

Fueling Agility



2024 CORPORATE SUSTAINABILITY REPORT



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Fueling Agility: About Summit

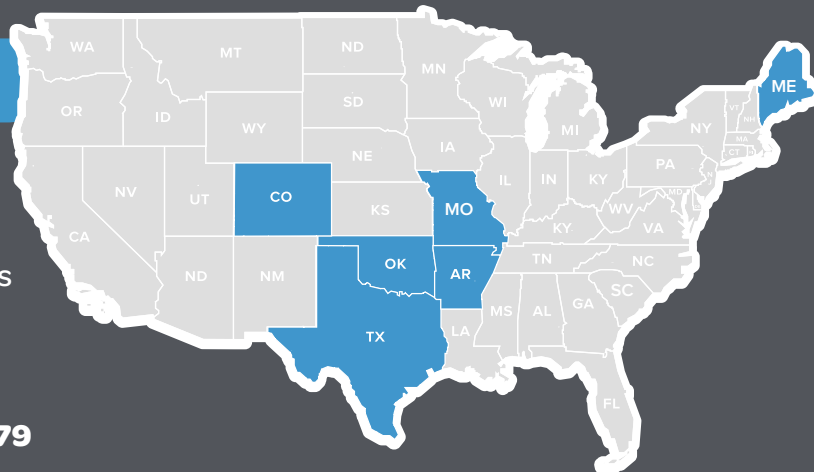
Summit operates in six states in the U.S.

Summit Utilities, Inc. (Summit) owns natural gas distribution subsidiaries that operate in Arkansas, Colorado, Maine, Missouri, Oklahoma and Texas. These subsidiaries work to safely provide reliable and affordable natural gas service to businesses and residents in six states through Arkansas Oklahoma Gas, Colorado Natural Gas, Summit Natural Gas of Maine, Summit Natural Gas of Missouri, Summit Utilities Arkansas and Summit Utilities Oklahoma. Additionally, Summit Utilities has a subsidiary, Peaks Renewables, which focuses on developing low carbon, carbon-neutral, and carbon-negative fuels like renewable natural gas and green hydrogen. Each of Summit's local natural gas distribution companies construct and install systems with the goal of supporting economic development by striving to provide safe and reliable natural gas service to residential and commercial customers, while providing exceptional customer service and commitment to the community.

Overall, Summit entities serve approximately 623,000 customers and operate more than 22,879 miles of pipeline. Summit is a wholly owned portfolio company of the Infrastructure Investments Fund, a private equity fund advised by J.P. Morgan Asset Management.

Summit At a Glance

- Formed in **1997**
- **1,496** employees
- Operations in **450** communities in **six** states
- Serves **~623,000** customers
- 2024 annual net revenue: **\$374 million**
- Miles of pipeline/distribution network: **22,879**





Letter from Our President and CEO

Energy empowers people—fueling homes, businesses, and the infrastructure we rely on every day. At Summit, our mission is to deliver safe, reliable, and essential natural gas to the communities we’re proud to serve. But we know that delivering energy today takes more than pipelines and meters—it takes the agility to adapt, improve, and respond to a world that’s constantly changing.

This year’s theme, Fueling Agility, reflects our commitment to staying ahead of the curve while staying true to our values. That means being responsive in the face of challenges, flexible in how we work, and focused on continuous improvement in every area of our business.

This agility is especially evident in our environmental stewardship efforts, which we view not just as a responsibility but as fundamental to good business. Managing our environmental footprint effectively creates value for all our stakeholders while ensuring we remain trusted stewards of our shared resources.

We’ve made meaningful progress—enhancing our systems, investing in infrastructure, strengthening relationships with stakeholders, and listening to our customers. We’re also building for the future by expanding renewable natural gas with Peaks Renewables, empowering our employees, and giving back to the communities we serve through programs like Summit Cares.

I’m particularly proud of our specific infrastructure initiatives, such as our pipe replacement projects in Arkansas and Oklahoma. These projects represent significant investments that improve safety, reduce emissions, and create long-term value—demonstrating how strategic ESG initiatives support our overall business objectives.

As we look toward the future, we remain committed to our ambitious goal of achieving zero net emissions by 2035. This isn’t just an aspiration—we’re developing clear pathways supported by accurate data and measurable milestones to ensure we can meet this target. Our progress is continuously

tracked and validated, including through external reviews, ensuring accountability and transparency in our journey.

What makes our ESG strategy truly effective is the cultural buy-in throughout our organization. Our teams understand that sustainable practices aren’t separate from our core business, they’re integral to how we operate every day. This culture of ownership has allowed us to reduce miles driven, improve efficiency, and create systems where every employee feels empowered to raise concerns and contribute ideas for improvement.

Rather than constantly launching new initiatives, we’re focused on executing and refining our existing ESG strategy. By reducing friction in our processes and improving what’s already working, we’re creating sustainable, long-term change that differentiates us from competitors and attracts capital from increasingly ESG-conscious investors.

Throughout it all, I’ve seen our team lead with urgency, integrity, and care. They show up every day ready to serve others—because to us, energy isn’t just a service. It’s a promise.

Thank you for trusting Summit. We’re honored to power your lives—and proud to be building a stronger, more agile utility for the future.

Kurt Adams
President & Chief Executive Officer

A handwritten signature in black ink, appearing to read 'K. Adams', with a long, sweeping horizontal line extending to the right.

Executive Summary

The 2024 Summit ESG Report outlines Summit Utilities' commitment to Environmental, Social, and Governance (ESG) principles, reflecting on the achievements of 2024 and setting goals for 2025. The report emphasizes the company's dedication to sustainability, community engagement, and operational excellence.

2024 ESG Highlights



FUELING GOVERNANCE

- Achieved a GRESB 5-star rating with a score of 98 out of 100.
- Invested 1,400 hours in cybersecurity training, supporting foundational system of compliance programs.
- The ESG Committee played a crucial role in enhancing sustainability and responsible practices.



FUELING SAFETY

- Received the Southern Gas Association's Emergency Management Award and the American Gas Association's Industry Leader Accident Prevention Certificate.
- Summit's Batesville, Arkansas team achieved 5,000 days without an accident or injury.



FUELING SUSTAINABILITY

- Deployed methane recapture technology, preventing 75 metric tons of CO₂e emissions from entering the atmosphere.
- Implemented advanced leak detection technology, methane recapture systems, and AI-driven work order systems to optimize operations and reduce emissions.
- Conserved 5.29 million therms¹ of gas through energy efficiency programs
- The Renewable Natural Gas (RNG) dairy digester project in Maine produced 80,219 MMBtu of RNG in 2024.



FUELING COMMUNITIES

- Deployed methane recapture technology, preventing 75 metric tons of CO₂e emissions from entering the atmosphere.
- Implemented advanced leak detection technology, methane recapture systems, and AI-driven work order systems to optimize operations and reduce emissions.



FUELING OUR PEOPLE

- Summit Natural Gas of Maine was Named 2024 Best Places to Work in Maine for the Sixth Year in a Row
- Launched the Women Igniting Success & Empowerment and the Military and Veteran Support Employee Resource Groups, both of which are open to all employees.
- Provided varied opportunities for professional development and introduced new benefits like expanded dental coverage and critical illness coverage.



FUELING OUR SUPPLY CHAIN

- Implemented a Supplier University Dashboard to enhance supplier performance monitoring.
- Established baseline measurements for supplier development, with 3.6% of supplier spend with small businesses.

¹ Includes the following Summit subsidiaries: Summit Utilities Arkansas, Arkansas Oklahoma Gas, Summit Natural Gas of Missouri, Summit Utilities Oklahoma, and Colorado Natural Gas.

About Our Report

At Summit Utilities, agility shapes our commitment to sustainability principles, enabling us to adapt and respond quickly in our innovative efforts towards sustainability, reducing our carbon footprint, and enhancing community well-being, safety, and inclusivity. Agility also informs our governance practices, emphasizing our ability to pivot with integrity, transparency, and the pursuit of continuous improvement.

Transparency serves as a guiding principle throughout our ESG framework. We believe that open and honest communication with all stakeholders is essential to building trust and driving meaningful progress. With this commitment to transparency in mind, we present this report, disclosing our methodology and strategies regarding ESG initiatives while documenting our achievements and areas for growth.

This year's report showcases how integrating agility with ESG principles directs Summit Utilities towards a sustainable energy future, ensuring we remain responsive and effective in creating a lasting positive impact on our planet and communities.



At Summit, achieving our goals and getting the job done isn't enough. How we do it matters just as much, which is why we are committed to fostering Summit's values, Pioneer, Excellence, Agility, Kindness and Safety, every day.

Summit is pleased to use the Global Reporting Initiative (GRI) Standards, the world's first and most used global standard for sustainability reporting, as a reference for this report.

The Standards identify the most relevant issues for inclusion in sustainability reports. They also enhance the comparability and quality of information on economic, environmental and social impacts (positive and negative) organizations have. They also create a common language to communicate that information to various stakeholders. This report is published annually and contains Standard GRI Disclosures throughout the report for calendar year 2024. The GRI Content Index can be found on page 59.

Summit's Approach to ESG

At Summit Utilities, we recognize that being a responsible energy provider extends beyond our day-to-day operations. Serving communities across diverse landscapes, from Colorado's majestic mountains to Maine's vibrant lakes and streams, we understand our responsibility as environmental stewards, engaged community members, and ethical business leaders.

Our approach to Environmental, Social, and Governance (ESG) is embedded in our corporate identity. We view ESG principles as integral to our business strategy, acknowledging that our ESG performance significantly impacts our long-term operational success in delivering energy solutions, fostering employee well-being, securing capital access, and ensuring business growth and longevity.

GUIDING PRINCIPLES

Our ESG approach is guided by several core principles:

- **Regulatory Excellence:** We commit to complying or even exceeding applicable regulations and best practices governing our operations, human rights protection, environmental stewardship, and health and safety.
- **Ethical Leadership:** We adhere to the highest standards of ethical conduct, avoiding corrupt business practices and conflicts of interest.
- **Industry Innovation:** We actively embrace opportunities to lead and drive change throughout the energy industry, particularly regarding environmental stewardship.
- **Risk Management:** We identify and assess material ESG risks and opportunities as part of evaluating growth opportunities and manage these factors following acquisitions, including those arising through supply chains.
- **Community Engagement:** We support and encourage employee involvement in community organizations through paid volunteer time off and corporate giving initiatives.

ESG Materiality²

To ensure our ESG efforts address the most significant impacts of our business, we employ a structured materiality assessment approach. We have leveraged the [Global Real Estate Sustainability Benchmarks Infrastructure Asset Benchmark Report](#) (GRESB) to identify and prioritize ESG factors that are most relevant to our operations and stakeholders. This framework helps us systematically evaluate which aspects of ESG have the greatest influence on our business success and societal impact. By focusing our resources on these material areas, we maximize the effectiveness of our initiatives and ensure alignment between our ESG activities and business objectives.

See Appendix B for a full list of ESG topics and their relevance to our operations.



Accountability and Transparency

We are committed to accountability in our ESG journey through:

- Assigning and maintaining ESG responsibilities with senior managers
- Regularly reviewing our approach for effectiveness and implementation
- Reporting relevant findings, progress, and recommendations to our Board
- Making our ESG policy and related information available to all employees and the public
- Ensuring appropriate ESG disclosure to shareholders and other stakeholders
- Fostering dialogue on ESG issues with all relevant parties

Our customer-centric corporate environment embraces innovation, accountability, diversity, and kindness toward each other, our customers, our stakeholders, and the communities we serve. We continuously strive for improvement in our ESG performance, recognizing that the journey toward sustainability is ongoing and evolving.

² Materiality in the context of ESG and this report refers to the identification of topics that have been identified as significant within the scope of Summit's ESG report and for shaping our ESG strategy. It should not be interpreted as an indication of the importance of this information to the business or financial outcomes.

United Nations Sustainable Development Goals

At Summit, we consider our approach taking the United Nations' Sustainable Development Goals (UNSDGs) into account where material. We take pride in the progress we've made on our stakeholders' long-term sustainability goals and, where financially material, set appropriate goals to safeguard our ability to participate in a more sustainable future. Through our core business, we actively contribute to several of the SDGs, 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 focused on delivering outcomes for our stakeholders, including participating in the path to a greener and more inclusive world.

The table below provides an overview of how the company contributes to some of the UNSDGs.

