ENERGIZING EXCELLENCE

2023 CORPORATE SUSTAINABILITY REPORT



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Our Report

At Summit Utilities, excellence shapes our commitment to Environmental, Social, and Governance (ESG) principles, guiding us in our innovative efforts towards environmental sustainability, reducing our carbon footprint, and enhancing community well-being, safety, and inclusivity. It also informs our governance practices, emphasizing integrity, transparency, and the pursuit of continuous improvement. This year's Corporate Sustainability Report showcases how integrating excellence with ESG principles directs Summit Utilities towards a sustainable energy future, ensuring a lasting positive impact on our planet and communities.



GLOBAL REPORTING INITIATIVE STANDARDS

Summit is pleased to align this report in reference to the Global Reporting Initiative Standards (GRI Standards), the first global standards for sustainability reporting. This report is published annually and contains Standard GRI Disclosures throughout the report for calendar year 2023. The GRI Content Index can be found on page 55.

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UNITED NATION'S SUSTAINABLE DEVELOPMENT GOALS

At Summit, we remain dedicated to supporting the United Nations' Sustainable Development Goals (UN's SDGs). We take pride in the progress we've made on our ESG goals and continuously set ambitious targets to drive us towards a more sustainable future. Through our core business, we actively contribute to the UN's 7th SDG, ensuring access to affordable, reliable, sustainable, and modern energy for all. By investing in renewable energy initiatives, reducing our carbon footprint, and fostering community engagement, we are committed to making a tangible impact and leaving a positive mark on the path to a greener and more inclusive world.



Our Company

Summit Utilities, Inc. (Summit) owns natural gas distribution subsidiaries that operate in Arkansas, Colorado, Maine, Missouri, Oklahoma, and Texas. Our headquarters are located in Centennial, Colorado.

Each of Summit's utility subsidiaries constructs and installs natural gas distribution systems with the goal of supporting economic development by providing safe and reliable natural gas to residential and commercial customers through exceptional customer service and commitment to community.

In 2021, Summit created Peaks Renewables (Peaks), an unregulated renewable development arm specializing in the development of low carbon, carbon-neutral, and carbon-negative fuels like renewable natural gas and green hydrogen. Peaks' goal is to help states, communities, utilities, homeowners, and industries reduce emissions while creating economic growth and providing access to safe, reliable, and affordable energy solutions.

In 2022, Summit acquired natural gas utility assets in Arkansas and Texarkana, Texas, creating Summit Utilities Arkansas, and Oklahoma, creating Summit Utilities Oklahoma. We are excited to continue to grow and provide Americans with resilient and reliable long-term energy solutions.

Summit is owned by institutional investors advised by J.P.



Morgan Asset Management.

ARKANSAS OKLAHOMA GAS CORPORATION

Arkansas Oklahoma Gas Corporation (AOG) is based in Fort Smith, Arkansas and provides natural gas to 57,746 customers. AOG's corporate office is located in Sebastian County.

ARKANSAS:

Customers: 45,461 T&D Main Line: 1,785 miles

Counties Served: Crawford, Franklin, Logan, Sebastian, Scott

OKLAHOMA:

Customers: 12,136 T&D Main Line: 761 miles

Counties Served: Delaware, Haskell, Latimer, Leflore, Sequoyah



COLORADO NATURAL GAS

Colorado Natural Gas (CNG) brings gas to residents and businesses in unserved and underserved communities. CNG's corporate office is located in Arapahoe County.

Customers: 25,286 T&D Main Line: 1,336 miles

Counties Served: Adams, Arapahoe, Cheyenne, Clear Creek, Gilpin,

Jefferson, Kiowa, Park, Pueblo, Summit, Teller



SUMMIT NATURAL GAS OF MAINE

Summit Natural Gas of Maine (SNGME) delivers safe and affordable natural gas to residences and businesses of all sizes and continues to expand across Maine. SNGME's corporate offices are located in Cumberland and Kennebec counties.

Customers: 5,825 T&D Main Line: 315 miles

Counties Served: Cumberland, Kennebec, Somerset



SUMMIT NATURAL GAS OF MISSOURI

Summit Natural Gas of Missouri (SNGMO) specializes in bringing gas to rural areas where other service providers can't or won't go. SNGMO's corporate office is located in Taney County.

Customers: 19,740 T&D Main Line: 1,455 miles

Counties Served: Barry, Benton, Caldwell, Camden, Davies, Douglas, Greene, Harrison, Howell, Laclede,

Lawrence, Miller, Morgan, Pettis, Stone, Taney, Texas, Webster, Wright

SUMMIT UTILITIES ARKANSAS & SUMMIT UTILITIES OKLAHOMA

Summit Utilities Arkansas (SUA) and Summit Utilities Oklahoma (SUO) are new additions to the Summit Utilities, Inc. group of companies as of January 10, 2022. SUA is headquartered in Pulaski County, and SUO is headquartered in Comanche County. Both companies bring natural gas to communities throughout Arkansas, Oklahoma, and Texarkana, Texas.



ARKANSAS:

Customers: 408,663 T&D Main Line: 13,894

Counties Served: Arkansas, Ashley, Bradley, Calhoun, Chicot, Clark, Clay, Cleburne, Cleveland, Columbia,

Conway, Craighead, Crittenden, Cross, Dallas, Desha, Drew, Faulkner, Garland, Grant, Greene, Hempstead, Hot Spring, Howard, Independence, Jackson, Jefferson, Johnson, Lafayette, Lawrence, Lee, Lincoln, Little River, Logan, Lonoke, Miller, Monroe, Montgomery, Nevada,

Ouachita, Perry, Phillips, Pike, Poinsett, Polk, Pope, Prairie, Pulaski, Randolph, Saline, Sevier,

Sharp, St. Francis, Union, Van Buren, White, Woodruff, Yell

TEXAS:

Customers: 14,614
T&D Main Line: 411
Counties Served: Bowie



OKLAHOMA:

Customers: 98,503 T&D Main Line: 2,792

Counties Served: Atoka, Beckham, Blaine, Caddo, Coal, Comanche, Cotton, Custer, Garfield, Garvin, Grady,

Grant, Greer, Hughes, Jackson, Kay, Latimer, Le Flore, Major, Marshall, Osage, Payne,

Pittsburg, Pontotoc, Pottawatomie, Roger Mills, Seminole, Stephens, Washita



Letter from Our PRESIDENT AND CEO

Energy is the lifeblood of modern society, underscoring every aspect of well-being—food, shelter, health, education, and beyond. Summit's mission is to deliver safe, reliable, and essential energy to the customers that we are honored to serve. Our day-to-day operations show that access to reliable energy transforms lives, drives economic growth, and enables our communities to thrive. The Summit team collectively recognizes that our mission extends beyond delivering natural gas; it empowers lives and fosters resilience through innovative and trusted energy solutions.

Reflecting on 2023, I am humbled and inspired by the impact Summit has made on our customers, colleagues, and communities. This year's theme, Energizing Excellence, encapsulates our commitment to harnessing the power of energy to elevate the lives of others while focusing on operational excellence.

In 2023, our commitment to operational excellence meant continuously optimizing our processes, investing in state-of-the-art infrastructure, and upholding the highest safety and reliability standards. By embracing advanced technologies and fostering a culture of continuous improvement, we enhance our efficiency and build the trust and confidence of our customers and stakeholders. Operational excellence enables us to respond swiftly to challenges, drive innovation, and deliver value beyond energy, ultimately empowering communities and contributing to their sustained growth and well-being.

Our commitment to excellence in 2023 is reflected in tangible achievements such as:

- ADVANCING SUSTAINABILITY: Maine's first Renewable Natural Gas (RNG) Dairy Digester began producing gas and helped Summit transport 438,000 MMBtu of RNG on its system.
- **INNOVATING FOR THE FUTURE:** By implementing methane recapture technology across six projects, we captured 85.9 metric tons of CO2e, preventing its release into the atmosphere.
- **FOSTERING SAFETY AND RELIABILITY:** In 2023, we achieved our targets for personal injuries and vehicle incidents, with regions like Colorado, Maine, and Missouri reporting no injuries. Our efforts were honored with the Southern Gas Association and the American Gas Association awards.
- **ENGAGING WITH OUR COMMUNITIES:** Summit team members contributed over 8,875 volunteer hours, and the company provided more than \$317,000 in donations and sponsorships to nearly 219 non-profit organizations.
- CHAMPIONING INCLUSIVITY: We launched our first Employee Resource Group, MAVS (Military and Veterans Support).

As we look forward, Summit is driven by a vision of excellence that encompasses deeper reductions in our carbon footprint, enhanced

community engagement, the pursuit of growth and innovation, and continued dedication to ethical, sustainable energy practices. Our goals for 2024 include:

- Expanding advanced leak detection technology.
- Continuing infrastructure improvements.
- Increasing community support initiatives.
- Furthering our diversity, equity, and inclusion (DEI) programs.

We are also preparing to achieve limited assurance for Scope 1 and 2 GHG emissions data, reinforcing our commitment to transparency and accountability.

Our dedication to achieving net-zero Scope 1 emissions by 2035 guides our path, and every step we take today builds a foundation for a more sustainable and prosperous future. This journey is not just about meeting targets but about making a lasting, positive impact on the lives of those we serve.

I extend my heartfelt gratitude to our dedicated team, loyal customers, and engaged stakeholders. Your passion, commitment, and support energize every part of our mission. Together, we are not only participating in the energy industry but leading it towards a brighter, more sustainable future. Thank you for being an integral part of Summit's journey.

Executive Summary

In a challenging and dynamic energy landscape, Summit remains focused on sustainability and operational excellence. Our 2023 Corporate Sustainability Report, Energizing Excellence, provides a comprehensive overview of our environmental stewardship, safety, community engagement, and governance progress.



SUSTAINABILITY IN ACTION

Summit is committed to practical and transparent actions that contribute to achieving our vision of leading the way in providing trusted and innovative energy solutions that strengthen and advance our communities. Our approach in 2023 focused on measurable environmental improvements and responsible energy practices:

- **Reducing Greenhouse Gas Emissions:** We continued replacing leak-prone pipes, completing over 95 miles in Arkansas and Oklahoma, contributing to emission reductions. Additionally, we transported 438,000 MMBtu of renewable natural gas (RNG) and began utilizing RNG produced by the Peaks Renewables dairy digester in Clinton, Maine, for heating homes and businesses.
- Implementing Innovative Technologies: Summit adopted methane recapture technology across six projects, capturing 85.9 metric tons of CO2e. These efforts demonstrate our commitment to practical emission reduction and enhanced gas loss measurement.



COMMITMENT TO SAFETY

Safety remains a cornerstone of Summit's operations, embedded in our corporate culture and practices:

• **Achievements in Safety:** In 2023, we met our targets for personal injuries and vehicle incidents, achieving records of no injuries in regions like Colorado, Maine, and Missouri. Our safety initiatives were recognized with the Southern Gas Association's Safety & Health Award and the American Gas Association's Industry Leader Accident Prevention Award.



COMMUNITY ENGAGEMENT

Summit actively supports the communities we serve, focusing on engagement and contributions that address local needs:

- **Volunteerism and Philanthropy:** Summit team members contributed over 8,875 volunteer hours, and Summit provided more than \$317,000 in donations and sponsorships to nearly 219 non-profit organizations. These efforts reflect our commitment to addressing critical community needs through tangible support.
- **Emergency Response:** Summit effectively managed responses to natural disasters, such as tornadoes in Arkansas and wildfires in Colorado, by providing emergency services and support, demonstrating our preparedness and community commitment.



GOVERNANCE AND TRANSPARENCY

Strong governance practices at Summit are essential for ensuring ethical conduct and transparency in all our operations:

- **Governance Enhancements:** Summit achieved a GRESB™ 5-star rating with a score of 98 out of 100, indicating strong governance performance. We made advancements in our corporate leadership structure, increased cybersecurity measures, and developed a Supplier Diversity Plan.
- **Cybersecurity and Compliance:** Summit invested in 1,400 hours of cybersecurity training and implemented enhanced security measures to protect our systems, maintaining a record of zero incidents of corruption and compliance violations.



PROMOTING AN INCLUSIVE WORKPLACE

Summit is committed to fostering a diverse and inclusive work environment:

• **Diversity and Inclusion Initiatives:** We launched Summit's first Employee Resource Group, MAVS (Military and Veterans Support), and enhanced our communications to support inclusivity. Our updated meeting norms ensure that diverse perspectives are welcomed and valued.

FUTURE EXCELLENCE

Looking forward, Summit aims to further our environmental and social goals with practical and achievable plans:

- 2024 Goals: Our objectives include expanding our use of advanced leak detection technology, continuing infrastructure improvements, increasing community support initiatives, and furthering our diversity, equity, and inclusion (DEI) programs.
- **Limited Assurance:** As our GHG emissions calculations mature, Summit is preparing to achieve limited assurance for Scope 1 and 2 data.

