terminals, and oil refining), and retailing. In fact, NAB "will continue to support integrated liquefied natural gas (LNG)", despite the IEA's finding that "many of the [LNG] liquefaction facilities currently under construction or at the planning stage" are "not needed" under NZE2050.
- The policy also allows the bank to fund greenfield gas extraction in Australia under the guise of 'national energy security', which it could argue applies to any domestic-focused gas supply.
- There is no record of NAB having funded—or considered funding for—ultra-deep water oil and gas extraction projects, rendering its exclusion of such financing materially meaningless.

NAB's oil and gas exposure management plan applies only to oil and gas extraction (including gas extracted as part of LNG operations). It fails to capture the remainder of the oil and gas supply chain; oil and gas transport (e.g. pipelines, shipping), refining (e.g. LNG refineries and terminals, and oil refining) and

retailing. This is particularly concerning given NAB’s recent record of funding these types of oil and gas infrastructure, discussed above.

Unlike each of its major competitors, NAB fails to even disclose its exposure to oil and gas sub-sectors outside of extraction. Meanwhile, Commonwealth Bank and Westpac disclose exposure to a broader ‘energy value chain’, and ANZ’s disclosure captures oil and gas extraction, transport, refining and retail.

### **WBC’s [policies](#) inconsistent with net-zero by 2050**

WBC says it will only consider directly financing new greenfield oil and gas projects that are in accordance with NZE2050, even though this scenario explicitly rules out new oil and gas field developments. The policy also offers a loophole for projects the Australian or New Zealand Government or regulators determine are necessary for national energy security. This means WBC’s apparent climate change commitment can effectively be overruled at any time to satisfy the government of the day.

WBC’s ‘[expectation](#)’ that customers will have developed credible transition plans by 2025 gives clients like Whitehaven Coal, Woodside and Santos three more years to open up new coal, oil and gas projects that are incompatible with the Paris Agreement and could operate for decades. There is also no clarity with regards to what a “credible” transition plan would need to entail, or the consequences clients would face for failing to produce such a plan.

The bank’s commitment to reduce upstream oil and gas project finance emissions by 23% by 2030 falls short of the emission reductions in NZE2050, which requires combined oil and gas emissions to fall by 28% from 2019-2030. Critically, a 2030 financed emissions target fails to stop WBC financing companies developing new oil and gas projects between now and then, which would lock in decades of emissions and undermine the Paris and net-zero climate goals WBC claims to support.

## **Investors expecting no finance for fossil fuel expansion**

Since the IEA’s seminal NZE2050 was published, shareholder proposals calling on banks not to finance fossil fuel expansion have become commonplace. As shown by the examples of investor support listed in the table below, many investors understand this action is required of banks in order to align their financing with the goals of the Paris Agreement and net-zero by 2050, as well as their own climate commitments.

<b>AGM</b>	<b>Resolution</b>	<b>Investor support</b>
CBA 2021	“...commitment to no longer provide banking and financing where proceeds would be used for new fossil fuel projects...”	15% in favour, including: Allianz GI, Amundi AM, Aviva Investors, AXA IM, BNP Paribas AM, Credit Suisse AM, HSBC GAM, LGIM, Manulife IM, Pictet AM, Schroders, Storebrand AM, TIAA, UBS AM
WBC 2021	As above	13% in favour, including: AllianceBernstein, Allianz GI, Aviva Investors, BMO GAM,

		CalPERS, Credit Suisse, Manulife IM, Northern Trust Investments, Pandal Group, Schroders, Storebrand AM
ANZ 2021	As above	15% in favour, including: Allianz GI, Amundi AM, Aviva Investors, AXA IM, BlackRock Sustainability Funds, BMO GAM, BNP Paribas AM, CalPERS, Credit Suisse AM, HSBC GAM, Manulife IM, Northern Trust Investments, Pandal Group, Schroders, Storebrand AM, Sunsuper
NAB 2021	As above	10% in favour, including: Allianz GI, Amundi AM, Aviva Investors, AXA IM, Credit Suisse AM, HSBC GAM, Manulife IM, Northern Trust Investments, Schroders, Storebrand AM
Standard Chartered 2022	As above	12% in favour, including: Aviva Investors, BNP Paribas AM, Cbus Super, Northern Trust Investments, Robeco, Royal London AM
Bank of America 2022	“...ensure that its financing does not contribute to new fossil fuel supplies...”	11% in favour, including: Amundi AM, Aviva Investors, AXA IM, HSBC GAM, LGIM, Northern Trust Investments, Robeco, The New York State Common Retirement Fund
Bank of Montreal 2022	As above	8% in favour, including: Amundi AM, Aviva Investors, BNP Paribas AM, LGIM, Schroders, UniSuper
Citigroup 2022	“...ensure that the company’s lending and underwriting do not contribute to new fossil fuel supplies...”	13% in favour, including: Amundi AM, Aviva Investors, AXA IM, BNP Paribas AM, LGIM, Northern Trust Investments, Robeco, The New York State Common Retirement Fund, UniSuper
Goldman Sachs 2022	As above	11% in favour, including: Allianz GI, Amundi AM, Aviva Investors, BNP Paribas AM, Capital Group, Credit Suisse AM, LGIM, Northern Trust Investments, Pictet AM, Robeco, Storebrand AM, The New York State Common Retirement Fund, UniSuper
Morgan Stanley 2022	As above	9% in favour, including: Amundi AM, Aviva Investors, AXA IM, BNP Paribas AM, LGIM, Robeco, The New York State Common Retirement Fund, UniSuper
Wells Fargo 2022	As above	11% in favour, including: Amundi AM, Aviva Investors, AXA IM, BNP Paribas AM, LGIM, Northern Trust Investments, Robeco, The New York State Common Retirement Fund, UniSuper
JPMorgan Chase & Co 2022	“...ensuring that its financing does not contribute to new fossil fuel supply...”	10% in favour, including: Amundi AM, Aviva Investors, AXA IM, BNP Paribas AM, HSBC GAM, LGIM, Robeco, UniSuper
SMBC 2022	“...ensure the proceeds of the Company's lending and underwriting are not used for the expansion of fossil fuel supply or associated infrastructure...”	10% in favour, including: Allianz GI, CalPERS, First Sentier Investors, HSBC GAM, LGIM, Robeco, UBS AM

## Engagement

Market Forces has been engaging with each of the four major banks in Australia since we commenced operations in 2013. Throughout that time we have maintained constructive dialogue internally with various stakeholders, from rank and file staff, to Corporate Social Responsibility and Corporate Affairs representatives, heads of Investor Relations, Company Secretaries, CEOs, Chairs, and Board members.

Since 2016 we have maintained a consistent set of asks of the banks in relation to their fossil fuel lending and exposure. Chief among them is the need to prevent the expansion of the fossil fuel industry, which this resolution clearly and directly addresses in a manner that allows the banks latitude to decide how it will satisfy the disclosure request contained in the resolution.

Market Forces lodged similar resolutions with ANZ and NAB in 2020, and with all four banks in 2021. Despite considerable shareholder support for those resolutions, against the boards' recommendations, none of the banks have come close to meeting their requests.

Market Forces has clearly informed each bank that these resolutions would be withdrawn if disclosures are made, or committed to, that would meet the requests of the resolutions. However, no bank has provided details to suggest the substance of these resolutions will be met.

**Shareholder support for these resolutions is therefore required to bring ANZ, CBA, NAB and WBC's fossil fuel lending policies and practices into line with their net-zero by 2050 commitments. Failure to do so leaves the banks and their investors exposed to unnecessary climate-related financial, legal, regulatory and reputation risks.**