UN Sustainable Development Goal (SDG)	Summit's Contributions	More Information
SDG 7: Affordable and Clean Energy	Invests in renewable energy initiatives, such as the RNG dairy digester, to provide sustainable and modern energy solutions.	Pages 32-33
SDG 9: Industry, Innovation, and Infrastructure	Implements innovative technologies, such as methane recapture and advanced leak detection, to improve energy efficiency and infrastructure.	Pages 28-29, 33
SDG 11: Sustainable Cities and Communities	Invests in safer, more reliable energy infrastructure and supports community engagement through disaster response efforts.	Pages 19, 35-40, 43, 59
SDG 12: Responsible Consumption and Production	Enhances GHG emissions reporting and develops a sustainable supply chain.	Page 53
SDG 13: Climate Action	Targets net-zero Scope 1 emissions by 2035, reduces carbon footprint through pipeline replacements, and expands renewable natural gas projects.	Pages 26-30, 32-33
SDG 15: Life on Land	Implements comprehensive biodiversity protection practices, safeguards threatened and endangered species habitats, minimizes wetland impacts, schedules vegetation management around wildlife breeding seasons, and prioritizes native species in revegetation efforts.	Pages 30-31



7: Affordable and Clean Energy



9: Industry, Innovation and Infrastructure



11: Sustainable Cities and Communities



12: Responsible Consumption and Production



13: Climate Action



15: Life on Land



Fueling Governance

Fueling Governance

At Summit, we understand that strong governance is essential for long-term financial success and for navigating a dynamic and evolving landscape. Fueling Agility means embedding environmental, social, and governance (ESG) principles into our decision-making to remain adaptable, resilient, and forward-thinking. As we reflect on our 2024 achievements, we recognize that the path to strong governance is one of continuous evolution—challenging us to refine our approach, anticipate change, and integrate sustainability at every level. In this section, we share our progress and aspirations, demonstrating how agility in governance drives lasting positive impact.

2024 HIGHLIGHTS

- **Achieved a 5-star rating from GRESB (Global Real Estate Sustainability Benchmark),** scoring 98 out of 100 for strong governance performance.
- **Invested in Cybersecurity and Compliance:** Summit invested in 1,400 hours of cybersecurity training and implemented enhanced security measures to protect our systems.

ESG COMMITTEE

Summit's ESG Committee has been key in enhancing our sustainability and responsible practices. This year, they focused on reducing environmental impact, improving social responsibility, and maintaining governance excellence, in each case, where financially material to Summit in the medium to long-term. The committee set stricter goals, developed strategies, and monitored our progress towards our financially material sustainability objectives.

In 2024, the committee's efforts were particularly evident in implementing and overseeing several key initiatives that marked significant progress in our long-term strategy:

- Continuously monitored our comprehensive ESG KPI Dashboard tracking environmental, social, and governance metrics.
- Coordinated the SGA Awards program with company-wide email voting to recognize sustainability contributions.
- Developed and executed a detailed GRESB assessment plan, identifying enhancement opportunities.
- Led the development of 2025 ESG Goals through collaborative discussions.
- Oversaw the expansion of the company's supplier development programs.

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.

Cybersecurity:

Protecting Our Digital Future



In today's hyperconnected world, protecting our digital infrastructure has become paramount. At Summit, we've elevated cybersecurity to a core pillar of our ESG framework, recognizing that robust digital defense directly impacts our operational integrity and stakeholder trust.

Throughout 2024, we faced an increasingly sophisticated threat landscape. Our cybersecurity team responded by implementing advanced detection systems and strengthening our response capabilities. We invested strategically in employee security awareness programs, knowing that our team members represent both our greatest asset and our first line of defense.

Our approach balances technological solutions with human-centered security practices. By protecting sensitive customer information, proprietary data, and critical infrastructure, we're not just meeting compliance requirements, we're fulfilling our fundamental responsibility to customers, employees, and communities.

This commitment to cybersecurity excellence does more than mitigate risk—it creates sustainable value. By building digital resilience, we're securing Summit's ability to innovate, grow, and deliver reliable service for years to come.



In 2024, Summit team members received approximately **1,400** hours of cybersecurity training.

Furthermore, we are proud to report that in 2024, 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 2024 Summit strengthened its cybersecurity framework through the implementation of comprehensive security enhancements designed to protect its systems.



The company's cybersecurity program expanded during the year with **several key initiatives focused on improving system resilience and data protection.**

2024 CYBERSECURITY INITIATIVES INCLUDED:

- 100% compliance with Level 2 Cybersecurity Capability Maturity Model
- Over 1,400 hours of Cybersecurity Awareness Training taken by Summit staff
- Effective training reduced the phishing clickthrough rate to under 10%

The Summit PAC Update

In 2024, 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) allows Summit team members to engage in the legislative process and participate in policy discussions with other energy industry professionals.

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 an environment that supports our commitment to sustainability and responsible business practices.





Meet Summit's Board of Directors

Summit's Board plays a vital role in our governance ecosystem, providing strategic guidance and comprehensive risk oversight. Our six (6) Directors, four (4) of whom are independent non-executive directors, contribute invaluable expertise that shapes organizational policies and ensures responsible business practices across our operations.

Integrity sits at the heart of our Board processes. We empower our Board members with thorough onboarding education on conflict management, equipping them with the knowledge needed to navigate complex governance landscapes.

Accountability through transparency defines our approach. We take pride in open communication that builds credibility with all stakeholders. During quarterly Board meetings, we present updated risk assessments that track emerging challenges, industry trends, and our corresponding mitigation strategies. This rigorous risk monitoring system ensures we maintain appropriate oversight of all potential risks that could impact our strategic objectives, financial performance, and reputation in the marketplace.

Our robust governance framework serves as the cornerstone of Summit's continued excellence. We recognize that sound Board leadership directly correlates with organizational performance and sustainable growth.

For detailed information about our Board members' qualifications and experience, their biographies are available on [Summit's website](#).

2024 Board Demographics

4.25
YEARS

AVERAGE TENURE

29%

RACIAL/ETHNIC

43%

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.

Commitment to Anti-Corruption

At Summit, ethical conduct isn't aspirational—it's operational. Our comprehensive Anti-Corruption Policy establishes clear guardrails that govern interactions across our organization. We've implemented a multi-layered approach that combines preventive measures with robust oversight.

Our safeguards include mandatory pre-clearance protocols for high-risk transactions, careful monitoring of gift exchanges and hospitality, and clear guidelines for government interactions. The strength of our approach lies in both our formal systems—including our confidential reporting hotline—and our culture of accountability.

Our disciplined commitment reflects more than compliance—it demonstrates how integrity serves as the foundation for sustainable business excellence at Summit.

Anti-Trust and Monopoly Guidelines

Summit embraces our responsibilities as a regulated natural gas utility through strict adherence to anti-trust principles. We recognize that fair markets benefit everyone—driving innovation, improving efficiency, and ensuring customers receive optimal value.

Our compliance framework promotes equitable energy access while fostering healthy market dynamics. By maintaining rigorous standards, we support not just our business interests, but the broader economic health of the communities we serve.

In 2024, Summit maintained its perfect record with zero violations of anti-trust or monopoly legislation.

Whistleblower Protection

Our ethical culture thrives when every team member acts as a guardian of Summit's values. We've built a speak-up environment where integrity is everyone's responsibility, from observing proper conduct to raising concerns when standards are not met.

Our 24/7 confidential compliance hotline, operated by an independent third party, ensures all voices can be heard without fear of retaliation. We actively promote awareness of these resources through multiple communication channels, including our intranet and workplace signage.

At Summit, we understand that true transparency means creating safe paths for truth to emerge, allowing our entire organization to uphold the values that define us.



In 2024, Summit received, addressed, and resolved **eight** concerns submitted through the Summit Whistleblower Hotline.



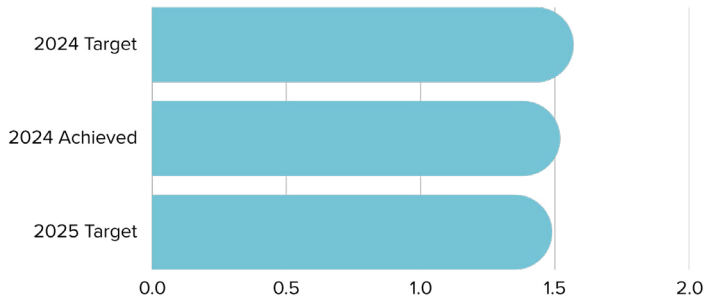
Fueling Safety

At Summit, Fueling Agility means maintaining an unwavering commitment to safety while adapting to an evolving energy landscape. The well-being of our team members, customers, and communities is at the core of every decision we make. By continuously enhancing our safety programs, embracing cutting-edge technologies, and fostering a proactive safety culture, we ensure the resilience and reliability of our operations. Through transparent reporting, rigorous training, and an uncompromising focus on excellence, we build trust with our stakeholders by demonstrating that safety isn't just a priority; it's the foundation of everything we do.

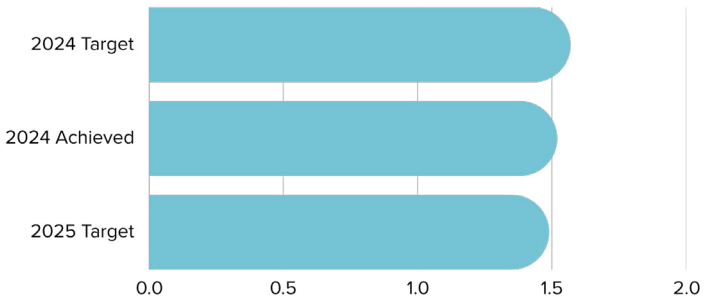
Safety Performance

Safety remains a core focus at Summit, and we continue to track key indicators as part of our 2024 Corporate Scorecard to assess our performance. We remain steadfast in our commitment to promoting a safer work environment. This reinforces the importance of our ongoing efforts to enhance training, improve safety protocols, and strengthen our culture of accountability to better protect our team members and the communities we serve.

PERSONAL INJURIES (TRIR*)



VEHICLE INCIDENTS (VIR**)



**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.*

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

Awards

EMERGENCY MANAGEMENT AWARD

In 2024, Summit Utilities was honored to receive the Southern Gas Association's (SGA) Emergency Management Award for our swift and effective response to natural disasters in Arkansas and Colorado. Following the tornado that struck Little Rock, Arkansas in May, over 150 team members and contractors mobilized immediately, responding to more than 500 work orders, clearing debris, and conducting additional leak surveys to ensure system safety efforts enhanced by advanced leak detection technology to identify potential hazards. Over the summer, in Colorado, as fast-moving wildfires threatened residential areas, the Colorado Natural Gas (CNG) team quickly established an incident command center, isolated critical sections of the gas system, and coordinated with emergency responders to safeguard infrastructure, including Sanborn Ranch. Most importantly, both emergency responses were executed without any injuries, reinforcing Summit's unwavering commitment to safety, innovation, and community protection.

"Receiving this award highlights the exceptional dedication and resilience of our team. It validates the hard work and effectiveness of our emergency management program and underscores the importance of the rigorous training we implement. I am immensely proud of our team's preparedness, their collaborative spirit, and their unwavering commitment to safety and community support."

– **BJ Proctor**, Summit's Senior Manager of Technical Training.

2024 DART AWARD

For the ninth consecutive year, Summit Utilities has been honored with the American Gas Association's (AGA) Industry Leader Accident Prevention Certificate, underlining our ongoing commitment to safety excellence in the gas utility industry. This recognition is awarded to companies that demonstrate exceptional accident prevention practices by maintaining an incident rate below the industry average for their company type and size. Receiving this award year after year highlights Summit's proactive safety culture, rigorous training programs, and dedication to ensuring the well-being of our employees, customers, and communities.



Safety Spotlight: **Batesville Team Reaches 5,000 Days Accident-Free!**

In 2024, our Batesville, Arkansas team achieved an extraordinary milestone: 5,000 days without an accident or injury. This accomplishment showcases their unwavering commitment to safety and reinforces our culture of accountability and vigilance. The team's dedication sets a high standard for workplace safety, demonstrating that vigilance and teamwork make all the difference.

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 maintained its safety protocols throughout 2024, ensuring that our team members are equipped with the skills and knowledge necessary to handle encounters with threatening or potentially violent individuals. 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.

2024 SAFETY SUMMIT

At Summit, safety is our top priority and it's the foundation of everything we do. That's why we host an annual Safety Summit, bringing together team members from across the company to learn, collaborate, and strengthen our shared commitment to safety. In July, more than 180 employees gathered at the Maumelle, Arkansas Training Center for two days of engaging discussions, hands-on learning, and inspiring presentations focused on continuous improvement and innovation in safety practices.

The summit featured interactive breakout sessions, roundtable discussions, and powerful keynote presentations, all aimed at reinforcing safety as a core value. Participants exchanged industry best practices and explored innovative strategies to address emerging safety challenges, ensuring Summit remains at the forefront of protecting our people, communities, and infrastructure.

The dedication and engagement throughout the summit demonstrated Summit's unwavering commitment to making safety more than just a policy—it's a mindset that defines our operations every day. The ideas and strategies discussed are being implemented into our safety protocols, further enhancing our industry-leading safety culture and ensuring the protection of both our teams and the communities we serve.



In 2024, Summit team members completed over
6,600 HOURS
of safety training.





Stakeholder Safety

COLLABORATION WITH LOCAL FIRE DEPARTMENTS

Colorado Natural Gas (CNG) team members worked with the Florissant Fire Protection District to host a specialized training for 50 firefighters from regional districts. Led by Joe Wilkes, CNG's Senior Safety Specialist, the session covered natural gas safety, emergency response, and hazard detection. Firefighters learned to identify leaks, respond to gas-related incidents, and differentiate between propane and natural gas. A live gas explosion simulation reinforced response techniques. Featured in the Pikes Peak Courier, this training strengthened emergency preparedness and interagency collaboration, supporting ongoing efforts to enhance firefighter education and safety.

