



To the Board of Directors of Vocus Group Limited

## Independent Limited Assurance Report on identified Subject Matter Information in the Vocus ESG Annual Report 2024

The Board of Directors of Vocus Group Limited (**'Vocus'**) engaged us to perform an independent limited assurance engagement in respect of the identified Subject Matter Information listed below (the **'Subject Matter Information'**) in the Vocus ESG Annual Report 2024 for the year ended 30 June 2024.

### Subject Matter Information and Criteria

The Subject Matter Information and the Criteria are set out below.

Subject Matter Information	Vocus ESG Annual Report 2024 page reference
Scope 1 & Scope 2 Location-based Greenhouse Gas ( <b>GHG</b> ) Emissions: 27,709 tCO <sub>2</sub> e	Referenced as 'Total Scope 1 and 2 GHG emissions (tCO <sub>2</sub> e)' on page 31
Scope 2 Market-based GHG Emissions: 23,789 tCO <sub>2</sub> e	Referenced as 'Scope 2 greenhouse gas emissions (market-based)' on page 32
Percentage change in Scope 1 & 2 Location-based GHG Emissions as compared to FY19 baseline: 38.7%	Referenced as 'reduction in Scope 1 and 2 location-based emissions compared to FY19 baseline' on page 31
Percentage change in Scope 1 & 2 Location-based GHG Emissions as compared to FY23: 13.7%	Referenced as 'reduction in Scope 1 and 2 location-based year-on-year emissions from FY23' on page 31
Percentage change in Scope 2 Location-based GHG Emissions from data centre assets as compared to FY23 after adjusting for annual emissions factor changes: 12.8%	Referenced as 'reduction in Scope 2 location-based data centre emissions through efficiency and consolidation.' on page 31
Total Energy Consumption: 152,868 GJ	Referenced as 'Total energy use' on page 33

The criteria used by Vocus to prepare the Subject Matter Information are set out in the 'ESG Basis of Preparation' attached as an Appendix to this Independent Limited Assurance Report (the **Criteria**).



The maintenance and integrity of Vocus' website is the responsibility of the Vocus Management; the work carried out by us does not involve consideration of these matters and, accordingly, we accept no responsibility for any changes that may have occurred to the reported Subject Matter Information or Criteria when presented on Vocus' website.

Our assurance conclusion is with respect to the year ended 30 June 2024 and does not extend to information in respect of earlier periods or to any other information included in, or linked from, the Vocus ESG Annual Report 2024 including any images, audio files or videos.

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### **Responsibilities of Vocus Management**

Vocus management is responsible for the preparation of the Subject Matter Information in accordance with the Criteria. This responsibility includes:

- determining appropriate reporting topics and selecting or establishing suitable criteria for measuring, evaluating and preparing the underlying Subject Matter Information;
- ensuring that those criteria are relevant and appropriate to Vocus and the intended users; and
- designing, implementing and maintaining systems, processes and internal controls relevant to the preparation of the Subject Matter Information which is free from material misstatement, whether due to fraud or error.

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### **Our independence and quality control**

We have complied with the ethical requirements of the Accounting Professional and Ethical Standard Board's APES 110 *Code of Ethics for Professional Accountants (including Independence Standards)* relevant to assurance engagements, which are founded on fundamental principles of integrity, objectivity, professional competence and due care, confidentiality and professional behaviour.

Our firm applies Australian Standard on Quality Management ASQM 1 *Quality Management for Firms that Perform Audits or Reviews of Financial Reports and Other Financial Information, or Other Assurance or Related Services Engagements*, which requires the firm to design, implement and operate a system of quality management including policies or procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

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### **Our responsibilities**

Our responsibility is to express a limited assurance conclusion based on the procedures we have performed and the evidence we have obtained.

Our engagement has been conducted in accordance with the Australian Standard on Assurance Engagements (ASAE) 3000 *Assurance Engagements Other Than Audits or Reviews of Historical Financial Information* and ASAE 3410 *Assurance Engagements on Greenhouse Gas Statements*. Those standards require that we plan and perform this engagement to obtain limited assurance about whether anything has come to our attention to indicate that the Subject Matter Information has not been prepared, in all material respects, in accordance with the Criteria, for the year ended 30 June 2024.



