CHORUS

CEO APPROVED POLICY

March 2026

Sustainability Policy

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 meets today's needs without compromising tomorrow's.

3. Being sustainable is more than a moral imperative; it is commercially sensible. We define corporate sustainability as a business approach that helps create long-term stakeholder value. It's about having a strategy that aims to reduce our environmental impact, improve digital equity in Aotearoa, and support our people, our partners and the communities 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' sustainability ecosystem: our environment, our communities, our customers and partners and our people. Our commitments in those four areas are set out below.

Our commitments

Chorus is committed to the following:

6. Overall commitments:

a) Pursue our sustainability strategy and report on our sustainability performance both internally, and externally through our Climate Statements, (in line with Aotearoa New Zealand's 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 key suppliers.

c) Provide education and encouragement to our people, suppliers, and partners so people understand our approach to sustainability and can support progress against targets within their scope of responsibility and influence.

d) Ensure this policy works in unison with other Chorus policies and frameworks, including the:

   i. Health & Safety Policy

   ii. Code of Ethics Policy

   iii. Diversity, Equity & Inclusion Policy

   iv. Risk Management Framework

   v. Supplier Code of Practice

   vi. Anti-Bullying, Harassment & Discrimination Policy.

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) 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 below).

e) Seek 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, assess and mitigate our climate related risks and opportunities (both physical and transition risks)

k) Model how climate change is likely to impact our sector and organisation (especially our assets).

l) 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, devices and skills.

d) Continue to promote fibre for Aotearoa towns and communities.

9. Our customer and partners commitments:

a) Support our customers and partners in their own ESG journeys and share our experience and journey for collective good.

b) Embed sustainability criteria within our contractual agreements with existing and prospective suppliers.

c) Encourage our top suppliers to commit to and validate science-based targets through the Science Based Targets initiative (SBTi), supporting our value chain decarbonisation pathway.

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. Foster a culture that encourages sustainable, low-carbon ways of living and working.

Greenhouse Gas Emissions

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 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: 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 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 Corporate Affairs & Sustainability in consultation with the Executive team and reported to the Audit and Risk Management Committee (**ARMC**). Changes will be made at the end of each financial year and disclosed in the next published Climate Statements.

Roles and Responsibilities

Sustainability is everyone's responsibility at Chorus. Our governance approach emphasises clear oversight by the Board, ARMC and Executive, supported by management embedding sustainability into day-to-day decisions:

Board and/or ARMC

a) Provide oversight of Chorus' sustainability direction, including strategy, climate-related risks and opportunities and external disclosures.

b) Review, consider and provide feedback on Chorus' sustainability reporting including the endorsement of any new sustainability targets or strategy.

Executive Leadership:

a) Provide sustainability leadership within Chorus by integrating sustainability considerations (including climate risks and opportunities) across strategic planning, day-to-day operations, cultural initiatives, and external relationships.

b) Agree sustainability targets.

Corporate Affairs & Sustainability team:

a) Lead Chorus-wide sustainability strategy implementation and coordination.

b) Administer this policy, ensuring Chorus applies a sustainability lens to its decision-making processes.

c) Provide advice to the business on Chorus' sustainability performance, risks and opportunities and progress against plans and targets.

d) Develop and recommend sustainability targets, in consultation with the wider business and in alignment with corporate strategy.

e) Report to the Chorus executive, ARMC and Board on our sustainability progress.

f) Lead Chorus' sustainability reporting.

All Chorus employees and contractors:

a) Assist in the integration of sustainability considerations into everyday decisions (including business planning), aligned with Chorus' purpose and strategic direction.

	Person
Owned by:	Head of Corporate Affairs & Sustainability
Reviewed by:	GM Frontier
Approved by:	CEO
Due for next review:	July 2028