Photo By Marianne Mogon Pikes Peak Courier Oct 21, 2024

"WHY I WORK SAFE": CAMPAIGN

A key takeaway from the 2024 Safety Summit is our "Why I Work Safe" initiative. What started as a local effort in our Summit Utilities Oklahoma territory has now grown into a company wide culture through the "Why I Work Safe" initiative. This movement has resonated deeply with team members across all regions, reinforcing that safety is personal.

Every day, employees across Summit share their personal reasons for working safely—whether it's their families, their health, or their teammates. By bringing these stories to the forefront, we've created a workplace where safety isn't just about policies and procedures, but about protecting what matters most. Now, with dedicated bulletin boards in our field offices and a virtual space on our company intranet, employees at every level are engaged in fostering a safety-first mindset.

This initiative has become more than a campaign, it's a shared commitment that unites us all. As more team members post their "whys," the message is clear: at Summit, safety is not just something we talk about; it's a culture we live every single day.



811 AWARENESS

At Summit, we recognize that ensuring safety and preventing damage to underground utilities are not just responsibilities—they are essential components of our commitment to maintaining the integrity of our services. As part of our proactive approach to safety, we actively promote 811 awareness among team members, contractors, customers, and the communities we serve. The 811 call-before-you-dig service, established by the Federal Communications Commission in 2005, was created to prevent accidents like the tragic event on the West Coast in the late 1960s, which caused gas leaks, fires, and power outages due to improper excavation practices.

Each year, on August 11, utilities and excavators across the nation unite to raise awareness about the critical need to call 811 before starting any digging project. This simple yet powerful step ensures utility operators can mark underground lines with flags or paint, allowing excavation work to proceed safely. By calling 811 a few days before digging, you reduce the risks of injury, service disruptions, and costly fines related to damaging utility lines.

It's important to remember that utility lines can be buried at shallow depths and may shift over time due to factors like erosion or root growth. Always avoid digging directly on top of marked utility lines and use hand-digging methods instead of mechanical equipment in these areas to ensure safety. With the annual cost of damage to underground utilities in the U.S. estimated at \$30 billion³, most incidents are caused by failure to contact 811, improper excavation, or inaccuracies in facility mapping. By reinforcing 811 awareness, we demonstrate our commitment to safety, community responsibility, and safeguarding the integrity of our operations, helping to protect lives, ensure service continuity, and reduce unnecessary costs.



**Know what's below.
Call before you dig.**

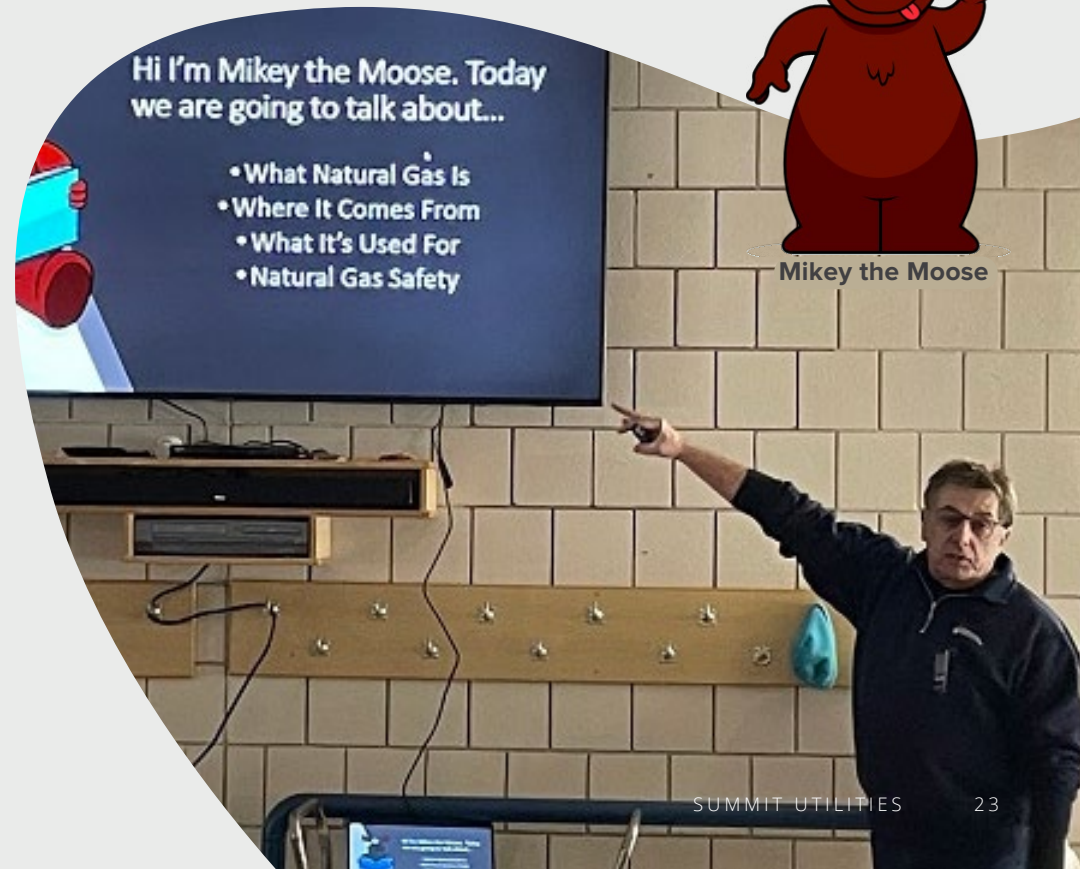
³ Source: [Common Ground Alliance](#)

NATURAL GAS SAFETY AT SCHOOL

Since 2017, Summit Utilities has been committed to educating and empowering students through in-school training presentations on natural gas safety. Rick Bellemare, Senior Technical Training Specialist, with the help of the Mickey the Moose presentation, visited 4th graders at Farrington Elementary School in Augusta, Maine, to teach important safety practices.

Through an animated demonstration and a fun pirate-themed video on the importance of calling 811 before digging, students learned how to identify locate flags, recognize the distinct smell of Mercaptan (a strong-smelling chemical added to natural gas to help detect leaks), and understand what to do, and not to do, to stay safe around natural gas.

These proactive outreach initiatives have continued to build stronger connections, deepen trust, and inspire a shared commitment to safety across our service territory. The session sparked curiosity and insightful questions, with students especially excited to see a photo of their school's gas meter and take home a safety-themed goodie bag.



Fueling Sustainability



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 1 emissions by 2035. We have determined that a focusing on minimizing our carbon footprint is material to Summit and therefore we have made it central to our environmental strategy.

Our approach to decarbonization is comprehensive and focused on tangible actions. We are reducing Scope 1 emissions through pipeline replacement, damage prevention, and advanced leak and repair. As we work towards a sustainable, lower-carbon future in collaboration with key stakeholders, we are committed to meeting our customers' energy needs thoughtfully, efficiently, and safely.

Sustainability is an ongoing endeavor for Summit. We recognize that the decisions we make today will have significant implications for the future, and this awareness drives our determination to implement lasting positive changes. By pursuing innovative initiatives in the energy sector, we aim to create a legacy of innovation and responsibility, providing sustainable energy solutions to our communities for generations.

2024 HIGHLIGHTS AND PERFORMANCE

- Expanded advanced **gas leak detection technology**.
- Implemented **direct emissions measurement** to enhance data accuracy and improve comprehensive emissions tracking.
- Launched an **AI-driven work order system** to optimize technician routing, reducing fuel consumption and emissions.
- Invested in technology to increase the use of **gas recovery equipment** to capture and reuse gas from decommissioned pipelines, thereby minimizing venting.
- Maintained **emissions reduction leadership** through partnerships with One Future, American Biogas Council, and RNG Coalition.
- Implemented **methane recapture technology**, preventing 75 metric tons of CO₂e emissions from entering the atmosphere.
- Conserved 5.29 million therms of gas through **energy efficiency programs**, equivalent to removing 6,000 cars from the road for a year⁴.

⁴ Includes the following Summit subsidiaries: Summit Utilities Arkansas, Arkansas Oklahoma Gas, Summit Natural Gas of Missouri, Summit Utilities Oklahoma, and Colorado Natural Gas.

EMISSIONS REDUCTION PLAN UPDATE

At Summit, we are firmly committed to natural gas as an essential component in creating a sustainable energy future. As the owner of several local distribution companies (LDCs), we recognize our dual responsibility: addressing climate change while continuing to deliver affordable, reliable energy to customers. These responsibilities reinforce our commitment to achieving net-zero direct (Scope 1) emissions across our local distribution companies operations by 2035.

Over the past year, we have made notable progress in implementing initiatives outlined in our comprehensive emissions reduction strategy first introduced in 2022. Our leadership team has refined this roadmap with more precise targets, which have been reviewed by the Board. This evolving roadmap enables us to track advancements and anticipate challenges as we navigate the changing energy landscape.

Our strategy for emissions reduction has evolved into a more refined three-phased approach:

PHASE THREE: ACHIEVEMENT & FUTURE GOALS

Building on the implementation work of Phase 2, this final phase focuses on measuring achievements, sustaining progress, and setting ambitious future targets. Here, we will integrate our emissions reduction strategy into standard operations.

PHASE TWO: IMPLEMENTATION & IMPROVEMENT

Focused on implementing the infrastructure and tools developed in Phase 1 to drive down emissions where consistent with the long-term needs of our stakeholders, including regulators, customers and communities.

PHASE ONE: FOUNDATION BUILDING

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

WE ARE HERE

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.

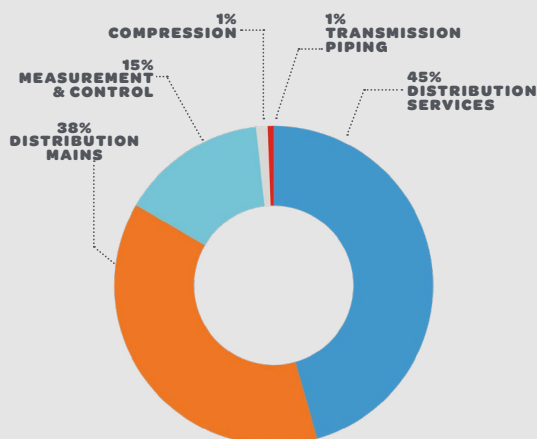


DISTRIBUTION SERVICES

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.



2024 Scope 1 Emissions by Asset Class



OUR PROGRESS

In 2024, Summit made notable progress in advancing our GHG accounting methodologies, reflecting our commitment to transparency, precision, and environmental responsibility. A significant challenge we faced involved harmonizing direct measurement data with existing emissions factors, as various systems and reporting formats require integration to enable real-time environmental performance monitoring.

A key objective for 2024 was completing a limited assurance audit of our emissions data. This process required extensive preparation and cross-departmental coordination to ensure data consistency and accuracy. This audit enhances the credibility of our reporting, ensuring that our emissions data meets the reliability and precision standards expected by our stakeholders.

We continue to refine our Scope 3 GHG emissions inventory. We've established a comprehensive accounting and reporting framework that provides better insight into our indirect GHG emissions, aligning with our long-term sustainability objectives. In 2025, we will prioritize further development of our emissions roadmap, with particular emphasis on Scope 3 emissions.

Implementing robust GHG accounting and reporting practices strengthens our sustainability reporting and builds stakeholder trust. These efforts demonstrate our ongoing commitment to reducing our carbon footprint and contributing to a more sustainable future. Continuous data sharing and collaborative decision-making across teams have led to significant environmental improvements. Accurate GHG emissions data enable us to understand our environmental impact and its ties to our financial success better and identify areas for further reduction efforts.

As we advance, we are committed to enhancing our environmental performance and ensuring that our sustainability practices are strong, transparent, and effective. Cross-departmental collaboration has been essential to our success.

In 2024, Summit achieved significant progress in our efforts to reduce Scope 1 emissions. This year marked a critical period as we strengthened our foundation while enhancing operational systems and processes. We broadened our internal data collection capabilities to develop a more comprehensive approach to our emissions reduction strategy. A significant accomplishment involved laying the groundwork for our transition from traditional emissions-factor estimates to direct measurement methodologies, which once implemented, will substantially improve data accuracy and support a more comprehensive emissions roadmap. These foundational improvements position us for meaningful progress in the coming years.



PIPELINE AND METER REPLACEMENT:

Remote meter installations located near roadways represent a significant source of emissions. Since 2018, Summit has invested over \$5 million in replacing remote meter sets throughout our Arkansas Oklahoma Gas (AOG) system. We plan to continue investing to replace remote meters across our service territories.