The procedures performed in a limited assurance engagement vary in nature and timing from, and are less in extent than for, a reasonable assurance engagement and consequently the level of assurance obtained in a limited assurance engagement is substantially lower than the assurance that would have been obtained had a reasonable assurance engagement been performed. Accordingly, we do not express a reasonable assurance opinion.

In carrying out our limited assurance engagement we:

- made inquiries of the persons responsible for the Subject Matter Information;
- obtained an understanding of the process for collecting and reporting the Subject Matter Information;
- performed limited substantive testing on a selective basis of the Subject Matter Information to third-party records to assess that data had been appropriately measured, recorded, collated and reported;
- undertook analytical review procedures over the activity data used in the calculations and preparation of the Subject Matter Information;
- assessed the completeness of energy and greenhouse gas activity sources;
- tested the arithmetic accuracy of a sample of calculations of the Subject Matter Information;
- assessed the appropriateness of energy conversion factors and greenhouse gas emissions factors; and
- considered the disclosure and presentation of the Subject Matter Information.

We believe that the evidence we have obtained is sufficient and appropriate to provide a basis for our conclusion.

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### **Inherent limitations**

Inherent limitations exist in all assurance engagements due to the selective testing of the information being examined. It is therefore possible that fraud, error or non-compliance may occur and not be detected. A limited assurance engagement is not designed to detect all instances of non-compliance of the Subject Matter Information with the Criteria, as it is limited primarily to making enquiries of Vocus management and applying analytical procedures.

Additionally, non-financial data may be subject to more inherent limitations than financial data, given both its nature and the methods used for determining, calculating and estimating such data. The precision of different measurement techniques may also vary. The absence of a significant body of established practice on which to draw to evaluate and measure non-financial information allows for different, but acceptable, evaluation and measurement techniques that can affect comparability between entities and over time. In addition, GHG quantification is subject to inherent uncertainty because of evolving knowledge and information used in estimating emissions factors and the values needed to combine emissions of different gases.

The limited assurance conclusion expressed in this report has been formed on the above basis.



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### Our limited assurance conclusion

Based on the procedures we have performed, as described under 'Our responsibilities' and the evidence we have obtained, nothing has come to our attention that causes us to believe that the Subject Matter Information has not been prepared, in all material respects, in accordance with the Criteria for the year ended 30 June 2024.

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### Use and distribution of our report

We were engaged by the Board of Directors of Vocus on behalf of Vocus to prepare this independent assurance report having regard to the Criteria specified by Vocus and set out in the Appendix to this report. This report was prepared solely for the Directors of Vocus for the purpose of providing limited assurance in respect of the Subject Matter Information contained within the Vocus ESG Annual Report 2024 for the year ended 30 June 2024 and may not be suitable for any other purpose.

We accept no duty, responsibility or liability to anyone other than Vocus in connection with this report or to Vocus for the consequences of using or relying on it for a purpose other than that referred to above. We make no representation concerning the appropriateness of this report for anyone other than Vocus and if anyone other than Vocus chooses to use or rely on it they do so at their own risk.

This disclaimer applies to the maximum extent permitted by law and, without limitation, to liability arising in negligence or under statute and even if we consent to anyone other than Vocus receiving or using this report.

A stylized, handwritten signature of the firm PricewaterhouseCoopers in black ink.

PricewaterhouseCoopers

A handwritten signature in black ink, appearing to read 'Carolyn Cosgrove'.