As we look ahead, Summit will continue to drive impactful and measurable change throughout the organization. Our vision for the future includes:

- Further reductions in our carbon footprint.
- Enhanced engagement with the communities we serve.
- The continuous pursuit of ethical and sustainable energy practices.

By setting clear, actionable goals and transparently reporting on our progress, including our commitment to achieving net-zero Scope 1 emissions by 2035, we are laying the groundwork for continued operational excellence and positive transformation.



At Summit, we understand that excellence in governance is essential for responsible corporate management and pivotal in driving positive environmental and social impacts. By incorporating Environmental, Social, and Governance (ESG) considerations into our governance framework, we tackle today's challenges and actively shape a sustainable and resilient future with excellence at the forefront. As we showcase our 2023 accomplishments, we remain aware that our journey toward outstanding governance is ongoing. This journey challenges us to consistently enhance and infuse sustainability principles into every facet of our decision-making process. In this section, we share our achievements and aspirations, reaffirming our commitment to governance characterized by excellence.

ESG PERFORMANCE

GOVERNANCE GOALS ACHIEVED IN 2023:

- Implemented an updated corporate leadership structure.
- Enhanced cybersecurity security measures by implementing SCADA isolation.
- Conducted four physical and interactive cyber security exercises and two BCP/incident response tabletop exercises.
- Developed a Supplier Diversity plan to collect relevant ESG data from suppliers in 2024.
- Implemented an annual company-wide policy review and acknowledgment process.

KEY 2024 GOVERNANCE GOALS:

- Complete the 2024 Supplier Diversity plan.
- Complete 1,600 cybersecurity training hours company-wide.
- Maintain a phishing click rate below 18%.
- Update Summit's Delegation of Authority Policy.

ESG Committee

The ESG Committee at Summit continues to play a crucial role in steering our organization towards outstanding sustainability achievements and responsible business practices. Throughout the year, the committee has sharpened its focus on reducing environmental impact, enhancing social responsibility, and upholding governance excellence. The ESG Committee has been instrumental in setting more rigorous goals, crafting innovative strategies, and tracking our achievements in meeting our sustainability objectives.

In 2023, the committee's efforts were particularly evident in several key initiatives that marked significant progress in our ESG strategy:

2023 ESG COMMITTEE HIGHLIGHTS:

- The committee oversaw the development of enhanced Scope 3
 emissions accounting and reporting processes, enabling us to better
 understand and manage our indirect greenhouse gas emissions in
 alignment with our long-term sustainability goals.
- A comprehensive desktop audit of our GHG emissions was completed, reaffirming our dedication to transparency and accuracy in sustainability reporting.
- The ESG Committee guided the creation of the Summit Supplier
 Diversity Plan, which promotes ESG data collection from our suppliers.
- Advanced 811 legislation in Arkansas; a crucial step for safeguarding our infrastructure and enhancing public safety.
- Through these initiatives and the dedicated oversight of the ESG Committee, Summit is better equipped to navigate the complexities of a rapidly evolving energy landscape.

ESG Reporting

The Global Real Estate Sustainability Benchmark (GRESB™) assesses and benchmarks the ESG performance of assets within pension funds; GRESB is used as a benchmark for both real estate and infrastructure investments worldwide. The two GRESB assessments are designed to

compare participants to their peers and provide participating companies with a roadmap of actions to improve their ESG performance.

In 2023, GRESB awarded Summit 5 out of 5 stars with a 98 out of 100 score for our ESG performance.





Summit is ranked number three of 14 in Network Utilities: Gas Distribution Companies.



Summit ranked 31 out of the 681 participating companies worldwide.



Cybersecurity

In the ever-evolving landscape of today's digital and interconnected world, safeguarding our digital assets and systems has never been more critical. Cybersecurity is an integral part of our comprehensive ESG strategy at Summit. We recognize that protecting our systems, data, and networks is crucial to maintaining the trust and confidence of our customers, stakeholders, and team members. Cybersecurity extends beyond a mere obligation; it is vital to our commitment to responsible business practices.

In 2023, our dedicated cybersecurity team has enhanced its vigilance, proactively identifying and addressing potential threats as the complexity and frequency of cyberattacks continue to grow. Through ongoing investments in comprehensive training for team members and stringent security protocols, we reinforce our defenses and resilience against cyber threats. This sustainable approach to cybersecurity protects sensitive information, intellectual property, and critical infrastructure and safeguards the privacy and safety of those we serve. By upholding the highest cybersecurity standards, we foster trust, enhance long-term value creation, and lay a resilient foundation for Summit's sustainable growth.



In 2023, Summit team members received approximately **1,400** hours of cybersecurity training.

Furthermore, we are proud to report that in 2023, Summit did not receive any substantiated complaints concerning breaches of customer privacy and losses of customer data, reaffirming our commitment to protecting the sensitive information entrusted to us.

In 2023, Summit continued to focus on cybersecurity and implemented a series of enhanced security measures to keep its system safe.



2023 CYBERSECURITY INITIATIVES INCLUDED:

- Fully segregated network for OT assets.
- Began tracking progress towards the NIST Cybersecurity Framework (70% complete).
- Launched a Self-Service Password Reset Portal for more secure and convenient password resetting and account unlocking.
- Created interactive exercises to inform and train against multifactor authentication fatigue.

The Summit PAC

In 2023, Summit's commitment to political engagement strengthened, recognizing that responsible governance includes proactive political outreach. Interacting with local elected officials allows us to positively influence our industry, ensuring that policies and regulations support sustainable and responsible practices.

At Summit, we prioritize building relationships, engaging with policymakers, and providing industry education as essential components of our governance strategy. These activities help us advocate for our industry's needs while promoting transparency and accountability in the legislative process.





Summit's Political Action Committee (Summit PAC) members joined industry professionals for "Natural Gas Day" at the Arkansas State Capitol. This event provided a valuable educational experience, allowing Summit team members to gain insights into the legislative process, participate in policy-making by attending an energy committee hearing, and tour the state capitol.

As the Summit PAC grows its membership, Summit continues to follow all relevant guidelines and regulations regarding political contributions and activities. Our political engagements, including voluntary membership in the Summit PAC and lobbying activities, comply with legal requirements.

Through these efforts, Summit demonstrates that responsible governance is about internal policies and practices and active participation in the legislative process. By engaging with policymakers and advocating for industry standards, we help shape a regulatory environment that supports our commitment to sustainability and responsible business practices.



Meet Summit's Board of Directors

Our Board is essential to Summit's governance, providing oversight of Summit's strategy and risk management. Our Directors are invaluable in helping Summit implement organizational strategies and policies for responsible business conduct. To mitigate potential risks related to conflicts of interest, our Directors always obtain approval from the company before diving into any Board activity that could pose a conflict. We help our Directors stay in the know and be at the forefront of our industry by providing education and guidance on handling conflicts of interest during their onboarding process.

Transparency is a fundamental principle at Summit, and it serves as a source of pride, fostering trust and credibility with stakeholders, customers, and the wider community. Within this framework, at the quarterly meetings of the Board, Summit presents an updated risk register, reflecting the ongoing evaluation of risks, trends, and the proactive mitigation strategies that our company undertakes. Our corporate governance practices ensure we stay on course and steer toward success together. At Summit, we know that having a strong Board and solid governance is the key to our outstanding performance.

To learn more about our Board of Directors, visit their biographies which are featured on Summit's public website.

*2023 BOARD DEMOGRAPHICS:



AVERAGE TENURE



RACIAL/ETHNIC



FEMALES

BOARD MEMBERS SERVE ON THREE STANDING COMMITTEES:



AUDIT



CORPORATE GOVERNANCE & NOMINATING



HUMAN RESOURCES. **COMPENSATION & SAFETY**

Each committee has adopted a formal charter that describes its purpose, organizational structure, and responsibilities in detail.

*As of December 31, 2023.

Upholding Integrity and Transparency

ANTI-CORRUPTION

Integrity and transparency are crucial to our commitment to responsible governance at Summit, where excellence in ethical conduct is a daily practice. Our Anti-Corruption Policy permeates every level of our organization, guiding team members from the boardroom to the field in upholding uncompromising standards of behavior, ensuring no tolerance for bribery or corruption.

This commitment to excellence is enforced through stringent processes such as the preclearance of high-risk transactions by our Chief Legal Officer or Chief Executive Officer and oversight of activities involving gifts, hospitality, and third-party intermediaries. We also maintain careful guidelines for interactions with government officials, safeguarded by a healthy compliance system with a hotline for reporting suspected violations.

By applying our Anti-Corruption Policy and fostering a culture of continuous training and vigilance, we proudly uphold a record of zero incidents of corruption. This achievement reflects our dedication to the highest ethical standards and solidifies our reputation for excellence in fostering a business environment characterized by trust, transparency, and accountability at Summit.

ANTI-TRUST AND MONOPOLY

GUIDELINES

For regulated natural gas utilities like Summit's, a fair and well-regulated market is essential to ensure equitable access to energy resources. Compliance with regulatory and anti-trust obligations is pivotal in maintaining a level playing field, fostering healthy competition, and safeguarding consumer interests. These principles encourage innovation, efficiency, and lead to optimal customer pricing. Summit recognizes that upholding regulatory and anti-trust requirements ensures fairness in the energy sector and supports economic growth by allowing market participants to thrive. Our commitment to adhering to these principles is a testament to our dedication to providing reliable, accessible, and reasonably priced natural gas services while contributing to the overall well-being of the communities we serve.

In 2023, Summit was not involved in any violations of anti-trust and monopoly legislation.

WHISTLEBLOWER PROTECTION

At Summit, fostering a culture of openness and accountability is paramount. Our success as an organization is built on a foundation of ethical decision-making and a commitment by every team member to uphold the highest standards of professional conduct on the job. The best way for us to support an ethical culture is for each of us to act with integrity every day – doing the right thing when it comes to our behavior, being aware

of what's going on around us, and being willing to speak up when we see or suspect activity that could harm our organization.

We encourage employees to voice their concerns and seek answers without fearing retaliation. The confidential compliance hotline is operational 24/7 and ensures that all employees and external parties can report any instances of illegal or unethical behavior. Managed by an independent, third-party operator, the hotline guarantees confidentiality and prompt investigation of all reported matters. We continuously promote awareness of our reporting system and nonretaliation policies through direct communications with employees, accessible information on our corporate intranet, and prominent displays in high-traffic work areas across the organization. At Summit, transparency and integrity are the pillars that guide us, empowering everyone to play a role in upholding our values and ethics.



In 2023, Summit received, addressed, and resolved **one** concern submitted through the Summit Whistleblower Hotline.



At Summit, our dedication to sustainability is deeply embedded in our core values, guiding our immediate actions and long-term vision. Our commitment to minimizing our carbon footprint is central to our environmental strategy, with a specific goal of achieving Net Zero Scope One Emissions by 2035.

Our approach to decarbonization is comprehensive and focused on tangible actions. We are reducing Scope 1 emissions through pipeline replacement, damage prevention, and enhanced data capture and analysis. As we work towards a sustainable, low-carbon future, we are committed to meeting our customers' energy needs thoughtfully and efficiently.

Sustainability is a long-term endeavor for Summit. We understand that our decisions today will have significant implications for the future, and this understanding drives our determination to implement enduring positive changes. By pursuing transformative initiatives in the energy sector, we aim to build a legacy of innovation and responsibility, providing sustainable energy solutions to our communities for generations.

Key Highlights of 2023:

- Replaced over 95 miles of leak-prone pipe in Arkansas and Oklahoma.
- Transported over 438,000 MMBtu of renewable natural gas (RNG) on our system.
- Peaks Renewables' (Peaks) RNG dairy digester project in Clinton,
 Maine, began producing RNG.
- Continued focus on ongoing emissions reduction leadership through continued engagement and partnership with industry allies like ONE Future, the American Biogas Council, and the Renewable Natural Gas Coalition.
- Utilized natural gas capture technology for five projects, resulting in 85.9 MT of CO2e avoided.
- Created a gas-loss calculation tool for the field to gather more precise natural gas released from pipeline damages.
- Relocated 695 meters per our meter relocation program.

ESG PERFORMANCE

ENVIRONMENTAL GOALS ACHIEVED IN 2023:

- Passed 811 legislation in Arkansas.
- Developed Enhanced Scope 3 accounting and reporting processes and procedures.
- Completed a desktop audit of GHG emissions data.

KEY 2024 ENVIRONMENTAL GOALS:

- Receive auditable quarterly ESG data on time.
- Complete limited assurance audit.
- Launch two additional Picarro units.

EMISSIONS REDUCTION PLAN UPDATE

At Summit, we continue to underscore the essential role of natural gas as a cornerstone in the journey toward a sustainable energy future. As the owner of several local distribution companies (LDCs), we are acutely aware of our system's pivotal role in combating climate change and ensuring delivery of affordable energy solutions to our customers. This dual responsibility fortifies our pledge to achieve net-zero direct (Scope 1) emissions across our LDC systems by 2035.