In 2024, we demonstrated our commitment to pipeline integrity through a significant response in Rover, Arkansas. When diesel contamination compromised the pipeline system, our teams swiftly executed a coordinated response, replacing 14,179 feet of mainline and installing 1,650 feet of new pipeline. Inactive services were retired and capped, and a neutralizing agent was applied. Throughout this process, we ensured that precise GPS coordinates were captured for the new infrastructure.

ENHANCED LEAK DETECTION:

Advanced leak detection technology improves customer safety, offers valuable data collection opportunities, conserves a natural resource, and contributes to our overall emissions reduction goals. Widespread Picarro⁵ technology implementation will help us identify more leaks, enabling faster remediation compared to conventional detection methods. Additionally, Picarro delivers more precise leak measurement data, allowing for the development of area-specific emissions factors. As we extend this technology across additional service territories, the insights gathered will be instrumental in guiding our long-term emissions reduction strategy and informing the next phases of our emissions roadmap.

In 2024, we further improved our leak detection capabilities and plan to launch two additional Picarro units in 2025.



⁵ A Picarro analyzer is an advanced measurement instrument that uses cavity ring-down spectroscopy to detect minute gas concentrations with remarkable sensitivity. These sophisticated devices excel at identifying methane emissions with extraordinary precision, making them invaluable tools for utilities conducting leak surveys. Their mobile deployment capability allows for efficient monitoring across extensive pipeline networks, providing significantly improved detection compared to traditional methods while generating comprehensive data that helps companies develop targeted emission reduction strategies.

ENHANCED DAMAGE PREVENTION:

Remote meter installations located near roadways represent a significant source of emissions. Since 2018, Summit has invested over \$5 million in replacing remote meter sets throughout our Arkansas Oklahoma Gas (AOG) system. We plan to continue investing to replace remote meters across our service territories.

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IMPLEMENTATION OF METHANE RECAPTURE TECHNOLOGY:

The integration of methane recapture systems presents significant opportunities for reducing emissions across our operations. By capturing and reusing gas that would otherwise be released into the atmosphere, we're taking important steps to minimize our environmental impact.

In 2024, Summit purchased and began operational use of specialized equipment designed for the safe recovery of gas from decommissioned pipeline sections. Instead of venting the gas, it is compressed and reintroduced into the system, which minimizes atmospheric emissions. This technology was implemented in several projects throughout the year.

In 2024, Summit implemented methane recapture technology across six projects, successfully **preventing 75 metric tons of CO₂e from being released** into the atmosphere. This effort had a positive environmental impact equivalent to planting and nurturing 88 acres of forest for an entire year.⁶

FLEET VEHICLES:

Our fleet management strategy begins with a thorough evaluation of vehicle metrics such as age, type, mileage, and repair history. By strategically replacing older and maintenance-intensive vehicles, we aim to control significant repair costs and achieve modest improvements in fuel efficiency.

Summit operates approximately 112 compressed natural gas (CNG) vehicles within our Arkansas Oklahoma Gas operations, constituting a significant portion of our fleet. As vehicles reach their replacement cycle, we continue to invest in CNG-powered units, reinforcing our commitment to fuel alternatives.

In 2025, we will explore opportunities to incorporate hybrid vehicles from Ford, specifically targeting Ford Escape and F-150 pickup truck models.

We have successfully implemented a GPS tracking system that monitors vehicle locations in real time. This enables our dispatchers to assign work to the nearest available technicians, optimizing operations and reducing overall emissions, while enhancing field operation efficiency. Furthermore, our monthly speeding report aims to improve safety and fuel efficiency across the fleet.

In 2024, we implemented a GIS tracking system to monitor vehicle locations, which complements our new AI-driven work order assignment system. This system reduces mileage, fuel consumption, and overall emissions while optimizing field operations.



⁶ As calculated by the [Greenhouse Gas Equivalencies Calculator provided by the United States Environmental Protection Agency](#).

AI-DRIVEN OPERATIONAL OPTIMIZATION:

New for 2024, Summit has implemented an AI technology system to assign work orders based on technician location. In 2024, Summit introduced a new AI technology system designed to assign work orders based on the location of our technicians. This route optimization and work prioritization system uses artificial intelligence to schedule our technicians' daily work more efficiently. By assigning work orders according to each technician's proximity to the job site, we aim to reduce driving distances, fuel consumption, and associated emissions, while also enhancing productivity and customer service. The system was rolled out in the fourth quarter of 2024, and we expect to realize significant efficiency improvements as we fully integrate the system in 2025.

At Summit, our commitment to sustainability extends beyond direct emissions management. The following sections highlight our innovative programs and collaborative partnerships designed to enhance environmental protection, strengthen ecosystem resilience, and promote sustainable practices across our operations. From comprehensive GHG monitoring to integrated vegetation management approaches, these initiatives demonstrate our dedication to creating lasting positive impacts on both the environment and the communities we serve.

OUR ENVIRONMENTAL MANAGEMENT SYSTEM (EMS):

Summit's Environmental Program is structured to align with ISO 14001, one of the most widely recognized international environmental management standards. Summit uses this framework to establish, implement, maintain, and continually improve environmental performance and demonstrate a commitment to sustainability. Summit has assessed its environmental impact, established environmental objectives, and consistently measures its performance. Internally, Summit performs a management review to evaluate the progress of its environmental program with respect to the Environmental Management System's framework. Additionally, we periodically engage a third-party consultant to provide a compliance assessment and evaluate the effectiveness of the environmental program and associated environmental policies and procedures.

Our Approach to Biodiversity and Vegetation Management:

ENVIRONMENTAL REVIEW PROCESS

At Summit Utilities, we recognize that our operations interact with diverse ecosystems across our service territories. We are committed to responsible environmental stewardship through comprehensive biodiversity protection and vegetation management practices that minimize our ecological footprint.

Summit implements a comprehensive environmental management system centered around our Project Environmental Review process. Established in our environmental policies and formalized in 2023, this system ensures all construction projects undergo thorough environmental assessment before commencement.

At the core of this system is our enhanced environmental review checklist, which serves as an essential tool for our engineering teams to identify and avoid sensitive environmental areas during both planning and execution phases. This comprehensive checklist provides detailed guidance for avoiding wetland impacts, protecting species habitats, and making environmentally sound construction decisions, such as selecting boring over trenching to reduce disruption.

The environmental review process identifies potential impacts to sensitive ecological areas and determines necessary permits, surveys, and mitigation measures. By proactively addressing environmental concerns, we ensure our projects maintain environmental integrity while meeting all applicable regulations. This approach results in more informed decision-making, improved project efficiency, regulatory compliance, and a minimized ecological footprint.

By applying these guidelines, we ensure that our projects can be completed because they are environmentally sound and compliant with all relevant regulations.

KEY COMPONENTS OF OUR BIODIVERSITY PROTECTION APPROACH INCLUDE:

Threatened and Endangered Species Protection

All construction projects are evaluated for potential impacts to both federally and state-listed threatened and endangered (T&E) species. Through consultation with the U.S. Fish and Wildlife Service's Information, Planning, and Consultation System (iPaC) and relevant state agencies, we identify critical habitats in our project areas and implement appropriate avoidance or mitigation strategies.

Wetlands and Waterbodies Conservation

We carefully assess our projects for impacts on wetlands, waterbodies, and intermittent streams protected under Section 404 of the Clean Water Act. When possible, we utilize directional boring technologies to avoid disturbing these sensitive aquatic ecosystems. For unavoidable impacts, we obtain necessary permits and implement best management practices to minimize disruption.

Avian and Bat Protection

We schedule tree-clearing activities outside of peak nesting seasons for migratory birds (which vary by state, ranging from February to September) to comply with the Migratory Bird Treaty Act, the Bald and Golden Eagle Protection Act and the Endangered Species Act. For projects that cannot avoid these timeframes, we conduct active nest surveys before proceeding. Similarly, we consider bat roosting seasons (typically April through October) when planning vegetation removal to protect potentially endangered bat species.

Vegetation Management Best Practices

Our vegetation management program balances operational requirements with ecosystem health:

- 1. Seasonal Planning:** We strategically schedule vegetation clearing outside of critical wildlife breeding and nesting periods whenever operationally feasible.
- 2. Minimized Disturbance:** For new construction, we calculate areas of disturbance and limit clearing to only what is necessary for safe operations.
- 3. Habitat Consideration:** In areas identified as potential wildlife corridors or important habitat, we implement modified vegetation management techniques that preserve ecological function while maintaining operational safety.
- 4. Native Species Approach:** Where revegetation is required, we prioritize the use of locally appropriate native plant species that support indigenous wildlife and promote biodiversity.

Environmental Regulatory Compliance

Our environmental review process is key to compliance with applicable federal, state, and local environmental regulations.

This comprehensive approach covers:

- Construction Stormwater Permitting for projects disturbing one or more acres
- Endangered Species Act requirements
- State-specific nongame, endangered, or threatened species protection
- Clean Water Act Section 404 compliance
- Public lands and wildlife management area requirements
- Floodplain regulations
- Historic and cultural resource protection
- Tree-clearing regulations
- Local environmental ordinances

Training and Awareness

All employees involved in project planning, management, and field operations receive environmental awareness training upon initial employment, when procedures change, when performance gaps are identified, and every three years thereafter. This training emphasizes the importance of biodiversity protection and proper implementation of our environmental procedures.

Continuous Improvement

We regularly review and update our environmental procedures to incorporate emerging best practices and regulatory changes. Our environmental team works closely with engineering, operations, and external environmental consultants to ensure that biodiversity considerations are integrated throughout our project lifecycle from planning through completion.

By implementing these comprehensive practices, Summit Utilities demonstrates our commitment to preserving biodiversity while providing essential energy services to the communities we serve.

Peaks Renewables

Renewable Natural Gas (RNG) marks a transformative step forward in the natural gas sector. This pipeline-quality gas derived from organic waste functions identically to conventional natural gas but with a dramatically reduced carbon footprint. By capturing methane from decomposing materials in landfills, wastewater facilities, farms, and food waste operations, RNG helps reduce greenhouse gas from entering the atmosphere while creating a circular waste economy. As RNG production infrastructure expands, it could replace a significant portion of conventional natural gas, further enhancing environmental benefits while utilizing existing pipeline networks.

As part of our commitment to developing lower-emission energy options, Summit's subsidiary, Peaks Renewables, concentrates on lowering carbon emissions within the thermal energy infrastructure. When Summit initially announced plans for this innovative Company in 2019, it signaled a strategic shift now underway. The Central Maine Community Dairy Digester in Clinton exemplifies our renewable portfolio's flagship initiative, demonstrating circular economy principles by converting dairy manure from local farms into Renewable Natural Gas (RNG). 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, provides a sustainable energy source that supports local economies and agriculture and demonstrates the ongoing viability of our existing pipes through the long-term energy transition. This project serves as an example of how innovative energy solutions can positively impact both the environment and the industry.

Peaks Renewables has established valuable partnerships with family-owned dairy operations throughout central Maine, creating a collaborative model that became operational in June 2023. This pioneering facility—a first of its kind in Maine—has been injecting locally-produced renewable gas into Summit Natural Gas of Maine's distribution system, directly meeting the heating requirements of homes and businesses through gas generated from a local digester, with renewable attributes from the project sold to third parties to help meet their climate goals. This initiative has allowed Summit to expand beyond conventional utility distribution services and accelerate our progression toward lower-carbon energy solutions.

PEAKS RENEWABLES 2024 ACHIEVEMENTS:

In 2024, the RNG digester project received the prestigious **Eco Excellence Award**, recognizing its outstanding commitment to environmental sustainability through reducing GHG emissions, utilizing waste products, and developing renewable energy sources.

The project expanded its impact with groundbreaking on an expansion to accept manure from additional local farms, including Caverly Farm. This expansion will increase renewable natural gas production and further reduce GHG emissions in the region.

Additionally, the Peaks Team completed development of an innovative **power to gas project** ("P2G") at the digester, which will synthesize additional RNG from hydrogen produced from renewable electricity. Funded in part by the US Department of Energy (DOE), the P2G project is being spearheaded by Peaks in alliance with a consortium of technology partners, including the National Renewable Energy Laboratory (NREL). The project will begin construction once approved by DOE. At full scale, this type of project could double RNG production from facilities like the Maine digester. This project highlights Summit's ongoing commitment to innovation and investment in new technologies to further decarbonize the energy system.



In 2024, RNG
from the RNG dairy
digester totaled
80,219 MMBtu.
That is the equivalent
to the annual energy
needs of 1,100 average
American homes.⁷



Benefits of Renewable Natural Gas

The RNG digester project highlights the benefits of renewable natural gas as a component in the transition to a more sustainable energy future:

- **Decarbonizing the Gas System:** RNG is a drop-in replacement for conventional natural gas, utilizing existing infrastructure while reducing reliance on fossil fuels.
- **Waste Utilization and Methane Reduction:** By capturing methane from organic waste sources like agricultural waste and landfills, RNG significantly reduces GHG emissions.
- **Circular Economy and Resource Efficiency:** The process promotes resource efficiency by creating valuable energy from materials that would otherwise be released into the environment.
- **Versatile Energy Applications:** RNG can be used for heating, electricity generation, transportation, and hydrogen production.
- **Job Creation and Economic Benefits:** RNG production creates jobs in agriculture, waste management, and energy sectors while providing economic benefits to rural communities.
- **Public Health:** Projects can improve air quality in communities affected by pollution from landfills and agricultural operations.