Carolyn Cosgrove  
Partner

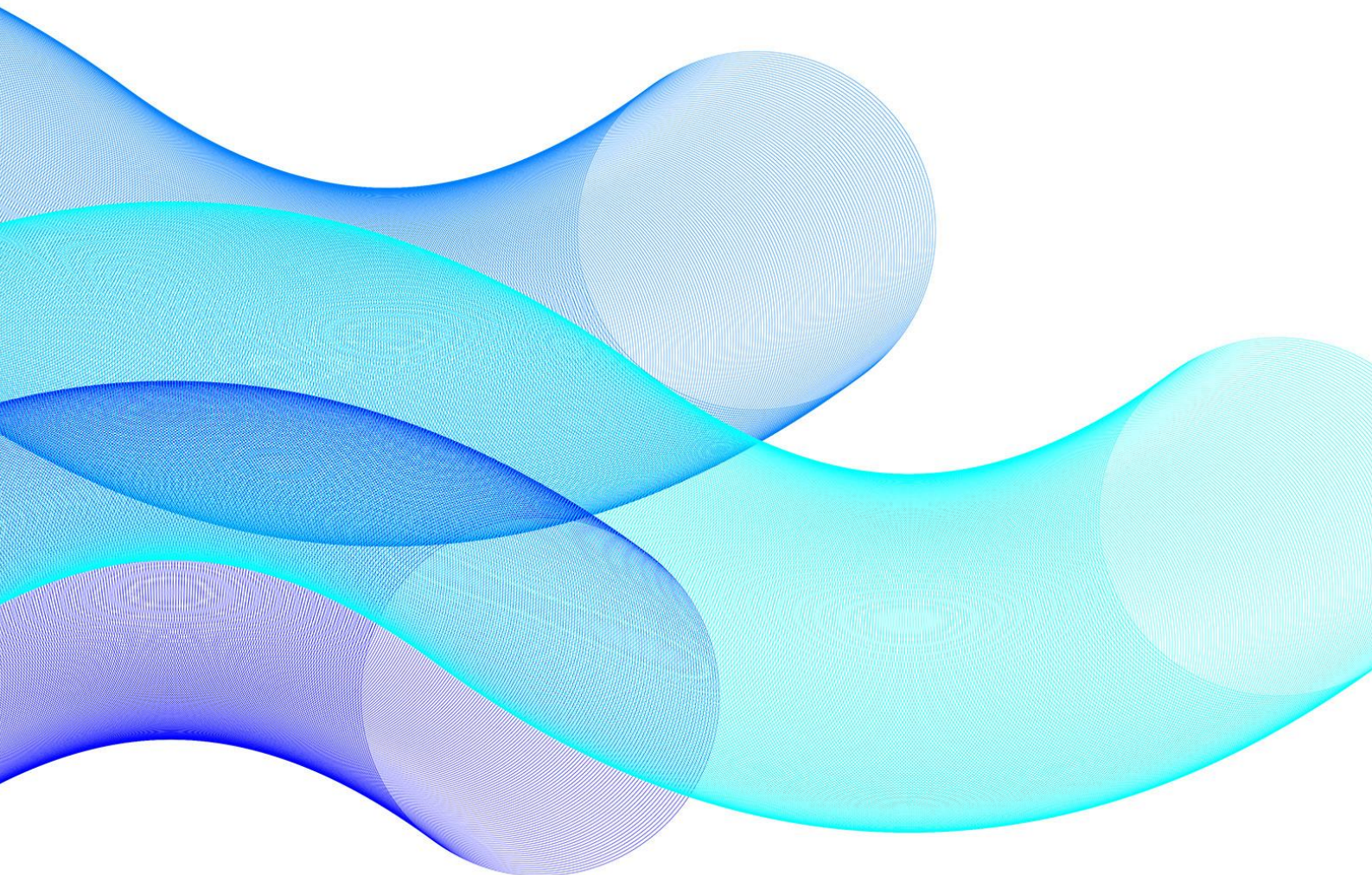
Sydney  
27 June 2025



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# Basis of Preparation

## ESG Reporting



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# Document Control

## Preparation

	FY23	FY24
Prepared by:	Kirsten Hengen	N/A
Reviewed by:	Louisa Harris-Baxter	Amber Tattersall

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# Scope 1 and 2 GHG emissions

## Purpose

This Basis of Preparation summarises the preparation and organisational boundary of Vocus Group Limited's operational energy consumption and Scope 1 and 2 emissions. The Basis of Preparation is reviewed annually to ensure it remains current with industry standards and regulations and is updated for any changes to Vocus' business activities and/or its respective policies and procedures.