In the past year, we have made significant strides along the path outlined in our Emissions Reduction Roadmap, a comprehensive strategy unveiled in 2023 to guide us toward our goals. This roadmap, a dynamic and evolving blueprint, facilitates tracking of our progress and anticipates potential hurdles, embodying our agile approach to navigating the complex energy landscape. Our strategy for emissions reduction has evolved into a more refined three-phased approach:

PHASE THREE: THREE-ACHIEVEMENT & FUTURE GOALS

Achieve net zero Scope 1 emissions and roll out an offset purchasing program that balances costs and alignment with our corporate mission.

PHASE TWO: TWOIMPLEMENTATION & IMPROVEMENT

Focused on implementing the infrastructure and tools developed in Phase 1 to aggressively drive down emissions.



PHASE ONE: FOUNDATION BUILDING

Concentrate on data accuracy and emissions reduction opportunities in each asset class. Lessons learned in Phase 1 will dictate directional changes for Phases 2 and 3.

Our three-phased approach aims to lower emissions across five key asset categories within our system: Compression, Transmission Piping, Measurement & Control, Distribution Mains, and Distribution Services.



COMPRESSION

Compressor stations account for approximately **1%** of Summit Scope 1 GHG emissions. Emissions from natural gas compression result from normal operations, from pipeline leaks, and station blowdowns.



TRANSMISSION PIPING

Transmission piping accounts for approximately **1%** of Summit Scope 1 GHG Emissions. These high-pressure, typically large diameter transmission pipelines can emit through line leaks and, in rare cases, line strikes.



MEASUREMENT & CONTROL

Measurement and controls account for approximately 12% of Summit's Scope 1 GHG emissions. Currently, Summit uses population-based emission factors that assume leaks from components like valves, flanges, regulators, meters, and connectors.



DISTRIBUTION MAINS

Distribution mains account for approximately 38% of Summit's scope 1 GHG emissions. **Emission from mains** result from normal pipeline operation, pipeline leaks, and excavators' line strikes. Except for line strikes, current emissions for distribution main leaks are calculated based on population-based emissions factors.

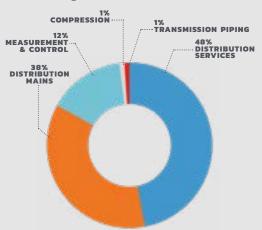


DISTRIBUTION SERVICES

Distribution services comprise approximately **48%** of Summit's Scope 1 GHG emissions. Emissions from services are a result of regular operation, service line leaks, residential and industrial meter leaks, and line strikes from excavators. Except for line strikes. current emissions for distribution service leaks are calculated based on population-based emissions factors.



2023 Scope 1 Emissions by Asset Class



Our Progress

In 2023, Summit made significant strides in its commitment to reducing Scope 1 emissions. 2023 was a pivotal year as we focused on building a solid foundation while enhancing our systems and processes for greater efficiency. We expanded the scope of our internal data capture, ensuring a more robust and informed approach towards our emissions reduction roadmap. These foundational efforts in 2023 have set the stage for impactful progress in the years ahead.

PIPELINE AND METER REPLACEMENT: Remote meter sets near the road are one major cause of emissions. Since 2018, Summit has invested more than \$3.8 million to replace remote meter sets on our Arkansas Oklahoma Gas (AOG) system. Over the next five years, we plan to invest another \$23.3 million to replace remote meters in our Arkansas and Oklahoma service territories.

In 2023, Summit relocated 695 meters in accordance with our meter relocation program and replaced over 95 miles of leak-prone pipe in Arkansas and Oklahoma.

ENHANCED LEAK DETECTION: Advanced leak detection improves customer safety, gathers meaningful data, and aids in overall emissions reduction. Implementing Picarro on a wide scale will assist in finding more leaks, allowing us to remedy them faster than traditional leak detection methods. Picarro also provides a more accurate measurement of leak data, allowing us to create areaspecific emissions factors. As we deploy Picarro in additional service territories, the Information gathered from implementing Picarro in Phase One will be critical to our long-term emissions reduction and dictating the next steps in Phases Two, Three, and beyond.

In 2023, Summit added an additional Picarro unit to our fleet to further increase data capture capabilities.

ENHANCED DAMAGE PREVENTION: Unintended and uncontrolled releases of natural gas from outside force facility damages, pose a safety risk and impact our emissions. Summit's Damage Prevention teams track facility damage root cause and gas loss to help us focus on areas that need the most attention. Reducing at-fault damages through locator training and map accuracy, pursuing enhanced 811 legislation, and targeting public awareness-focused communications on excavators and homeowners to bring awareness to the dangers of line strikes will help us achieve greater safety and increased emissions reductions.



In 2023, the Summit team created a gas-loss calculation tool for the field to gather more precise natural gas released from pipeline damages.

Summit also played a role in passing 811 legislation in Arkansas in 2023. This effort was crucial for ensuring public safety, protecting our infrastructure, and reducing the release of natural gas into the atmosphere.

IMPLEMENTATION OF METHANE RECAPTURE TECHNOLOGY: Our adoption of methane recapture technology holds great potential for emissions reduction within our operations. By capturing and repurposing gas that would otherwise be released into the atmosphere, we seize a valuable opportunity to minimize our environmental footprint.

In 2023, Summit successfully utilized methane recapture technology during six projects, preventing 85.9 metric tons of CO2e from entering the atmosphere. The positive environmental impact of the carbon we captured through this project was equivalent to planting and nurturing 100 acres of forest for an entire year.*

* As calculated by the Greenhouse Gas Equivalencies Calculator provided by the United States Environmental Protection Agency.

FLEET VEHICLES: Our Phase 1 plan pivots on ensuring our fleet management program evaluates vehicle age and type and replaces older, higher-emission vehicles with newer, lower-emission vehicles.

In 2023, we continued to invest in more efficient vehicles and new technologies to reduce the miles driven on the road while increasing data-gathering accuracy. We also added two hybrid vehicles to Summit's fleet.

Going Beyond Scope 1

At Summit, our commitment to sustainability extends beyond our direct emissions. In the section below, we highlight our innovative initiatives and partnerships to enhance environmental stewardship, improve ecosystem resilience, and foster sustainable practices across all operations. From comprehensive greenhouse gas accounting to integrated vegetation management, these efforts exemplify our dedication to creating a positive and lasting impact on the environment and our communities.

ENVIRONMENTAL REVIEW

In 2023, Summit implemented an enhanced environmental review checklist as part of our commitment to minimizing ecological impact and streamlining

project compliance. This new checklist is designed to identify and avoid sensitive environmental areas during project planning and execution. It is a comprehensive tool for our engineers, ensuring that each project is thoroughly reviewed for potential environmental impacts before commencement.

The enhanced checklist has been integral in improving our project review process. It includes detailed guidelines for avoiding wetlands, protecting species' habitats, and making informed decisions about construction methods, such as choosing boring over trenching to minimize disruption. By applying these guidelines, we ensure that our projects are environmentally sound and compliant with all relevant regulations.

Our engineers underwent specialized training throughout the year to implement the enhanced environmental review checklist effectively. This training equipped them with the knowledge and skills necessary to identify sensitive areas and make environmentally responsible decisions during the planning and execution phases of our projects. As a result, the checklist has not only streamlined our compliance process but also enhanced our ability to proactively address environmental concerns.

The impact of this initiative has been significant. By identifying and avoiding environmentally sensitive areas, we have reduced the potential for negative impacts and improved our overall project efficiency. The enhanced review process has led to better decision-making, ensuring we meet regulatory requirements while minimizing our ecological footprint.

VEGETATION MANAGEMENT

Summit launched an integrated vegetation management project at Gillam Park in Little Rock, collaborating with the Arkansas Audubon Society to enhance our right-of-way (ROW) practices in 2023. This project is a testament to our commitment to environmental stewardship and sustainable land management. By allowing native vegetation to grow within the ROW, we promote biodiversity and create a more resilient ecosystem.

The partnership with the Audubon Society has been instrumental in the success of this project. Their expertise in native vegetation and wildlife conservation has provided valuable insights, enabling us to develop and

implement best practices for vegetation management. Together, we are working to create a thriving habitat that supports local wildlife and maintains the area's ecological balance.

This initiative at Gillam Park serves as a template for future vegetation management projects across our operations. The positive outcomes observed here have reinforced the benefits of using native vegetation to manage ROWs, including reduced maintenance costs, enhanced ecosystem services, and improved aesthetic value. We aim to replicate these successes in other locations by integrating these practices into our standard procedures.

The integrated vegetation management project exemplifies our dedication to learning and growing through partnerships. By working closely with the Audubon Society, we have gained a deeper understanding of sustainable land management practices that benefit our operations and the environment. This collaboration not only enhances our current projects but also paves the way for continued innovation and improvement in our approach to vegetation management.

ENHANCED GHG ACCOUNTING

In 2023, Summit achieved advancements in our greenhouse gas (GHG) accounting practices, reflecting our dedication to transparency, accuracy, and environmental responsibility. We completed a comprehensive desktop audit of our Scope 1 and Scope 2 GHG emissions data and initiated a pilot project for Scope 3 GHG emissions inventory.

Scope 1 emissions are direct emissions from owned or controlled sources. In contrast, Scope 2 emissions are indirect emissions from the generation of purchased electricity, steam, heating, and cooling consumed by the reporting company. Conducting a thorough audit of these emissions ensures that our sustainability initiatives are based on reliable and precise data. This audit reaffirms Summit's dedication to continuous improvement in our operations. Accurate GHG emissions data enable us to understand our environmental impact better and identify areas for further reduction efforts.

Furthermore, this audit brings us closer to achieving limited assurance of our Scope 1 and Scope 2 emissions data. Limited assurance provides additional credibility to our reporting, ensuring that our emissions data

meet the standards of accuracy and reliability expected by our stakeholders.

In addition to our Scope 1 and 2 efforts, Summit launched a Scope 3 GHG emissions inventory pilot project in 2023. The objective of this pilot program was to establish a comprehensive Scope 3 GHG emissions inventory in preparation for third-party assurance aligned with the global GHG Protocol Standards. Scope 3 emissions encompass all indirect emissions that occur in the reporting company's value chain, both upstream and downstream.

Developing this enhanced Scope 3 accounting and reporting process allows us to understand and manage our indirect greenhouse gas emissions better, aligning with our long-term sustainability goals. This initiative was a critical step in our sustainability journey, enabling us to take a more holistic approach to GHG management and reduction.

Investing in comprehensive GHG accounting and reporting practices strengthens our sustainability reporting and builds trust with our stakeholders. These efforts demonstrate our ongoing commitment to reducing our carbon footprint and contributing to a more sustainable future.

As we progress, Summit remains focused on enhancing our environmental performance and ensuring our sustainability practices are robust, transparent, and effective. Completing our Scope 1 and Scope 2 audit and initiating our Scope 3 pilot project are critical milestones in this ongoing journey.

PEAKS RENEWABLES

After years of planning, research and development, farm visits, challenges, and victories, the Central Maine Community Dairy Digester in Clinton, Maine, officially started producing renewable natural gas (RNG) in 2023.

The project was first announced in 2019 when Summit announced its intention to have its subsidiary, Peaks Renewables, build the state-of-the-art digester. Peaks team members collaborated with family dairy farms throughout central Maine to turn manure from their daily operations into RNG, serving as a historic step for Summit, moving beyond the confines of a distribution utility and continuing its lower-carbon journey.

In June 2023, the facility began injecting homegrown gas into Summit Natural Gas of Maine's distribution system. This milestone marks the first time in Maine that gas produced from a local digester is used to heat homes and businesses. Meanwhile, the renewable attributes are sold to third parties to meet their

decarbonization goals.

The RNG digester project highlights the benefits of renewable natural gas as a component in the transition to a more sustainable energy future. By converting manure into RNG, the digester helps reduce greenhouse gas emissions and provides a sustainable energy source that supports local economies and agriculture. This project serves as an example of how innovative energy solutions can positively impact both the environment and the industry.

Moreover, the digester's success demonstrates the viability and importance of RNG projects. These efforts are impactful locally and contribute to the broader industry by showcasing renewable energy technologies' practical benefits and scalability.

The project reflects Summit's commitment to sustainability and innovation, setting a precedent for future RNG initiatives. It stands as a testament to the potential of renewable energy projects to drive industry-wide change, promote environmental stewardship, and support community resilience.

As Summit continues its journey toward a lower carbon future, this project illustrates the potential of renewable natural gas and the importance of ongoing investment in sustainable energy solutions.

In 2023, RNG from the RNG dairy digester totaled **25,567 MMBtu**, 2.6% of Summit's total sales throughput!



Energy Efficiency

In our pursuit of sustainability, energy efficiency remains a cornerstone of Summits' strategy. In 2023, we saw substantial participation in our Energy Efficiency programs across various regions, reflecting our customers' commitment to reducing energy consumption and lowering their carbon footprints.