While we're proud of the environmental progress we've made this year, we recognize that sustainability is a journey rather than a destination. **We remain committed to continuous improvement and are excited to build on our momentum through the implementation of the following goals for the coming year:**

- Scale up direct measurement initiatives at multiple metering and regulation stations to ensure full coverage and improved accuracy
- Refine the Emissions Roadmap based on early results from AI deployment and direct measurement data
- Continue to streamline environmental data collection and reporting systems, reducing manual reconciliation between different data sources
- Expand implementation of the AI-driven route optimization system for technicians
- Completed the Power-to-Gas project at the Clinton, Maine digester—an innovative initiative that converts renewable energy into clean, storable natural gas of the power to gas project at the digester.
- The Department of Energy Pilot Project to capture CO₂ from a dairy digester, combine it with renewable hydrogen, and convert it into lower-carbon methane.
- Beyond RNG production, our renewable energy strategy includes Peaks Renewables' pioneering work in hydrogen injection and landfill gas capture technologies. These initiatives form a critical component of our GHG emissions reduction targets and underscore our holistic approach to environmental stewardship.

Energy Efficiency

In our pursuit of long-term business sustainability, energy efficiency remains a cornerstone of Summit's strategy. In 2024, 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. During the year, our energy efficiency programs resulted in savings of approximately 5.29 million therms of natural gas—avoiding about 28,000 metric tons of CO₂ emissions. That's equivalent to taking over 6,000 cars off the road for a year, or the same as the carbon sequestered by more than 460,000 tree seedlings grown over a decade.⁸

ONE Future Coalition

Summit has maintained its long-term collaboration with the ONE Future Coalition, a group of energy companies from the natural gas supply chain dedicated to achieving a scientifically-based average methane emission rate of 1% or less across facilities. Our company leaders, who serve on the ONE Steering Committee and various policy and technical committees, provide emissions data, share mitigation strategies, and report best practices to guide the industry towards a sustainable future with reduced emissions and more efficient operations.



⁸ Includes the following Summit subsidiaries: Summit Utilities Arkansas, Arkansas Oklahoma Gas, Summit Natural Gas of Missouri, Summit Utilities Oklahoma, and Colorado Natural Gas.



Fueling Communities

Fueling Communities

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.

Volunteer efforts significantly impact our communities.

1 hour
of volunteer time

=

approximately \$33.49 of economic impact
invested in our communities.

Measured this way, Summit's volunteer efforts equated to **over \$304,226** of economic impact in 2024 from over **9,089 volunteer hours**.⁹

⁹ Includes Volunteer time value calculation completed by [Independent Sector](#).



At Summit, we are committed to supporting our communities through volunteer efforts, sponsorships, and donations.



In 2024, Summit supported **over \$588,000** in donations and sponsorships to nearly **260** non-profit organizations.

In 2024, Summit Cares continued to evolve how we give back by supporting communities with greater consistency and agility. Through a multi-year funding model, Summit has pledged \$4,000 annually for three years (2023-2025) to 19 nonprofit organizations across the five states we serve.

This commitment, made on behalf of our operating companies, provides nonprofits with stable, predictable funding to launch and sustain long-term programs. By reducing the pressure of year-to-year fundraising, our partners can focus on delivering high-impact services where they're needed most. It's just one way we're fueling agility in the communities we call home.



"One of Summit's priorities is to build meaningful partnerships and strengthen our relationships in the communities we serve. We are excited to support these non-profits that play a crucial role in enhancing the well-being of our Oklahoma communities."

- FRED KIRKWOOD,
Chief Customer Experience Officer for Summit



Key 2025 Community Goals:

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

Awards and Accomplishments

In June, Summit employees stepped up once again to support the Arkansas Foodbank's annual Summer Cereal Drive by donating cereal and volunteering at community drop-off locations across Central Arkansas. To celebrate the campaign's success, Summit attended the Arkansas Foodbank's Breakfast of Champions in August.

At the event, Summit was honored with the **Community Partner Award**, recognizing our strong volunteer presence and commitment to fighting food insecurity. Our trophy—an oversized cereal box—is now proudly displayed at one of our key offices as a reminder of what we can achieve together. We're already looking forward to next summer and raising the bar even higher.





COLORADO ▲

Colorado Natural Gas: Colorado Natural Gas donated to the Mountain Resource Center in Conifer, Colorado.



MAINE ▲

Summit Natural Gas of Maine: Summit Natural Gas of Maine gave to Give IT. Get IT in Waterville, Maine.



MISSOURI ▲

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.



ARKANSAS ▲

Summit Utilities Arkansas: Summit Utilities Arkansas contributed to The Call. The Call recruits, trains, and supports foster and adoptive families in Arkansas.



OKLAHOMA ▲

Summit Utilities Oklahoma: Summit Utilities Oklahoma provided to MIGHT Community Development & Resource Center in Lawton, Oklahoma. It empowers and equips individuals and their families through life skill services.

Approximately
1 in 6 people in the U.S.
receive food assistance
from the charitable sector.*

\$1 = approximately
10 average sized meals.*



\$1



In 2024, Summit
donated **over**
\$102,000 to
local foodbanks.

Measured this
way, Summit's
monetary
donations
equated to
over \$1 million
meals.

Volunteerism

At Summit, we deliver with heart and purpose, even when time is limited. Each year, we provide employees with 20 hours of paid volunteer time (VTO), empowering them to give back to the causes they care about most.

In 2024, despite a demanding year, our team members showed up using their time, energy, and compassion to support communities across our footprint. Their dedication reflects our belief that agility isn't just about how we work, it's also about how we serve.

Summit employees
donated **over 9,089
volunteer hours**,
exceeding our 8,900
hour goal.



▲ ARKANSAS



◀ COLORADO



▲ MAINE



MISSOURI ▲



OKLAHOMA ▲

Honoring Outstanding Service: 2024 Citizen Award Winners

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 2024, many team members once again exceeded the 20-hour Volunteer Time Off (VTO) benchmark, embodying Summit's core value of kindness through their time, energy, and compassion.

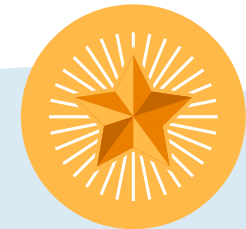
Among these dedicated individuals, two stood out for their exceptional commitment to community service: Carrie Collins, Manager of Operations, and Frank Myers, Customer Development Representative. In recognition of their extraordinary efforts, Summit's Diversity & Inclusion Committee proudly presented them with the 2024 Citizen Award.

The Citizen Award is an annual recognition given to team members who complete their 20 hours of company-provided volunteer time off and participate in the award survey. It honors those who demonstrate an exceptional commitment to volunteerism and philanthropy.

In honor of their achievements, both awardees selected a nonprofit organization to receive a donation from Summit:

- **Carrie Collins** chose Special Olympics Arkansas, which provides year-round sports training and competition for children and adults with intellectual disabilities.
- **Frank Myers** selected United Way of Southwest Oklahoma, which supports local programs addressing education, income stability, health, and basic needs.

Carrie and Frank's service reflects the spirit of the Citizen Award and Summit's enduring dedication to strengthening the communities we call home.



Stakeholder Engagement

At Summit, we endeavor to 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, we are deeply committed to building strong, collaborative relationships with our stakeholders.

Our stakeholder engagement plan brings together regulators, legislators, local officials, first responders, and educators to support natural gas safety, shape energy policy, and strengthen our resilience in the face of economic, operational, and political challenges.

We believe the best way to understand and meet our communities' needs is to stay actively involved. That's why we continue to partner with local organizations to drive meaningful change, nurturing safer, stronger, and more vibrant communities. We're proud of the trust placed in us and remain committed to fueling a future where everyone can thrive.

A Rapid Response Rooted in Teamwork and Service for Rover, Arkansas

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MEMBERSHIPS & ASSOCIATIONS

THE FOLLOWING IS A LIST OF ORGANIZATIONS THAT SUMMIT IS A PART OF, OR COLLABORATES WITH:

MEMBERSHIPS & ASSOCIATIONS

- ACP-Association of Continuity Professionals
- American Biogas Council
- American Gas Association
- Appalachian Gas Measurement Short Course
- Arkansas Advanced Energy Association
- Arkansas Business Publishing Group
- American Gas Foundation
- Arkansas GIS Users Group
- Arkansas State Heating, Venting, Air Conditioning, and Refrigeration Association
- Arkansas Chamber National Association of Housing
- Arkansas Women in Power
- Augusta Rotary
- Avaya Alumni Network
- Avaya Professionals
- Central Maine Apartment Owners Association
- Central Maine Growth Council
- Climate Work Maine
- COGA
- Colorado One Call
- Colorado Pipeline Association
- Common Ground Alliance
- Crawford County Board of Realtors
- DPAC
- DNG-ISAC
- E2Tech
- EAM CAB -- Oracle Enterprise Asset Management Customer Advisory Board
- EC-Council
- Energy & Utilities Network
- Energy Solutions Center
- Environmental Federation of Oklahoma
- 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
- Lawton 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 Arkansas Homebuilders
- Northeast Gas Association
- Oklahoma Gas Association
- One Future
- Oracle Application Users Experts

- Our Nation's 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
- Rotary Club of Yarmouth
- Saas Group
- Saline Home Builders Association
- Scrum Alliance
- Southern Gas Association
- Texarkana Home Builders 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

- Ada Chamber of Commerce
- Alma Area Chamber of Commerce
- Altus Chamber of Commerce
- Arkansas State Chamber of Commerce
- Arkadelphia Alliance and Chamber
- Ava Chamber of Commerce
- Batesville Area Chamber of Commerce
- Benton Chamber of Commerce

- Blackwell Chamber of Commerce
- Branson Chamber of Commerce
- Branson Lakes Area Chamber of Commerce
- Bryant Chamber of Commerce
- Camdenton Area Chamber of Commerce
- Canton Chamber of Commerce
- Chickasha Chamber of Commerce
- Conifer Area Chamber of Commerce
- Conway Chamber of Commerce
- Corning Chamber of Commerce
- Cross Country Chamber of Commerce
- Crossett Area Chamber of Commerce
- Cumberland Falmouth Community Chamber of Commerce
- Cushing Chamber of Commerce
- Dewitt Chamber of Commerce
- Elgin Chamber of Commerce
- Forrest City Chamber of Commerce
- Fort Smith Chamber of Commerce
- Gallatin Chamber of Commerce
- Grant County Chamber
- Greater Lawton Rotary
- Greater West Plains Chamber of Commerce
- Hamburg Chamber of Commerce
- Heber Springs Area Chamber of Commerce
- Hot Springs Chamber of Commerce
- Hollister Chamber of Commerce
- Jacksonville Chamber of Commerce
- Jonesboro Regional 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

- Lawton Ft Still Chamber of Commerce
- Lebanon Chamber of Commerce
- Little River County Chamber of Commerce
- Little Rock Regional Chamber
- Maine State Chamber of Commerce
- Malvern Hot Springs County Chamber
- Marian Chamber of Commerce
- McAlester Chamber of Commerce
- Mena Polk County Chamber of Commerce
- Mid-Maine Chamber of Commerce
- Missouri Chamber of Commerce
- Monticello-Drew County Chamber of Commerce
- Morrilton Area Chamber
- Mountain Grove Chamber of Commerce
- Muldrow Chamber of Commerce
- Nashville Chamber of Commerce
- Newport Area Chamber of Commerce
- Oklahoma State Chamber of Commerce
- Paragould Regional Chamber of Commerce
- Portland Regional Chamber
- Poteau Chamber of Commerce
- Prescott – Nevada Chamber of Commerce
- Randolph County Chamber of Commerce
- Searcy Regional Chamber of Commerce
- Sevier County Chamber of Commerce
- Sherwood Chamber of Commerce
- Sallisaw Chamber of Commerce
- Stuttgart Chamber of Commerce
- Texarkana Chamber of Commerce
- Van Buren Chamber of Commerce
- Warsaw Chamber of Commerce
- Weatherford 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 on community engagement, charitable giving, and nurturing economic development, we aim to leave a lasting positive impact on the regions we proudly serve and call home.

\$903,107,144

SUPPLIER PAYMENTS

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

\$42,948,410

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.

\$329,816,000

CAPITAL INVESTMENT

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



\$157,171,000

EMPLOYEE COMPENSATION

(Wages & Benefits)*

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



\$23,427,624

PROPERTY TAXES

We prioritize hiring from the local talent pool whenever possible, working to reflect the communities we are privileged to serve, and enhancing the region's overall economic well-being.



\$18,503,845

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.



Fueling Our People

At Summit, our people are the driving force behind our success. Their dedication, expertise, and diverse perspectives and skills power our innovation, strengthen our culture, and enable us to deliver reliable energy solutions that make a difference in the communities we serve.

