



ENVIRONMENTAL, SOCIAL AND GOVERNANCE POLICY

This Environmental, Social and Governance Policy ("ESG Policy") applies to all employees of Summit Utilities, Inc. and its subsidiaries (collectively, the "Company").

I. PURPOSE

At Summit, we are fortunate to serve some of our country's most beautiful communities. From Colorado's majestic mountains to Maine's vibrant lakes and streams, we understand that being a responsible energy provider and a good corporate citizen and neighbor is about more than carrying out the duties of our day-to-day business. It means being a good environmental steward, committed and engaged community member, and ethical business and employer. This is why we regard implementation of environmental, social and governance (ESG) principles as an integral part of how we do business and recognize that our ESG activities are of an on-going nature and strive for continual improvement in our ESG performance.

Our ESG performance has a significant impact on the Company's long-term operational performance in terms of delivering natural gas and other energy solutions to our customers, the well-being of our employees, our access to capital, and the growth and longevity of our business.

In developing this ESG Policy, we have considered a range of codes and standards, including the United Nations-supported Principles for Responsible Investment (PRI), and the requirements of our Anti-Corruption Policy and Code of Business Conduct and Ethics, and the input of our shareholders.

II. RESPONSIBILITY

As a company, we will, to the best of our ability:

- Comply with, and when appropriate exceed, applicable regulations and appropriate best practices governing our operations, the protection of human rights, environmental stewardship, and occupational and public health and safety.
- Adhere to the highest standards of ethical conduct to avoid corrupt business practices and practices involving conflicts of interest.
- Embrace and seek out opportunities to lead and drive change throughout the energy industry and natural gas utilities sector – particularly in regard to environmental stewardship.
- Assist our employees and contractors, as appropriate, in the identification and management of ESG risks and opportunities and provide them with appropriate support and assistance.
- Identify and assess material ESG risks and opportunities as part of the evaluation of growth opportunities and manage material ESG risks and opportunities following acquisitions, including those arising through supply chains, if applicable.
- Support and encourage our employees to help community organizations and activities, such as by providing our employees paid volunteer time off and through corporate giving opportunities.

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- Ensure that environmental impact is considered in our operations and our procurement of products and services, in our management of assets, and in our investment decisions.
- Provide for the assignment of and accountability for ESG responsibilities to senior managers.
- Review this policy’s effectiveness and implementation on a regular basis, and report relevant findings, progress and recommendations to our Board.
- Make available this policy and related ESG information to all employees and the public.
- Ensure appropriate ESG disclosure to, and encourage dialogue on ESG issues with, our shareholders and other stakeholders as appropriate.
- 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.

QUESTIONS

All questions about this ESG Policy should be directed to the Chief Legal Officer.