2023 Energy Efficiency Participation by Operating Company:

Arkansas Oklahoma Gas: 1,335

Colorado Natural Gas: 700

Summit Natural Gas of Missouri: 145 Summit Utilities Arkansas: 179,000 Summit Utilities Oklahoma: 3,000



ONE Future Coalition

In 2023, Summit continued its multi-year partnership with the ONE Future Coalition, an organization of energy companies from across the natural gas supply chain committed to achieving a science-based average rate of methane emissions across facilities equivalent to 1% or less of total natural gas production. With company leaders on ONE Steering Committee and other policy and technical committees, we report emissions data, mitigation efforts, and best practices to lead the industry to a sustainable path of lower emissions and more efficient operations.



At Summit, every action is anchored in our commitment to safety. We understand that the well-being of our team members, customers, and the communities we serve is of utmost importance. Safety is a top priority and a constant imperative, and our commitment to it permeates every aspect of our operations. With comprehensive safety training programs and the adoption of advanced technologies, we strive to ensure the safety of our operations and the integrity of our infrastructure. Through transparent reporting and a culture deeply rooted in excellence, we continue to build trust and confidence among our stakeholders, reinforcing that safety is an integral part of our identity at Summit.

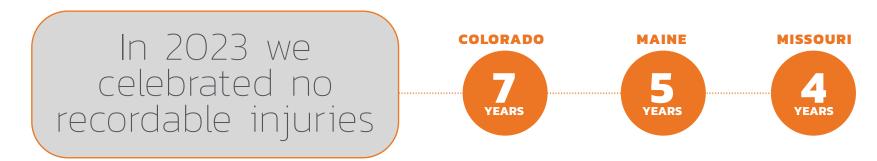
Safety Performance

As a vital component of our Corporate Scorecard, we continue monitoring key safety indicators to assess our quarterly and annual performance. We are pleased to announce that in 2023, we exceeded our safety objectives for personal injuries and vehicle incidents. This accomplishment underscores our unwavering commitment to maintaining a secure work environment for our team members and safeguarding the communities we serve.



^{*}TRIR is the Total Recordable Incident Rate which is calculated by the number of OSHA recordable incidents per year and the total number of hours worked.

^{*2023} company-wide targets calculated to include the targets for newly-acquired assets in Arkansas, Oklahoma, and Texarkana, Texas.



^{**}VIR is the Vehicle Incident Rate which is calculated by the number of vehicles incidents per year and total miles driven.

Awards

SAFETY AND HEALTH AWARD

In 2023, Summit was honored to win the award for Safety & Health from the Southern Gas Association (SGA) for the Safety Milestone of no recordable injuries for our Colorado subsidiary since June 2016, seven consecutive years.



"One of the biggest factors is that every person on this team takes ownership in the Safety Program, they watch out for each other, they come to work every morning with the goal that all of them are going to go home safe that evening."

- JOE WILKES, SENIOR EHS SPECIALIST

MERITORIOUS ACTION HONOREE

Houston Sutherland, Summit's Supervisor of Corrosion Control Pipeline Safety, was a 2023 Meritorious Action Honoree. This award celebrates individuals who have displayed courageous actions to save or attempt to save lives. Houston Southerland, the Supervisor of Corrosion Control Pipeline Safety, accepted the life-saving award at the annual SGA's Natural Gas Connect Conference. While on the job, Southerland's quick efforts helped save and bring a mother and her two children to safety after their vehicle caught on fire following a car wreck in Fort Smith, Arkansas.

"I was in the right place at the right time to help the mother and her kids after they experienced the accident. I credit the safety training we receive at Summit that helped me spring into action when I heard the crash and saw smoke coming from the engine."

- HOUSTON SOUTHERLAND

2023 DART AWARD

For the seventh year in a row, Summit received an "Industry Leader Accident Prevention Award" from the American Gas Association for excellence in safety performance. In fact, in 2023, we came in second place in our category with a 0.85 DART incident rate.

The DART incident rate measures recordable cases involving days away from work, days of restricted work activity, or job transfers. This accomplishment is a testament to our company's value of "Put Safety First" every day and our focus on tracking leading indicators like near misses, job hazard analysis, and safety training. Summit had the fifth-lowest DART incident rate in its category.

LOCATE RODEO

In December of 2023, Summit proudly participated in the International Locating Rodeo at the Missouri Common Ground Alliance Summit, the premier competition for locating experts in the industry. The 2023 event featured 60 competitors across the United States, including teams from Texas, California, and Florida. Representing Summit, Richard Chronister achieved remarkable success in his first locate rodeo. He secured 8th place overall, excelled by placing 1st in one of the rounds, and earned 2nd place in the gas division.

Richard's outstanding performance shows our team's expertise and commitment to excellence in utility locating, highlighting Summit's dedication to maintaining the highest safety and accuracy standards in our operations.

Safety Culture

POLICIES AND PROCEDURES

Summit is dedicated to ensuring a safe and healthy work environment for all our team members, contractors, vendors, and visitors. Integral to our core values, we staunchly uphold the "Safety First" principle, a commitment we actively prioritize in our daily operations.

In line with this commitment, Summit enhanced our safety protocols in 2023 by adopting a new procedure designed to equip our team members with the skills and knowledge necessary to handle encounters with threatening or potentially violent public members. We also rolled out comprehensive training programs focused on Reporting Acts or Threats of Violence, ensuring that all personnel are prepared to respond effectively and maintain safety in such situations.

These initiatives are part of our broader strategy to foster a secure and supportive workplace where safety is not just a policy but a practice embedded in every aspect of our organizational culture.

SAFETY SUMMIT

In February 2023, Summit hosted its inaugural large-scale Safety Summit in Maumelle, Arkansas, marking a significant milestone in our commitment to safety. Themed "The House that Summit Built," the event drew inspiration from the construction industry, establishing a vivid analogy between building sturdy homes and fostering a robust safety culture within the organization.

The safety summit, led by Summit's Safety 1st Committees, showcased how foundational safety practices are integrated from the ground up. The presentations covered various aspects of safety culture development, from initial planning and risk assessment to implementation and ongoing vigilance, mirroring the comprehensive steps in constructing a home.

Approximately 125 team members participated in the summit, which served as a dynamic platform for sharing knowledge and unifying Summit's vision for safety. The Safety 1st Committee members delivered impactful presentations that emphasized the importance of everyone's role in maintaining safety standards.

Key Outcomes of the 2023 Safety Summit:

- **Enhanced Safety Awareness and Knowledge:** The presentations provided a clear, sequential understanding of building a safety culture, significantly boosting team members' awareness.
- **Unified Vision and Practices:** The safety summit effectively integrated long-standing safety practices with new, innovative strategies, reinforcing a cohesive approach to safety across Summit.
- **Empowered Engagement:** The event fostered an inclusive atmosphere where safety concerns and ideas were openly discussed, enhancing engagement across all levels of the organization.
- Supported our PEAKS Values: The PEAKS values (pioneering, excellence, agility, kindness, safety) were highlighted as the architectural blueprint for ongoing safety efforts, equipping team members with a guiding framework.
- **Strengthened Community and Team Spirit:** The safety summit focused on technical safety protocols while strengthening team morale and reinforcing safety as a collective goal.

The success of the 2023 Safety Summit has set a new standard for safety initiatives within Summit, providing a clear blueprint for continuous improvement in safety practices and culture. This event celebrated the achievements and dedication of the Safety 1st Committee and advanced our commitment to being a safety-first organization.

As a result, Summit is better positioned to sustain and build upon its safety culture, ensuring a safer environment for its employees, customers, and the communities it serves, thus embodying the company's commitment to safety as a cornerstone of our operations.



In 2023, Summit team members completed over **4,200 HOURS** of safety training.



ENHANCED INTERNAL SAFETY CAMPAIGNS

101 Days of Summer Safety: In May of 2023, Summit launched its 101 Days of Summer Safety campaign to educate and reinforce essential safety information throughout the summer months. Weekly communications provided team members with safety information that was useful both at work and at home.



Stop Work Authority: At Summit, we uphold the principle that everyone has the responsibility and authority to stop any work that does not comply with our Safety First Principles. This Stop Work Authority empowers our team to take immediate action if they encounter unsafe conditions or practices. Anyone working at or

with Summit has the authority to stop work. We are dedicated to fostering an environment where safety concerns can be raised openly and addressed promptly without any repercussions.

Stakeholder Safety

Stakeholder and community engagement is a cornerstone of Summit's strategy. In 2023, our enthusiastic Summit team participated in over 90 safety-related stakeholder meetings and events. These engagements served as powerful platforms to foster robust dialogues, share valuable insights, and collaborate with diverse stakeholders to enhance safety awareness.

COLLABORATION WITH LOCAL FIRE DEPARTMENTS

Summit Utilities Oklahoma (SUO) employees in Cushing, OK, were called on by the Cushing Fire Department to help with a training and safety project. The Cushing firefighters contacted SUO to build a mock meter set for their state-of-the-art training facility. SUO team members and the Cushing Fire Department collaborated to construct a meter set that would suit their training needs. Cushing firefighters now can train at their facility with a meter set simulating a structure fire, providing them with valuable, hands-on training that would otherwise not be possible. This collaboration helps ensure the safety of the firefighters, SUO team members, and the communities they serve.



NATURAL GAS SAFETY AT SCHOOL

Since 2017, Summit has continued to educate and empower the younger generation by conducting engaging in-school training presentations on natural gas safety at numerous schools within our service territory. Through these proactive outreach initiatives, we strive to build stronger connections, deepen trust, and inspire a shared commitment to safety. We ensure that every community member, from students to local leaders, is well-informed and actively invested in fostering a safer and more secure environment.

811 AWARENESS

Ensuring safety and preventing damage to underground utilities are critical responsibilities that we take seriously at Summit. Recognizing the importance of safe excavation practices, we actively promote 811 awareness with team members, contractors, customers, and our communities. The 811 number is a universal call-before-you-dig service established by the Federal Communications Commission in 2005 to prevent accidents like the major one on the West Coast in the late 1960s, which caused gas leaks, fires, and power outages due to improper digging.

On August 11 each year, utilities and excavators nationwide join forces to raise awareness about the necessity of calling 811 before any digging project. This simple step allows utility operators to mark underground lines with flags or paint, ensuring excavation work can proceed safely. By contacting 811 a few days before you dig, you help prevent the risks of injury, service disruption, and costly fines associated with damaging utility lines.

It is essential to remember that utility lines can be buried at shallow depths and may shift over time due to erosion or root growth. Therefore, always avoid digging directly on top of a marked utility line and use hand digging methods instead of mechanical equipment near these areas.

The annual cost of damages to underground utilities in the U.S. is estimated at \$30 billion, with most damages resulting from not contacting 811, improper excavation practices, or inaccuracies in facility mapping. By promoting 811 awareness, we reinforce our commitment to safety and community responsibility, helping to protect lives, maintain service integrity, and avoid unnecessary costs.



As a part of our outreach about safe digging practices, Summit hosted a segment on THV 11 in Little Rock to inform the public about 811.





ENERGIZING COMMUNITIES: Building Excellence

At Summit, our responsibility extends beyond being a utility provider; we are committed to building excellence in the communities we serve. Our dedication goes beyond business - it's personal. We actively empower and uplift our vibrant communities and see ourselves as integral parts of their fabric. Through targeted philanthropy and our Volunteer Time Off (VTO) program, we take pride in creating lasting social, economic, and environmental benefits. Together, with meaningful partnerships and purposeful actions, we are fostering stronger, more resilient communities. Our journey is shared with our neighbors, and we're thrilled to continue this incredible adventure together.

ESG PERFORMANCE

COMMUNITY GOALS ACHIEVED IN 2023:

- Donated over 8,875 volunteer hours, exceeding our 5,600-hour goal.
- Launched Summit's new Nonprofit Partnership Program for 2023-2025 in five states of operation.

KEY 2024 COMMUNITY GOALS:

- Donate 8,900 hours of volunteer time off.
- Achieve a 65% participation rate in volunteer time off.
- Expand Summit Fuel Fund to Arkansas Oklahoma Gas.
- Transition all customer satisfaction surveys to a new platform.

Volunteer efforts make a huge difference in our communities.

1 hour of volunteer time

approximately \$33.49 of economic impact

invested in our communities.

Measured this way, in 2023, Summit's volunteer efforts equated to over \$290,000 of economic impact from over 8,875 volunteer hours.

Volunteer time value calculation completed by Independent Sector.



At Summit, we are committed to supporting our communities through volunteer efforts, sponsorship, and donations. In 2023, Summit supported over \$317,000 in donations and sponsorships to nearly 219 non-profit organizations.

In 2023, Summit Cares created a new way of giving back to communities in the five states we serve. Summit has pledged \$4,000 annually for the next five years to 20 non-profits on behalf of Colorado Natural Gas, Arkansas Oklahoma Gas, Summit Natural Gas of Maine, and Summit Natural Gas of Missouri. Our commitment is to deliver impactful, multi-year funding to support non-profit organizations and offer them guaranteed income streams to initiate long-term programs. This sustained support empowers non-profits to prioritize delivering excellent services and focus less on raising necessary funds.

In 2023, Arkansas, Oklahoma, and Texarkana, Texas, were brought into Summit's already established Summit Cares charitable giving program. Summit granted over \$200,000 to over 50 non-profits focusing on community giving.

