



# 2025 Sustainability Report



**summit**  
UTILITIES

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# Letter from Our President and CEO

To Our Stakeholders,

Following our acquisition of the service territories in Arkansas, Oklahoma, and Texarkana, we recognized that providing exceptional service required the development of entirely new operational frameworks. Our initial priority was to establish a foundational backbone that would allow the organization to function reliably. In 2025, we reached a significant milestone, transitioning from that initial integration period into a new era defined by high-level performance and organizational refinement. This shift toward a performance-based culture serves as the catalyst for our sustainability strategy; by optimizing our operations, we are better able to embed environmental stewardship, safety, and social responsibility into the long-term fabric of our business.

We believe that fostering safety for our communities and our employees is our fundamental license to operate. In 2025, we successfully transitioned our advanced leak identification efforts to a full-scale operation by deploying our target fleet of 10 specialized detection units. By embracing this technology, we have moved to a more frequent three-year inspection rotation, allowing us to identify and mitigate risks much faster than the five-year standard typically seen in our industry. Central to this safety focus is our pipeline replacement program, which made great progress in 2025 as we replaced vintage lines with modern, leak-resistant materials. These are two of the many initiatives that have allowed us to make substantial progress on our safety performance this year.

These same efforts—high-precision leak detection and strategic infrastructure renewal—represent two of the various strategies we employ to reduce our environmental footprint. In conjunction with our other sustainability programs, they play a critical role in our carbon mitigation strategy. By identifying and eliminating potential leaks through both high-precision monitoring and the installation of resilient assets, we directly lower greenhouse gas emissions.

Beyond our operational and environmental work, we have seen exceptional progress in our social initiatives. Our commitment to community engagement reached new heights in 2025 as our team members volunteered a record 10,042 hours—significantly exceeding our goal of 8,900 hours. We also surpassed our 65% participation target, with 67% of our workforce actively participating in programs such as painting homes with Habitat for Humanity and supporting the Special Olympics. These efforts reflect the heart of Summit's culture and our dedication to making a positive difference in the communities where we live and work.

This progress is made possible by the dedication and hard work of the entire Summit team. I want to thank our employees for their unwavering commitment to our values and for the critical role they play in our collective success. I invite you to explore the rest of this report to learn more about the significant strides we are making toward a more sustainable future.

Sincerely,



Kurt Adams President and CEO,  
Summit Utilities, Inc.



# About Summit

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 those states through:

- Arkansas Oklahoma Gas
- Colorado Natural Gas
- Summit Natural Gas of Maine
- Summit Natural Gas of Missouri
- Summit Utilities Arkansas
- Summit Utilities Oklahoma

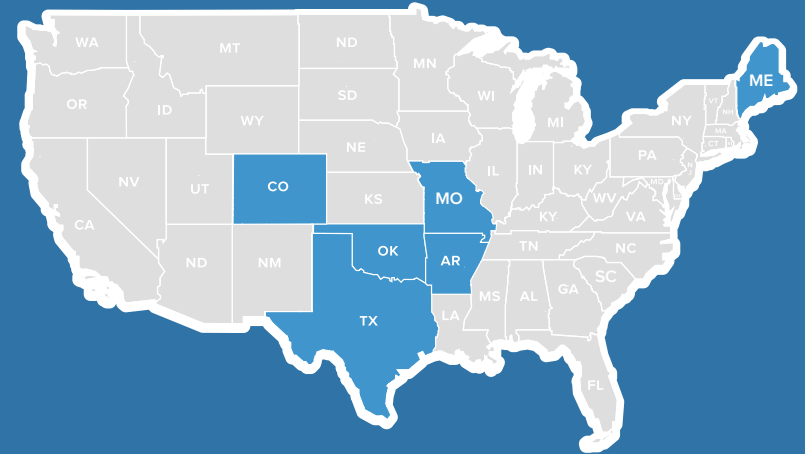
In addition to traditional natural gas distribution, Summit's subsidiary **Peaks Renewables** focuses on developing low-carbon, carbon-neutral, and carbon-negative fuels, including renewable natural gas (RNG). Our mission is to provide safe, reliable, and affordable energy while supporting economic development and delivering exceptional service to our residential and commercial customers.

Each of Summit's local distribution companies constructs and maintains systems that support economic development by delivering safe, reliable natural gas service to residential and commercial customers.

**Summit entities serve approximately 622,209 customers and operate more than 22,518 miles of pipeline.**

## Summit At a Glance

- **1,535** employees
- Operations in **450** communities in **six** states
- Serves **~622,209** customers
- Miles of pipeline/distribution network: **22,518**



# About Our Report

This 2025 Sustainability Report provides a comprehensive overview of Summit Utilities' environmental, social, and governance (ESG) performance for the 2025 calendar year. This report highlights our progress toward our long-term goals, specifically our commitment to achieve net-zero Scope 1 emissions by 2035.

At Summit, we believe that transparency is a fundamental principle of our sustainability approach and a core responsibility to our stakeholders. We recognize that our customers, investors, employees, and community partners rely on clear, accurate data to measure our progress and hold us accountable. This report serves as our primary vehicle for that transparency by moving beyond a simple summary of achievements to offer an honest assessment of our operational milestones, the challenges inherent to our business, and the strategic investments we are making to overcome them.

To ensure rigorous, data-driven, and industry comparable disclosures, our reporting aligns with leading global frameworks and benchmarks, including the Global Reporting Initiative (GRI) and the GRESB Infrastructure Asset Assessment.

## Our Approach to ESG and Sustainability

Sustainability is not a standalone initiative at Summit; it is embedded in how we operate and make decisions across the organization. Our environmental, social, and governance (ESG) approach reflects our responsibility as a regulated energy provider, an employer, and a community partner and supports the long-term resilience of our business.

Summit's ESG approach is grounded in core guiding principles—including regulatory excellence, ethical leadership, risk management, innovation, and community engagement, which shape our strategy and governance.

**These principles are implemented through seven operational pillars that guide our day-to-day execution and long-term planning:**

- **Agility** – Building resilient systems and a flexible workforce capable of navigating a changing energy landscape.
- **Governance** – Maintaining high standards of ethics, corporate oversight, and transparency.
- **Safety** – Prioritizing the well-being of our team members and the public through industry-leading programs such as Advanced Leak Detection.
- **Sustainability** – Investing in emissions reductions and lower-carbon energy solutions to support long-term targets.
- **Communities** – Strengthening the regions we serve through philanthropy, economic development, and employee volunteerism.
- **Our People** – Fostering an inclusive culture and creating opportunities for continuous professional growth.
- **Our Supply Chain** – Partnering with suppliers that share our commitment to ethical conduct, sustainability, and operational excellence.

Together, these pillars translate Summit's ESG principles into action and support long-term value creation for our stakeholders.

# Materiality:

## Aligning Strategy with Impact



To ensure our ESG efforts address the issues most significant to our business and stakeholders, we look to established, infrastructure-specific frameworks to guide our priorities. Summit Utilities references the GRESB Infrastructure Asset Benchmark — a globally recognized standard designed for infrastructure businesses — as the basis for identifying and evaluating ESG topics relevant to our operations. GRESB's entity-specific materiality ratings provide a structured starting point for understanding which Environmental, Social, and Governance issues carry the greatest relevance to companies in our sector.

The table below reflects those ratings as applied to Summit Utilities' business context. High-relevance topics — including greenhouse gas emissions, energy, physical risk, health and safety, human capital, and local employment — inform the priorities of our ESG program and receive the greatest strategic attention. Medium- and low-relevance topics remain part of our ongoing monitoring, while those with no identified relevance to our operations are acknowledged but excluded from active programming.

Issue	Materiality	Issue	Materiality	Issue	Materiality
Environmental Issues		Social Issues		Governance Issues	
Air pollution	Medium relevance	Child labor	No relevance	Adult committee structure/ independence	Medium relevance
Biodiversity and habitat	Medium relevance	Community development	Medium relevance	Board composition	Medium relevance
Contaminated land	No relevance	Customer satisfaction	Medium relevance	Board ESG oversight	Medium relevance
Energy	High relevance	Employee engagement	Medium relevance	Bribery and corruption	Low relevance
Greenhouse gas emissions	High relevance	Forced or compulsory labor	No relevance	Compensation committee structure/independence	Medium relevance
Hazardous substances	Medium relevance	Freedom of association	Low relevance	Conflicts of Interest	Medium relevance
Light pollution	No relevance	Health and safety: community	Medium relevance	Cybersecurity	Medium relevance
Material sourcing and resource efficiency	Low relevance	Health and safety: contractors	High relevance	Data protection and privacy	Medium relevance
Net zero	High relevance	Health and safety: employees	High relevance	Delegating authority	Medium relevance
Noise pollution	Low relevance	Health and safety: supply chain	Medium relevance	Executive compensation	Medium relevance
Physical risk	High relevance	Health and safety: users	High relevance	Fraud	Medium relevance
Waste	Low relevance	Human capital	High relevance	Independence of board chair	Medium relevance
Water inflows/withdrawals	Low relevance	Labor standards and working conditions	Low relevance	Lobbying activities	Medium relevance
Water outflows/discharges	No relevance	Local employment	High relevance	Political contributions	Medium relevance
		Social enterprise partnering	Medium relevance	Shareholder rights	Medium relevance
		Stakeholder relations	Medium relevance	Whistleblower protection	Medium relevance








# UN Sustainable Development Goals (SDGs)



Many of Summit's core activities align with the United Nations Sustainable Development Goals (SDGs), particularly in areas where these goals are material to the business. We take pride in the progress made toward the long-term sustainability objectives of our stakeholders. When financially viable, we establish specific targets to ensure we can effectively contribute to a more sustainable future.

Through our primary operations, we support several SDGs by ensuring access to energy that is affordable, reliable, and modern. Our focus remains on delivering meaningful outcomes for our stakeholders—such as investing in renewable energy, reducing our carbon footprint, and engaging with our communities—to support a more inclusive and greener global path.

The table below details how our specific company initiatives align with various SDGs.

UN Sustainable Development Goal (SDG)	Summit's Contributions	More Information
 <b>SDG 7: Affordable and Clean Energy</b>	Invests in renewable energy initiatives, such as the RNG dairy digester, to provide sustainable and modern energy solutions.	Pages 32-34
 <b>SDG 8: Decent Work and Economic Growth</b>	Supports local hiring, promotes workforce inclusion, and invests in capital projects that create jobs and strengthen local economies.	Pages 36,44, 53
 <b>SDG 9: Industry, Innovation, and Infrastructure</b>	Implements innovative technologies, such as methane recapture and advanced leak detection, to improve energy efficiency and infrastructure.	Pages 17-19, 24-26
 <b>SDG 11: Sustainable Cities and Communities</b>	Invests in safer, more reliable energy infrastructure and supports community engagement through disaster response efforts.	Pages 56, 17-18
 <b>SDG 12: Responsible Consumption and Production</b>	Enhances transparency in ESG emissions through reporting and develops a sustainable supply chain.	Pages 57-60, 64
 <b>SDG 13: Climate Action</b>	Implements carbon reduction initiatives such as advanced leak detection, methane capture, and production of renewable natural gas.	Pages 22-35
 <b>SDG 15: Life on Land</b>	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 29-31



# Governance

# Governance

At Summit Utilities, strong governance is the cornerstone of our operations. We maintain a robust framework of oversight and ethical standards to ensure transparency, accountability, and the long-term resilience of our business. Our governance structure is designed to align our strategic objectives with the interests of our stakeholders while navigating the complexities of the energy transition.



## BOARD OVERSIGHT

Summit's Board of Directors is central to the company's governance, offering high-level strategic direction and extensive risk management. The board consists of six directors, including four independent, non-executive members, whose collective expertise is used to define corporate policies and uphold ethical business standards throughout the organization.

## ETHICS & INTEGRITY

Integrity is maintained through a Code of Conduct and Ethics that serves as an operational blueprint for all employees and contractors. In 2025, the company achieved 100% coverage of key policies, including Anti-Bribery, Anti-Trust, Whistleblower Protection, and Data Privacy. To support a "Speak Up!" culture, the Summit Hotline (855.734.6409) allows for the anonymous reporting of ethical or policy violations.

## RISK MANAGEMENT & TRANSPARENCY

Summit has matured its risk management framework by aligning its risk register and policies with ISO 31000 guidelines. Transparency is reinforced through a new centralized ESG data management platform, which acts as a "single source of truth" for sustainability metrics. This system formalizes data ownership across departments to ensure disclosures are accurate, traceable, and audit ready.

# Cybersecurity Governance



Protecting the integrity of Summit’s operational and customer data is a core governance priority. In 2025, our Information Technology and Cybersecurity teams made significant progress toward our desired target state within the Cybersecurity Capability Maturity Model (C2M2), reinforcing our commitment to a resilient, secure, and compliant operating environment.

Key initiatives included enhanced cybersecurity due diligence for technology vendors, comprehensive security awareness training for all employees, modernization of systems supporting operational reliability, and strengthened endpoint protection and identity and access management controls. Together, these efforts safeguard our digital ecosystem—from field devices to enterprise systems—ensuring alignment with regulatory expectations and industry best practices while enabling safe and reliable utility operations.

To validate and continuously strengthen our security posture, Summit conducts independent penetration testing, vulnerability assessments, and regular incident response and executive tabletop exercises. These activities help identify potential risks, enhance preparedness, and ensure our teams can effectively respond to evolving cyber threats affecting both enterprise IT and critical natural gas infrastructure.

Cybersecurity is also a recurring agenda item for executive leadership and the Board of Directors. Through regular board-level readouts, Summit provides updates on cybersecurity performance, significant incidents, emerging threat intelligence, regulatory developments, and enterprise risk posture. This governance model ensures transparency, reinforces accountability, and aligns cybersecurity strategy with enterprise risk management and business objectives.

These practices are further aligned with recognized industry frameworks, including the Cybersecurity Capability Maturity Model (C2M2) and the NIST Cybersecurity Framework (CSF).

An important indicator of our progress is the phishing click-through rate, which measures the percentage of employees who interact with a simulated malicious link or attachment in our internal cybersecurity training program. Continuous cybersecurity training fosters a culture of vigilance and reduces human-centric risk across the organization.

## Looking ahead to 2026

Summit will continue advancing its cybersecurity maturity in alignment with its C2M2 roadmap. Planned initiatives include enhancing threat detection and response capabilities, expanding executive and operational tabletop exercises, strengthening third-party risk management, and further modernizing security technologies. As part of our commitment to continuous improvement, Summit has established a new target to reduce its phishing click-through rate to 10% or less, reinforcing a culture of security awareness across the organization.

Through disciplined governance, rigorous testing, and ongoing investment in people, processes, and technology, Summit remains committed to protecting its critical infrastructure, customers, and communities while enabling safe, reliable, and resilient utility operations.

# Summit's Board of Directors

Summit's Board is central to our governance structure, offering strategic direction and oversight of organizational risk. Summit's six Directors, four of whom are independent and non-executive, bring varied expertise to inform company policy and support responsible operations.

Strong governance starts with integrity. Board members receive thorough onboarding on conflict-of-interest management, preparing them to handle the complexities of corporate governance effectively.