We are committed to creating an inclusive, collaborative, and dynamic workplace where every team member can thrive. By investing in well-being, professional growth, and engagement, we empower our workforce to reach their full potential while advancing Summit's mission.

This year, we celebrate the remarkable contributions of our team—whether pioneering new solutions, enhancing safety and reliability, or deepening our community impact. Their passion and commitment continue to shape the future of energy and drive us forward.

2024 Awards & Accomplishments



BEST PLACES TO WORK IN MAINE

Summit Natural Gas of Maine was named one of the 2024 Best Places to Work in Maine in the large company category. It is the sixth consecutive year Summit has received this honor.



BEST PLACES TO WORK IN OKLAHOMA

Summit Utilities Oklahoma was named one of the 2024 Best Places to Work in Oklahoma. Summit has received this honor for three consecutive years.



Our Approach and Progress During the Year

At Summit, we are committed to fostering a workplace where every team member has the opportunity to grow, lead, and contribute to our shared success. In 2024, we continued to invest in professional development, strengthen our company culture, and enhance our commitment to inclusion. Through leadership training, employee resource groups, and a renewed focus on our Mission, Vision, and Values, we empowered our workforce to drive meaningful impact across our organization and the communities we serve.

Investing in Growth: Training & Development

Supporting our team members' growth and development is a priority at Summit. In 2024, we provided varied opportunities for employees at all levels to enhance their leadership skills, improve well-being, and align their work with our strategic goals. Key initiatives included:

Annual Strategic Leadership Forum – Every year, Summit holds a two-day, in-person event bringing together senior managers and executives to explore key business strategies, leadership development, and industry trends. Through interactive discussions and expert-led sessions, participants gained valuable insights to navigate challenges, drive innovation, and strengthen Summit's strategic direction.



Supervisors & Managers Leadership Forum – To expand our leader training, a supervisor and manager training was designed in 2024. This two-day event provided supervisors and managers with the tools to build high-performing teams, enhance communication, and foster a culture of operational excellence. Attendees participated in hands-on workshops, leadership training, and peer discussions to strengthen their management skills and support their teams more effectively.



Stress Management for the Holidays and Beyond – Summit's Diversity & Inclusion Committee (D&I Committee) retained an external expert to provide a practical and engaging session focused on equipping team members with mindfulness techniques to manage stress, improve focus, and maintain well-being—especially during high-demand times of the year. Team members learned actionable strategies to balance work and personal commitments while prioritizing mental wellness.

Remote Work Panel: Pioneering Connections to Build Stronger Remote Teams – The D&I Committee also offered a dynamic discussion featuring Summit team members who shared their experiences, best practices, and lessons learned in remote and hybrid work environments. The panel explored ways to foster collaboration, maintain team cohesion, and enhance productivity in a virtual setting.

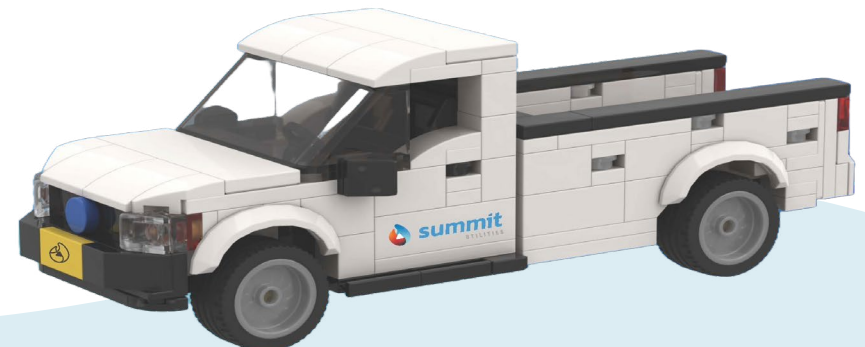
Building Your Department Mission – A hands-on workshop was designed to help teams create their own departmental mission and mantra that complements Summit's updated Mission, Vision, and Values. Through guided exercises and collaborative discussions, team members learned how to define their department's purpose and ensure it contributes meaningfully to Summit's broader vision.

Defining Our Future: Mission, Vision, and Values

In 2024, we introduced an updated Mission, Vision, and Values (MVV) to reflect Summit's continued growth and long-term vision. More than just guiding principles, our MVV serve as the foundation of our culture and decision-making. To reinforce these values, we engaged employees through interactive training sessions, company-wide videos, and even Summit-branded logo trucks, ensuring that our purpose is visible in every aspect of our work.



**WATCH THE MVV
HYPE VIDEO HERE**



Strengthening Inclusion: Employee Resource Groups (ERGs)

At Summit, we foster a workplace where team members can connect, find support, and grow together. Our Employee Resource Groups (ERGs) are open to everyone and create spaces for team members to share experiences, build community, and drive meaningful change.

In 2024, we expanded our ERG program to foster inclusion and professional growth:



WISE (Women Igniting Success & Empowerment)

In 2024, Summit proudly launched WISE, our second Employee Resource Group. WISE is dedicated to fostering the growth, empowerment, and advancement of women at Summit, providing a supportive space for mentorship, networking, and professional development. Open to all team members, WISE encourages meaningful connections and collaboration across the organization.



MAVS (Military and Veteran Support)

Founded in 2023, MAVS is dedicated to building awareness and providing support and resources for veterans, active military members, their families, and friends. By fostering a strong, supportive community, MAVS has already made a meaningful impact through blood drives, volunteer events, military-focused interviews, and community outreach. In 2024, the group introduced Wear Red Fridays, encouraging employees to show solidarity with deployed U.S. service members by wearing red each Friday as part of the Remember Everyone Deployed (R.E.D.) initiative.

As we continue to invest in our people, we remain focused on providing meaningful opportunities for growth, strengthening our culture, and ensuring every team member feels valued and connected to Summit's purpose.

Working at Summit

Engagement and Feedback

At Summit, fostering open communication and actively listening to our team members is at the heart of our culture. In 2024, we launched the Speak Up Progress Report—a new initiative designed to provide team members with a deeper look into the changes, initiatives, and feedback gathered from our bi-annual pulse surveys.

Twice a year, we invite team members to share their thoughts on key topics such as safety, workload, job satisfaction, and inclusion initiatives through an anonymous survey. These insights help us identify trends, address concerns, and continuously improve our team's experience. The Speak Up Progress Report ensures that team members not only have a voice but also see how their feedback is shaping real action across the organization. By strengthening this two-way dialogue, we reaffirm our commitment to building a workplace that evolves with the needs of our people.



ENGAGEMENT PERFORMANCE:

Meaningful progress comes from the ability to measure impact. In September 2024, the Summit team scored an 81% engagement rate, 6 percentage points over our 75% benchmark.

Fueling Our Team: Benefits & Well-Being

At Summit, we are committed to providing benefits that support our team members' well-being, both at work and at home. We understand that a strong, engaged workforce starts with ensuring employees have access to meaningful benefits that offer flexibility, security, and peace of mind.

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

**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 2024

In 2024, we focused on making our benefits even more valuable by negotiating favorable long-term rate agreements, bundling coverage to maximize cost savings, and carefully evaluating plan options to ensure the best overall value.

We recognize that affordability is a top priority, but just as important is having access to coverage that provides protection and support for our team and their families. That's why, in direct response to team member input, Summit introduced several key enhancements in 2024:

Expanded Dental Coverage

Our buy-up plan with Delta Dental now includes adult orthodontia, providing greater flexibility for those seeking orthodontic care.

Improved Medical Benefits

We enhanced support for team members managing conditions like diabetes, ensuring better access to essential care.

New Critical Illness Coverage

We added a Critical Illness plan with Voya as part of our voluntary benefits, offering additional financial protection in the event of serious health conditions.

No Increase in Employee Premiums

For the third year in a row, we are proud to maintain no increases in premiums, reinforcing our commitment to keeping health care costs stable while maintaining high-quality coverage.



New Policies in 2024

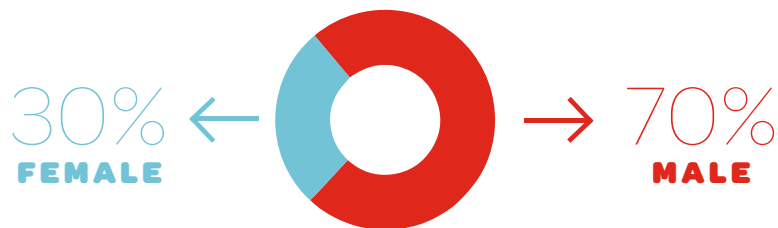
In 2024, Summit continued to evolve its workplace policies to better support our team members and reflect the changing needs of our workforce. By regularly reviewing and refining our policies, we ensure they remain aligned with industry best practices while fostering a workplace that is fair, inclusive, and supportive.

- ✓ **Military Leave Policy**
- ✓ **Incident Response Policy**
- ✓ **State Paid Leave Addendums**

2024 Workforce Demographics

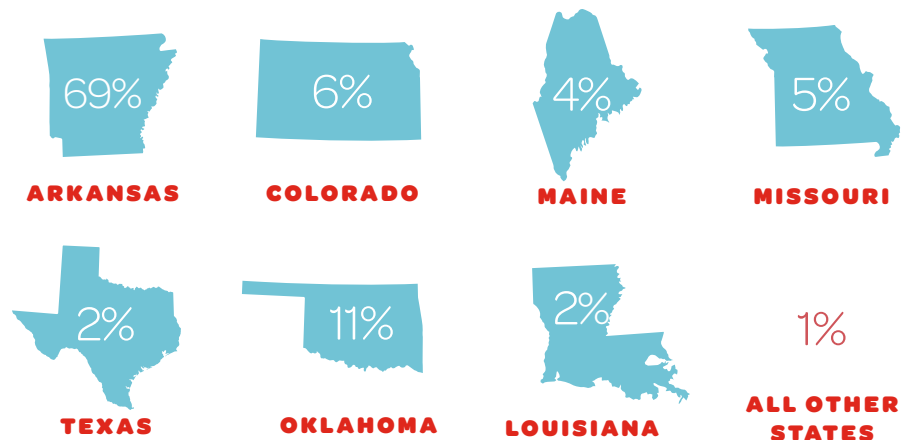
TOTAL EMPLOYEES

1,496



0 PART TIME EMPLOYEE

PERCENT OF TOTAL EMPLOYEES BY STATE:



NUMBER OF NEW JOBS CREATED: 82

EXECUTIVE LEADERSHIP POSITIONS HELD BY WOMEN



ETHNIC DIVERSITY*



VETERANS+



REPRESENTED BY UNIONS



AVERAGE TENURE



VOLUNTARY TURNOVER RATE



RETIREMENT RATE



*Refers to employees who self-identify with racial or ethnic backgrounds other than White/Caucasian, including but not limited to Black /African American, Hispanic/Latino, Asian, Pacific Islander, Indigenous/Native, and other multiracial backgrounds.

+Based on employee self-reporting.

Looking Forward: Strengthening Our Culture & Investing in Our People

As Summit continues to grow, we recognize that our success depends on our ability to develop and retain top talent, foster a strong and inclusive culture, and equip our team members with the skills they need to thrive.

Elevating Our Culture

In 2025, we are increasing our focus on reinforcing and strengthening Summit's culture—ensuring that our workplace is not only high-performing but also a place where every team member feels supported and empowered. This means:

- **Expanding Leadership & Professional Development** – We will introduce new trainings focused on Emotional Intelligence and Psychological Safety, equipping leaders and team members with the skills to foster trust, collaboration, and a healthy workplace environment. We're launching new leadership development programs to provide aspiring and new leaders earlier with the tools to be successful and sustain the Summit culture.
- **Reinforcing Core Cultural Norms** – We will level-set key workplace expectations, including our culture of open communication, ensuring that all team members feel comfortable raising ideas and concerns, as well as emphasizing the importance of one-on-ones for meaningful connections with teams and their leaders.
- **Renewed Focus on Meeting Norms** – We will review our approach to meetings to ensure they are productive, inclusive, and aligned with Summit's values, helping teams collaborate more effectively.

Key Social Goals for 2025

To further strengthen our commitment to diversity, inclusion, and engagement, we are setting strategic goals for the year ahead:

- **Expanding Employee Resource Groups** – Building on the success of MAVS and WISE, we will launch a new ERG open to all employees to create additional spaces for connection, support, and professional development.

Investing in Talent Development for the Future

Summit's Talent Development Framework will continue to evolve, focusing on succession planning, high-performer programs, career mapping, and learning and development initiatives. As we refine our approach, we remain committed to ensuring every team member has access to growth opportunities that align with both their personal aspirations and Summit's strategic goals.

By investing in our people and fostering a culture of learning, inclusion, and engagement, we will continue to build a thriving workplace—one that strengthens our team and positions us for long-term success.



Fueling Our Supply Chain

Our Evolving Supply Chain: Supporting **SUSTAINABILITY** and **RESILIENCE**

At Summit, we're transforming our supply chain to advance our environmental, social, and governance (ESG) commitments while enhancing operational resilience. Throughout 2024, we've made strategic improvements focused on transparency, supplier opportunity, and system integration—all essential elements of our responsible business approach.

