

# Sustainability Policy

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1. This CEO approved policy applies to all Chorus people.

## Purpose and overview

2. We're focused on having a sustainable operating model that efficiently delivers our needs of today without compromising our needs of tomorrow.
3. Being sustainable is more than a moral imperative; it is also sensible business. We define corporate sustainability as a business approach that helps create long-term stakeholder value. It's about having strategy that protects nature and reflects the broader cultural, social, and economic context we operate in.
4. Sustainability is aligned to Chorus' broader strategic purpose – it is part of **how** we enable better futures for Aotearoa and deliver on the environmental and social benefits of fibre as a low-emissions and accessible technology.
5. Our sustainability strategy has been developed in alignment with Chorus' overall corporate strategy and sets out Chorus' four focus areas: our people, our environment, our communities, and our customers and partners.

## Our commitments

Chorus is committed to the following:

### 6. Overall commitments:

- a) Report on our sustainability performance both internally, and annually through our Climate Statements, in line with Aotearoa New Zealand climate standards as set by the XRB, and through our Annual Report.
- b) Engage with key stakeholders on our approach to sustainability and work collaboratively within our sector, with communities and with key suppliers.
- c) Provide education and encouragement to our people, suppliers, and partners so people understand our approach to sustainability.
- d) Ensure our sustainability policy works in unison with other Chorus policies and frameworks, namely:
  - i. Health & Safety Policy
  - ii. Code of Ethics Policy
  - iii. Diversity, Equity & Inclusion Policy
  - iv. Risk Management Framework

### 7. Our environment commitments:

- a) Aim to operate an efficient, low emission network and business, with climate-resilient assets.
- b) Reduce scope 1 & 2 emissions 62% by 2030, from a base year of 2020 (our validated Science Based Target).

- c) Implement and maintain an internal emissions data and reporting system.
- d) Disclose our annual Greenhouse Gas Emissions data and report on any changes to previous reporting years (see recalculation guideline section).
- e) Identify and innovate to create a sustainable value chain; reduce waste, energy, and emissions.
- f) Continue to divert waste from landfill through our supplier engagement (packaging reduction or take-back), reusing where possible and recycling all remaining waste (especially our e-waste in alignment with international best practice)
- g) Ensure all physical and operational works comply with the National Environmental Standards for Telecommunications Facilities, the Health & Safety Act NZ, the Resource Management Act and other relevant local and central government legislation.
- h) Engage with iwi, hapū and rūnanga organisations, particularly where build work is scheduled to take place in culturally sensitive landscapes to ensure cultural impacts are appropriately mitigated where possible.
- i) Take practical steps to avoid environmental breaches and report on any potential breaches.
- j) Identify the risks associated with climate change, evaluate, and monitor the risks and if necessary, take action to control, reduce or eliminate them.
- k) Identify, assess and mitigate our climate related risks and opportunities
- l) Know and evidence how climate change is likely to impact our sector and organisation (especially our assets) to cope with changing weather patterns.
- m) Assess physical climate hazards as part of our asset management to help build resilient infrastructure that reduces vulnerability to climate related events and adapt to future climatic conditions.

**8. Our community commitments:**

- a) Continue to collaborate with others who are working towards digital equity in Aotearoa.
- b) Help build awareness of digital skills support available for our local communities.
- c) Support organisations who are focused on digital inclusion and skills.
- d) Continue to connect Aotearoa towns and communities to fibre.

**9. Our partners and customer commitments:**

- a) Support our customers and partners in their own ESG journeys and share our experience and journey for collective good.
- b) Make climate objectives part of our contracts for suppliers.
- c) Encourage our top suppliers to set science-based targets for emission reductions.