Transparency is fundamental to how we operate. Quarterly Board meetings include updated risk assessments covering emerging issues, industry developments, and mitigation strategies — ensuring ongoing oversight of risks that could affect our strategic goals, financial outcomes, and market reputation.

This governance framework underpins Summit's sustained performance. We believe that strong Board leadership and long-term organizational health are directly linked.

Full biographies for Board members are available on [Summit's website](#).

## 2025 BOARD DEMOGRAPHICS

6.2  
YEARS

Average board director's  
tenure: 6.2 years

33%

Percentage of female  
board members: 33%

29%

Percentage of board directors  
from underrepresented racial  
or ethnic backgrounds: 33%

## Commitment to Anti-Corruption

At Summit, ethical behavior is embedded in daily operations, not just stated as a goal. Our Anti-Corruption Policy sets clear standards for conduct across the organization, supported by a layered approach combining prevention and oversight.

Key safeguards include pre-clearance requirements for high-risk transactions, monitoring of gifts and hospitality, and defined protocols for government interactions — all reinforced by a confidential reporting hotline and a culture of accountability.

This commitment goes beyond regulatory compliance; it reflects integrity as a core driver of sustainable business performance.

## Anti-Trust and Monopoly Guidelines

As a regulated natural gas utility, Summit upholds fair competition principles as part of its core responsibilities. We recognize that competitive markets drive innovation, efficiency, and customer value.

Our compliance framework supports equitable energy access and healthy market conditions — benefiting both our business and the communities we serve.

In 2025, Summit recorded zero anti-trust or monopoly violations.

## Whistleblower Protection

An ethical workplace depends on every employee taking ownership of Summit's values — both by modeling proper conduct and by speaking up when concerns arise.

Our independently operated, 24/7 confidential compliance hotline gives all employees a safe channel to report issues without fear of retaliation. Awareness of this resource is promoted through the company intranet, workplace signage, and other communication channels.

Creating safe, accessible paths for raising concerns is how Summit ensures transparency extends throughout the entire organization.



In 2025, Summit received, addressed, and resolved **ten** concerns submitted through the Summit Whistleblower Hotline.

# The Summit PAC Update

In 2025, Summit continued to strengthen its commitment to responsible governance through thoughtful and consistent political engagement. Recognizing that effective governance extends beyond internal operations, Summit engages with local, state, and federal policymakers to help shape policies that support sustainable and responsible industry practices and benefit the communities we serve.



Building and maintaining relationships with elected officials and regulators remains a core priority. Through ongoing dialogue and industry education, Summit works to provide clear, fact-based insights that empower policymakers to make informed decisions.

Summit's Political Action Committee (Summit PAC) plays an important role in this effort by offering team members a structured and compliant way to participate in the civic process and engage with broader industry policy discussions. Participation in the Summit PAC is voluntary and reflects the company's commitment to supporting employee involvement in issues that impact the industry and the communities where we operate.

As Summit PAC membership continues to grow, the company remains committed to adhering to all applicable laws, regulations, and reporting requirements governing political contributions and lobbying activities. Integrity and compliance are central to all political engagement efforts.

Through these initiatives, Summit demonstrates that responsible governance includes not only strong internal policies but also active, responsible participation in the public policy process. By engaging constructively with policymakers, Summit helps support a regulatory environment that aligns with its commitment to sustainability and responsible business practices.

## Looking Ahead to 2026

### • ISO 31000 Full Rollout:

We will continue refining and expanding our ISO 31000-aligned risk management practices, reinforcing the enterprise-wide framework through iterative improvements to our risk register and policies.

### • ESG Data Platform Completion:

We will finalize the ESG data platform rollout, transitioning from manual tracking to a digitized, audit-ready baseline for all material disclosures. This will enable us to ensure the accuracy and completeness of our data.

### • “Speak Up” Culture Reporting:

We will publish a dedicated progress report on our Speak Up! Program, Summit's confidential ethics reporting system, providing greater transparency on its reach and effectiveness.



# Commitment to Health and Safety



# Commitment to Health & Safety

Safety is the fundamental foundation of Summit Utilities' culture and the primary lens through which we measure operational success. It is more than a priority; it is a core value integrated into every decision we make to ensure the well-being of our team members, customers, and communities. To maintain this commitment, we employ a proactive, multifaceted approach that combines advanced technology, field training, and a focus on identifying risks before they lead to incidents.

By fostering an environment where every employee is empowered to prioritize safety above all else, we enhance the resilience of our infrastructure and build lasting trust with our stakeholders. Our determination to achieve excellence and to be transparent is reflected in our Corporate Scorecard, which we use to track key performance indicators and hold ourselves accountable. In 2025, we were proud to cut our total recordable injury rate in half compared to 2024, a significant achievement resulting from our ongoing investments in training and cultural development. However, we recognize that our work is never finished; for example, preventable motor vehicle accidents trended upward this year. We are addressing this challenge head-on with targeted initiatives to ensure the continued reliability of our systems and the safety of every team member, every day.

## Key Achievements

**In 2025, Summit made significant strides across safety performance, training, and culture-building through the following initiatives:**

- **Significant Injury Reduction:** We achieved an approximately 50% reduction in our Total Recordable Injury Rate (TRIR) compared to 2024.
- **Advanced Leak Detection (ALD) Full Expansion:** In 2025, Summit achieved full expansion of its ALD program, deploying 10 mobile ALD units used to detect leaks.
- **Safety First Mentorship Program:** Launched in July 2025, this formal six-month program pairs our most experienced field personnel with newly hired team members. The program provides every team member with the personalized guidance they need to navigate the unique challenges of field operations safely. Our first class of mentees successfully graduated by year-end.
- **Infrastructure Integrity and Probabilistic Modeling:** Our safety strategy is further strengthened through integration with probabilistic leakage modeling. This data-driven approach, combined with recommended Distribution Integrity Management Program (DIMP) replacements informed by methane volume averages collected by advanced mobile leak detection vehicles, allows us to target the replacement of the riskiest pipelines. This strategy is expected to reduce leakage in the Arkansas and Oklahoma systems over time while enhancing the long-term safety and resilience of our network.
- **Strengthened EHS Onboarding:** We enhanced the Environmental, Health, and Safety (EHS) onboarding process. The program was expanded from a brief 2–3 hour orientation to a dedicated, week-long curriculum delivered to ensure a high standard of safety readiness from day one.

# Key Achievements

## CONTINUED

- **In-House Line Locating:** To better protect our underground infrastructure and the public, we are transitioning line locating services to our internal teams.
- **AGA Recognition:** For the ninth consecutive year, Summit received the AGA Industry Leader Accident Prevention Certificate (DART Award), recognizing our sustained excellence in accident prevention.
- **Field Service Management (FSM) Transformation:** In 2025, we began transforming our FSM systems as part of our key operational initiatives. By streamlining how we schedule and dispatch work, we are improving the efficiency of our response times and ensuring that the most qualified technician is assigned to the right job every time.
- **Safety Training Excellence:** Our workforce completed over 6,600 hours of safety training this year, ensuring our team is equipped with the latest knowledge and skills to operate safely in both the field and the communities we serve.
- **“Why I Work Safe” Campaign:** We continued the “Why I Work Safe” campaign company-wide, deepening personal engagement with safety. By sharing personal motivations—such as families, hobbies, and community involvements—we remind one another that our safety protocols are not just rules, but the way we ensure everyone gets home to what matters most.

# Safety Culture

## POLICIES AND PROCEDURES

Summit is dedicated to ensuring a safe and healthy work environment for all 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.

Comprehensive training programs focused on identifying actual and potential hazards, ensuring that team members were equipped with the skills and knowledge necessary to maintain safety.

## SAFETY FIRST MENTOR PROGRAM

One of the most significant new safety initiatives of 2025 was the launch of the Safety First Mentorship Program. Developed in direct response to data showing a higher potential incident rate among newer team members, this formal six-month program pairs recently hired employees with experienced mentors—typically members of one of Summit’s Safety First committees.

The program establishes a structured process of regular check-in meetings between the new team members, their safety mentor, their supervisor, and the EHS team. By the end of 2025, Summit celebrated its first graduating class of program participants, a milestone that reflects the company’s data-driven and proactive approach to protecting its workforce.



# Safety Culture

## ADVANCED LEAK DETECTION

Keeping natural gas safely contained within our pipeline system is one of Summit's most fundamental safety responsibilities—to our team members, our customers, and the communities where we operate. Advanced Leak Detection (ALD) technology is central to how we meet that responsibility. By deploying state-of-the-art Picarro high-precision gas analyzers across our service territories, Summit can identify leaks faster, survey more of our system more frequently, and respond to potential hazards well before they pose a risk to public safety.

Where traditional survey methods rely on technicians walking routes with handheld detectors, ALD units use high-precision laser technology to detect concentrations of methane from a moving vehicle, covering more ground in less time and with far greater sensitivity. This means that a leak that might have gone undetected for up to five years under conventional survey schedules can now be potentially identified and remediated promptly, protecting customers, residents, and our infrastructure alike.



*ALD in action: Summit's survey vehicles bring high-precision methane detection directly to our communities*

## 2025 Advanced Leak Detection Highlights

### Full-scale deployment across summit's footprint

2025 marked a significant milestone: the successful completion of Summit's full-scale ALD hardware deployment. Summit now operates a fleet of 10 specialized ALD units—giving the company consistent, high-sensitivity leak surveying capability across its three primary gas service territories.

Reaching this scale was not simply a technology upgrade—it represented a fundamental shift in how Summit approaches public safety and system surveillance. With a full fleet operational, Summit can now execute advanced leak surveys across our systems. The result is a more complete, more current picture of the integrity of our distribution system at any given time.

### Accelerating Survey Cycles: From Five Years to Three

One of the most consequential safety outcomes of full ALD deployment is Summit's ability to survey its entire distribution system on a three-year cycle—a significant acceleration from the five-year cycle that represents the industry standard for plastic and coated, protected steel pipelines.

For customers and communities, this matters enormously. A leak that might have gone undetected for up to five years under a conventional schedule can now be potentially identified within three years, given that ALD-equipped vehicles can detect anomalies at trace levels that handheld instruments could miss. Critically, this capability extends

to customer-side leaks — enabling Summit to identify and address potential hazards at the residential level before they escalate to emergency calls, reducing incident risk and improving customer experience without a regulatory mandate driving it. Faster detection of potentially hazardous leaks means faster remediation, reduced exposure risk, and greater confidence in the safety of the gas distribution system serving homes and businesses across Summit's footprint.

### Speed, Precision, and Faster Remediation

The safety case for this advanced detection technology rests on two core advantages over conventional detection methods: speed and precision.

**On speed:** a vehicle-mounted ALD unit can survey pipeline routes at normal driving speeds, covering in hours what might take a technician days on foot. This allows Summit to complete full territory surveys more efficiently, giving leak survey teams a better way to focus on actual leaks rather than clearing no-leak areas.

**On precision:** these devices' advanced sensors can detect methane concentrations at the parts-per-billion level. This makes it possible to find very small leaks, the kind that pose a low immediate risk but can grow over time if left unaddressed. By identifying these leaks earlier in their lifecycle, Summit can prioritize and remediate them before they escalate, rather than responding reactively to larger failures.

# 2025 Advanced Leak Detection Highlights *continued*

## Regional Deployment and Regulatory Compliance

Summit's ALD deployment is calibrated to meet state-specific regulatory requirements. In Colorado, where direct emissions reporting obligations apply, Summit maintains a dedicated ALD unit to ensure that survey data meets the precision and documentation standards required by state regulators. This ensures that Summit's safety and compliance programs are mutually reinforcing: the same technology that protects public safety also generates the verified data needed to satisfy regulatory oversight.

**Our ALD fleet now completes a full system survey every three years, ensuring more frequent and rigorous leak inspections across the network.**

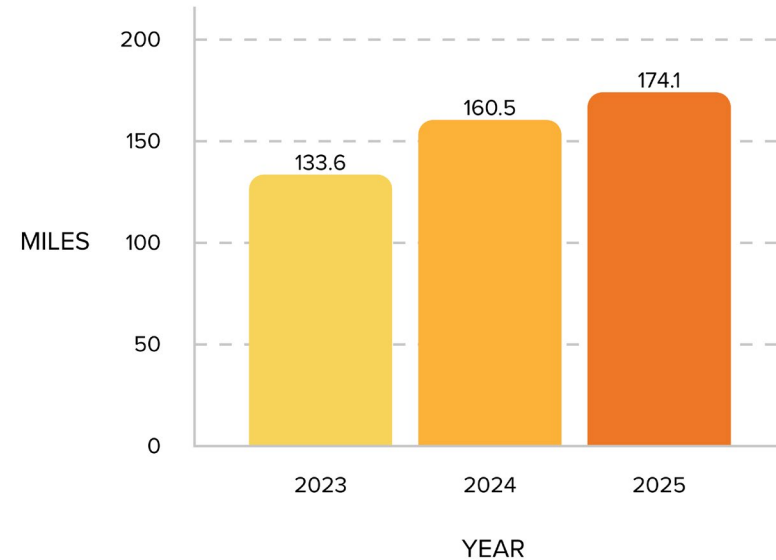
## Pipeline Replacement: Reducing Risk at the Source

Advanced Leak Detection finds leaks. Integrity Risk Models project future leaks. Pipeline replacement works to reduce them. Together, these programs form the backbone of Summit's proactive infrastructure integrity strategy.

Summit continues to prioritize capital investments to reduce risk and enhance safety and reliability by proactively replacing leak-prone mainlines and associated service lines with modern materials and construction methods. These replacements target aging infrastructure (bare/unprotected steel and vintage plastic) that carries a statistically higher risk of failure, leakage, and third-party damage over time.

Replacement decisions are guided by Summit's Distribution Integrity Management Program (DIMP) and informed by probabilistic leakage modeling and emissions data collected by ALD. This is a data-driven approach that uses methane volume averages and system data to identify and prioritize the segments of our network most likely to pose future safety risks. This analytical rigor ensures that capital is deployed where it will have the greatest impact on public safety and system reliability.

The company has retired the following number of miles of pipeline through its System Improvement capital investments:



*Miles of pipeline retired annually through System Improvement capital investments.*

The trajectory is clear and deliberate: Summit retired 133.6 miles of leak-prone mainline in 2023, 160.5 miles in 2024, and 174.1 miles in 2025. This represents a 30% increase over the three-year period. This consistent acceleration reflects Summit's growing operational capacity and its commitment to moving aggressively on the highest-risk segments of its inherited infrastructure.

In 2025, Summit retired  
**174.1 miles**  
of leak-prone mainline—  
its highest annual total to date.

## ENHANCED EHS ONBOARDING

Building on years of safety culture development, Summit significantly strengthened its Environmental, Health and Safety (EHS) onboarding process for team members beginning in 2025.

Led by Safety Specialists and coordinated with the technical training team, this expanded onboarding moves beyond surface-level policy review. Team members explore the reasoning behind each safety requirement and walk through real-world examples of how those requirements apply to their specific roles. The response from employees in the field has been consistently positive, with many noting that the depth of engagement signals a genuine organizational investment in their well-being.