## Standards and Principles of Reporting

We calculate our greenhouse gas emissions and overall energy use according to management-defined criteria, in alignment with the Greenhouse Gas Protocol of the World Business Council for Sustainable Development and World Resources Institute<sup>1</sup>, using calculation methodologies set out in the NGER (Measurement) Determination 2008<sup>2</sup>.

## Organisational Boundary

Vocus Group Limited, including all subsidiaries.

## Operational Boundary and Emissions Summary

Vocus reports its energy use and greenhouse gas emissions in accordance with the operational control model defined in Section 11 of the NGER Act<sup>3</sup>. We have deemed all operations over which Vocus Group Limited or one of its subsidiaries has control and the authority to introduce and implement any or all of the following: operating policies; health and safety policies or environmental policies, as within our operational control boundary.

As such, we have considered energy use and emissions from the following operations to be within our operational reporting boundary:

- Vocus operated data centres
- Leased office and warehouse space
- Leased fleet vehicles
- Vocus operated Controlled Environment Vaults (CEVs)
- Vocus operated Points of interconnect (BPOIs or 'small sites')
- Vocus operated network points of presence (PoP sites)
- A small number of Vocus operated Cable landing stations; nodes; exchanges and radio towers that service our Networks.

The following exclusions have been applied in determining our operational boundary for reporting purposes:

- **Energy use within third party data centres and network exchange buildings.** Vocus Group does not have operational control of these facilities, as defined in Section 11 of the NGER Act. We do not have the authority to introduce operating policies at these facilities and energy costs are paid for by the third-party provider, and typically included as part of an overall service fee.

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<sup>1</sup> Greenhouse Gas Protocol Corporate Accounting and Reporting Standard, Chapter 6

<sup>2</sup> NGER (Measurement) Determination 2008, Division 2.3.2, Division 2.4.2, Section 4.102 and Section 7.2

<sup>3</sup> National Greenhouse and Energy Reporting Act 2007 (NGER Act)



- Despite excluding this energy use from its current emissions inventory, Vocus Group is committed to managing its environmental impacts and working with its third-party providers to better capture actual energy use data for its equipment within these facilities through Scope 3 emission management.
- **Energy use within third-party controlled network points of presence (PoP).** Vocus does not have operational control (as defined in Section 11 of the NGER Act) over the facilities in which it installs and manages network points of presence on its customers' behalf. In instances where Vocus does not have visibility over the energy use of its PoP equipment or pay for this directly, this energy use is excluded from its emissions boundary.

## Key estimates and Assumptions

Fuel type	Method
Electricity (grid)	In instances where we were unable to retrieve electricity invoices for certain months from our accounts payable system, we used an average of the adjacent months or billing periods to estimate the data. If actual data was not available for more than one concurrent billing period, the average of the data from across the rest of the 12-month period was relied upon. In instances where facility data was unavailable for the entire year, we used an average of annual consumption from other comparable facilities. Where invoice data spans two financial years (e.g. 1 June 2022–1 August 2022) the kWh are divided by the amount of days in the billing period and the monthly totals are attributed to separate reporting years. In some instances, where this overlap is less than a month impact due to off-cycle billing, the full amount is attributed to the primary month covered within the billing period. Data estimates do not contribute a material difference to Vocus' total scope 1 and 2 emissions.
Refrigerants	Emissions are estimated based on the average refrigerant charge of the unit type/size, as per the product spec sheet.
Diesel (stationary)	Diesel consumption estimated based on generator run time (seconds) and average load (kW). To estimate the total diesel energy, a generator efficiency of 30% was assumed consistent with common performance ranges for commercial diesel backup generators operating under partial load. Emissions were then calculated using the National Greenhouse and Energy Reporting (NGER) diesel emission factor for stationary energy use. Actual generator efficiency may vary with load, runtime duration, and maintenance.