STRATEGIC ESG PROGRESS

• • **Enhanced Visibility and Performance Monitoring**

Our new supplier tracking capabilities provide greater transparency across our operations, allowing us to make more informed decisions that align with our stakeholders' sustainability goals and ethical standards.

• • **Foundation of Inclusion**

We established our first formal baseline measurements for supplier development, identifying that approximately 3.6% of spend is with small businesses. This creates accountability and sets the stage for meaningful growth in our efforts to drive economic development in the communities we are privileged to serve.

• • **Systems Integration Across Regions**

Progress in unifying our procurement systems across Colorado, Missouri, Maine, and Arkansas-Oklahoma Gas is reducing redundancies and creating a more efficient approach to responsible sourcing.

NAVIGATING MARKET CHALLENGES

While supply chain pressures have eased somewhat, we continue adapting to extended lead times and economic conditions that particularly impact small and local suppliers. Our strategy balances immediate operational needs with long-term ESG objectives.

FUTURE DIRECTION

Looking ahead to 2025, our supply chain initiatives will focus on:

- Expanding supplier opportunity and engagement through inclusive procurement processes
- Leveraging improved data systems to reduce waste and enhance resource efficiency

By strengthening our supply chain foundations, we're creating a more resilient business while advancing our commitments to environmental sustainability, community impact, and inclusive economic growth.

- **Data Integration Gaps:** Aligning data from legacy systems with new platforms continues to pose technical hurdles, particularly in capturing and analyzing supplier engagement metrics.
- **Economic Pressures on Small and Local Suppliers:** Inflation and rising costs disproportionately affect small and local suppliers, impacting their competitiveness in procurement processes.

By the Numbers



FUELING GOVERNANCE



FUELING SAFETY



FUELING SUSTAINABILITY



FUELING COMMUNITIES



FUELING OUR PEOPLE



FUELING OUR SUPPLY CHAIN

About Summit

Metric	Unit	2024
Revenue	Million \$	\$374
Miles of pipeline/distribution network	Miles	22,879
Communities with operations	#	450
# of customers	#	~623,000



FUELING GOVERNANCE

Board of Directors Demographics

Metric	Unit	2024
Average Tenure	Years	4.25
Diverse racial / ethnic backgrounds	%	29
Female board representation	%	43

Fueling Governance

Metric	Unit	2024
Cybersecurity training	Hours	1,400
Phishing clickthrough rate	%	7.48
Reported cyber incidents	#	0
% of employees that completed cybersecurity training	%	100
GRESB rating score	#	98/100
Whistleblower Hotline concerns resolved	#	8



FUELING SAFETY

Fueling Safety

Metric	Unit	2024
Safety training hours	Hours	6,600

Employees

Metric	Unit	2024
Fatalities	#	0
Lost time injuries	#	8
Total recordable injuries	#	20
Near miss incidents	#	7,534
Hours worked	#	2,768,772
Lost time injury frequency rate (LTIFR)	#/hrs * 1 million	2.89
Total recordable injury frequency rate (TRIFR)	#/hrs * 1 million	7.22

Contractors

Metric	Unit	2024
Fatalities	#	1
Lost time injuries	#	129
Total recordable injuries	#	389
Hours worked	#	71,572,953

Contractor Intensities

Metric	Unit	2024
Lost time injury frequency rate (LTIFR)	#/hrs * 1 million	1.8
Total recordable injury frequency rate (TRIFR)	#/hrs * 1 million	5.43

Users

Metric	Unit	2024
Fatalities	#	0
Total recordable injuries	#	0

Community

Metric	Unit	2024
Fatalities	#	0
Total recordable injuries	#	0



FUELING SUSTAINABILITY

Fueling Sustainability

Metric	Unit	2024
Gas conserved through energy efficiency programs (see Note 1)	million therms	5.29
RNG dairy digester project production	MMBtu	80,219

Greenhouse Gas Emissions (GHG)

Metric	Unit	2024
Scope 1 GHG emissions	mt CO ₂ e	184,995
Scope 2 GHG emissions (Location-based)	mt CO ₂ e	2,584
Scope 2 GHG emissions (Market-based)	mt CO ₂ e	2,894
Scope 3 emissions	mt CO ₂ e	2,917,630
Metric tons of captured CO ₂ e	MT	75
Energy used in operations	MWh	81,053
Energy consumption intensity	MWh/USD	0.0000316
SOx	kg	121.735405
NOx	kg	28183.6478
PM2.5	kg	287.8817503
PM10	kg	296.6109648

1. This number includes from the following Summit subsidiaries: Summit Utilities Arkansas, Arkansas Oklahoma Gas, Summit Natural Gas of Missouri, Summit Utilities Oklahoma, and Colorado Natural Gas.

Biodiversity

Metric	Unit	2024
Wildlife Fatalities	#	0
T&E species fatalities	#	0
Habitat removed	Hectares	42.54
Habitat enhanced or restored	Hectares	42.51
Habitat protected (on-site)	Hectares	0
Habitat protected (off-site)	Hectares	0.37625

Water

Metric	Unit	2024
Water withdrawal	Megaliters	16,144.00
Water withdrawal intensity (/revenue)	Megaliters /USD	4.31658E-08

Waste

Metric	Unit	2024
Generation / Import:		
Hazardous	Tonnes (t)	2.870058021
Non-hazardous	Tonnes (t)	438.795829
Disposal / Export:		
Re-use	Tonnes (t)	NA
Recycling	Tonnes (t)	1.690083792
Composting	Tonnes (t)	NA
Waste-to-energy	Tonnes (t)	NA
Incineration	Tonnes (t)	NA
Landfill	Tonnes (t)	438.795829
Total waste disposed	Tonnes (t)	441.665887
Environmental violations received	#	0



FUELING COMMUNITIES

Fueling Communities		
Metric	Unit	2024
Volunteer hours contributed	#	9,089
Donations and sponsorships provided	\$	588,000
Summit Cares grants awarded	\$	70,000
Employee Wages & Benefits*	\$	157,171,000
Supplier Payments	\$	903,107,144
Property Taxes	\$	23,427,624
Sales & Use Tax**	\$	42,948,410
City Franchise Fees ***	\$	18,503,845
Capital Investment	\$	329,816,000
Customer Net Promoter Score		10

* 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.



FUELING OUR PEOPLE

Fueling Our People		
Metric	Unit	2024
Number of employees	#	1,496
Employee wages & benefits	\$	157,171,000

Demographics		
Metric	Unit	2024
Executive leadership positions held by women	%	37.50
Racial / Ethnic diversity	%	25.00
Veterans	%	3.34
Represented by unions	%	5.70
Voluntary turnover rate	%	6.46
Retirement rate	%	0.88
Under 30 years old	%	13
Between 30 and 50 years old	%	57
Over 50 years old	%	30
Average employee tenure	Years	8.02
Number of new jobs created	#	82.00



FUELING OUR PEOPLE

Employees by State		
Metric	Unit	2024
Arkansas	%	69
Colorado	%	6
Maine	%	4
Missouri	%	5
Texas	%	2
Oklahoma	%	11
Louisiana	%	2
Other States	%	1
Employee engagement score	%	81



FUELING OUR SUPPLY CHAIN

Fueling Our Supply Chain		
Metric	Unit	2024
Supplier spend with small businesses	%	3.6
Supplier spend with small suppliers	%	1
Supplier payments	\$	903,107,144

Appendix A: Global Reporting Initiative Index

Statement of use: Summit Utilities, Inc. has reported the information cited in this GRI content index for the period January 1, 2024 to December 31, 2024 with reference to the GRI Standards.

GRI STANDARD	DISCLOSURE	LOCATION / RESPONSE
GRI 102: General Disclosures 2021	2-1 Organizational details	Our Company, page 3
	2-2 Entities included in the organization's sustainability reporting	Our Company, page 3
	2-3 Reporting period, frequency and contact point	Our Report, page 8
	2-4 Restatements of information	None
	2-6 Activities, value chain and other business relationships	Fueling our Supply Chain, page 53
	2-7 Employees	2024 Workforce Demographics, page 50
	2-9 Governance structure and composition	Summit's Board of Directors, page 16
	2-10 Nomination and selection of the highest governance body	
	2-11 Chair of the highest governance body	
	2-12 Role of the highest governance body in overseeing the management of impacts	
	2-13 Delegation of responsibility for managing impacts	We have established a robust framework to manage our environmental, social, and governance (ESG) impacts. The delegation of responsibility for managing these impacts is clearly defined and integrated into our organizational structure to ensure accountability and effective management. Our ESG management is overseen by the VP, Treasury, who is responsible for coordinating and implementing our ESG strategies across the organization. This role involves working closely with various departments to ensure that ESG principles are embedded in our operations and decision-making processes. Each department within Summit Utilities has specific responsibilities related to ESG management. For instance, the Operations department manages environmental impacts such as emissions and energy usage, while the Finance department oversees the financial aspects of our ESG initiatives. The Pipeline Safety team focuses on ensuring the safety and integrity of our pipeline infrastructure. We have a comprehensive data collection and reporting system in place to track our ESG performance. This system involves various data owners and support persons who are responsible for collecting and verifying data related to our ESG impacts. Our ESG governance framework includes regular reviews and audits to ensure compliance with relevant regulations and standards. The internal audit department maintains a listing of monetary fines and formal notifications from regulators, which are reported to the Board of Directors. This ensures that any incidents are promptly addressed and corrective actions are taken. We are committed to continuously improving our ESG performance. This involves setting ambitious targets, investing in renewable energy initiatives, and fostering community engagement. Our approach to ESG is guided by core principles such as regulatory excellence and ethical leadership.
	2-15 Conflicts of interest	Summit's Board of Directors, page 16

Appendix A: Global Reporting Initiative Index (continued)

GRI STANDARD	DISCLOSURE	LOCATION / RESPONSE
GRI 102: General Disclosures 2021 (continued)	2-16 Communication of critical concerns	Whistleblower Protection, page 17
	2-22 Statement on sustainable development strategy	Letter from our CEO, page 5
	2-23 Policy commitments	Addressed in Summit's Code of Business Conduct and Ethics, page 1: "The Company is proud of the values with which it conducts business. It has and will continue to uphold the highest levels of business ethics and personal integrity in all types of transactions and interactions." Also stated on the same page, This Code of Business Conduct and Ethics serves to (1) emphasize the Company's commitment to ethics and compliance with the law; (2) set forth basic standards of ethical and legal behavior; (3) provide reporting mechanisms for known or suspected ethical or legal violations; and (4) help prevent and detect wrongdoing.
	2-24 Embedding policy commitments	Addressed in the Code of Business Conduct and Ethics, page 6: "All Covered Parties are expected to cooperate in internal investigations of misconduct." Pages 6-7 outline steps for preventing violations
	2-25 Processes to remediate negative impacts	Covered in the Code of Business Conduct and Ethics, page 5: "The Company's Board of Directors, Chief Executive Officer, Chief Financial Officer and Chief Legal Officer shall promptly report any known or suspected violations of this Code to the Chair of the Company's Board of Directors." Also includes reporting mechanisms for all employees and a non-retaliation policy
	2-26 Mechanisms for seeking advice and raising concerns	Addressed in the Code of Business Conduct and Ethics, page 5: "Covered Parties may also report questionable behavior in the same manner as they may report complaints regarding accounting, internal accounting controls or auditing matters by contacting the Chief Legal Officer or (anonymously, if desired) the Summit Hotline.
	2-27 Compliance with laws and regulations	Per Summit's Code of Business Conduct and Ethics, page 4: "Obeying the law, both in letter and in spirit, is the foundation on which the Company's ethical standards are built." Also states: "In conducting the business of the Company, Covered Parties shall comply with applicable governmental laws, rules and regulations at all levels of government in the United States
	2-28 Membership associations	Memberships & Associations, page 41
	2-29 Approach to stakeholder engagement	Stakeholder Engagement, page 40
	2-30 Collective bargaining agreements	Workforce Demographics, page 50
GRI 3: Material Topics 2021	3-1 Process to determine material topics	ESG Materiality, page 10
	3-2 List of material topics	
	3-3 Management of material topics	
GRI 201: Economic Performance 2016	201-1 Direct economic value generated and distributed	At Summit, we recognize the essential role of natural gas as a fundamental part of achieving a sustainable energy future. As the owner of several local distribution companies (LDCs), we are acutely aware of our system's pivotal role in the energy transition and providing affordable energy solutions to our customers. We understand that regulatory changes, shifting market dynamics, and evolving stakeholder expectations present challenges and opportunities for our industry. To address these issues, we continuously evaluate policies, technologies, and strategies that support a lower-carbon future while maintaining system resiliency and affordability. Our approach includes exploring innovative solutions and modernizing our infrastructure to enhance efficiency and reduce emissions over time. We actively engage with policymakers, regulators, and stakeholders to align our operations with advancing sustainability while ensuring energy security and economic viability. Our focus remains on adapting to regulatory developments, ensuring safety and reliability, and making informed decisions that reflect our sustainability priorities.