Summit team member-led review panels determined which organizations best aligned with Summit Cares' strategic areas of giving: basic human needs, education with a focus on STEAM, community vitality, and environmental stewardship.



"Summit is committed to forming meaningful partnerships and building relationships in our service area and this is one way we can contribute to the communities we serve. We are thrilled to give back to these non-profits that work to improve our communities and state."

FRED KIRKWOOD,
 Chief Customer Officer



Awards and Accomplishments

Summit Utilities Arkansas was recognized as Arkansas Foodbank's 2023 Corporate Volunteer Group of the Year.

The Arkansas Foodbank is the State's largest hunger relief organization and serves 33 counties across central, eastern, and southern Arkansas. The Arkansas Foodbank awarded Summit its 2023 Corporate Volunteer Group of the Year.

"At the Arkansas Foodbank, we stand at the intersection of compassion and need. Our mission to end hunger in our community would not be possible without the steadfast support of our corporate sponsors and generous donors. Every contribution, big or small, is a lifeline for those facing hunger. We are thankful for [Summit's] partnership as we continue to serve and uplift those in our community."

-BRIAN BURTON,
Arkansas Foodbank CEO

Giving Back

Summit's dedication to building excellence extends far beyond our everyday operations. We are committed to supporting non-profit organizations that are crucial in delivering essential needs to our community members. Whether food, shelter, energy assistance or other fundamental items, we are committed to empowering those facing challenges. Through strategic partnerships and proactive initiatives, we aim to cultivate a brighter, more resilient future for all, leaving no one behind. Together, we can forge a stronger, more compassionate community where every individual has the chance to flourish.

Arkansas Oklahoma Gas: Arkansas Oklahoma Gas awarded Donald Reynolds Cancer Support House with grant funding. The organization offers free services and helps patients with utility, rent, or mortgage expenses.

Colorado Natural Gas: Colorado Natural Gas donated to Spark the Change. It's a senior companion program that operates in eight Colorado counties.

Summit Natural Gas of Maine: Summit Natural Gas of Maine gave to the Augusta Overnight Warming Center. The non-profit offers services to the unhoused community and helps fulfill basic human needs.

Summit Natural Gas of Missouri: Summit Natural Gas of Missouri granted money to Elevate Branson. It addresses the root causes of generational poverty to create lasting change.

Summit Utilities Arkansas: Summit Utilities Arkansas contributed to The Watershed. It is a food pantry and provides utility assistance to people in Central Arkansas.

Summit Utilities Oklahoma: Summit Utilities Oklahoma provided to Catholic Charities. It assists the local community with emergency rent or utility assistance.



1 in 6 people received food assistance from the charitable sector.*



Summit donated over \$55,500 to local foodbanks.

\$1 = approximately 10 average sized meals+.





Measured this way, Summit's monetary donations equated to over 555,000 meals.

^{*}Information provided by Feeding America.

⁺Information provided by Feeding America.

Volunteerism

At Summit, our commitment to excellence in community service is reflected in the genuine kindness of our team. We prioritize giving back by granting our team members 20 hours of paid time off for volunteer activities (VTO) each year. Many dedicated team members embrace this opportunity wholeheartedly and utilize the 20 hours that Summit generously offers. Even during an extraordinarily busy year, our team's unwavering dedication to their communities' shines through as they persist in finding ways to volunteer and create a positive impact.

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ARKANSAS >







COLORADO ▼





MISSOURI A



◆ OKLAHOMA

Citizen Award Winners for Outstanding Volunteerism in 2023

At Summit, we are incredibly proud of the team members who go above and beyond in their dedication to serving and uplifting their communities, reinforcing our shared commitment to giving back. In 2023, many team members surpassed our 20-hour Volunteer



Time Off (VTO) benchmark, exemplifying Summit's core value of kindness through countless service hours.

Among these exceptional individuals, Kista Taylor, Supervisor of Order Management Services, stood out for her unwavering commitment to helping communities thrive. In recognition of her extraordinary efforts, Summit's Diversity & Inclusion Committee proudly presented her with the 2023 Citizen Award.

Kista's journey into volunteering began with her desire to set a positive example for her children. "I started volunteering many years ago because I wanted my children to learn compassion and responsibility through my example," she explained. She finds purpose in community service, adding, "Overall, I find that volunteering gives me a sense of purpose, and I feel more fulfilled knowing I have made a positive impact."



The Citizen Award annually honors a Summit team member who has completed 20 hours of company-provided VTO and participated in the award survey. It celebrates those who go above and beyond in volunteerism and philanthropy.

Kista directed a \$250 donation from Summit to the Apache Senior Nutrition Center. This organization provides nutritious meals and social interaction opportunities to seniors aged 55 and older, ensuring accessibility both onsite and for home-bound individuals.

For those considering starting their volunteer journey, Kista advises aligning their efforts with their passions. "Volunteering is a great way to give back to your community and make a positive impact. Start local! Think about what you care about—animal welfare, children's literacy, community security, etc. When you're interested in the work that you are doing, you're more likely to stay motivated and committed to the project."

Kista's dedication and practical advice embody the spirit of the Citizen Award, highlighting the importance of personal contribution and reflecting Summit's ongoing commitment to service and kindness.

Stakeholder Engagement

At Summit, we uphold a standard of excellence as a committed partner and compassionate neighbor to our customers, communities, and stakeholders. As a regulated public utility serving Arkansas, Colorado, Maine, Missouri, Oklahoma, and the Texarkana, Texas area, Summit actively cultivates warm relationships with stakeholders. Our comprehensive stakeholder relations plan involves collaborative engagement with regulators, legislators, local officials, first responders, and educational institutions. These partnerships are pivotal in our mission to promote natural gas safety, provide valuable input on energy policy, and fortify our resilience against various economic, operational, or political challenges.

To truly grasp and meet the distinct needs of our communities, we advocate for staying actively involved. Year after year, we proudly collaborate with numerous local, community-driven organizations, magnifying our collective impact and fostering positive change in people's lives. We continue to forge a more sustainable and vibrant future for all through these impactful alliances. Our unwavering commitment to being a trusted ally and neighbor remains resolute, and we sincerely appreciate the trust and support of every community we have the privilege to serve.



EMERGENCY RESPONSE

In March 2023, Summit faced unprecedented emergencies as tornados tore through Arkansas and wildfires threatened Colorado. Our comprehensive emergency management program sprang into action, embodying our commitment to community safety and resilience.

Beyond direct donations, we took pride in sponsoring community events and activities. By doing so, we actively raised awareness and generated funds for critical causes in the area.

At Summit, community involvement is not just a checkbox; it is a core value that drives us to make a positive and lasting impact on the lives of our neighbors and the broader community we serve.

In addition to our partnership with the Arkansas Food Bank, the Summit team donated time, funds, and nonperishable foods to food banks across Arkansas, Colorado, Maine, Missouri, Oklahoma, and Texarkana, Texas.

TORNADO RESPONSE

On March 31, 2023, a tornado devastated Central Arkansas and Wynne, Arkansas, causing widespread destruction. Over 150 Summit team members and contractors worked tirelessly, including overnight and weekend shifts, to respond to more than 500 emergency work orders and clear debris for affected community members. Summit coordinated closely with local law enforcement, elected officials, and state agencies to deliver assistance in the storm's aftermath. In addition to these efforts, Summit demonstrated its commitment to the community by making charitable contributions. The company donated \$20,000 to the Arkansas Division of Emergency Management and contributed \$10,000 to the Wynne Yellowjacket Foundation. Summit also provided essential supplies to families who lost their homes in the disaster.

Following the storm's response, Summit thanked its hardworking team members by hosting a steak lunch. State lawmakers and elected officials personally thanked employees for their tireless efforts in responding to the storm's aftermath.

WILDFIRE RESPONSE

In Colorado, the proximity of forest fires to residential areas and critical infrastructure prompted a swift evacuation and response strategy. Our team established an incident command center and worked tirelessly to isolate sections of the natural gas system to prevent further danger. Our team members' quick decision-making and actions, especially notifying fire services of the imminent threat to Sanborn Ranch, exemplified our proactive and safety-first approach.

Our preemptive actions and coordination with firefighting services prevented what could have been a catastrophic escalation, demonstrating the importance of preparedness and rapid response in emergency management. The Colorado team protected numerous homes and the Sanborn Ranch, highlighting our team's effectiveness in crises.

Summit's emergency management program responded effectively to immediate crises and laid the foundation for ongoing community support and environmental stewardship. Our efforts underscored the importance of utility companies in disaster resilience, demonstrating how innovative technology, strategic planning, and community engagement can come together to navigate the challenges posed by natural disasters. The program's success reflects our deep commitment to the safety, well-being, and recovery of the communities we are privileged to serve, marking a significant achievement in emergency management and community service.

Memberships & Associations

ACP-Association of Continuity Professionals

American Biogas Council

American Gas Association

Appalachian Gas Measurement Short Course

Arkansas Advanced Energy Association

Arkansas Gas Association

Arkansas GIS Users Group

Arkansas State Heating, Venting, Air Conditioning,

and Refrigeration Association

Augusta Rotary

Avaya Alumni Network

Avaya Professionals

Central Maine Apartment Owners Association

Central Maine Growth Council

COGA

Colorado One Call

Colorado Pipeline Association

Common Ground Alliance

Crawford County Board of Realtors

DNG-ISAC

E2Tech

EAM CAB -- Oracle Enterprise Asset Management

Customer Advisory Board

EC-Council

Energy & Utilities Network

Energy Solutions Center

Financial Research Institute

Fort Smith Board of Realtors

Fort Smith Regional Alliance

Fort Smith Regional Council

Fort Smith School District Partners In Education

Greater Fort Smith Association of Homebuilders

Infraguard

ISC2

Kennebec Valley Board of Realtors

Leadership Fort Smith

Maine Association of Plumbing, Heating, and

Cooling Contractors

Missouri Association of Natural Gas Operators

Missouri Energy Cybersecurity Coalition

Missouri Energy Development Association

Missouri One Call

MUST

National Association of Homebuilders

National Energy Foundation

Natural Gas Vehicles of America

NextGenGas Coalition

Northeast Gas Association

Oklahoma Gas Association

One Future

Oracle Application Users Experts

Our Nations Energy Future Coalition

PAPA

Pine Tree Society

Pipeline Association for Public Awareness

Pipeline Association of Missouri

Poteau Chapter Ducks Unlimited

Poteau Kiwanis Club

Renewable Natural Gas Coalition

River Valley IT Professionals

Saas Group

Scrum Alliance

Southern Gas Association

The Poultry Federation

United Way

US-CERT

Van Buren Rotary Club

VMUG

Western Arkansas Human Resources Association

Women's Energy Network

Chambers of Commerce

Alma Area Chamber of Commerce

Arkansas State Chamber of Commerce

Ava Chamber of Commerce

Branson Chamber of Commerce

Branson Lakes Area Chamber of Commerce

Camdenton Area Chamber of Commerce

Cumberland Falmouth Community Chamber of

Commerce

Fort Smith Chamber of Commerce

Gallatin Chamber of Commerce

Greater West Plains Chamber of Commerce

Hollister Chamber of Commerce

Kennebec Valley Chamber of Commerce

Lake Area Chamber of Commerce

Lake of the Ozarks Chamber of Commerce

Lake West Chamber of Commerce

Lebanon Chamber of Commerce

Maine State Chamber of Commerce

Mid-Maine Chamber of Commerce

Missouri Chamber of Commerce

Mountain Grove Chamber of Commerce

Muldrow Chamber of Commerce

Oklahoma State Chamber of Commerce

Portland Regional Chamber

Poteau Chamber of Commerce

Sallisaw Chamber of Commerce

Van Buren Chamber of Commerce

Warsaw Chamber of Commerce

Yarmouth Chamber of Commerce

Community Economic Impact

At Summit, we embrace the concept of excellence in corporate sustainability, recognizing that it extends beyond environmental efforts and philanthropy. Our commitment extends to being reliable partners in the communities we operate in. Through ongoing efforts to community engagement, charitable giving, and fostering economic development, we aim to leave a lasting positive impact on the regions we proudly serve and call home.

\$261,300,000 SUPPLIER PAYMENTS

As we source materials and services from nearby suppliers, we actively foster a network of partnerships, supporting the growth of local industries and promoting economic resilience.

\$52,900,000 SALES & USE TAX**

The taxes we pay, including income, property, and sales taxes, play a pivotal role in funding essential public services, such as education, infrastructure development, and healthcare.

\$302,700,000 CADITAL INVESTMENT

Capital investments improve our extensive natural gas infrastructure systems' safety, reliability, and resiliency while also creating local, well-paying careers.



\$145,700,000 EMPLOYEE COMPENSATION

(Wages & Benefits)*

Our commitment to providing high-quality goods and services contributes to the growth and sustainability of local businesses.

\$18,900,000 PROPERTY TAXES

We prioritize hiring from the local talent pool whenever possible, promoting workforce diversity and enhancing the region's overall economic well-being.