## Non-Quantified emissions

The following sources of emissions have been assessed as relevant, are captured within our emissions boundary, but are not measured (quantified) in our carbon inventory. They are not-quantified due to one of the following reasons:

1. **Immaterial:** <1% for individual items and no more than 5% collectively
2. **Cost effective:** Quantification is not cost effective relative to the size of the emission
3. **Below threshold:** Data is potentially available, but emission sources fall below reporting thresholds specified in the NGER (Measurement) Determination 2008.

These include:

Fuel type	Location/s	Reason	Justification
Diesel (stationary)	CEV sites and PoP sites	1 – immaterial 2 – cost effective	Vocus' scope 1 emissions overall are estimated to contribute <5% of total scope 1 and 2 emissions, with most diesel use taking place in our data centres being measured and included. CEV and PoP site diesel use, which is a small part of the overall diesel use, has therefore not been included within the emissions inventory.

Refrigerants	CEV sites, small sites, leased office and warehouse space, and some data centres (only a handful of our Data Centres have units that meet the 100kg refrigerant charge unit threshold).	4 – below threshold	Refrigerant units from these locations do not exceed the 100kg refrigerant charge unit threshold.
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## Key Definitions

Term	Definition
<b>Scope 1 Location-based GHG Emissions (tCO<sub>2</sub>-e)</b>	Scope 1 emissions are direct greenhouse gas emissions resulting from operations that are owned or controlled by Vocus. These primarily relate to fuel from our fleet, backup generators in our data centres and refrigerants from our cooling units. The emissions are based on energy generation emission factors as defined within the NGER (Measurement) Determination 2008.
<b>Scope 2: Location-based GHG Emissions (tCO<sub>2</sub>-e)</b>	Scope 2 emissions are indirect greenhouse gas emissions resulting from electricity consumed in operations that are owned or controlled by Vocus. The emissions are based on state-based energy generation emission factors as defined by the Clean Energy Regulator. Vocus applies the NGA factors available as at the end of each financial year reporting period.
<b>Scope 2 Market-based GHG Emissions (tCO<sub>2</sub>-e)</b>	Scope 2 emissions are indirect greenhouse gas emissions resulting from electricity consumed in operations that are owned or controlled by Vocus. The emissions are based on market-based generation fuel mix from which we contractually purchase electricity or directly provided electricity via a direct line transfer. Vocus applies the Climate Active guidance <sup>4</sup> , utilising the current National Greenhouse Accounts (NGA) Factors available as at the end of the financial reporting year period to inform the national residual mix factor.
<b>Percentage change (%) in Scope 1 &amp; 2 Location-based GHG Emissions as compared to FY19 baseline</b>	This is the difference between total Scope 1 and 2 location-based emissions in the current reporting period and our baseline, expressed as a % decrease or increase.
<b>Percentage change (%) in Scope 1 &amp; 2 Location-based GHG Emissions as compared to prior year</b>	This is the difference between total Scope 1 and 2 location-based emissions in the current reporting period and the prior reporting period, expressed as a % decrease or increase.
<b>Percentage change (%) in Scope 2 Location-based GHG Emissions from data centre assets as compared to prior year after adjusting for annual emissions factor changes</b>	This is the difference between Scope 2 emissions across all 18 Vocus data centres in the current reporting period and the prior reporting period, excluding any decrease/increase resulting from a change in emissions factors between the two disclosure periods. To calculate this difference, prior year emissions factors were applied to both data sets when calculating the % decrease/increase in emissions between the two disclosure periods. The 18 data centres referenced here include 17 active sites, and one site that was exited during the financial year.
<b>Total Energy Consumption (GJ)</b>	Energy consumption is all forms of energy products (including combustible fuels, electricity, heat, renewable energy, and others) consumed by operations that are owned or controlled by Vocus.

<sup>4</sup> <https://www.climateactive.org.au/sites/default/files/2021-04/Climate%20Active%20Electricity%20Accounting.pdf>