GRI STANDARD	DISCLOSURE	LOCATION / RESPONSE
GRI 201: Economic Performance 2016 (continued)	201-2 Financial implications and other risks and opportunities due to climate change	At Summit, we recognize the essential role of natural gas as a fundamental part of achieving a sustainable energy future. As the owner of several local distribution companies (LDCs), we are acutely aware of our system's pivotal role in the energy transition and providing affordable energy solutions to our customers. We understand that regulatory changes, shifting market dynamics, and evolving stakeholder expectations present challenges and opportunities for our industry. To address these issues, we continuously evaluate policies, technologies, and strategies that support a lower-carbon future while maintaining system resiliency and affordability. Our approach includes exploring innovative solutions and modernizing our infrastructure to enhance efficiency and reduce emissions over time. We actively engage with policymakers, regulators, and stakeholders to align our operations with advancing sustainability while ensuring energy security and economic viability. Our focus remains on adapting to regulatory developments, ensuring safety and reliability, and making informed decisions that reflect our sustainability priorities.
GRI 203: Indirect Economic Impacts 2016	203-1 Infrastructure investments and services supported	Community Economic Impact, page 43
	203-2 Significant indirect economic impacts	
GRI 205: Anti-corruption 2016	205-1 Operations assessed for risks related to corruption	Commitment to anti-corruption, page 17 Additionally, page 2 of Summit's Code of Business Conduct contains several specific references to prohibited practices that relate to anti-corruption.
	205-2 Communication and training about anti-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 practices	Anti-trust and Monopoly Guidelines, page 17
GRI 207: Tax 2019	207-1 Approach to tax	The company's tax management strategy is in line with Summit's corporate business principles. Our tax policies keep the company in compliance with all applicable tax laws and obligations in all states and jurisdictions where we operate, across all direct and indirect taxes. We engage in transparent and respectful communication with tax authorities, as needed, throughout normal and extraordinary business transactions. We consider the interests of key stakeholders, such as our shareholder, employees, customers, taxing authorities and the communities where we operate. We maintain strong tax governance, controls, and risk management by developing and training our personnel to stay up to date with applicable tax laws and industry standards. Our tax strategy and affairs are maintained in accordance with the Chief Financial Officer organization's overall strategy, as well as with the Board of Directors, as applicable.
	207-2 Tax governance, control, and risk management	
	207-3 Stakeholder engagement and management of concerns related to tax	
	207-4 Country-by-country reporting	
GRI 301: Materials 2016	301-1 Materials used by weight or volume	By the Numbers, page 56
	301-2 Recycled input materials used	
	301-3 Reclaimed products and their packaging materials	

Appendix A: Global Reporting Initiative Index (continued)

GRI STANDARD	DISCLOSURE	LOCATION / RESPONSE
GRI 302: Energy 2016	302-1 Energy consumption within the organization	By the Numbers, page 56
	302-2 Energy consumption outside of the organization	By the Numbers, page 56
	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	Wetlands and waterbodies conservation, page 31
	303-2 Management of water discharge-related impacts	By the Numbers, page 56
	303-3 Water withdrawal	
	303-4 Water discharge	
	303-5 Water consumption	
GRI 304: Biodiversity 2016	304-1 Operational sites owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas	By the Numbers, page 56
	304-2 Significant impacts of activities, products and services on biodiversity	
	304-3 Habitats protected or restored	
	304-4 IUCN Red List species and national conservation list species with habitats in areas affected by operations	
GRI 305: Emissions 2016	305-1 Direct (Scope 1) GHG emissions	Emissions Reduction Plan Update, Page 26
	305-2 Energy indirect (Scope 2) GHG emissions	By the Numbers, page 56
	305-3 Other indirect (Scope 3) GHG emissions	
	305-4 GHG emissions intensity	
	305-5 Reduction of GHG emissions	
	305-6 Emissions of ozone-depleting substances (ODS)	Summit Utilities does not produce, import, or export ozone-depleting substances (ODS) as part of our core natural gas distribution operations. Natural gas itself, which is primarily composed of methane (CH ₄), is not classified as an ozone-depleting substance.
	305-7 Nitrogen oxides (NOx), sulfur oxides (SOx), and other significant air emissions	By the Numbers, page 56
GRI 306: Waste 2020	306-1 Waste generation and significant waste-related impacts	Summit Utilities acknowledges the potential environmental impacts of hazardous and universal waste generated at our facilities. Our Environmental Guide identifies that improper management or disposal of these wastes can result in contaminated soil, surface water, groundwater, and drinking water, as well as potential civil penalties. We classify our facilities as Very Small Quantity Generators (VSQGs) of hazardous waste, generating less than 100 kg (220 pounds) of hazardous waste per month, and as Small Quantity Generators (SQGs) of universal waste, accumulating less than 5,000 kg (11,000 pounds) of universal waste on site at any one time.

GRI STANDARD	DISCLOSURE	LOCATION / RESPONSE
GRI 306: Waste 2020 (continued)	306-2 Management of significant waste-related impacts	We have established a comprehensive waste management approach guided by our Environmental Guide: Hazardous Waste and Universal Waste. We implement regulatory compliance measures and best management practices (BMPs) to prevent releases of hazardous and universal wastes. Our management approach includes: • Identifying all hazardous and universal wastes generated through our HAZOM Chemical Inventory Form • Ensuring appropriate container sizing, labeling, and maintenance • Establishing accumulation timeframes and proper disposal channels • Implementing state-specific considerations where applicable (Maine, Colorado) • Providing employee training upon employment and every two years thereafter • Conducting routine inspections of waste accumulation areas • Maintaining necessary documentation and records
	306-3 Waste generated	Summit tracks waste generation to ensure compliance with our VSQG status for hazardous waste (less than 100 kg/220 pounds per month) and SQG status for universal waste (less than 5,000 kg/11,000 pounds on site at any time). For special projects or facility clean-up events that might exceed these thresholds, we require advance notification to our Environmental Health and Safety Department to properly adjust generator status with regulatory agencies.
	306-4 Waste diverted from disposal	Summit implements several waste diversion practices, including: • Recycling empty aerosol cans after puncturing and proper management of liquid contents • Contracting with Veolia for universal waste handling using their RecyclePack prepaid containers for proper storage, transportation, and disposal • Partnering with reputable waste vendors in each state to ensure proper management of waste streams
	306-5 Waste directed to disposal	We ensure all hazardous waste is delivered to authorized off-site treatment or disposal facilities through contracts with reputable waste vendors in each state where we operate. For universal waste, we have specifically contracted with Veolia as our authorized universal waste handler. While not required by regulation to keep documentation of hazardous waste disposal as a VSQG, we maintain disposal records/manifests as part of our best management practices to ensure proper waste management.
GRI 308: Supplier Environmental Assessment 2016	308-1 New suppliers that were screened using environmental criteria	Addressed in the Procurement Policy, page 5, which details environmental evaluation criteria for suppliers including: Environmental violations; ISO 14001 certification; Environmental, Social and Governance Policy; Waste management practices
	308-2 Negative environmental impacts in the supply chain and actions taken	Summit Utilities' Procurement Policy incorporates environmental considerations within our vendor selection and evaluation process. When selecting vendors for large purchases, specific consideration is given to environmental, social, and governance (ESG) issues. Our vendor evaluation criteria includes assessment of environmental violations, waste management practices, ISO 14001 certification, ESG policies, and business continuity plans. Our Procurement Department actively considers environmental performance criteria when selecting vendors and sourcing goods and services. This framework establishes environmental considerations as a component of our procurement decisions.
GRI 401: Employment 2016	401-1 New employee hires and employee turnover	Working at Summit, page 47
	401-2 Benefits provided to full-time employees that are not provided to temporary or part-time employees	Compensation and Benefits, page 48
	401-3 Parental leave	

Appendix A: Global Reporting Initiative Index (continued)

GRI STANDARD	DISCLOSURE	LOCATION / RESPONSE
GRI 403: Occupational Health and Safety 2018	403-1 Occupational health and safety management system	Safety Culture, page 20
	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 20
	403-7 Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	Stakeholder Safety, page 20 This is also addressed in the Procurement Policy, which includes supplier evaluation criteria for: -OSHA 300/300a Logs -Contractor Safety Manual -Preventable vehicle incident rate -Federal Motor Carrier Safety Administration safety rating
	403-8 Workers covered by an occupational health and safety management system	All workers are covered
	403-9 Work-related injuries	Safety Performance, page 19
	403-10 Work-related ill health	
GRI 404: Training and Education 2016	404-1 Average hours of training per year per employee	Cybersecurity, Page 14 and Safety Training, page 21
	404-2 Programs for upgrading employee skills and transition assistance programs	Working at Summit, page 45
	404-3 Percentage of employees receiving regular performance and career development reviews	100%
GRI 405: Diversity and Equal Opportunity 2016	405-1 Diversity of governance bodies and employees	Meet Summit's Board of Directors, page 16 and Workforce Demographics, page 50
GRI 407: Freedom of Association and Collective Bargaining 2016	407-1 Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk	No operations have been identified where freedom of association and collective bargaining are at risk. In fact, some employees at our subsidiary, Arkansas Oklahoma Gas Corporation, are represented by a collective bargaining unit, demonstrating our commitment to supporting labor rights.

GRI STANDARD	DISCLOSURE	LOCATION / RESPONSE
GRI 408: Child Labor 2016	408-1 Operations and suppliers at significant risk for incidents of child labor	Per our internal procurement policy, the evaluation criteria for construction services should assist in measuring a supplier's strengths and weaknesses in the ESG issues of occupational health and safety, public health and safety, and resilience. One of the evaluation criteria is having a labor policy including written assertion of no use of slave or child labor in supply chain. Additionally, per our Code of Ethics and Business Conduct, Summit unequivocally condemns modern slavery in all its forms, including slavery, servitude, forced labor, debt bondage, and human trafficking. The company has zero tolerance for the use of slave labor and expects contractors and suppliers to adhere to the same ethical standards. We have not identified any operations or suppliers where there is significant risk of child labor or forced or compulsory labor. The nature of our natural gas distribution operations within the United States, combined with our procurement policies, substantially mitigates these risks within our business activities and supply chain.
GRI 409: Forced or Compulsory Labor 2016	409-1 Operations and suppliers at significant risk for incidents of forced or compulsory labor	
GRI 411: Rights of Indigenous Peoples 2016	411-1 Incidents of violations involving rights of indigenous peoples	No incidents have been identified. This is not typically a particular concern for our operations.
GRI 413: Local Communities 2016	413-1 Operations with local community engagement, impact assessments, and development programs	Fueling Our Communities, page 35
	413-2 Operations with significant actual and potential negative impacts on local communities	
GRI 414: Supplier Social Assessment 2016	414-1 New suppliers that were screened using social criteria	Addressed Business Continuity Plan; Cyber security measures.
	414-2 Negative social impacts in the supply chain and actions taken	The policy enables the exclusion of vendors who fail to comply with Summit's requirements or who demonstrate unsatisfactory performance on previous contracts.
GRI 415: Public Policy 2016	415-1 Political contributions	Summit PAC, page 15
GRI 416: Customer Health and Safety 2016	416-1 Assessment of the health and safety impacts of product and service categories	Safety, page 20
GRI 418: Customer Privacy 2016	418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data	Cybersecurity, page 14

Appendix B: List of Material Topics

Environmental Issues	
Issue	Entity Specific Materiality
Air pollution	Medium relevance
Biodiversity and habitat	Medium relevance
Contaminated land	No relevance
Energy	High relevance
Greenhouse gas emissions	High relevance
Hazardous substances	Medium relevance
Light pollution	No relevance
Material sourcing and resource efficiency	Low relevance
Net zero	High relevance
Noise pollution	Low relevance
Physical risk	High relevance
Waste	Low relevance
Water inflows/withdrawals	Low relevance
Water outflows/discharges	No relevance

Social Issues	
Issue	Entity Specific Materiality
Child labor	No relevance
Community development	Medium relevance
Customer satisfaction	Medium relevance
Employee engagement	Medium relevance
Forced or compulsory labor	No relevance
Freedom of association	Low relevance
Health and safety: community	Medium relevance
Health and safety: contractors	High relevance
Health and safety: employees	High relevance
Health and safety: supply chain	Medium relevance
Health and safety: users	High relevance
Human capital	High relevance
Labor standards and working conditions	Low relevance
Local employment	High relevance
Social enterprise partnering	Medium relevance
Stakeholder relations	Medium relevance

Governance Issues	
Issue	Entity Specific Materiality
Audit committee structure/independence	Medium relevance
Board composition	Medium relevance
Board ESG oversight	Medium relevance
Bribery and corruption	Low relevance
Compensation committee structure/independence	Medium relevance
Conflicts of interest	Medium relevance
Cybersecurity	Medium relevance
Data protection and privacy	Medium relevance
Delegating authority	Medium relevance
Executive compensation	Medium relevance
Fraud	Medium relevance
Independence of board chair	Medium relevance
Lobbying activities	Medium relevance
Political contributions	Medium relevance
Shareholder rights	Medium relevance
Whistleblower protection	Medium relevance