## IN-HOUSE LOCATING OPERATIONS

A multi-year initiative to bring line locating operations in-house reached a significant milestone in 2025, with the North Region of Arkansas now operating exclusively with internal locators.

This shift has improved both efficiency and quality. When locate tickets arrive, Summit's own team members respond directly, meaning that if a line cannot be found or further investigation is needed, the company can expedite resolution without waiting for a third-party vendor. The result is more accurate utility markings in the field, faster response times, and lower damage rates. This in-house capability also strengthens Summit's broader integrity management and damage prevention mission.



# Annual Safety Summit

Each year 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 2025, team members once again 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 Safety 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 strategies to address emerging safety challenges.

The dedication and engagement demonstrated throughout the Safety Summit reflects Summit's unwavering responsibility to making safety more than just a policy—it is a mindset that defines our operations every single day.



In 2025, Summit team members completed over **6,600 Hours** of safety training.

# Community Safety

## PUBLIC SAFETY & COMMUNITY ENGAGEMENT

Summit's commitment to safety extends far beyond our operational footprint and into the neighborhoods we serve. We believe that an informed community is a safer community, which is why we invest in public education, damage prevention advocacy, and deep partnerships with local first responders.

## COMMUNITY ENGAGEMENT AND OUTREACH

In 2025, Summit teams participated in over 15 high-visibility community events to provide face-to-face safety education. By engaging with thousands of residents at venues such as the Oklahoma State Fair, the Arkansas Home Show, and the Maine Flower Show, we share critical information on how to recognize the scent of natural gas and the importance of calling 811 before digging. These interactions allow us to translate complex safety protocols into accessible, life-saving knowledge for our customers.

## DAMAGE PREVENTION AND 811 ADVOCACY

Preventing damage to underground utilities is an essential component of maintaining the integrity of our services. Central to this effort is our promotion of the 811 "call-before-you-dig" service.

Data from 2025 indicates that **approximately 33% of system damages occur because an 811 call was never placed**. To combat this, Summit has shifted toward a more proactive, internal model:

- **Public Awareness:** Each year on August 11th (811 Day), Summit joins utilities nationwide to reinforce this simple yet powerful step that protects excavators and residents alike. In 2025, our 811 Day efforts included:
  - Issuing official press releases in Arkansas and Oklahoma, reminding customers of state-specific notification timelines.
  - Amplifying 811 Day messaging across Summit's social media channels, aligned with Damage Prevention and Corporate Communications plans.
  - Co-hosting in-person community events with state 811 organizations, bringing together utilities, regulators, contractors, and excavators for live education sessions.

## CONTRACTOR SAFETY AND CONSTRUCTION ACTIVITY MANAGEMENT

As infrastructure investment has accelerated across Summit's service areas, driven in part by significant federal funding for fiber and telecommunications upgrades, the volume of excavation activity near Summit's underground assets has increased substantially.

Summit has responded by strengthening oversight of contractor safety practices, holding all contractors to rigorous standards as a condition of working near Summit's underground infrastructure. By ensuring locate tickets are handled with precision and accountability, Summit reduces the risk that third-party excavators break ground on inaccurate or outdated utility markings.



Know what's below.  
Call before you dig.



## PARTNERSHIPS WITH FIRST RESPONDERS

When incidents do occur, seamless coordination with local authorities is vital. Throughout 2025, we continued our robust partnership with regional fire districts, hosting specialized natural gas safety training for local firefighters.

Led by our senior safety specialists, these sessions provide emergency responders with practical skills, including:

- Natural gas safety fundamentals and hazard detection.
- Live simulations to distinguish the physical properties and flammability limits of propane versus natural gas.
- Emergency response procedures tailored to gas-related incidents.

These collaborations strengthen interagency preparedness and reinforce Summit's role as a trusted, transparent partner in the communities where we operate.

## WHY I WORK SAFE CAMPAIGN

What started as a local effort in Summit's Oklahoma territory has grown into a company-wide cultural movement. The "Why I Work Safe" initiative resonates deeply with team members across all regions because it makes safety personal, grounded not in rules or policies, but in the people and things that matter most.

Every day, employees across Summit share their personal reasons for working safely: their families, their health, their teammates, and their communities. By bringing these stories to the forefront—through dedicated bulletin boards in field offices and a virtual space on the company intranet—Summit has created a workplace where safety is about protecting what matters most.

The 2024 Safety Summit elevated this initiative to a new level by formalizing it as a company-wide practice, and 2025 saw continued expansion and deepening engagement as the program became a fixture of Summit's identity. 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.



## Looking Ahead to 2026

Summit's safety journey is one of continuous evolution. Building on the momentum of 2025, the company is preparing several forward-looking initiatives designed to further strengthen its safety culture, improve performance metrics, and embrace new technologies:

- **GPS Precision Mapping & Damage Prevention:** In 2026, Summit will launch a multi-year, multi-million dollar initiative to improve GPS accuracy for all underground facilities.
- **Technician Route Optimization:** We are piloting technology that uses advanced algorithms to optimize travel paths for our field teams. This ensures our qualified technician reaches a job site faster while reducing total miles driven.

- **Emissions Reduction Leaks (ERL) Program:** Beginning in 2026, we will expand this program to target non-hazardous, high-volume methane emitters. By prioritizing these specific leaks, we are optimizing our mitigation strategy to "tighten" our system for the long term.
- **Virtual Reality (VR) Training:** Summit will trial VR-based tools to bring immersive, scenario-based learning to our technical training.
- **Fleet Safety & Driver Coaching:** To address the vehicle incident trends from 2025, we are increasing investment in driver safety programming by including data-driven monitoring and behavioral coaching.



**There is no finish line when it comes to safety. Every year, every initiative, and every team member's story adds to a culture that is stronger, more resilient, and more deeply committed to protecting what matters most.**



# Environmental Stewardship



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# Environmental Stewardship

We are dedicated to providing the safe, reliable, and cleaner energy necessary to power our communities while actively reducing our operational footprint. Our strategy is guided by the principle that natural gas and its infrastructure are essential components of a reliable and resilient energy system that can contribute to meeting ambitious climate goals while maintaining affordability and safety for our customers.

Central to this strategy is our commitment to achieving net-zero Scope 1 emissions by 2035. Our approach to decarbonization is grounded in tangible operational action: pipeline replacement, advanced leak detection, and damage prevention programs that permanently remove fugitive methane from our distribution system rather than relying on future offsets. These same programs that protect public safety are the foundation of our path to net zero.

We align our operations with a performance-based approach, leveraging advanced data and technology to prioritize investments that yield measurable reductions in our environmental footprint. By focusing on infrastructure modernization and the development of renewable fuels through Peaks Renewables, we are building a sustainable foundation for the generations to come.

## Our Environmental Management System (EMS)

Summit's Environmental Program is built around the ISO 14001 framework, one of the most globally respected standards for environmental management.

Summit uses this structure to establish, implement, sustain, and continuously strengthen its environmental performance while demonstrating a genuine commitment to sustainability. As part of this effort, the company has evaluated its environmental impact, set clear environmental objectives, and regularly tracks its progress against those goals.

Internally, Summit conducts management reviews to assess how well its environmental program is advancing within the ISO 14001 framework. In addition, the company periodically brings in outside consultants to independently evaluate regulatory compliance and gauge the overall effectiveness of its environmental program, policies, and procedures.

## ADVANCED LEAK DETECTION AND EMISSIONS REDUCTION:

Natural gas is primarily composed of methane—a potent greenhouse gas. When gas escapes from our distribution system through leaks, it contributes to atmospheric emissions and represents both an environmental liability and a waste of a natural resource. Summit's ALD program directly addresses this challenge by enabling accurate measurement of methane across the service territory where ALD units are deployed. While ALD is also a cornerstone of our public safety program, its environmental benefits are equally significant and are central to our long-term emissions reduction strategy.

The deployment of high-precision analyzers used for methane leak detection transforms the way Summit measures, understands, and reduces its methane footprint. Unlike conventional survey methods, ALD units deliver high-precision concentration data that quantifies the leak, not just locates it. This richer dataset allows Summit to develop area-specific emissions factors and build a more accurate, evidence-based picture of where methane losses are occurring and at what scale agent was applied. Throughout this process, we ensured that precise GPS coordinates were captured for the new infrastructure.

**10**

ALD Units  
Deployed

**3-Year**

Survey Cycle  
(down from 5)

**\$7M**

In Cost  
Savings Realized



## 2025: Full-Scale Deployment Achieved

The completion of Summit's full ALD hardware rollout marked a significant milestone in 2025. Summit now operates a fleet of 10 ALD units across the territories we serve. Achieving this scale was a prerequisite for the next phase of Summit's emissions work: moving from isolated data points to a comprehensive, territory-wide emissions baseline.

### Key milestones from this deployment include:

- **Accelerated Survey Cycles:** Summit has successfully transitioned from the industry-standard five-year survey cycle to a three-year cycle across its entire footprint. More frequent surveys mean leaks are identified and repaired sooner, reducing the cumulative volume of methane released between detection and remediation.
- **Operational Savings:** By negotiating at scale, Summit realized approximately \$7 million in cost savings on implementation and vendor pricing—resources that can be reinvested in emissions reduction infrastructure and other environmental programs.
- **Regional Specialization:** A dedicated ALD unit is maintained in Colorado to satisfy state-level direct emissions reporting requirements, ensuring that Summit's data meets the precision standards required for regulatory compliance and voluntary disclosure.

## FROM DETECTION TO EMISSIONS INTELLIGENCE

The environmental value of advanced leak detection technology extends well beyond finding individual leaks. The precise measurement data generated by each survey pass allows Summit's integrity and environmental teams to characterize emissions patterns at a granular, area-specific level. This enables the development of localized emissions factors that more accurately reflect the actual performance of our distribution assets in each operating environment—a significant improvement over industry-average assumptions.

This data foundation is instrumental in guiding Summit's long-term emissions reduction strategy. By understanding where methane losses are concentrated, whether by geography, pipe material, age, or operating conditions, Summit can target infrastructure replacement and remediation investments where they will have the greatest emissions impact. The insights gathered through leak detection technology deployment are actively informing the next phases of Summit's emissions roadmap.

# Conserving a Natural Resource

Every undetected leak represents a double loss: natural gas that never reaches a customer, and methane released directly into the atmosphere as a potent greenhouse gas. That gas was extracted, transported, and distributed — only to be lost as both a wasted resource and an avoidable emission. Summit's ALD program works to conserve a natural resource, reduce system losses, and measure greenhouse gas emissions — improving both the efficiency of gas delivery and the environmental footprint of our network.

This resource conservation dimension connects Summit's environmental performance directly to its operational and customer service commitments. A tighter, better-surveyed system is not only better for the environment, but also for the customers who depend on reliable, efficient gas service. The safety benefits of faster leak detection—explored in detail in the Safety section of this report—are the complement to these environmental gains: the same technology, serving both missions simultaneously.

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**More frequent surveys.  
More precise data.**

A clearer path to reducing  
Summit's methane footprint.

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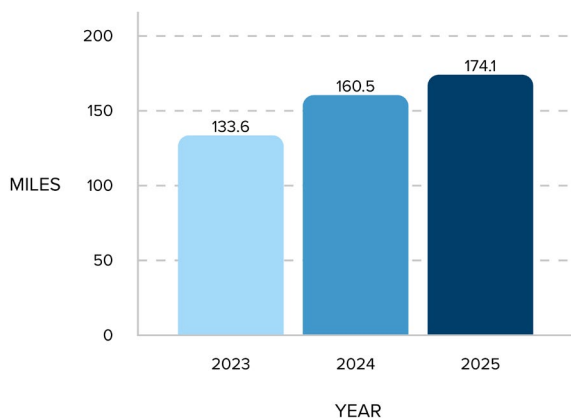
# Pipeline Replacement: Durably Reducing Fugitive Emissions

While the safety benefits of pipeline replacement are covered in the Safety section, the environmental impact is its own story: every mile of aging pipe replaced is a permanent reduction in our methane footprint.

Advanced Leak Detection identifies where our system is losing methane; pipeline replacement addresses those loss points at the source. While ALD enables Summit to find leaks faster and more accurately than ever before, certain categories of aging infrastructure, particularly steel pipelines that lack corrosion resistant coating and cathodic protection (also known as “bare” or “unprotected” steel), as well as vintage plastic pipelines made with resins that become brittle over time, represent chronic, structural emission sources that detection and repair alone cannot fully resolve. Replacing this infrastructure is the only way to permanently remove these emission points from our network.

Summit continues to prioritize capital investments in infrastructure modernization, with each mile of aging pipe replaced representing a permanent reduction in fugitive methane emission potential of our distribution system. From an environmental perspective, each mile of aging pipe replaced is a permanent reduction in the fugitive methane emission potential of our distribution system. This represents a durable, verifiable contribution to Summit’s long-term emissions reduction goals.

Replacement decisions are guided by Summit’s Distribution Integrity Management Program (DIMP) and informed by probabilistic leakage modeling that incorporates the precise measurement data generated by our ALD fleet. This is where the two programs become more than the sum of their parts: ALD surveys identify where methane concentrations are highest and characterize emission volumes at the segment level, while DIMP analysis uses that data to determine which pipe segments represent the greatest long-term emission risk. The result is a capital investment strategy that is measurably targeted at the highest-impact replacements. We focus not just on the riskiest pipes but also consider the ones contributing most to our methane footprint.



Miles of mainline retired annually through System Improvement capital investments

In 2025, Summit retired **174.1 miles** of leak-prone mainline—a 30% increase since 2023 and the program's highest annual total to date.

Summit retired 133.6 miles of mainline in 2023, 160.5 in 2024, and 174.1 in 2025 — a 30% increase over three years that reflects both the scale of legacy infrastructure across Summit's service territories and the company's deepening commitment to infrastructure modernization as a core emissions reduction strategy.

The environmental significance of this program compounds over time. Unlike a repaired leak — which resolves the immediate emission but leaves the underlying pipe in place — a replaced pipe segment reduces the structural emission risk at that location, replacing a chronic liability with modern material that won't degrade, corrode, or permeate as much as its predecessor did. Modern polyethylene pipe does not corrode and does not develop the micro-permeations associated with aging metallic mains, significantly extending the useful life of the network. Each mile replaced is a mile that is far less likely to require repeated remediation, reappear in future ALD surveys as a chronic emitter, or contribute to the fugitive emission totals that Summit is committed to driving down year over year. This program is a foundational pillar of Summit's path to net-zero Scope 1 emissions by 2035. Looking ahead, the 10/50 Strategy described in the Looking Ahead section—where targeting the worst 10% of emitters can yield a 50% reduction in total system emissions—will increasingly rely on ALD-informed replacement prioritization to deliver those results. The safety benefits of this work, which are explored in the Safety section of this report, are inseparable from its environmental impact: the same pipe that stops emitting methane is also the pipe that stops posing a risk to the public.