**10. Our People commitments:**

- a) Prioritise the safety, health, and welfare of our people, physically, mentally and emotionally.
- b) Create psychological safety by ensuring clear, trusted channels and processes are in place so all Chorus people know how to access help, feel supported and are confident to speak up.
- c) Champion diversity, equity, inclusion and holistic wellbeing, fostering a workplace where everyone feels valued and respected.
- d) Inspire future generations to explore careers in technology, helping build a more inclusive and innovative digital future.
- e) Empower our people to contribute to community wellbeing and social equity through volunteering, partnerships, and social sustainability initiatives. Help our people to live sustainable, low emission lifestyles.

**11. Greenhouse Gas Emissions recalculation guidelines**

- a) Chorus calculates its carbon emissions in line with the Greenhouse Gas ("GHG") Protocol methodology.
- b) This section sets out Chorus's base year emissions recalculation policy in order to articulate the basis and context for any recalculations, and to define what "significance threshold" is to be applied for deciding on historic emissions recalculation.
- c) Subject to the "significance threshold" as set out below, recalculation can be triggered by any one or more of the following cases:
  - a. Structural changes in the business, for example mergers, acquisitions and divestments, new joint ventures, or the outsourcing or insourcing of emitting activities
  - b. Changes in calculation methodology, improvements in the accuracy of data (including emission factors), or the discovery of significant errors in previously reported data
  - c. Changes to the operational or organisational boundaries of the GHG inventory
- d) Base year: Base year Chorus has used June 2019 to July 2020 as the base year for our emission calculations related to our near-term Science Based Target.
- e) Significance threshold definition: If any of the above examples of changes occur which result in Scope 1 & 2 combined emissions, and/or Group Scope 3 emissions changing by 5% or more, then the base year emissions will be recalculated and restated.
- f) If there is a change that results in a difference of less than 5% but is considered by Chorus to be a significant change to the business; Chorus may decide to recalculate and restate the base year emissions.
- g) In any case; this decision will be taken by the Head of Sustainability in consultation with the Executive team and the Audit and Risk Management

Committee. Changes will be made at the end of each financial year, in the next published Sustainability Report.

## 12. Roles and Responsibilities

The roles and responsibilities in relation to this policy are as follows:

### **Audit and Risk Management Committee (ARMC):**

- a) Provide primary oversight for climate-related and sustainability disclosures.
- b) Review climate-related risks and opportunities, and modern slavery risks on a half yearly basis.

### **Board:**

- a) Oversee Chorus' strategy, risk management and governance frameworks.
- b) Monitor the effectiveness of Chorus' sustainability governance policies and practices.
- c) Review, consider and provide feedback on the half yearly sustainability update.
- d) Endorse any new sustainability targets or strategy.

### **CEO:**

- a) Review and approve any new sustainability targets proposed by the Head of Sustainability.
- b) Review this policy biennially.

### **GM Frontier:**

- a) Be the responsible executive for the sustainability strategy and supporting programmes of work.
- b) Review the sustainability goals and targets and monitor the progress made towards achieving them.

### **Executive:**

- a) Understand this policy and communicate/promote our sustainability focus across the business and with key stakeholders.
- b) Provide sustainability leadership within Chorus.

### **Head of Sustainability:**

- a) Lead the co-ordination of the sustainability strategy, targets, and programmes of work and biennial review of this policy.
- b) Recommend sustainability goals and targets to the CEO.
- c) Report to the Chorus executive, ARMC and Board on our sustainability progress.
- d) Communicate our sustainability strategy with key stakeholders.

### **Sustainability team:**

- a) Input into Chorus' sustainability strategy and targets.
- b) Be part of sustainability programmes and activities that will help us achieve our targets.
- c) Assist in the integration of sustainability considerations into business planning and strategy, risk management, processes and culture.
- d) Be advocates and spokespeople across the business for sustainability.

|                             | <b>Person</b>          |
|-----------------------------|------------------------|
| <b>Owned by:</b>            | Head of Sustainability |
| <b>Reviewed by:</b>         | GM Frontier            |
| <b>Approved by:</b>         | CEO                    |
| <b>Due for next review:</b> | October 2027           |