\$22,300,000 CITY FRANCHISE FEES***

Paying franchise fees directly improves public spaces, parks, and recreational facilities, fostering a stronger sense of community and social cohesion.

^{*} Benefits include employer contributions for health and welfare benefits as well as 401(k) and retirement contributions.

^{**} Depending on state and local laws, we must collect sales tax from customers on taxable sales of goods and services. We also pay taxes on certain purchases made by Summit that the vendor or service provider has not previously taxed.

^{***}Payments made to local governments for use of public rights-of-way.



At Summit, our pursuit of excellence is driven by the passion and dedication of our team members. They are the architects of our innovation, the stewards of our integrity, and the champions of our culture.

Our team's diverse talents and perspectives transform challenges into opportunities and visions into realities, enabling us to deliver reliable energy solutions that positively impact our communities. We foster a culture of excellence by encouraging every team member to reach their potential in an inclusive, collaborative, and continuously improving environment.

We invest in our workforce's well-being, development, and empowerment, recognizing that a motivated team is vital to achieving our goals. This year, we celebrate the excellence demonstrated by our team in every project and initiative, from innovative energy solutions to community engagement.

ESG PERFORMANCE

SOCIAL GOALS ACHIEVED IN 2023:

- Achieved diversity, equity, and inclusion targets in accordance with SUI's DEI plan.
- Launched Summit's first Employee Resource Group.

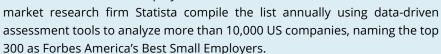
KEY 2024 SOCIAL GOALS:

• Complete four company-wide Diversity, Equity, and Inclusion trainings.

2023 Awards & Accomplishments

SUMMIT UTILITIES, INC. NAMED ONE OF FORBES AMERICA'S BEST SMALL EMPLOYERS

In 2023, Summit was honored to be named one of Forbes' America's Best Small Employers for 2023. Forbes and



"At Summit, people are at the heart of everything we do, which is why we are incredibly honored to be named one of Forbes' Best Small Employers in the country. This accolade is a testament to our commitment to providing every member of the Summit family the tools, resources, and support they need to provide safe and reliable natural gas services to homeowners and businesses across our operating companies every day. Putting people first is what makes Summit strong."

-KURT ADAMS,

President and CEO of Summit Utilities, Inc.

BEST PLACES TO WORK IN ARKANSAS

Summit Utilities Arkansas was named one of Arkansas Business's Best Places to Work in 2023. This was the first year Summit has participated in the program and received this recognition.

BEST PLACES TO WORK IN MISSOURI

Summit Natural Gas of Missouri was named one of Biz 417's 2023 Best Places to Work in the large employer category. The Southwest Missouri regional awards program identifies, recognizes, and honors the best places of employment in the area.

BEST PLACES TO WORK IN MAINE

Summit Natural Gas of Maine was named one of the 2023 Best Places to Work in Maine in the large company category. It is the fifth year Summit has received this honor.

BEST PLACES TO WORK IN OKLAHOMA

Summit Utilities Oklahoma was named one of the 2023 Best Places to Work in Oklahoma. Summit has received this honor for two consecutive years.





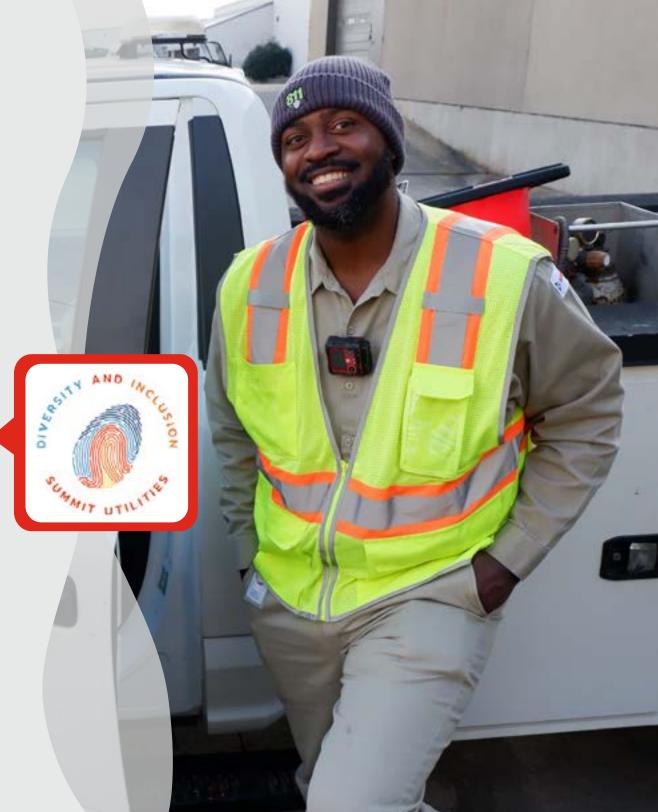
Diversity and Inclusion Committee

At Summit, the Diversity and Inclusion Committee (D&I Committee) plays a pivotal role in championing a workplace where excellence thrives through diversity and inclusivity. This dynamic group, composed of individuals from varied backgrounds, is dedicated to enhancing our organizational culture by celebrating differences and fostering a sense of belonging.

In 2023, the D&I Committee focused on initiatives that promoted inclusion and advanced communication and fortified our mission to create a respectful work environment. By embracing individual uniqueness, the committee ensures that excellence is reflected in our interactions, ideas, and innovations.

THE D&I COMMITTEE'S 2023 ACCOMPLISHMENTS INCLUDE:

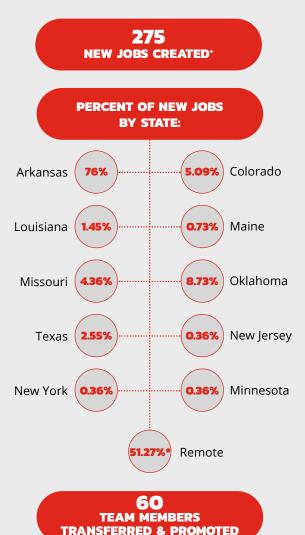
- Launched Summit's First ERG: MAVS (Military and Veterans Support) is Summit's first Employee Resource Group (ERG) with a mission to provide support and resources to our veterans and active military members, their families and friends. This initiative fosters a sense of community and enhances our understanding and appreciation of military experiences within Summit.
- Expanded D&I Communications: Enhanced communications initiatives further amplified our commitment to diversity and inclusion. This included the launch of team member-created videos, which offered a platform for our team to share their stories and perspectives, enriching our company culture.
- Updated Summit's Meeting Norms: In our pursuit
 of inclusivity, we updated our company's meeting
 norms. These new norms are designed to ensure
 every voice is heard and valued, fostering an
 environment where diverse perspectives are
 welcomed and actively sought out.



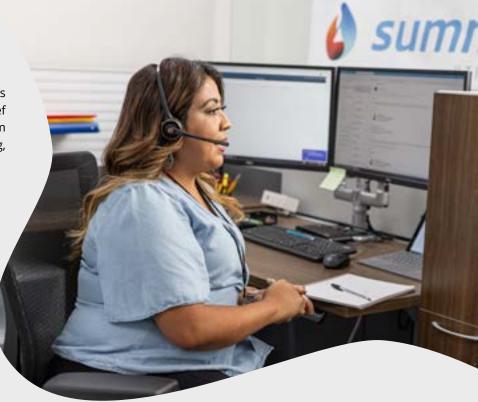
Working at Summit

GROWTH

In 2023, Summit expanded significantly by welcoming new team members across various departments and locations. This growth underscores our commitment to excellence and belief in the value of fresh perspectives to drive innovation and success. By investing in our new team members from the outset, we ensure that their journey with Summit is productive and enriching, reflecting our dedication to excellence and shared success.



⁺The new jobs created in 2023 represent additional roles within the company and were distinct from the 567 team members who joined Summit as a result of the acquisition.



EDUCATION REIMBURSEMENT

At Summit, we're not just about jobs—we're about cultivating dynamic careers that evolve with our dedicated team members. We believe in fostering an environment where unique talents and passions can flourish. From the moment someone joins us, they embark on lifelong learning and professional development.

A crucial part of this journey is our education reimbursement benefit, which supports our employees in pursuing further education and professional certifications. This benefit is designed to empower our team members to enhance their skills, explore areas of interest, and advance their careers. Alongside our commitment to internal mobility and the opportunity to work on projects that intrigue them, our education reimbursement program ensures that each career path is tailored to individual aspirations and growth.

We're proud to be a place where tangible resources support professional growth and careers can genuinely thrive.

^{*}This number represents other states not listed above. In total, 51.27% new jobs in 2023 were remote.



Engagement and Feedback

In 2023, Summit continued its dedication to open communication by actively gathering insights from our valued team members. Utilizing a dynamic employee engagement survey tool and fostering our long-standing "speak up" culture, we remain committed to understanding and responding to our team's sentiments.

Each quarter, we provide an anonymous survey, giving our team a candid platform to share their thoughts on critical issues within the company. This approach allows us to monitor trends and empowers employees to voice their perspectives on safety, workload, job satisfaction, DEI initiatives, and other essential topics. By consistently seeking and valuing their feedback, we ensure that our commitment to excellence is reflected in every aspect of our workplace culture, driving continuous improvement and alignment with our team's needs and aspirations.

ENGAGEMENT PERFORMANCE:

Meaningful progress comes from the ability to measure impact. In November 2023, the Summit team scored an 84% engagement rate, 9% over our 75% benchmark.

Compensation and Benefits

At Summit, we are committed to supporting our team members at every stage of their journey, recognizing that excellence in our workforce begins with their well-being. We offer competitive pay and a comprehensive benefits package designed to provide flexibility, choice, and essential support when needed most.

Our benefits are thoughtfully crafted to extend beyond the workplace, reflecting the importance of home and family. By prioritizing overall well-being, we ensure our team has the resources and assistance required to excel professionally and personally. This commitment to comprehensive support empowers our employees to achieve excellence in their roles and contributes to a thriving, engaged workforce.

HERE'S A GLIMPSE OF WHAT WE'RE PROUD TO PROVIDE*:

- Competitive pay, including pay-for-performance incentives
- Robust medical, dental, and vision plans
- Pet insurance
- Legal insurance
- ID Theft Protection
- Flexible spending accounts
- Employer contributions to Health Savings Accounts
- Company-paid life and disability coverage
- Accident insurance
- 401k retirement savings plan with a generous employer match and immediate vesting
- Flexible paid time off (PTO), as well as paid holidays and floating holidays
- Paid volunteer time off for all employees
- Parental leave to all parents for the birth or adoption of a child
- Adoption assistance
- Wellness program that encourages healthy living
- Education reimbursement to support growth and skill development
- Employee Assistance Program
- Flexible work arrangements including remote work

^{*}A Collective Bargaining Agreement governs benefits for some positions in Arkansas and Oklahoma and may differ from the benefits we provide to our other employees.

New offerings for team members in 2023

At Summit, our annual commitment to enhancing the well-being of our team members reflects our dedication to excellence in every aspect of their growth, happiness, and work-life balance. By actively listening to our team members and understanding their goals, we continually innovate our offerings, providing diverse resources designed to empower them personally and professionally. This approach ensures that our benefits support their immediate needs and contribute to their long-term success and fulfillment, fostering an environment where excellence can flourish.

SUMMIT4HEALTH

Recognizing the importance of our team members' total well-being, Summit launched the Summit4Health wellness program in 2023. This initiative is designed to motivate, educate, and provide essential resources across four key pillars of



well-being: Physical, Emotional, Financial, and Social. Summit4Health offers a comprehensive approach that helps employees maintain a healthy quality of life, manage stress, achieve financial stability, and foster a sense of belonging. This program empowers our team to thrive personally and professionally, exemplifying our commitment to excellence in every aspect of their lives.

REAL APPEAL

As part of our Summit4Health wellness program, Summit introduced Real Appeal in 2023. This 52-week online weight loss program is available at no additional cost to employees, spouses, and dependents covered under Summit's medical plans with United HealthCare. Appeal offers personalized support and motivational resources through convenient online access.

Participants benefit from weekly online meetings with a personal coach and have the flexibility to schedule one-on-one sessions tailored to their health goals. The program provides practical guidance on meal prepping, cooking low-calorie meals, and maintaining a healthy lifestyle. With access to a supportive community, a user-friendly website, and a mobile app, participants can set goals, track meals and activity, stream expert-led workouts, and explore hundreds of recipes. Real Appeal exemplifies our commitment to enhancing employee well-being by offering innovative resources that support a healthy lifestyle.

NEW POLICIES

In 2023, Summit introduced several new policies to enhance our work environment and support the evolving needs of our team members. By continually updating our policies, we ensure that our practices align with current standards and best serve our employees, promoting a balanced, equitable, and productive organizational culture.

- Employment and Payroll Practice Policy
- · Employment of Relatives Policy
- Holiday Policy
- Leaving Summit Policy
- Remote Work Policy

DENTAL AND MEDICAL UPDATES

In response to team member feedback, we enhanced our benefits package to include adult orthodontia and improved medical coverage for conditions like diabetes. We also introduced a new Critical Illness plan as part of our voluntary benefit options.