**174.1 miles of leak-prone mainline retired in 2025. Each mile replaced is a reduction in Summit's methane footprint.**

## OPERATIONAL OPTIMIZATION TECHNOLOGY

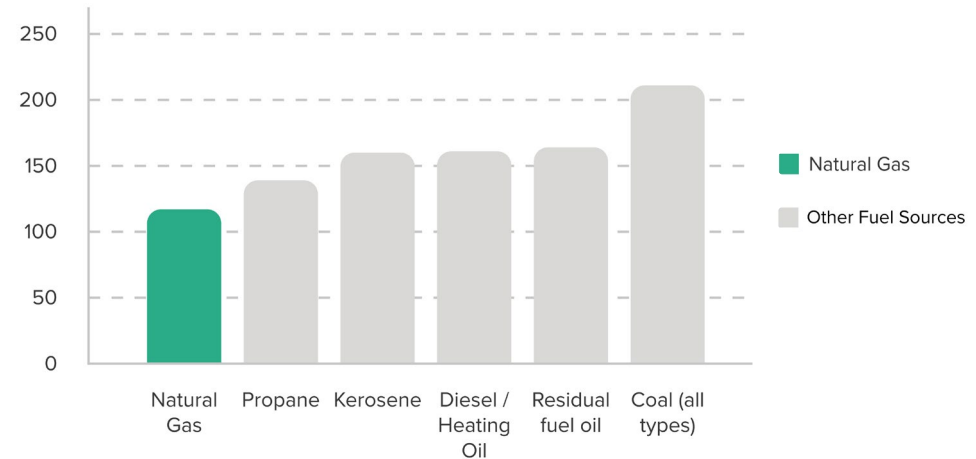
Building on our commitment to efficiency, we have updated our "Optimization Technology" protocols. By utilizing advanced logistics algorithms, we are improving technician routing to ensure the most qualified personnel reach their destinations faster. This not only improves service but reduces our total fleet miles driven and the associated vehicle emissions.

## CARBON INTENSITY COMPARISON

Natural gas continues to play a vital role in reducing the carbon intensity of the U.S. energy grid. When compared to other fossil fuel sources, natural gas remains the cleanest combustion option for heating and industrial processes.

### Carbon Intensity by Fuel Type

(Lbs of CO<sub>2</sub> per million Btu – U.S. EIA, 2022)



## Energy Efficiency Programs

Summit's energy efficiency programs help homes, schools, businesses, and public institutions use natural gas more effectively, lowering utility bills, reducing waste, and contributing to Summit's broader goal of shrinking the environmental footprint of natural gas delivery across our service territories.

In 2025, Summit's energy efficiency programs delivered incentives and technical support that enabled measurable reductions in natural gas consumption. These programs span a range of facility types and intervention strategies—from high-efficiency commercial boiler upgrades and steam trap replacements at hospitals and universities, to weatherization improvements at government buildings and school-based education initiatives that reach thousands of students directly.

**\$8,130,452**

In Incentives Paid

**5,206,978**

Therms Saved

**168,922**

Units Installed<sup>1</sup>

### WHERE THE SAVINGS COME FROM

Summit's efficiency programs are tailored to the specific needs and energy profiles of different customer segments. In 2025, the highest energy savings were generated across four primary categories. Commercial and Industrial projects account for the largest share of total therms — a reflection of the scale of custom upgrades at hospitals, universities, and industrial facilities, where single projects can deliver tens of thousands of therms in savings. Across all segments, the breadth of participation reflects Summit's commitment to serving diverse community needs:

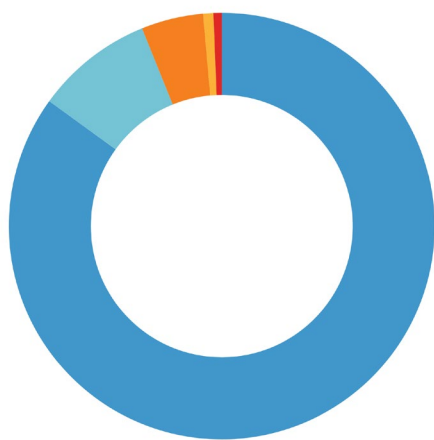
- **Education Institutions:** Schools, colleges, and universities across Arkansas and Oklahoma accounted for the largest share of program participation and savings. Through a combination of the LivingWise School Kit program—which delivers hands-on energy education and practical efficiency measures to fifth and sixth grade students—and direct equipment upgrades at university campuses, Summit supported 45 educational institutions in reducing their natural gas consumption. The LivingWise program alone reached 49 school districts and distributed over 9,044 kits, generating an estimated 208,301 therms in savings while building lasting energy literacy in the next generation.

<sup>1</sup>Units installed" reflects the number of individual pieces of equipment installed across all program participants during the 2025 program year. This includes items such as aerators, weatherstripping kits, tankless water heaters, and other efficiency measures. Note that measurement conventions vary across the energy efficiency industry; some programs count unique customers or households rather than individual equipment pieces.

## WHERE THE SAVINGS COME FROM *(continued)*

- **Government Facilities:** Six government facilities—including fire stations, city halls, and police departments—participated in weatherization and equipment upgrade programs. The Weatherford Fire Station (SUO) was the single largest energy saver in the portfolio, with overhead door weatherstripping delivering nearly 77,966 therms in estimated annual savings from a single project. Across the government segment, weatherization improvements collectively saved over 142,689 therms.
- **Commercial and Industrial Custom Projects:** Twenty-two commercial and industrial facilities participated in customized energy audits and targeted upgrades, including boiler tune-ups, boiler replacements, and steam trap replacements at hospitals, universities, and healthcare facilities. These custom projects, while fewer in number, deliver some of the highest per-project savings and demonstrate the value of tailored efficiency solutions for complex facilities.
- **Affordable Housing and Shelter:** Summit continued to prioritize energy efficiency investments in affordable housing, supporting 6 multifamily housing authorities and shelters across Arkansas and Oklahoma with tankless water heater installations and equipment bundles. These investments reduce utility burdens for low- and moderate-income residents, a population for whom energy costs represent a disproportionate share of household expenses.

### Estimated energy savings (therms) by participant category



## HIGHLIGHTS: DELIVERING EFFICIENCY AT SCALE

Several 2025 program participants stand out for the scale or significance of their energy savings:

- **Weatherford Fire Station (SUO):** A comprehensive overhead door weatherstripping project at the Weatherford Fire Station delivered an estimated 77,966 therms in annual savings, the largest single-project result in the 2025 portfolio. The City of Weatherford also participated separately, with combined government facility savings across the Weatherford area exceeding 129,000 therms.
- **VA Medical Centers (SUA):** Summit partnered with the VA Medical Center in North Little Rock and the John McClellan VA Hospital on multiple steam trap replacement and insulation projects, collectively delivering over 92,000 therms in estimated savings. These facilities serve veterans across Arkansas, and the efficiency improvements directly reduce operating costs that would otherwise reduce funds available for patient care.
- **Russellville School District (SUA):** With 1,128 LivingWise School Kits distributed to students, the Russellville School District was the largest single participant in the school education program, generating an estimated 26,095 therms in savings while bringing hands-on energy education to classrooms across the district.
- **Arkansas State University – Jonesboro (SUA):** ASU Jonesboro participated in both the aerator program (992 units across dormitories and residential facilities) and weatherstripping projects, generating a combined estimated 67,306 therms in savings—one of the highest totals for any single institution in the portfolio.

## CHALLENGES AND CONTEXT

Summit's energy efficiency programs operate in a challenging economic environment. Rising equipment costs have increased the incremental expense of high-efficiency appliances, particularly high-efficiency furnaces, making it harder for customers to justify the upfront investment even with incentive support. Summit is actively working to update its rebate structures to remain competitive, but general inflationary pressure on equipment pricing is an industry-wide headwind that affects participation rates across all program types.

While Summit supports higher efficiency standards, customers should retain the right to choose the equipment that best meets their individual needs and financial circumstances. Utility energy-efficiency programs provide incentives that help offset the cost of higher-efficiency equipment, while still allowing customers with limited budgets to select more affordable options. Government mandated efficiency standards require existing gas customers to purchase higher-efficiency equipment whether it is financially feasible for them. Summit monitors this regulatory development closely and will adapt its program design accordingly.

# Looking Ahead to 2026

Summit is expanding its energy efficiency portfolio in 2026 with two new programs designed to reach previously underserved customer segments:

- **Oklahoma Weatherization Program:** A new weatherization initiative for Oklahoma customers, with a specific focus on rural households that lack access to traditional utility weatherization programs. The program is structured around the profile of each home, its age, construction type, and energy consumption—to deliver tailored efficiency improvements. This fills a meaningful gap in Summit’s Oklahoma service territory, where no comparable program previously existed.
- **Mission-Based Nonprofit Program:** A dedicated program targeting nonprofit organizations that serve their communities from aging, energy-inefficient facilities. Nonprofits frequently direct their operating budgets entirely toward the services they deliver, leaving little capacity for capital improvements. This program provides weatherization services specifically to these organizations, reducing their utility overhead and allowing more of their resources to flow directly to community benefit.

Both programs are set to launch in 2026 and will be reported in full in Summit’s 2026 Sustainability Report.

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Summit's 2025 energy efficiency programs served

**76 organizations**

across three territories—from VA hospitals and school districts to affordable housing authorities and fire stations.

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# Our Approach to Biodiversity and Vegetation Management

## ENVIRONMENTAL REVIEW PROCESS

As an infrastructure company operating across diverse landscapes, Summit Utilities recognizes the importance of environmental stewardship in every region it serves. The company is dedicated to responsible environmental stewardship by protecting biodiversity and managing vegetation in ways that reduce its overall ecological impact.

To support this commitment, Summit has developed a structured environmental management system built around its Project Environmental Review process. Formalized in 2023 and grounded in company policy, this system requires all construction projects to go through a thorough environmental assessment before any work begins.

Central to this system is an enhanced environmental review checklist, which helps project design teams pinpoint and steer clear of environmentally sensitive areas during both the planning and construction stages. The checklist offers detailed direction on avoiding and/or minimizing damage to wetlands and preserving wildlife habitats. This includes prioritizing trenchless technologies like horizontal boring over traditional open-cut trenching. While trenching requires clearing a wide right-of-way and excavating topsoil, boring allows for infrastructure installation with minimal surface disruption, keeping ecosystems intact and significantly reducing the need for post-construction land restoration.

## OUR APPROACH TO BIODIVERSITY AND VEGETATION MANAGEMENT *(continued)*

Through this review process, Summit identifies possible risks to sensitive ecosystems and determines what permits, surveys, and mitigation steps are required. By getting ahead of environmental concerns early, the company ensures its projects uphold environmental standards while remaining fully compliant with applicable regulations. The result is better-informed decision-making, smoother project execution and a reduced environmental footprint.



### Environmental Stewardship: The Burrowing Owl Protection Project

At Summit, our environmental stewardship extends to the protection of local biodiversity. A standout success in 2025 was our work on the GCC 8-Inch Pueblo West Project in Pueblo County, Colorado.

During the permitting and construction phase, an initial desktop review identified potential habitat for the burrowing owl, a Colorado state-threatened species. **Protecting these migratory birds required a high level of operational coordination:**

- **Scientific Monitoring:** We contracted expert ecologists to conduct field surveys identifying two nesting pairs and six active burrows.
- **Rigorous Buffers:** In coordination with Colorado Parks and Wildlife (CPW), we established and enforced a 200-meter no-disturbance buffer around all active burrows.
- **Adaptive Engineering:** When owls were found near planned construction paths, Summit proactively relocated a Horizontal Directional Drilling (HDD) location and delayed construction in specific segments to ensure the nesting pairs remained undisturbed.
- **Route Modification:** In mid-September, when a new pair of owls moved near a planned access road, we immediately modified our construction route to an alternative path outside the buffer zone.

Because of these efforts, the project was completed successfully after the ecologists confirmed the owls had safely migrated for the season, proving that infrastructure can be built in harmony with nature.

*The burrowing owl, a Colorado threatened species*

## KEY COMPONENTS OF OUR BIODIVERSITY PROTECTION APPROACH INCLUDE:

Summit's biodiversity protection approach is built into every phase of project planning and construction. The following outlines the key procedures we follow to ensure that environmental protection goes beyond what's required, not just meeting what's mandated, for how we engage with the natural environments where we work.

### Threatened and Endangered Species Protection

Every construction project is reviewed for potential effects on species listed as threatened or endangered at both the federal and state levels. By consulting the U.S. Fish and Wildlife Service's Information, Planning, and Consultation System (iPaC) along with relevant state agencies, Summit identifies critical habitats within project areas and puts appropriate avoidance or mitigation strategies in place.

### Wetlands and Waterbodies Conservation

Projects are carefully evaluated for potential impacts on wetlands, waterbodies, and intermittent streams that fall under the protection of Section 404 of the Clean Water Act. Where feasible, directional boring is used to avoid disturbing these sensitive aquatic environments. When impacts cannot be avoided, Summit secures the necessary permits and applies best management practices to keep disruption to a minimum.

### Avian and Bat Protection

Tree-clearing activities are scheduled outside peak nesting seasons for migratory birds in order to comply with the Migratory Bird Treaty Act, the Bald and Golden Eagle Protection Act, and the Endangered Species Act. Similarly, bat roosting seasons, typically running April through October, are factored into tree-clearing activities to safeguard potentially endangered bat species. When project timelines overlap with these periods, surveys are completed to determine what, if any, protected species may be present before work proceeds.

### Vegetation Management Best Practices

Summit's vegetation management program is designed to balance operational needs with the health of surrounding ecosystems:

- 1. Seasonal Planning:** When feasible, vegetation clearing is strategically scheduled outside critical wildlife breeding and nesting periods whenever operationally possible.
- 2. Minimized Disturbance:** For new construction, areas of disturbance are calculated in advance, and clearing is limited to only what is necessary for safe operations.
- 3. Habitat Consideration:** In areas identified as potential wildlife corridors or significant habitat zones, modified vegetation management techniques are applied to maintain ecological function while preserving operational safety.
- 4. Native Species Approach:** Where revegetation is needed, locally appropriate native plant species are prioritized to support indigenous wildlife and encourage broader biodiversity.

### Continuous Improvement

Summit regularly reviews and refreshes its environmental procedures to reflect emerging best practices and evolving regulatory requirements. The environmental team collaborates closely with engineering, operations, and outside environmental consultants to ensure biodiversity considerations are woven into every stage of the project lifecycle, from initial planning through final completion.

Through these comprehensive practices, Summit Utilities reaffirms its dedication to preserving biodiversity while continuing to deliver essential energy services to the communities it serves.



## Peaks Renewables:

### Advancing decarbonization through low-carbon fuel development.

Peaks Renewables is a renewable energy development company and subsidiary of Summit Utilities, Inc., dedicated to developing low-carbon, carbon-neutral, and carbon-negative fuels that leverage our existing infrastructure to deliver sustainable energy solutions. We believe that working together to reduce the carbon used in our energy system is critical to limiting the impacts of climate change, and everything we do is focused on helping to reduce emissions while creating economic growth and providing access to clean, safe, reliable, and affordable energy.

