
PURPOSE

Environmental, social, and governance (**ESG**) factors are increasingly important for businesses to consider in their operations, strategy, and reporting. As a natural gas local distribution company, Summit recognizes its responsibility to deliver safe, and reliable energy to our customers, while minimizing our environmental impact, enhancing our social contribution, and ensuring good governance practices. Our ESG policy reflects our commitment to these principles and guides our actions and decisions in alignment with our vision, mission, and values.

Summit's ESG policy covers the following areas:

- **Environmental:** We aim to reduce our greenhouse gas emissions, energy consumption, and waste generation, and to increase our use of renewable energy sources and energy efficiency measures. We also seek to protect biodiversity and natural resources, and to mitigate and adapt to the effects of climate change.
- **Social:** We strive to create a positive social impact in the communities we serve, by supporting local economic development, education, health, and social welfare initiatives. We also foster a culture of diversity, inclusion, and respect among our employees, customers, suppliers, and stakeholders, and ensure a safe, healthy, and productive work environment.
- **Governance:** We uphold high standards of ethics, integrity, and transparency in our governance structure, policies, and processes. We comply with all applicable laws and regulations, and adhere to best practices in risk management, internal control, and audit. We also engage with our stakeholders in a constructive and responsive manner and disclose our ESG performance and progress regularly and comprehensively.

The ESG policy is managed by the Vice President and Corporate Treasurer and approved by the Company's Executive Leadership Team, which consists of senior management. In developing this ESG Policy, we have considered a range of codes and standards, including the United Nations-supported Principles for Responsible Investment (**PRI**), the requirements of our [Anti-Corruption Policy](#) and [Code of Business Conduct and Ethics](#), and the input of our shareholders.

PURPOSE

This Policy applies to all managers, officers, directors, and employees (collectively, "**Team Members**") of Summit Utilities, Inc. and its subsidiaries (collectively the "**Company**").

ENVIRONMENTAL RESPONSIBILITY

Commitment to Environmental Stewardship:

- **Emissions Reduction:** Implement measures to minimize greenhouse gas (**GHG**) emissions, including methane, through improved leak detection and repair programs, adoption of advanced technologies, and implementation of initiatives to reduce emissions in the broader natural gas value chain.
- **Energy Efficiency:** Promote energy efficiency within our operations and support energy efficiency programs for our customers to reduce overall energy consumption and associated emissions.
- **Renewable Energy Integration:** Explore and invest in renewable natural gas (**RNG**) and other low-carbon energy sources to complement natural gas supply, reducing the carbon footprint of our energy portfolio.
- **Environmental Compliance:** Ensure that environmental impact is considered in our operations and our procurement of products and services, management of assets and investment decisions. See Environmental Policy.

SOCIAL RESPONSIBILITY

Workforce and Community Engagement:

- **Employee Well-Being:** Foster a safe, inclusive, and supportive work environment that promotes diversity, equity, and inclusion (**DEI**).
- **Cybersecurity:** Implement robust cybersecurity measures to protect employee, customer and company data. Educate employees on cybersecurity best practices and ensure compliance with relevant data protection regulations.
- **Community Investment:** Engage with local communities through strategic investments in community development, education and public health initiatives. Provide support for community-based environmental and social programs. See [Corporate Giving Policy](#).
- **Customer Service:** Foster a customer-centric corporate environment that embraces innovation, accountability, diversity and kindness to each other, our customers, our stakeholders and the communities we serve.
- **Volunteer Time Off:** Encourage community involvement by providing employees with paid volunteer time off to participate in community service and charitable activities. Promote and support employee-led volunteer initiatives. See [Volunteer Time Off Policy](#).
- **Human Rights and Labor Standards:** Uphold and promote human rights across our operations including fair labor practices, non-discrimination, and prohibition of forced and child labor. Ensure fair and equitable treatment of all employees and contractors and encourage feedback and grievance mechanisms.

- **Stakeholder Engagement:** Actively engage with stakeholders, including customers, communities, regulators, and industry peers, to understand expectations related to ESG performance.

GOVERNANCE

Transparent Reporting:

- **Accuracy and Reliability:** Ensure that all ESG disclosures are accurate, reliable, and prepared in accordance with recognized reporting standards. Implement rigorous internal controls and verification processes to ensure the integrity of the data presented.
- **Standards Alignment:** Align ESG reporting with leading frameworks such as the Global Reporting Initiative (GRI) to provide clear, consistent, and comparable information.
- **Third-Party Verification:** Where appropriate, engage with independent third-party assurance providers to verify the accuracy and completeness of ESG data and disclosures.

Data Management and Integrity:

- **Data Governance:** Establish robust data governance protocols to manage ESG data collection, storage, and reporting. This includes maintaining comprehensive records, ensuring data consistency, and addressing any discrepancies promptly.
- **Continuous Improvement:** Regularly review and improve data management practices to enhance the quality and accuracy of ESG information over time.
- **Stakeholder Communication:** Clearly communicate methodologies, assumptions, and limitations associated with ESG data to stakeholders, ensuring transparency in how data is collected and reported.

Reporting and Accountability:

- **Regular Updates:** Provide regular updates on ESG performance and progress against established goals, highlighting key achievements and areas for improvement.
- **Stakeholder Engagement:** Engage with shareholders, employees, and other stakeholders through accessible and understandable reports, fostering informed dialogue on ESG issues.
- **Board Oversight:** Ensure that the Board of Directors regularly reviews ESG goals and initiatives, reinforcing accountability and oversight at the highest organizational level.

IMPLEMENTATION & ACCOUNTABILITY

Continuous Improvement:

- **Policy Review and Updates:** Regularly review and update the ESG Policy to reflect evolving best practices, regulatory requirements, and stakeholder expectations.
 - The Chief Financial Officer’s organization, through the Manager of ESG, is responsible for the ownership and implementation of this policy.
- **Performance Metrics:** Establish and monitor performance metrics to drive continuous improvement in our ESG efforts, ensuring alignment with our strategic goals and stakeholder commitments.

Responsibilities and Training:

- **Company-wide Accountability:** Assign ESG responsibilities to senior management and ensure accountability for ESG performance across all levels of the organization.
- **ESG Support:** Provide necessary resources and training to employees to support the implementation of this policy.

QUESTIONS

All questions about this ESG Policy should be directed to the Vice President and Corporate Treasurer.

REVISIONS

Date	Revisions
2018-12-18	Adopted.
2024-07-22	Substantial revision. Updated to reflect CFO organization oversight, expanded definitions of goals and reporting.