2023 Workforce Demographics

TOTAL EMPLOYEES





PART TIME EMPLOYEE

PERCENT OF TOTAL EMPLOYEES BY STATE:





COLORADO



MAINE



MISSOURI







ALL OTHER STATES

EXECUTIVE LEADERSHIP POSITIONS HELD BY WOMEN

35%



ETHNIC DIVERSITY*



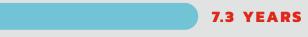
VETERANS*



REPRESENTED BY UNIONS



AVERAGE TENURE



VOLUNTARY TURNOVER RATE



RETIREMENT RATE



*Based on employee self-reporting.

Parent Company: Summit Utilities, Inc.

Business Type(s): LDC

State(s) of Operation: Arkansas, Colorado, Maine, Missouri, Oklahoma, Texas

Regulatory Environment: Regulated Report Date: December 31, 2023



Summit Utilities, Inc.		
METHANE EMISSIONS AND MITIGATION FROM DISTRIBUTION MAINS-2023		
Number of Gas Distribution Customers		
Plastic (miles)	659,139	
Cathodically Protected Steel - Bare & Coated (miles)	13,697	
Unprotected Steel - Bare & Coated (miles)	8,370	
Cast Iron / Wrought Iron - without upgrades (miles)	315	
Unprotected Steel (Bare & Coated) (# years to complete)	0	
Cast Iron / Wrought Iron (# years to complete)	0	
EMISSIONS		
CO2e Fugitive Methane Emissions from Gas Distribution Operations (metric tons)	157,240	
CH4 Fugitive Methane Emissions from Gas Distribution Operations (metric tons)	5,879	
CH4 Fugitive Methane Emissions from Gas Distribution Operations (MMSCF/year)	290	
Annual Natural Gas Throughput from Gas Distribution Operations in thousands of standard cubic feet (Mscf/year)	94,076,780	
Annual Methane Gas Throughput from Gas Distribution Operations in millions of standard cubic feet (MMscf/year)	87,867	
Fugitive Methane Emissions Rate (Percent MMscf of Methane Emissions per MMscf of Methane Throughput)	3%	

Parent Company: Summit Utilities, Inc.

Operating Company: Arkansas Oklahoma Gas Corporation

Business Type(s): LDC

State(s) of Operation: Arkansas, Oklahoma Regulatory Environment: Regulated Report Date: December 21, 2023



Arkansas Oklahoma Gas Corporation		
METHANE EMISSIONS AND MITIGATION FROM DISTRIBUTION MAINS-2023		
Number of Gas Distribution Customers	61,431	
Plastic (miles)	1,513	
Cathodically Protected Steel - Bare & Coated (miles)	650	
Unprotected Steel - Bare & Coated (miles)	269	
Cast Iron / Wrought Iron - without upgrades (miles)	0	
Unprotected Steel (Bare & Coated) (# years to complete)	5	
Cast Iron / Wrought Iron (# years to complete)	0	
EMISSIONS		
CO2e Fugitive Methane Emissions from Gas Distribution Operations (metric tons)	25,232	
CH4 Fugitive Methane Emissions from Gas Distribution Operations (metric tons)	970	
CH4 Fugitive Methane Emissions from Gas Distribution Operations (MMSCF/year)		
Annual Natural Gas Throughput from Gas Distribution Operations in thousands of standard cubic feet (Mscf/year)	9,597,383	
Annual Methane Gas Throughput from Gas Distribution Operations in millions of standard cubic feet (MMscf/year)	8,964	
Fugitive Methane Emissions Rate (Percent MMscf of Methane Emissions per MMscf of Methane Throughput)	0.5%	

Parent Company: Summit Utilities, Inc.
Operating Company: Colorado Natural Gas

Business Type(s): LDC

State(s) of Operation: Colorado Regulatory Environment: Regulated Report Date: December 31, 2023



Colorado Natural Gas, Inc.		
METHANE EMISSIONS AND MITIGATION FROM DISTRIBUTION MAINS-2023		
Number of Gas Distribution Customers	25,596	
Plastic (miles)	1,223	
Cathodically Protected Steel - Bare & Coated (miles)	106	
Unprotected Steel - Bare & Coated (miles)	0	
Cast Iron / Wrought Iron - without upgrades (miles)	0	
Unprotected Steel (Bare & Coated) (# years to complete)	0	
Cast Iron / Wrought Iron (# years to complete)	0	
EMISSIONS		
CO2e Fugitive Methane Emissions from Gas Distribution Operations (metric tons)	5,076	
CH4 Fugitive Methane Emissions from Gas Distribution Operations (metric tons)		
CH4 Fugitive Methane Emissions from Gas Distribution Operations (MMSCF/year)		
Annual Natural Gas Throughput from Gas Distribution Operations in thousands of standard cubic feet (Mscf/year)	2,323,086	
Annual Methane Gas Throughput from Gas Distribution Operations in millions of standard cubic feet (MMscf/year)		
Fugitive Methane Emissions Rate (Percent MMscf of Methane Emissions per MMscf of Methane Throughput)	0.4%	

Parent Company: Summit Utilities, Inc.

Operating Company: Summit Natural Gas of Maine, Inc.

Business Type(s): LDC

State(s) of Operation: Maine

Regulatory Environment: Regulated Report Date: December 31, 2023



Summit Natural Gas of Maine, Inc.		
METHANE EMISSIONS AND MITIGATION FROM DISTRIBUTION MAINS-2023		
Number of Gas Distribution Customers	5,957	
Plastic (miles)	247	
Cathodically Protected Steel - Bare & Coated (miles)	.46	
Unprotected Steel - Bare & Coated (miles)	0	
Cast Iron / Wrought Iron - without upgrades (miles)	0	
Unprotected Steel (Bare & Coated) (# years to complete)		
Cast Iron / Wrought Iron (# years to complete)	0	
EMISSIONS		
CO2e Fugitive Methane Emissions from Gas Distribution Operations (metric tons)	1,733	
CH4 Fugitive Methane Emissions from Gas Distribution Operations (metric tons)		
CH4 Fugitive Methane Emissions from Gas Distribution Operations (MMSCF/year)		
Annual Natural Gas Throughput from Gas Distribution Operations in thousands of standard cubic feet (Mscf/year)	3,554,056	
Annual Methane Gas Throughput from Gas Distribution Operations in millions of standard cubic feet (MMscf/year)		
Fugitive Methane Emissions Rate (Percent MMscf of Methane Emissions per MMscf of Methane Throughput)	0.07%	

Parent Company: Summit Utilities, Inc.

Operating Company: Summit Natural Gas of Missouri, Inc.

Business Type(s): LDC

State(s) of Operation: Missouri Regulatory Environment: Regulated Report Date: December 31, 2023



Summit Natural Gas of Missouri, Inc.		
METHANE EMISSIONS AND MITIGATION FROM DISTRIBUTION MAINS-2023		
Number of Gas Distribution Customers	21,583	
Plastic (miles)	1,076	
Cathodically Protected Steel - Bare & Coated (miles)	201	
Unprotected Steel - Bare & Coated (miles)	0	
Cast Iron / Wrought Iron - without upgrades (miles)	0	
Unprotected Steel (Bare & Coated) (# years to complete)	0	
Cast Iron / Wrought Iron (# years to complete)	0	
EMISSIONS		
CO2e Fugitive Methane Emissions from Gas Distribution Operations (metric tons)	6,900	
CH4 Fugitive Methane Emissions from Gas Distribution Operations (metric tons)	246	
CH4 Fugitive Methane Emissions from Gas Distribution Operations (MMSCF/year)	12	
Annual Natural Gas Throughput from Gas Distribution Operations in thousands of standard cubic feet (Mscf/year)	3,489,399	
Annual Methane Gas Throughput from Gas Distribution Operations in millions of standard cubic feet (MMscf/year)	3,259	
Fugitive Methane Emissions Rate (Percent MMscf of Methane Emissions per MMscf of Methane Throughput)	0.4%	

Parent Company: Summit Utilities, Inc.

Operating Company: Summit Utilities Arkansas, Inc.

Business Type(s): LDC

State(s) of Operation: Arkansas Regulatory Environment: Regulated Report Date: December 31, 2023



Summit Utilities Arkansas, Inc Arkansas		
METHANE EMISSIONS AND MITIGATION FROM DISTRIBUTION MAINS-2023		
Number of Gas Distribution Customers	424,646	
Plastic (miles)	8,363	
Cathodically Protected Steel - Bare & Coated (miles)	5,498	
Unprotected Steel - Bare & Coated (miles)	33	
Cast Iron / Wrought Iron - without upgrades (miles)	0	
Unprotected Steel (Bare & Coated) (# years to complete)		
Cast Iron / Wrought Iron (# years to complete)	0	
EMISSIONS		
CO2e Fugitive Methane Emissions from Gas Distribution Operations (metric tons)	90,300	
CH4 Fugitive Methane Emissions from Gas Distribution Operations (metric tons)		
CH4 Fugitive Methane Emissions from Gas Distribution Operations (MMSCF/year)		
Annual Natural Gas Throughput from Gas Distribution Operations in thousands of standard cubic feet (Mscf/year)	61,408,124	
Annual Methane Gas Throughput from Gas Distribution Operations in millions of standard cubic feet (MMscf/year)	57,355	
Fugitive Methane Emissions Rate (Percent MMscf of Methane Emissions per MMscf of Methane Throughput)	0.3%	

Parent Company: Summit Utilities, Inc.

Operating Company: Summit Utilities Arkansas, Inc.

Business Type(s): LDC State(s) of Operation: Texas

Regulatory Environment: Regulated Report Date: December 31, 2023



Summit Utilities Arkansas, Inc Texas		
METHANE EMISSIONS AND MITIGATION FROM DISTRIBUTION MAINS-2023		
Number of Gas Distribution Customers	15,034	
Plastic (miles)	246	
Cathodically Protected Steel - Bare & Coated (miles)	165	
Unprotected Steel - Bare & Coated (miles)	0.1	
Cast Iron / Wrought Iron - without upgrades (miles)	0	
Unprotected Steel (Bare & Coated) (# years to complete)	0	
Cast Iron / Wrought Iron (# years to complete)	0	
EMISSIONS		
CO2e Fugitive Methane Emissions from Gas Distribution Operations (metric tons)	2,620	
CH4 Fugitive Methane Emissions from Gas Distribution Operations (metric tons)	105	
CH4 Fugitive Methane Emissions from Gas Distribution Operations (MMSCF/year)		
Annual Natural Gas Throughput from Gas Distribution Operations in thousands of standard cubic feet (Mscf/year)	1,246,798	
Annual Methane Gas Throughput from Gas Distribution Operations in millions of standard cubic feet (MMscf/year)	1,165	
Fugitive Methane Emissions Rate (Percent MMscf of Methane Emissions per MMscf of Methane Throughput)	0.4%	

Parent Company: Summit Utilities, Inc.

Operating Company: Summit Utilities Oklahoma, Inc.

Business Type(s): LDC

State(s) of Operation: Oklahoma Regulatory Environment: Regulated Report Date: December 31, 2023



Summit Utilities Oklahoma, Inc.			
METHANE EMISSIONS AND MITIGATION FROM DISTRIBUTION MAINS-2023			
Number of Gas Distribution Customers	104,892		
Plastic (miles)	1,029		
Cathodically Protected Steel - Bare & Coated (miles)	1,750		
Unprotected Steel - Bare & Coated (miles)	12		
Cast Iron / Wrought Iron - without upgrades (miles)	0		
Unprotected Steel (Bare & Coated) (# years to complete)	0		
Cast Iron / Wrought Iron (# years to complete)	0		
EMISSIONS			
CO2e Fugitive Methane Emissions from Gas Distribution Operations (metric tons)	25,379		
CH4 Fugitive Methane Emissions from Gas Distribution Operations (metric tons)	951		
CH4 Fugitive Methane Emissions from Gas Distribution Operations (MMSCF/year)			
Annual Natural Gas Throughput from Gas Distribution Operations in thousands of standard cubic feet (Mscf/year)	12,457,934		
Annual Methane Gas Throughput from Gas Distribution Operations in millions of standard cubic feet (MMscf/year)			
Fugitive Methane Emissions Rate (Percent MMscf of Methane Emissions per MMscf of Methane Throughput)	0.4%		

Statement of use Summit Utilities, Inc. has reported the information cited in this GRI content index	
	for the period January 1, 2023 to December 31, 2023 with reference to the GRI
	Standards.
GRI 1 used	GRI 1: Foundation 2021