At the center of our strategy is Renewable Natural Gas (RNG). RNG is a drop-in replacement for conventional natural gas — it can be transported through existing pipeline systems and used by customers without any equipment modifications, allowing for a seamless transition to cleaner energy. Peaks develops RNG from agricultural waste, landfills, food waste, and wastewater treatment plants, effectively turning a greenhouse gas liability into a renewable energy asset.



## The Pillars of Our RNG Strategy

- **Waste Utilization and Methane Reduction:** We capture methane from organic waste sources — including agricultural operations, landfills, and wastewater treatment plants — that would otherwise escape into the atmosphere, turning a greenhouse gas liability into a renewable energy asset.
- **Fostering a Circular Economy:** By repurposing waste materials, we promote resource efficiency and reduce reliance on traditional fossil fuels, supporting a closed-loop system where local waste provides local energy.
- **Versatility in Application:** RNG is a highly flexible energy source. While currently used for heating and electricity, it holds significant potential as a feedstock for clean hydrogen production, further expanding the decarbonization of the industrial and transportation sectors.
- **Community and Economic Benefits:** Peaks Renewables' projects support local economies by creating specialized jobs in agriculture and waste management, particularly in the rural areas where our facilities are located.

As an energy developer, Peaks is committed to building strong relationships with farmers, municipalities, policymakers, industry and community leaders, and technology companies developing cutting-edge ideas for thermal energy. We work together from a project's conception to completion to develop solutions that meet emissions targets in new and innovative ways.

In November 2025, Peaks Renewables made a preferred equity investment in Biogas Development's Hidden Hollow Energy Landfill Gas Project in Boise, Idaho, the first landfill gas-to-RNG project of its kind in Idaho. The facility, which began producing renewable natural gas in early 2025, captures methane from decomposing waste at the Ada County Landfill and upgrades it into pipeline-quality RNG injected into the regional natural gas system. The investment supports ongoing growth and optimization at the facility, with goals to increase distributed energy production, reduce emissions, and strengthen energy resilience for Ada County and the surrounding region. The Boise project is a model for the circular economy principles at the heart of Peaks' strategy—transforming a local liability into a renewable energy asset that fuels communities and drives resiliency.

*Landfill gas processing equipment at the Hidden Hollow Energy Project in Boise, Idaho — part of Peaks Renewables' growing portfolio of renewable gas investments.*



## Other 2025 Highlights

### Maine Dairy Digester Operations

Peaks' dairy digester at Flood Brothers Farm in Clinton, Maine continued and expanded operations throughout 2025 by bringing manure from an additional family farm for the project. Despite operational challenges during an extended cold weather event, the facility demonstrated the resilience of Peaks' operating model and the value of methane capture as both an environmental and energy solution.

In 2025, renewable natural gas from the  
Maine dairy digester totaled

**71,611 MMBtu.**

That is equivalent to the annual energy  
needs of 980 average American homes.<sup>2</sup>

### INDUSTRY LEADERSHIP

Peaks Renewables President Lizzy Reinholt serves on the Board of Directors of the American Biogas Council (ABC), the leading trade association representing the U.S. biogas industry. This board seat reflects Peaks' commitment to

shaping the future of renewable gas policy and industry standards at the national level, and positions Summit Utilities as an active voice in the advancement of biogas as a cornerstone of the clean energy transition.



<sup>2</sup>Per the EIA's Residential Energy Consumption Survey (RES) data.

## ENVIRONMENTAL STEWARDSHIP *(continued)*

Across all of Summit Utilities' environmental programs — from pipeline replacement to renewable gas development — we recognize that progress in environmental stewardship is ongoing. There is always more to do and new challenges to address. In 2025, a persistent challenge remained 811 compliance; approximately 33% of damages to our infrastructure occur because third-party contractors or the public fail to "call before they dig."

Additionally, we faced mapping limitations caused by legacy infrastructure. In some instances, older underground facilities cannot be accurately marked using traditional methods, increasing the risk of accidental damage. Finally, as we rapidly scale our workforce to support our accelerated pipeline replacement programs, maintaining a uniform and rigorous adherence to environmental protocols across all new crews is a primary focus for our leadership team.

## Looking ahead to 2026

- **Expanded Emissions Business Case:** Following the success of our technology pilots in Colorado and Missouri, we are developing a formal proposal to expand our most advanced emissions-reduction hardware across our entire six-state footprint.
- **Infrastructure Modernization:** We will continue our pipeline replacement program, which not only improves safety but is a key driver in reducing fugitive methane emissions.
- **The 10/50 Strategy:** We will formally implement findings from our advanced leak analysis showing that repairing the worst 10% of emitters can yield a 50% reduction in total emissions, making this performance-based insight a core driver of our repair prioritization.
- **Annual Drivable System Goal:** We are working toward a "100% drivable system" target, under which the entire accessible system is surveyed annually—one-third for regulatory compliance and two-thirds for proactive emissions reduction.
- **2027 Measurement Target:** Summit has set 2027 as our target year for making "measured promises" on annual system-wide surveys, transitioning from our current baselining phase to formal, verifiable emissions commitments.
- **Direct Measurement Phase 2:** We will formalize the rollout of direct measurement technology across additional asset classes to further refine the accuracy of our corporate carbon footprint reporting.
- **Third-Party EMS Verification:** We are planning an external audit of our Environmental Management System (EMS) to ensure that all facilities and construction projects meet our high sustainability standards.
- **Gen 2 Ultrasonic Metering:** We will begin the transition to next-generation ultrasonic metering technology across our system, improving measurement accuracy and long-term operational reliability.
- **Peaks Renewables – Sector Diversification:** Peaks is focused on advancing additional investments in both new development opportunities and already-operating RNG facilities. In development, the team is actively pursuing projects across landfill gas, wastewater treatment, and poultry



# Our People



# Our People

Our success at Summit hinges on the unwavering dedication of our team members. They are the heartbeat of our organization, the drivers of innovation, and the connective force that allows us to deliver dependable, safe energy solutions to the communities we proudly serve.

We believe that a collaborative workplace is created when all team members feel comfortable voicing concerns and are empowered to do their best work. This requires purposeful investments in our workforce, providing opportunities for them to develop their professional skills and grow into tomorrow's leaders.

From enhancing the reliability of our energy services to providing positive contributions in the communities we serve, our team members made 2025 a year defined by forward progress.

## 2025 ESG PERFORMANCE

### **Social Goals Achieved in 2025:**

- Implemented bi-annual talking points to support transparency and communication based on the results of the employee engagement Speak Up Survey.
- Launched FUEL (Facilitate, Uplift, Empower, Lead), our third Employee Resource Group (ERG).
- Initiated a joint initiative from two Summit ERGs—a food and goods drive involving MAVS (Military and Veteran Support) and WISE (Women Igniting Success & Empowerment).
- Exceeded our target overall employee participation score, achieving an 83% response rate to September's Speak Up Survey.



## Engagement and Feedback

Empowering team members to share feedback is a core Summit value. Twice a year, we conduct the anonymous Speak Up Survey to gather input on satisfaction, safety, ethics, workload, and inclusion. We continually refine the survey for clarity and, in 2025, updated several questions.



In 2025, we further enhanced the Speak Up Progress Report, launched in 2024, to provide team members with a detailed, data-driven view of survey results. The report highlights our top performance areas, key opportunities for improvement, and how feedback is leveraged to shape company policies and strategies.

We are committed to building a workplace centered on open communication and agility to better respond to evolving needs.



### ENGAGEMENT PERFORMANCE:

Progress begins with measuring impact. In September 2025, the Summit team achieved an **83% participation rate**, surpassing both our 75% benchmark and our 81% 2024 rate.

# 2025 Awards & Accomplishments



## BEST PLACES TO WORK IN **MAINE**

Summit Natural Gas of Maine was named one of the 2025 Best Places to Work in Maine, marking the seventh consecutive year Summit has received this honor.



## BEST PLACES TO WORK IN **ARKANSAS**

Summit Utilities Oklahoma was named one of the 2025 Best Places to Work in Oklahoma, earning this recognition for the fourth consecutive year.



## BEST PLACES TO WORK IN **OKLAHOMA**

Summit Utilities Arkansas and Arkansas Oklahoma Gas were certified among the 2025 Best Places to Work in Arkansas.

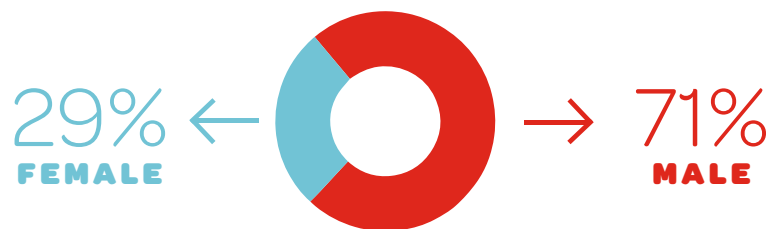


## BEST PLACES TO WORK IN **COLORADO**

Colorado Natural Gas was named one of the 2025 Best Places to Work in Colorado.

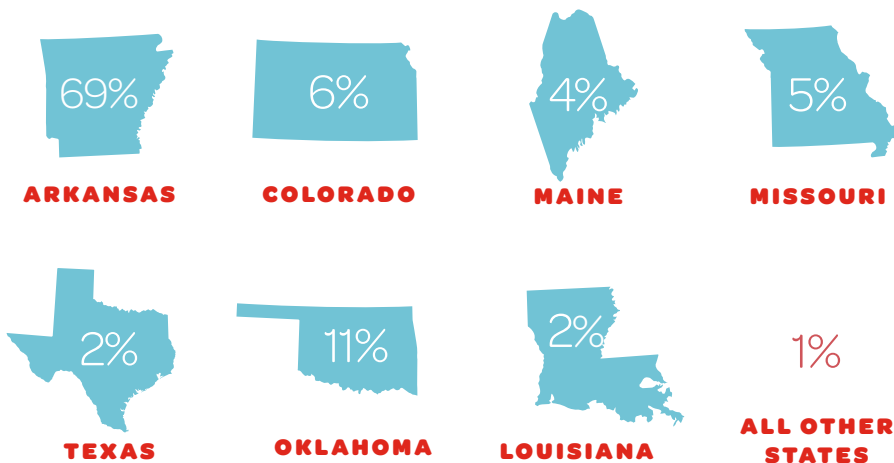


# 2025 Workforce Demographics



0 PART TIME EMPLOYEES

**PERCENT OF TOTAL EMPLOYEES BY STATE:**



**EXECUTIVE LEADERSHIP POSITIONS HELD BY WOMEN**



**ETHNIC DIVERSITY\***



**VETERANS+**



**REPRESENTED BY UNIONS**



**AVERAGE TENURE**



**VOLUNTARY TURNOVER RATE**



**RETIREMENT RATE**



**NUMBER OF NEW JOBS CREATED: 158**

\*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.

# Fueling Growth: Learning & Development Initiatives

We are committed to supporting team members in developing and strengthening their professional skills. In 2025, we renewed our investment in our team's professional development through a robust array of training workshops and leadership programs. We believe that equipping our workforce with new skills advances our strategic goals and creates an environment where every team member is a valued asset.

## CULTURE TRAINING FOR OPERATIONS LEADERS

Operations leaders completed targeted culture training designed to reinforce our PEAKS (Pioneering, Excellence, Agility, Kindness, and Safety) values, leadership consistency, psychological safety, and speak-up culture. The program connected daily decisions to Summit's culture and safety goals, providing leaders with practical tools to model behaviors, engage teams, and drive change.

## ONE-ON-ONE TRAINING WORKSHOPS

Direct conversations between leaders and employees are central to Summit's engaged, connected workplace. In 2025, we offered two workshops to support these moments: the first equipped leaders to lead meaningful one-on-ones, and the other helped employees make the most of their time with their manager. By investing in both sides of the conversation, we continue to strengthen one-on-ones as a cornerstone of our culture.

## STRATEGIC LEADERSHIP FORUM

Each year, Summit's senior leaders attend the two-day Strategic Leadership Forum to discuss strategy and enhance leadership development. United by Summit's mission to deliver safe, reliable, and affordable energy, leaders engaged in interactive sessions and peer discussions focused on aligning objectives and building trust and collaboration to respond to a rapidly evolving energy landscape.

After the 2025 Strategic Leadership Forum, we launched a year-long emotional intelligence program for senior leaders. Featuring learning sessions, peer accountability partnerships, and reflection prompts, the training reinforced our commitment to developing leaders who champion trust and engagement.

## NEW ONBOARDING RESOURCES

To support our growing workforce, we launched The Trailhead in 2025, a centralized onboarding hub that gives new employees easy access to the tools, resources, and information they need to get started. We also strengthened onboarding checklists to create a more consistent experience across teams and introduced culture training to bring Summit's PEAKS values to life early in the employee journey. These updates help new hires feel welcomed, confident, and ready to contribute.

## ASPIRING LEADER PROGRAM

We launched the Aspiring Leader Program to equip team members with the skills and experience needed to become Summit's next leaders.



## LEADERSHIP ESSENTIALS DEVELOPMENT PROGRAM

The Leadership Essentials Development Program, designed for new managers, builds foundational leadership skills and mindsets. The program supports the transition from individual contributor to leader, offering practical tools for communication, feedback, decision-making, and living Summit's values.



## LUNCH & LEARNS

In 2025, we offered interactive professional development sessions, including our first hybrid Lunch & Learn panel on the unwritten rules of work, and a leadership-focused session in which our senior leaders addressed questions about career growth and navigating personal challenges.

# Fostering Inclusion Through Employee Resource Groups (ERGs)

We are committed to creating a workplace where all team members are encouraged to network and collaborate. Our ERGs are open to all employees and provide voluntary, open spaces for team members to connect, share experiences, and work together on meaningful projects.

## ERG EXPANSIONS AND UPDATES IN 2025



### FUEL (Facilitate, Uplift, Empower, Lead)

In December, we proudly launched FUEL, our third Employee Resource Group. FUEL is dedicated to organizing educational, professional development, community service, and networking opportunities for members or allies of

the Black and African American communities. The group is open to all Summit employees and fosters connections and growth aligned with Summit's PEAKS values.



### PULSE (Powering Understanding, Learning, Support & Engagement)

Renamed to better reflect its role in listening and responding to team members' needs, PULSE partners with ERGs and champions initiatives that strengthen our culture.



In November, **WISE** hosted a Lunch & Learn for Summit employees, during which senior leaders discussed career growth and navigating leadership challenges.



In March, MAVS (Military and Veteran Support) hosted a blood drive, receiving 13 generous donations to help patients in need.



In November, MAVS hosted a lunch celebrating the brave men and women who have served in our armed forces.



## Supporting Our Team: Compensation & Benefits

We support our employees' well-being with a comprehensive benefits package that enables them to lead safe, productive lives and maintain peace of mind at home.

### WE ARE PROUD TO OFFER OUR TEAM MEMBERS:

- 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 & Policies for Team Members in 2025

In 2025, we introduced new initiatives and enhancements to benefit our team members and their families. By listening to feedback and updating our programs, we aim to empower employees, address their needs, and foster a productive and innovative workplace.

### Enhanced Vision Benefits

Our vision plan through VSP includes updated frame and contact lens allowances, as well as the addition of light care benefits.

### Increased Maximum on Dental Buy-Up Plan

Our buy-up plan with Delta Dental features a 25% increase in the calendar year annual maximum.

### New 401(k) Retirement Savings Plan Features

We increased the contribution provision for participants ages 60-63 and added a 1% annual auto-escalation for auto-enrolled participants.

### Expanded Parental Leave

Birthing mothers now receive an additional week of paid leave, providing more time for rest, recovery, and bonding.

### Employee Asset Purchase Program

Team members can now purchase company vehicles and equipment that have recently been retired from service.

### Expanded Military Leave Policy

Employees are now eligible for up to 30 days of approved short-term military leave or other military obligations.

### Immigration and Naturalization Reimbursement

We support team members in the U.S. naturalization process with up to \$2,000 in reimbursement for eligible expenses.

## The Path Ahead: Our 2026 Goals for Empowering Our People

In 2026, we will deepen our commitment to structured talent development programs that support growth at every stage of the employee lifecycle. This includes:

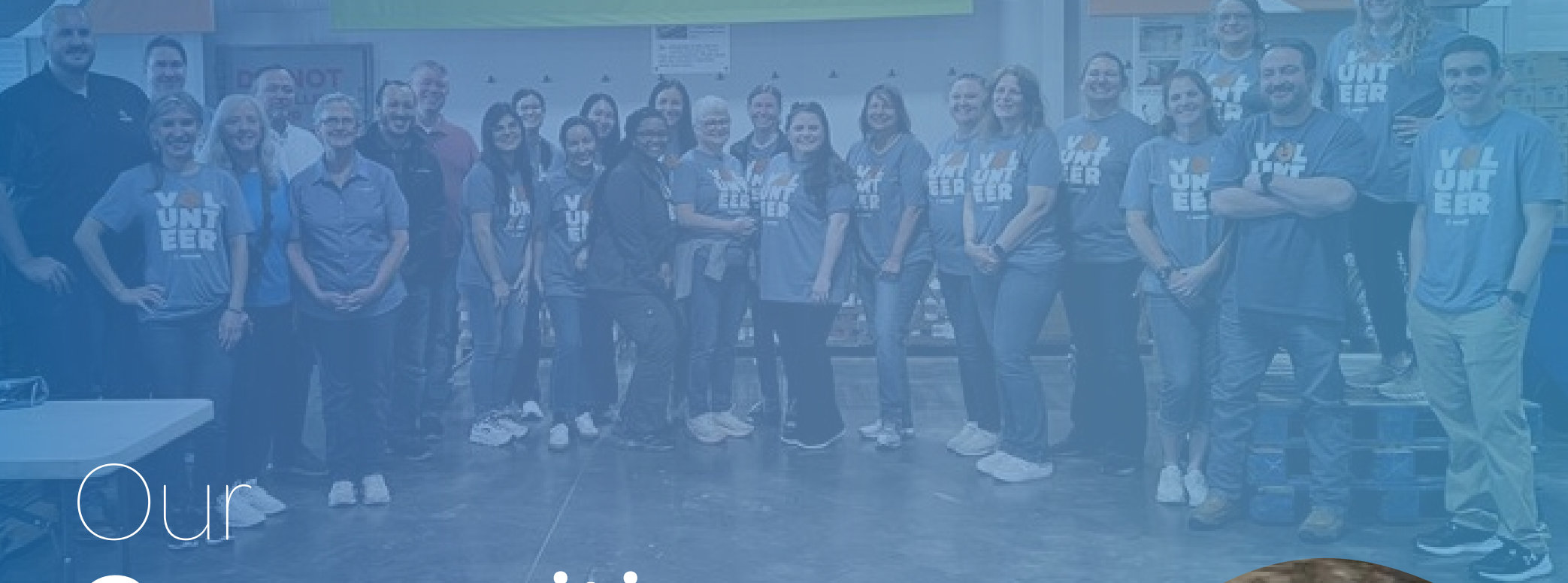
- **Expanding Professional Development Programs** – We will further invest in mentoring opportunities to encourage knowledge sharing and cross-functional relationships to support professional development. We will also identify and develop high-potential team members, providing targeted learning, leadership exposure, and career acceleration.
- **Enhancing Succession Planning** – We will continue to build a strong succession planning framework to ensure organizational continuity and prepare future leaders for critical roles across the business.
- **Improving the Employee Experience** - We will continue to refine and upgrade our onboarding process to better integrate new hires, accelerate productivity, and reinforce our culture and PEAKS values.

## Key Social Goals for 2026

We remain committed to encouraging a culture of open communication and engagement that enables our team members to thrive.

### Our core objectives for 2026 include:

- Launching integrity-focused learning modules to reinforce our team members' ability to work ethically and lead by example.
- Achieving at least 80% employee participation in our bi-annual Speak Up Survey.



# Our Communities



# Our Communities

At Summit Utilities, our responsibility to our neighbors is a core part of our mission. We believe that a sustainable energy company must also be a sustainable community partner. Our community engagement strategy focuses on meeting critical needs—from energy affordability and food security to supporting the next generation through STEAM education. By investing in the places where we live and work, we are helping to build a more resilient and prosperous future for all.

**Volunteer efforts significantly impact our communities.**

**1 hour**  
of volunteer time



**approximately \$34.79 of economic impact**  
invested in our communities.

Measured this way, Summit’s volunteer efforts equated to **over \$349,361** of economic impact in 2025 from over **10,042 volunteer hours**.<sup>3</sup>

<sup>3</sup> Includes Volunteer time value calculation completed by [Independent Sector](#).

## Record-Breaking Community Impact through Volunteerism

In 2025, our team demonstrated an unprecedented commitment to community service, achieving a record-breaking 67% participation rate in our Volunteer Time Off (VTO) program.

This accomplishment surpassed our ambitious annual goal of 65% and set a new high for the company, growing from 63% in 2024.

Our employees utilized these hours to support a wide range of causes, including food banks, environmental restoration, and youth development, reinforcing Summit's role as an active and engaged neighbor.



## Expanding the Summit Heating Assistance Fund

A cornerstone of our 2025 community efforts was the strategic expansion of the Summit Heating Assistance Fund. For the first time, this critical safety net was extended to serve Arkansas Oklahoma Gas (AOG) customers, providing much-needed relief during the winter months.

### The fund reached a significant scale this year:

- **SUA/TX: \$230,000** in support provided to **974 customers**.
- **SUO: \$40,000** distributed to **193 customers**.
- **AOG: \$20,000** in relief provided to **84 customers** in its inaugural year.

This expansion provides greater access for our most vulnerable customers have access to financial assistance to manage past-due balances and maintain essential service when it is needed most.



## Summit Cares Charitable Grant Giving Program

Throughout 2025, Summit directed **\$180,000 in charitable donations** to area nonprofits across our six-state footprint. Grants support service area nonprofits focusing on four key areas:



**Basic Human Needs:** Supporting nonprofits that provide life's essentials—food, shelter, and critical resources—helping neighbors when they need it most.



**Community Enrichment:** Enhancing the cultural and social vibrancy of our service areas.



**Environmental Stewardship:** Protecting our environment by supporting efforts in energy efficiency, waste reduction, and pollution reduction—creating a healthier future for generations to come.



**STEAM Education:** Funding programs that prepare students for future careers in technology and the energy sector.

# Fueling Our Communities: **SUMMIT CARES**

## ★ IMPACT CELEBRATION ★

We were proud to host the inaugural Summit Cares Impact Celebration in September at our Little Rock office, honoring our commitment to the communities we serve. The event recognized our \$75,000 contribution to 41 nonprofit organizations across Arkansas, all of which were invited.

Summit leaders shared insights into our organization's approach to giving back and supporting local initiatives. The celebration highlighted Summit's role in empowering these organizations and reinforced our mission to create meaningful change throughout our service areas.



## Awards and Accomplishments

During the Arkansas Foodbank's 2025 Summer Cereal Drive, Summit team members collected 200 boxes of cereal at our corporate offices and contributed \$6,500, bringing the total to 6,700 boxes. Their generosity and dedication were recognized with Summit's invitation to the Arkansas Foodbank's Breakfast of Champions event in July.

Summit earned second place in our division for the cereal drive and received a trophy, reflecting our commitment to strengthening communities and addressing food insecurity for children in Arkansas. We are proud to support the Arkansas Foodbank and look forward to contributing to the 2026 drive.



# CITIZEN AWARD



## Leading By Example: Our 2025 Citizen Award Winner

At Summit, we are incredibly proud of the team members who go above and beyond to serve and uplift their communities and, in doing so, support our goal of giving back. In 2025, 121 team members met or exceeded the 20-hour Volunteer Time Off (VTO) benchmark, demonstrating our value of kindness through service.

We are proud to celebrate **Kristin Jacobs**, Risk Manager, as our 2025 Citizen Award winner. Through her volunteer service with Mile High United Way as a VITA-certified tax preparer, and her hands-on support at the Action Center's food and clothing pantry, she has helped ensure working families and retired seniors have access to critical resources. Together with the VITA volunteer team, she helped return more than \$20 million to members of the Denver community last year—funds often relied on for essentials like housing, clothing, and debt reduction. The time she invests each year in training and certification is a powerful example of excellence and kindness in action.

When asked what makes our VTO program meaningful to her, Kristin said, "Supporting 'local' is very important to me, and sitting face to face with families and seniors and helping them navigate complicated tax forms to assist in getting them tax return funds that will be critical in their daily lives always inspires me. I am proud that Summit encourages me to use my finance skills to become certified as a VITA tax preparer and contribute so meaningfully to my community."



# MEMBERSHIPS & ASSOCIATIONS

Summit is proud to be a member of various industry and local organizations across our footprint. We believe that active participation in these groups is essential for staying connected to our stakeholders, sharing best practices with our peers, and ensuring that our operational goals are aligned with the broader needs of the communities we serve.

- ACP-Association of Continuity Professionals
- Ada Chamber of Commerce
- Alma Area Chamber of Commerce
- Altus Chamber of Commerce
- American Biogas Council
- American Gas Association
- American Gas Foundation
- Appalachian Gas Measurement Short Course
- Arkadelphia Alliance and Chamber
- Arkansas Advanced Energy Association
- Arkansas Business Publishing Group
- Arkansas Chamber National Association of Housing
- Arkansas GIS Users Group
- Arkansas State Chamber of Commerce
- Arkansas State Heating, Venting, Air Conditioning, and Refrigeration Association
- Arkansas Women in Power
- Augusta Rotary
- Ava Chamber of Commerce
- Avaya Alumni Network
- Avaya Professionals
- 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
- Central Maine Apartment Owners Association
- Central Maine Growth Council
- Chickasha Chamber of Commerce
- Climate Work Maine
- COGA
- Colorado One Call
- Colorado Pipeline Association
- Common Ground Alliance
- Conifer Area Chamber of Commerce
- Conway Chamber of Commerce
- Corning Chamber of Commerce
- Crawford County Board of Realtors
- Cross Country Chamber of Commerce
- Crossett Area Chamber of Commerce
- Cumberland Falmouth Community Chamber of Commerce
- Cushing Chamber of Commerce
- Dewitt Chamber of Commerce
- DNG-ISAC
- DPAC
- E2Tech

## MEMBERSHIPS & ASSOCIATIONS

- EAM CAB -- Oracle Enterprise Asset Management Customer Advisory Board
- EC-Council
- Elgin Chamber of Commerce
- Energy & Utilities Network
- Energy Solutions Center
- Environmental Federation of Oklahoma
- Financial Research Institute
- Forrest City Chamber of Commerce
- Fort Smith Board of Realtors
- Fort Smith Chamber of Commerce
- Fort Smith Regional Alliance
- Fort Smith Regional Council
- Fort Smith School District Partners in Education
- Gallatin Chamber of Commerce
- Grant County Chamber
- Greater Fort Smith Association of Homebuilders
- Greater Lawton Rotary
- Greater West Plains Chamber of Commerce
- Hamburg Chamber of Commerce
- Heber Springs Area Chamber of Commerce
- Hollister Chamber of Commerce
- Hot Springs Chamber of Commerce
- Infraguard
- ISC2
- Jacksonville Chamber of Commerce
- Jonesboro Regional Chamber of Commerce
- Kennebec Valley Board of Realtors
- Kennebec Valley Chamber of Commerce
- Lake Area Chamber of Commerce
- Lake of the Ozarks Chamber of Commerce
- Lake West Chamber of Commerce
- Lawton Board of Realtors
- Lawton Fort Sill Chamber of Commerce
- Leadership Fort Smith
- Lebanon Chamber of Commerce
- Little River County Chamber of Commerce
- Little Rock Regional Chamber
- Maine Association of Plumbing, Heating, and Cooling Contractors
- 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 Association of Natural Gas Operators
- Missouri Chamber of Commerce
- Missouri Energy Cybersecurity Coalition
- Missouri Energy Development Association
- Missouri One Call
- Monticello-Drew County Chamber of Commerce
- Morrilton Area Chamber
- Mountain Grove Chamber of Commerce
- Muldrow Chamber of Commerce
- MUST
- Nashville Chamber of Commerce
- National Association of Homebuilders
- National Energy Foundation

## MEMBERSHIPS & ASSOCIATIONS

- Natural Gas Vehicles of America
- Newport Area Chamber of Commerce
- NextGenGas Coalition
- Northeast Arkansas Homebuilders
- Northeast Gas Association
- Oklahoma Gas Association
- Oklahoma State Chamber of Commerce
- One Future
- Oracle Application Users Experts
- Our Nation's Energy Future Coalition
- PAPA
- Paragould Regional Chamber of Commerce
- Pine Tree Society
- Pipeline Association for Public Awareness
- Pipeline Association of Missouri
- Portland Regional Chamber
- Poteau Chamber of Commerce
- Poteau Chapter Ducks Unlimited
- Poteaus Kiwanis Club
- The Poultry Federation
- Prescott-Nevada Chamber of Commerce
- Randolph County Chamber of Commerce
- Renewable Natural Gas Coalition
- River Valley IT Professionals
- Rotary Club of Yarmouth
- SaaS Group
- Saline Home Builders Association
- Sallisaw Chamber of Commerce
- Scrum Alliance
- Searcy Regional Chamber of Commerce
- Sevier County Chamber of Commerce
- Sherwood Chamber of Commerce
- Southern Gas Association
- Stuttgart Chamber of Commerce
- Texarkana Chamber of Commerce
- Texarkana Home Builders Association
- United Way
- US-CERT
- Van Buren Chamber of Commerce
- Van Buren Rotary Club
- VMUG
- Warsaw Chamber of Commerce
- Weatherford Chamber of Commerce
- Western Arkansas Human Resources Association
- Women's Energy Network
- Yarmouth Chamber of Commerce

# Community Economic Impact

We embrace the concept of excellence in corporate sustainability, recognizing that it extends beyond environmental efforts and philanthropy. It also involves 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.