GRI STANDARD	DISCLOSURE	LOCATION
GRI 2: General Disclosures 2021	2-1 Organizational details	Our Company, Page 4
	2-2 Entities included in the organization's	Our Company, Page 4-5
	sustainability reporting	
	2-3 Reporting period, frequency and contact point	Our Report, Page 3
	2-4 Restatements of information	n/a
	2-5 External assurance	n/a
	2-6 Activities, value chain and other business	n/a
	relationships	
	2-7 Employees	2023 Workforce Demographics, Page 46
	2-8 Workers who are not employees	n/a
	2-9 Governance structure and composition	Meet Summit's Board of Directors, Page 14
	2-10 Nomination and selection of the highest	Meet Summit's Board of Directors, Page 14
	governance body	
	2-11 Chair of the highest governance body	Meet Summit's Board of Directors, Page 14
	2-12 Role of the highest governance body in	Meet Summit's Board of Directors, Page 14
	overseeing the management of impacts	
	2-13 Delegation of responsibility for managing	n/a
	impacts	
	2-14 Role of the highest governance body in	n/a
	sustainability reporting	
	2-15 Conflicts of interest	Meet Summit's Board of Directors, Page 14
	2-16 Communication of critical concerns	Whistleblower Protection, Page 15
	2-17 Collective knowledge of the highest	n/a
	governance body	
	2-18 Evaluation of the performance of the highest	n/a
	governance body	
	2-19 Remuneration policies	n/a
	2-20 Process to determine remuneration	n/a
	2-21 Annual total compensation ratio	n/a
	2-22 Statement on sustainable development	Letter from our CEO, Page 6-7
	strategy	

	2-23 Policy commitments	n/a
	2-24 Embedding policy commitments	n/a
	2-25 Processes to remediate negative impacts	n/a
	2-26 Mechanisms for seeking advice and raising	Meet Summit's Board of Directors, Page 14 and
	concerns	Whistleblower Protection, Page 15
	2-27 Compliance with laws and regulations	n/a
	2-28 Membership associations	Memberships & Associations, Page 38
	2-29 Approach to stakeholder engagement	Stakeholder Engagement, Page 35
	2-30 Collective bargaining agreements	2023 Workforce Demographics, Page 46
GRI 3: Material Topics 2021	3-1 Process to determine material topics	n/a
	3-2 List of material topics	
	3-3 Management of material topics	
GRI 201: Economic Performance 2016	201-1 Direct economic value generated and	n/a
	distributed	
	201-2 Financial implications and other risks and	
	opportunities due to climate change	
	201-3 Defined benefit plan obligations and other	
	retirement plans	
	201-4 Financial assistance received from	1
	government	
GRI 202: Market Presence 2016	202-1 Ratios of standard entry level wage by gender	n/a
	compared to local minimum wage	
	202-2 Proportion of senior management hired from	
	the local community	
GRI 203: Indirect Economic Impacts 2016	203-1 Infrastructure investments and services	Community Economic Impact, Page 39
•	supported	
	203-2 Significant indirect economic impacts	Community Economic Impact, Page 39
GRI 204: Procurement Practices 2016	204-1 Proportion of spending on local suppliers	n/a
GRI 205: Anti-corruption 2016	205-1 Operations assessed for risks related to	Anti-corruption, Page X
	corruption	
	205-2 Communication and training about anti-	1
	corruption policies and procedures	
	205-3 Confirmed incidents of corruption and	
	actions taken	
GRI 206: Anti-competitive Behavior 2016	206-1 Legal actions for anti-competitive behavior,	Anti-trust and Monopoly Guidelines, Page 15
,	anti-trust, and monopoly practices	
GRI 207: Tax 2019	207-1 Approach to tax	n/a
	207-2 Tax governance, control, and risk	
	management	

	207-3 Stakeholder engagement and management of	1
	concerns related to tax	-
	207-4 Country-by-country reporting	,
GRI 301: Materials 2016	301-1 Materials used by weight or volume	n/a
	301-2 Recycled input materials used	
	301-3 Reclaimed products and their packaging	
	materials	
GRI 302: Energy 2016	302-1 Energy consumption within the organization	n/a
	302-2 Energy consumption outside of the	n/a
	organization	
	302-3 Energy intensity	
	302-4 Reduction of energy consumption	
	302-5 Reductions in energy requirements of	
	products and services	
GRI 303: Water and Effluents 2018	303-1 Interactions with water as a shared resource	n/a
	303-2 Management of water discharge-related	1
	impacts	
	303-3 Water withdrawal	1
	303-4 Water discharge	1
	303-5 Water consumption	1
GRI 304: Biodiversity 2016	304-1 Operational sites owned, leased, managed in,	n/a
·	or adjacent to, protected areas and areas of high	
	biodiversity value outside protected areas	
	304-2 Significant impacts of activities, products and	1
	services on biodiversity	
	304-3 Habitats protected or restored	n/a
	304-4 IUCN Red List species and national	n/a
	conservation list species with habitats in areas	1174
	affected by operations	
CRI 205: Fii 2046		Fasiania na Daduntia a Dian Hardata Dana 10
GRI 305: Emissions 2016	305-1 Direct (Scope 1) GHG emissions	Emissions Reduction Plan Update, Page 18
	305-2 Energy indirect (Scope 2) GHG emissions	n/a
	305-3 Other indirect (Scope 3) GHG emissions	n/a
	305-4 GHG emissions intensity	n/a
	305-5 Reduction of GHG emissions	n/a
	305-6 Emissions of ozone-depleting substances	n/a
	(ODS)	

	305-7 Nitrogen oxides (NOx), sulfur oxides (SOx),	n/a
	and other significant air emissions	1770
GRI 306: Waste 2020	306-1 Waste generation and significant waste-	n/a
dia 500. Waste 2025	related impacts	1770
	306-2 Management of significant waste-related	
	impacts 306-3 Waste generated	
	306-4 Waste diverted from disposal	
	306-5 Waste directed to disposal	
GRI 308: Supplier Environmental Assessment 2016	·	n/a
dia 300. Supplier Environmental Assessment 2010	environmental criteria	11/4
	308-2 Negative environmental impacts in the	
	•	
CPI 401: Employment 2016	supply chain and actions taken 401-1 New employee hires and employee turnover	Working at Summit, Page 43
GRI 401: Employment 2016	401-1 New employee filles and employee turnover	Working at Summit, Page 43
	401-2 Benefits provided to full-time employees that	Compensation and Benefits, Page 44
	are not provided to temporary or part-time	
	employees	
	401-3 Parental leave	Compensation and Benefits, Page 44
GRI 402: Labor/Management Relations 2016	402-1 Minimum notice periods regarding	n/a
	operational changes	
GRI 403: Occupational Health and Safety 2018		Safety Culture, Page 27
GRI 403: Occupational Health and Safety 2018	403-1 Occupational health and safety management	Safety Culture, Page 27
GRI 403: Occupational Health and Safety 2018		Safety Culture, Page 27 Safety Culture, Page 27
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GRI 403: Occupational Health and Safety 2018	403-1 Occupational health and safety management system 403-2 Hazard identification, risk assessment, and incident investigation	Safety Culture, Page 27
GRI 403: Occupational Health and Safety 2018	403-1 Occupational health and safety management system 403-2 Hazard identification, risk assessment, and incident investigation 403-3 Occupational health services	
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GRI 403: Occupational Health and Safety 2018	403-1 Occupational health and safety management system 403-2 Hazard identification, risk assessment, and incident investigation 403-3 Occupational health services	Safety Culture, Page 27 Safety Culture, Page 27
GRI 403: Occupational Health and Safety 2018	403-1 Occupational health and safety management system 403-2 Hazard identification, risk assessment, and incident investigation 403-3 Occupational health services 403-4 Worker participation, consultation, and communication on occupational health and safety	Safety Culture, Page 27 Safety Culture, Page 27 Safety Culture, Page 27
GRI 403: Occupational Health and Safety 2018	403-1 Occupational health and safety management system 403-2 Hazard identification, risk assessment, and incident investigation 403-3 Occupational health services 403-4 Worker participation, consultation, and	Safety Culture, Page 27 Safety Culture, Page 27
GRI 403: Occupational Health and Safety 2018	403-1 Occupational health and safety management system 403-2 Hazard identification, risk assessment, and incident investigation 403-3 Occupational health services 403-4 Worker participation, consultation, and communication on occupational health and safety 403-5 Worker training on occupational health and	Safety Culture, Page 27 Safety Culture, Page 27 Safety Culture, Page 27 Safety Culture, Page 27
GRI 403: Occupational Health and Safety 2018	403-1 Occupational health and safety management system 403-2 Hazard identification, risk assessment, and incident investigation 403-3 Occupational health services 403-4 Worker participation, consultation, and communication on occupational health and safety 403-5 Worker training on occupational health and safety	Safety Culture, Page 27 Safety Culture, Page 27 Safety Culture, Page 27
GRI 403: Occupational Health and Safety 2018	403-1 Occupational health and safety management system 403-2 Hazard identification, risk assessment, and incident investigation 403-3 Occupational health services 403-4 Worker participation, consultation, and communication on occupational health and safety 403-5 Worker training on occupational health and safety 403-6 Promotion of worker health	Safety Culture, Page 27
GRI 403: Occupational Health and Safety 2018	403-1 Occupational health and safety management system 403-2 Hazard identification, risk assessment, and incident investigation 403-3 Occupational health services 403-4 Worker participation, consultation, and communication on occupational health and safety 403-5 Worker training on occupational health and safety 403-6 Promotion of worker health 403-7 Prevention and mitigation of occupational health and safety impacts directly linked by	Safety Culture, Page 27
GRI 403: Occupational Health and Safety 2018	403-1 Occupational health and safety management system 403-2 Hazard identification, risk assessment, and incident investigation 403-3 Occupational health services 403-4 Worker participation, consultation, and communication on occupational health and safety 403-5 Worker training on occupational health and safety 403-6 Promotion of worker health 403-7 Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	Safety Culture, Page 27
GRI 403: Occupational Health and Safety 2018	403-1 Occupational health and safety management system 403-2 Hazard identification, risk assessment, and incident investigation 403-3 Occupational health services 403-4 Worker participation, consultation, and communication on occupational health and safety 403-5 Worker training on occupational health and safety 403-6 Promotion of worker health 403-7 Prevention and mitigation of occupational health and safety impacts directly linked by business relationships 403-8 Workers covered by an occupational health	Safety Culture, Page 27 Stakeholder Safety, Page 28-29
GRI 403: Occupational Health and Safety 2018	403-1 Occupational health and safety management system 403-2 Hazard identification, risk assessment, and incident investigation 403-3 Occupational health services 403-4 Worker participation, consultation, and communication on occupational health and safety 403-5 Worker training on occupational health and safety 403-6 Promotion of worker health 403-7 Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	Safety Culture, Page 27 Stakeholder Safety, Page 28-29

	403-10 Work-related ill health	Safety Performance, Page 25
GRI 404: Training and Education 2016	404-1 Average hours of training per year per	Cybersecurity, Page 12 and Safety Training, Page 27
	employee	
	404-2 Programs for upgrading employee skills and	Working at Summit, Page 43
	transition assistance programs	
	404-3 Percentage of employees receiving regular	n/a
	performance and career development reviews	
GRI 405: Diversity and Equal Opportunity 2016	405-1 Diversity of governance bodies and	Meet Summit's Board of Directors, Page 14 and
	employees	Workforce Demographics, Page 46
	405-2 Ratio of basic salary and remuneration of	n/a
	women to men	
GRI 406: Non-discrimination 2016	406-1 Incidents of discrimination and corrective	n/a
	actions taken	
GRI 407: Freedom of Association and Collective	407-1 Operations and suppliers in which the right	n/a
Bargaining 2016	to freedom of association and collective bargaining	
	may be at risk	
GRI 408: Child Labor 2016	408-1 Operations and suppliers at significant risk	n/a
	for incidents of child labor	
GRI 409: Forced or Compulsory Labor 2016	409-1 Operations and suppliers at significant risk	n/a
	for incidents of forced or compulsory labor	
GRI 410: Security Practices 2016	410-1 Security personnel trained in human rights	n/a
	policies or procedures	
GRI 411: Rights of Indigenous Peoples 2016	411-1 Incidents of violations involving rights of	n/a
	indigenous peoples	
GRI 413: Local Communities 2016	413-1 Operations with local community	n/a
	engagement, impact assessments, and	
	413-2 Operations with significant actual and	
GRI 414: Supplier Social Assessment 2016	notential negative impacts on local communities 414-1 New suppliers that were screened using social	n/a
GKI 414. Supplier Social Assessment 2016	criteria	11/4
	414-2 Negative social impacts in the supply chain	
	and actions taken	
GRI 415: Public Policy 2016	415-1 Political contributions	n/a
GRI 416: Customer Health and Safety 2016	416-1 Assessment of the health and safety impacts	n/a
2 To. Casconier ficalen and surcey 2010	of product and service categories	1174
	416-2 Incidents of non-compliance concerning the	
	health and safety impacts of products and services	
	Thealth and safety impacts of products and services	

GRI 417: Marketing and Labeling 2016	417-1 Requirements for product and service	n/a
	information and labeling	
	417-2 Incidents of non-compliance concerning	
	product and service information and labeling	
	417-3 Incidents of non-compliance concerning	
	marketing communications	
GRI 418: Customer Privacy 2016	418-1 Substantiated complaints concerning	Cybersecurity, Page 12
	breaches of customer privacy and losses of	
	customer data	