**\$16,200,000**

## SHORT-TERM INCENTIVE COMPENSATION

By rewarding employees for achieving financial, operational, and safety goals, we reinvest in the people who power our communities every day.

**\$6,200,000**

## 401(K) MATCHING CONTRIBUTIONS

Our commitment to our employees' long-term financial security is reflected in our retirement matching contributions, supporting the economic wellbeing of our workforce and their families.

**\$24,615,000**

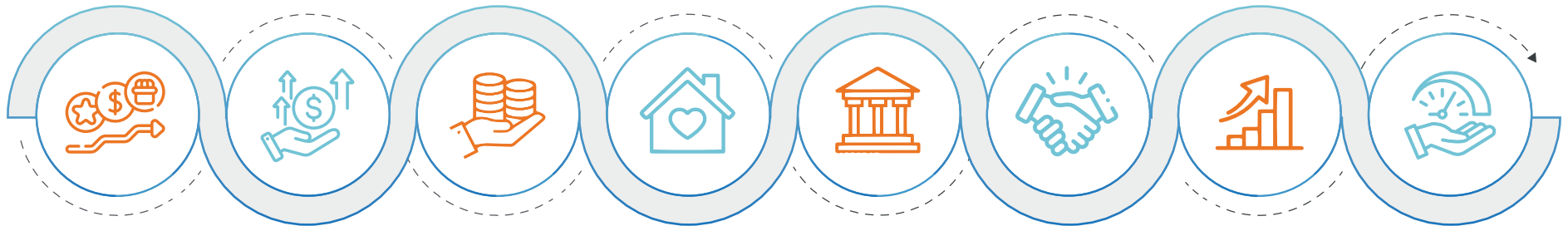
## TAXES PAID (OTHER THAN INCOME TAXES)\*

The taxes we pay, including property and franchise taxes, play a pivotal role in funding essential public services across our operating states, such as education, infrastructure development, and healthcare.

**\$390,901,000**

## CAPITAL INVESTMENT

Capital investments strengthen and expand our natural gas infrastructure systems, improving safety, reliability, and resiliency across the communities we serve while creating local, well-paying careers.



**\$5,300,000**

## LONG-TERM INCENTIVE COMPENSATION

Our long-term incentive programs retain skilled talent in the communities where we operate, building lasting careers and supporting regional economic stability.

**\$180,000**

## SUMMIT CARES GRANTS AWARDED

Through Summit Cares, our employee-informed grant program, we provide direct financial support to nonprofits in the communities we serve, creating local, measurable impact aligned with our ESG priorities

**\$725,000**

## DONATIONS AND SPONSORSHIPS

From local sponsorships to community events, we actively participate in the civic life of the regions we serve, fostering connection and shared prosperity.

**10,042**

## VOLUNTEER HOURS CONTRIBUTED

Our employees contribute their time and skills to local causes, extending our community commitment beyond financial giving and into meaningful hands-on engagement.

*\* 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.*

## Environmental and Public Safety Education

Beyond financial support, our community engagement includes a strong focus on public awareness and safety. We continue to prioritize education around 811 "Call Before You Dig" laws and share our progress on biodiversity initiatives, such as our successful burrowing owl protection project in Colorado. By maintaining transparency in our operations and proactively sharing our sustainability journey, we build the trust required to serve as a reliable energy provider.

While our results are encouraging, we continue to target areas for improvement while navigating new challenges. In 2025, our primary challenge was ensuring equitable engagement across a geographically diverse footprint. Coordinating volunteer efforts and assistance programs across six states—ranging from rural towns to urban centers—requires immense logistical focus. Additionally, we face a continuous hurdle in public safety awareness, as third-party damages caused by a failure to call 811 remain a public safety concern that we address through ongoing community education. We view these challenges as opportunities to refine our communication and deepen our local partnerships.

## Energy Efficiency as Community Investment

Summit's energy efficiency programs are more than an environmental initiative—they are a direct investment in the communities we serve. By helping schools educate students about energy, supporting veterans' hospitals in reducing operating costs, partnering with affordable housing authorities to lower utility burdens, and working alongside nonprofits to stretch their program dollars further, Summit uses its efficiency portfolio as a tool for meaningful community benefit.

Summit's energy efficiency programs served 76 organizations across Arkansas, Oklahoma, and Fort Smith in 2025 — details on program reach and impact are covered in the Environmental Stewardship section.

## Community Spotlight: Habitat for Humanity Partnership

In 2025, Summit partnered with Habitat for Humanity on a home rehabilitation project that brought high-efficiency natural gas equipment to a family in need. Working with equipment manufacturers, Summit helped source and install a high-efficiency stove and tankless water heater for the home—and connected the project with a weatherization partner to ensure the whole-home efficiency picture was addressed, not just the appliances.

Summit team members volunteered directly on the project. This partnership reflects a broader effort Summit has made over several years to demonstrate the affordability and performance of natural gas to organizations that have historically defaulted to electric equipment. For this family, the result is a warmer, more efficient home—and lower utility bills for years to come.



# Educating the Next Generation: LivingWise in Schools

One of Summit's most far-reaching community investments is the LivingWise School Kit program, which brings hands-on energy education directly into K-12 classrooms. In 2025, Summit distributed over 9,044 kits<sup>4</sup> across 49 school districts in Arkansas and Oklahoma, putting practical energy-saving tools—and the knowledge to use them—directly in the hands of students and their families.

**The program reached some of the largest school districts in Summit's service territory, including Russellville (1,128 kits), Little Rock (964 kits), and Greenbrier (499 kits).**

These are not just numbers—each kit represents a household conversation about energy, a tangible reduction in consumption, and a student who leaves school with a clearer understanding of how energy works and why it matters. The cumulative estimated savings from the LivingWise program in 2025 exceeded 208,301 therms across participating districts.

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Over **9,044** kits delivered to  
**49 school districts**  
in 2025—bringing energy education and  
real savings into thousands of Arkansas  
and Oklahoma homes.

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<sup>4</sup>Each LivingWise kit contains a set of energy-efficient products (including aerators, LED bulbs, and low-flow fixtures) distributed to individual students for installation in their homes, alongside a curriculum workbook.

## Energy Efficiency as Community Investment

Supporting Veterans and Public Health Institutions  
Summit's Custom program supported meaningful efficiency upgrades at two VA medical facilities serving Arkansas veterans. At the VA Medical Center in North Little Rock and the John McClellan VA Hospital in Little Rock, Summit funded multiple rounds of steam trap replacements and insulation improvements—collectively generating over 120,000 therms in estimated annual savings across these facilities.

For institutions like VA hospitals, energy efficiency is not an abstract environmental goal—it directly affects operating budgets that would otherwise fund patient care, staffing, and services for veterans. By reducing the energy overhead at these facilities, Summit is helping to ensure more of those resources stay focused on the people the facilities are there to serve.

## Reducing Energy Burdens in Affordable Housing

Energy costs can represent a disproportionate share of household expenses for some low- and moderate-income families. Summit's affordable housing efficiency programs seeks to support families in need by funding equipment upgrades—primarily tankless water heaters and efficiency bundles—at housing authorities and shelters across Arkansas and Oklahoma.

In 2025, Summit supported 11 multifamily housing authorities and shelter organizations, including the City of Van Buren Housing Authority (96 units with tankless water heater installations), the Ada Housing Authority (275 units with efficiency bundles), and the Little River County Housing Authority (78 units). These upgrades reduce monthly utility costs for residents—often fixed-income seniors, families with children, and individuals in transitional housing—while improving the comfort and reliability of their homes.

Summit also partnered with Our House Inc., a shelter and social services organization in Little Rock, supporting efficiency measures across both its dormitory and dining facilities. Investments like these recognize that nonprofits serving vulnerable populations often have the least capacity to fund capital improvements on their own, and that Summit's efficiency programs can serve as a meaningful equalizer.

**From veterans' hospitals to school classrooms to affordable housing—Summit's 2025 efficiency programs made energy work harder for the communities that need it most.**

# When Disaster Strikes, Summit Team Members Step Up

After tornadoes struck Northeastern Arkansas on March 14, 2025, Summit employees responded quickly, resolving over 20 gas emergencies and identifying more than 30 locations needing remediation. We also backed broader recovery efforts with a \$5,000 donation to the American Red Cross to help individuals and families affected by the disaster rebuild.

On June 8, 2025, another devastating tornado struck Van Buren, Arkansas. Summit responded by supporting the critical work of the United Way of Fort Smith and the Salvation Army with a \$5,000 donation for disaster relief. We are proud to stand alongside communities when they need us most.

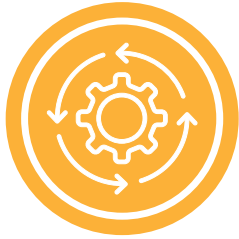
## Looking Ahead to 2026

- **Grant Program Expansion:** Increasing our investment in our Summit Cares grant program in Arkansas and Oklahoma to better align with the size of our customer base
- **Community Advisory Panels:** Summit engages team members across our service territories through structured panels to evaluate community grant awards and ensure investments reflect local needs.
- **Grant Management Software Implementation:** Launching a more streamlined online application process for the Summit Cares charitable giving grant program.
- **Grant Strategy Pivot:** We are moving away from a high-volume, small-grant model toward fewer, larger grants (\$5,000–\$10,000) to build deeper, more meaningful partnerships with community organizations and amplify our impact in key focus areas.





# Supply Chain Responsibility



# Supply Chain Responsibility

Our supply chain is a critical extension of our operational values. We recognize that to achieve our goals of safety, reliability, and environmental stewardship, we must partner with vendors and contractors who share our commitment to integrity and innovation. Our supply chain strategy focuses on operational efficiency through scale, ethical procurement practices, and the promotion of a broad and resilient vendor ecosystem. By modernizing our internal systems and deepening our vendor relationships, we ensure that every dollar spent supports the long-term sustainability of the communities we serve.

## Key Achievements and New Projects

### **Strategic Systems Modernization: The Order to Recovery (O2R) Framework**

In 2025, Summit reached a major milestone in its multi-year journey to modernize the core business systems that power our operations. A central pillar of this effort is the (O2R) initiative.

O2R is an end-to-end strategic overhaul of our back-office and procurement processes designed to better support our crews in the field. By streamlining the entire lifecycle—from the initial request for materials to the final verification and cost recovery—we have eliminated administrative bottlenecks that can slow down vital infrastructure projects. For our supply chain, this means:

- **Enhanced Vendor Reliability:** Faster processing and clearer communication with our partners.
- **Data-Driven Procurement:** Improved visibility into inventory and material needs, reducing waste and ensuring crews have the right tools at the right time.
- **Scalable Growth:** A standardized framework that allows us to integrate new assets and territories more efficiently.

### **Leveraging Scale for Operational Efficiency**

A primary example of our modernized procurement strategy was the 2025 negotiation for our Advanced Leak Detection (ALD) hardware. By committing to a full-scale deployment of 10 ALD units across our six-state footprint, our procurement team was able to leverage our collective scale to secure preferred pricing, resulting in approximately \$7 million in cost savings. This demonstrates how a centralized strategic sourcing directly supports our environmental goals by making world-class technology more cost-effective to deploy.

# Vendor Integrity and Supplier Development

Summit maintains high expectations for the ethical conduct of its partners. We believe that a responsible supply chain is one built on transparency, mutual accountability, and a commitment to the local economy.

- **Supplier Code of Conduct:** All primary vendors are required to adhere to our **Code of Business Conduct and Ethics**. In 2025, we updated our standard contracts to ensure all partners are aligned with our latest policies regarding anti-discrimination, anti-harassment, and whistleblower protections.
- **Support for Local Economies:** As a provider of essential services, we prioritize partnering with local businesses in the states we serve. By tracking our local spend, we ensure that our operational investments fuel economic growth and job creation in the communities where our employees live and work.
- **Diverse Procurement:** We are committed to increasing the participation of small businesses in our supply chain. We believe that a broad vendor base fosters innovation and provides us with a more resilient and flexible network of suppliers.

**Leveraging Scale for Operational Efficiency:** A primary example of our modernized procurement strategy was the 2025 negotiation for our Advanced Leak Detection (ALD) hardware. By committing to a full-scale deployment of 10 ALD units across our six-state footprint, our procurement team was able to leverage our collective scale to secure preferred pricing, resulting in approximately \$7 million in cost savings. This demonstrates how a centralized strategic sourcing directly supports our environmental goals by making world-class technology more cost-effective to deploy.

## Ethical Standards and Compliance

Our obligation to ethical procurement is absolute. We align our supply chain practices with industry best practices to ensure our operations are free from corruption and unethical labor.

- **Anti-Corruption and Bribery:** We maintain a zero-tolerance policy for bribery and corruption. Our procurement and management teams undergo regular training to identify and mitigate risks associated with vendor relationships.
- **Cybersecurity in the Supply Chain:** As we integrate more digital mapping tools and operational algorithms, we have enhanced our cybersecurity vetting for all technology vendors. Protecting company and customer data is a non-negotiable requirement for any partner entering the Summit ecosystem.
- **Human Rights and Labor Standards:** We align our procurement policies with international standards to ensure that our supply chain remains free from forced labor or unethical employment practices.

# Looking Ahead to 2026

We celebrate our wins while staying focused on areas of opportunity and the difficulties we still encounter. In 2025, a primary hurdle was the administrative complexity of system migration. Transitioning legacy vendor data into our modernized Order to Recovery framework required significant manual verification to ensure accuracy, which created temporary learning curves for both our internal teams and long-term vendors.

Additionally, as we ramped up the number of contract crews to support our accelerated pipeline replacement programs, ensuring that all new partners were immediately aligned with Summit's specific environmental and safety protocols remained a high-priority management focus.

- ..... **Digital Vendor Portal:** We plan to launch a modernized vendor portal in 2026 to simplify the onboarding process and make it easier for diverse-owned businesses to register and compete for contracts.
- ..... **GPS Mapping Integration for Contractors:** Our multi-year GPS mapping project will provide contract crews with more accurate facility data, significantly reducing the risk of accidental damages and improving overall job-site efficiency.
- ..... **Continuous Process Optimization:** We will continue to refine the Order To Recovery framework to identify further efficiencies in how we source materials for our path toward Net Zero, ensuring that sustainability is a factor in every major procurement decision.
- ..... **Small Supplier Engagement Benchmarking:** Using year-end 2025 spend data, we will identify specific categories where Summit can meaningfully increase engagement with small and small business suppliers, setting measurable targets for the 2026 cycle.
- ..... **Economic Development Reporting Evolution:** We will leverage our new economic impact reporting capabilities, such as jobs created, taxes generated, and local economic activity, as the next evolution of our Supplier Development Program, driving community opportunity in a legally compliant manner.
- ..... **Extending ESG Requirements to Tier 2+ Suppliers:** We are developing an RFP framework to expand our ESG conduct and reporting expectations beyond our primary vendors to Tier 2 and Tier 3 suppliers, strengthening the integrity and resilience of our full supply chain.



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# By the Numbers

# By the Numbers

The following metrics provide a snapshot of Summit Utilities' sustainability performance across the four pillars of our ESG program: environment, safety, social, and governance. These figures reflect data collected for the year ending December 31, 2025, and are intended to give stakeholders — from investors and regulators to the customers and communities we serve — a clear, quantitative picture of our progress and commitments. Where applicable, metrics have been subject to limited assurance by an independent third party to support the accuracy and reliability of our reporting.



## GOVERNANCE



## COMMITMENT TO HEALTH & SAFETY



## ENVIRONMENTAL STEWARDSHIP



## OUR PEOPLE



## OUR COMMUNITIES



## OUR SUPPLY CHAIN

About Summit			
Metric	Unit	2024	2025
Total Operating Revenue	Million \$	\$661,096,000	\$833,593,000
Miles of pipeline/ distribution network	Miles	22,879	22,518
Communities with operations	#	450	450
Number of customers	#	623,000	622,209



## GOVERNANCE

Board of Directors Demographics			
Metric	Unit	2024	2025
Average Tenure	Years	4.25	6.19
Diverse racial / ethnic backgrounds	%	29	33
Female board representation	%	43	33

Governance			
Metric	Unit	2024	2025
Phishing clickthrough rate	#	7.48	7.56
Reported cyber incidents	#	0	1
% of employees that completed cybersecurity training	%	100	90
Whistleblower Hotline concerns resolved	#	8	10



## COMMITMENT TO HEALTH & SAFETY

Commitment to Health & Safety			
Metric	Unit	2024	2025
Employees that completed safety training	%	90	96

Employees			
Metric	Unit	2024	2025
Fatalities	#	0	0
Lost time injuries	#	8	9
Total recordable injuries	#	20	11
Near miss incidents	#	7,534	8,432
Hours worked	#	2,768,772	2,803,892
Lost time injury frequency rate (LTIFR)	#/hrs * 1 million	2.89	0.64
Total recordsble injury frequency rate (TRIFR)	#/hrs * 1 million	7.22	0.79

Users			
Metric	Unit	2024	2025
Fatalities	#	0	0
Total recordable injuries	#	0	0

Community			
Metric	Unit	2024	2025
Fatalities	#	0	0
Total recordable injuries	#	0	0



## ENVIRONMENTAL STEWARDSHIP

Sustainability			
Metric	Unit	2024	2025
Incentives paid through energy efficiency programs	\$	\$9,455,123	\$8,130,452
Gas conserved through energy efficiency programs (see Note 1)	million therms	5.29	5.21
RNG dairy digester project production	MMBtu	80,219	71,611
Miles of pipeline replaced	#	161	174

Water			
Metric	Unit	2024	2025
Water withdrawal	Cubic Meters	16,144.00	28,809
Water withdrawal intensity (/revenue)	Megaliters /USD	0.0000244	0.0000346

Biodiversity			
Metric	Unit	2024	2025
Wildlife Fatalities	#	N/A	16
Habitat removed	Hectares	42.54	182.7
Habitat enhanced or restored	Hectares	42.51	180.4
Habitat protected (on-site)	Hectares	0	0
Habitat protected (off-site)	Hectares	0.37625	13.54

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.

Waste			
Metric	Unit	2024	2025
Generation / Import:			
Hazardous	Tonnes (t)	2.87	0.1
Non-hazardous	Tonnes (t)	438.796	145.36
Disposal / Export:			
Recycling	Tonnes (t)	1.69	0.1
Landfill	Tonnes (t)	438.796	145.4
Total waste disposed	Tonnes (t)	441.666	145.56
Environmental violations received	#	0	0

Greenhouse Gas Emissions (GHG)			
Metric	Unit	2024	2025
Scope 1 GHG emissions <sup>5</sup>	mt CO <sub>2</sub> e	212,098	202,704
Scope 2 GHG emissions (Location-based)	mt CO <sub>2</sub> e	3,021	2,963
Scope 2 GHG emissions (Market-based)	mt CO <sub>2</sub> e	3,371	3,293
Scope 3 emissions	mt CO <sub>2</sub> e	2,917,630	2,898,563
Avoided emissions	mt CO <sub>2</sub> e	68	130
Metric tons of captured CO <sub>2</sub> e	MT	75	131
Energy used in operations	MWh	81,053	83,939
Energy consumption intensity	MWh/USD	0.0001226	0.000100695
SOx	kg	121.735	151.6
NOx	kg	28,183.65	31,807.4
PM2.5	kg	287.882	654.8
PM10	kg	296.611	663

5. 2024 Scope 1 and Scope 2 GHG emissions data have been restated due to an error in the original calculations.



## OUR PEOPLE

Our People			
Metric	Unit	2024	2025
Number of employees	#	1,496	1,535
Employee wages & benefits	\$	157,171,000	170,820,791

Demographics			
Metric	Unit	2024	2025
Executive leadership positions held by women	%	37.5	57
Racial / Ethnic diversity	%	25	25
Veterans	%	3.34	3.3
Voluntary turnover rate	%	6.46	9.3
Retirement rate	%	0.88	0.72
Under 30 years old	%	13	16
Between 30 and 50 years old	%	57	56
Over 50 years old	%	30	28
Average employee tenure	Years	8.02	8.63
Number of new jobs created	#	82	158



## OUR COMMUNITIES

Our Communities			
Metric	Unit	2024	2025
Donations and sponsorships provided	\$	588,000	725,000
Summit Cares grants awarded	\$	70,000	180,000
Capital Investment	\$	N/A	390,901,000
Taxes Paid (other than income taxes)	\$	N/A	24,615,000
401(k) Matching Contributions	\$	N/A	6,200,000
Short-Term Incentive Compensation	\$	N/A	16,200,000
Long-Term Incentive Compensation	\$	N/A	5,300,000
Volunteer hours contributed	#	9,089	10,042



## SUPPLY CHAIN RESPONSIBILITY

Our Supply Chain			
Metric	Unit	2024	2025
Supplier spend with small businesses	%	3.6	3.6
Supplier payments	\$	903,107,144	976,000,000



# Global Reporting Initiative (GRI) Index

# Global Reporting Initiative (GRI) Index

Summit Utilities, Inc. has reported the information cited in this GRI content index for the period January 1, 2025 to December 31, 2025 with reference to the GRI Standards. This index serves as a navigational tool for stakeholders seeking to locate specific environmental, social, and governance disclosures within this report and its associated references. Summit's use of the GRI Standards reflects our commitment to transparency, comparability, and accountability in communicating our sustainability performance to customers, regulators, investors, and the communities we serve.

GRI 2: GENERAL DISCLOSURES		
GRI STANDARD	DISCLOSURE	LOCATION / RESPONSE
GRI 2: General Disclosures	2-1 Organizational details	Summit Utilities, Inc. is a privately held natural gas distribution company headquartered in the United States. Summit owns and operates local distribution company (LDC) subsidiaries across six states: Arkansas, Colorado, Maine, Missouri, Oklahoma, and Texas. These subsidiaries include Arkansas Oklahoma Gas, Colorado Natural Gas, Summit Natural Gas of Maine, Summit Natural Gas of Missouri, Summit Utilities Arkansas, and Summit Utilities Oklahoma. Summit also operates Peaks Renewables; a subsidiary focused on low-carbon fuels including renewable natural gas (RNG) and green hydrogen.  Summit serves approximately 622,200 customers across approximately 450 communities and operates more than 22,518 miles of pipeline.
	2-2 Entities included in the organization's sustainability reporting	This report covers the consolidated sustainability performance of Summit Utilities, Inc. and all its operating subsidiaries for the 2025 calendar year. The entities included are: Arkansas Oklahoma Gas, Colorado Natural Gas, Summit Natural Gas of Maine, Summit Natural Gas of Missouri, Summit Utilities Arkansas, Summit Utilities Oklahoma, and Peaks Renewables.
	2-3 Reporting period, frequency and contact point	This report covers the period January 1 through December 31, 2025, and is published annually. For questions or feedback regarding this report or Summit's sustainability disclosures, please contact Federico Sendel at <a href="mailto:fsendel@summitutilities.com">fsendel@summitutilities.com</a> .
	2-4 Restatements of information	2024 Scope 1 and Scope 2 GHG emissions data have been restated due to an error in the original calculations
	2-6 Activities, value chain and other business relationships	Refer to Supply Chain Responsibility on page 57 for details on Summit's procurement practices, vendor relationships, and the Order to Recovery framework governing our operational supply chain across six states.
	2-7 Employees	Refer to the About Summit section on page 4 for total headcount; Employee Demographics on page 40 for workforce composition; and the By the Numbers table on page 65 for specific data breakdowns.
	2-9 Governance structure and composition	Refer to the Board of Directors section on page 11 for the composition, structure, and oversight responsibilities of Summit's highest governance body, including board member backgrounds and committee assignments.
	2-11 Chair of the highest governance body	Cheryl Campbell is the non-executive Chair of the Board of Directors. The Chair role is separate from executive management. More information is available <a href="#">here</a> .
	2-12 Role of the highest governance body in overseeing the management of impacts	Summit's Board of Directors provides direct oversight of the company's management of material ESG impacts. At quarterly Board meetings, leadership presents updated risk assessments that address emerging environmental, social, and governance issues, industry trends, and corresponding mitigation strategies. The Vice President and Corporate Treasurer provides the Board with quarterly updates on Summit's progress against its ESG initiatives. The Board's oversight scope encompasses risks and opportunities related to Summit's strategic goals, financial performance, and operational reputation — including climate-related risks, safety performance, and regulatory compliance.

GRI STANDARD	DISCLOSURE	LOCATION / RESPONSE
<b>GRI 2: General Disclosures (continued)</b>	2-13 Delegation of responsibility for managing impacts	<p>We have established a strong and clearly structured framework to manage our environmental, social, and governance (ESG) impacts. Responsibilities for managing these impacts are formally defined and embedded across the organization to ensure effective oversight, accountability, and continuous improvement. ESG oversight is led by the Vice President and Corporate Treasurer, who coordinates and advances our ESG strategy across all business units. This role works closely with cross-functional leaders to ensure ESG principles are integrated into day-to-day operations and strategic decision-making.</p> <p>Each department plays a defined role within our ESG framework. Operations manages environmental impacts such as emissions, energy use, and other operational footprints. Finance oversees the financial integrity of ESG initiatives. The Pipeline Safety team maintains the safety, reliability, and integrity of our pipeline infrastructure.</p> <p>To support accurate and transparent reporting, we maintain a comprehensive ESG data collection system staffed by designated data owners and support personnel. These individuals are responsible for gathering, validating, and submitting data aligned with our ESG commitments and regulatory requirements.</p> <p>Our governance structure also incorporates routine reviews and internal audits to ensure adherence to applicable standards and regulations. The Internal Audit team tracks all monetary fines and formal notices from regulators and reports them to the Board of Directors, enabling timely corrective actions and organizational learning.</p> <p>The Vice President and Corporate Treasurer provides the Executive Leadership Team and the Board of Directors with an update on the Company’s progress towards achieving its ESG initiatives on a weekly and quarterly basis, respectively.</p>
	2-15 Conflicts of interest	<p>Summit Utilities’ Code of Business Conduct and Ethics requires all covered parties, including directors, officers, and employees, to avoid situations where personal interests interfere, or appear to interfere, with the interests of the Company. Conflicts may arise when personal relationships, financial interests, outside employment, or receipt of improper benefits compromise objective decision-making.</p> <p>Covered parties are expected to promptly disclose any actual or potential conflicts of interest to appropriate management or the Company’s Chief Legal Officer. Directors and executive officers must disclose material transactions or business relationships that could reasonably give rise to a conflict to the Chair of the Board of Directors. No action may be taken with respect to such matters unless they are reviewed and approved by the Board of Directors.</p> <p>Summit also prohibits the misuse of corporate opportunities and requires employees and leaders to seek guidance when conflicts are unclear, reinforcing transparency, accountability, and ethical conduct across the organization.</p>
	2-16 Communication of critical concerns	Refer to Whistleblower Protection on page 12 for Summit’s mechanisms for raising and communicating critical concerns, including the Summit Hotline and the non-retaliation policy that protects those who report concerns in good faith.
	2-22 Statement on sustainable development strategy	Refer to the Letter from our CEO on page 3 for Summit’s senior leadership statement on our approach to sustainable development.
	2-23 Policy commitments	<p>Addressed in Summit’s Code of Business Conduct and Ethics: “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.”</p> <p>Also stated in the same document, “this Code 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.”</p>

GRI STANDARD	DISCLOSURE	LOCATION / RESPONSE
<b>GRI 2: General Disclosures (continued)</b>	2-24 Embedding policy commitments	<p>Our commitment to ethical conduct is grounded in the principles outlined in Summit's Code of Business Conduct and Ethics. As stated on 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."</p> <p>The Code further establishes its purpose by affirming that it serves to: (1) Emphasize the Company's commitment to ethics and compliance with the law; (2) Define core standards of ethical and legal behavior; (3) Provide clear mechanisms for reporting known or suspected violations; and (4) Support the prevention and detection of wrongdoing.</p> <p>Together, these principles form the foundation of our ethical culture and guide how we conduct ourselves as individuals and as an organization.</p>
	2-25 Processes to remediate negative impacts	<p>Summit's Code of Business Conduct and Ethics states: "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."</p> <p>The Code also establishes clear reporting mechanisms for all employees and includes a strong non-retaliation policy to ensure individuals can raise concerns safely and without fear of adverse consequences.</p>
	2-26 Mechanisms for seeking advice and raising concerns	<p>Addressed in the Code of Business Conduct and Ethics: "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."</p>
	2-27 Compliance with laws and regulations	<p>The Code of Business Conduct and Ethics (page 4) affirms that: "Obeying the law, both in letter and in spirit, is the foundation on which the Company's ethical standards are built."</p> <p>It further requires that: "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."</p> <p>These statements establish legal compliance as a core expectation for all employees and a fundamental component of Summit's ethical culture.</p>
	2-28 Membership associations	<p>Refer to the Memberships &amp; Associations on page 50 for Summit's full list of industry, trade, and community organizations across our six-state service territory, reflecting our commitment to stakeholder engagement and industry collaboration.</p>
	2-29 Approach to stakeholder engagement	<p>Refer to the Materiality: Aligning Strategy with Impact on page 6 for our engagement methodology and Our Communities on page 45 for specific stakeholder group activities.</p>
	2-30 Collective bargaining agreements	<p>Refer to Workforce Demographics on page 40 for disclosure of the percentage of Summit's workforce covered by collective bargaining agreements, by operating state where applicable.</p>
<b>GRI 3: MATERIAL TOPICS</b>		
GRI STANDARD	DISCLOSURE	LOCATION / RESPONSE
<b>GRI 3: Material Topics</b>	3-1 Process to determine material topics	<p>Refer to the Materiality: Aligning Strategy with Impact section on page 6 for a description of Summit's 2025 Double Materiality Analysis process, including stakeholder identification, impact and financial materiality assessments, and the methodology used to prioritize ESG topics.</p>
	3-2 List of material topics	<p>Refer to the Materiality: Aligning Strategy with Impact section on page 6 for the full list of topics determined to be material to Summit's operations and stakeholders following our 2025 Double Materiality Analysis.</p>
	3-3 Management of material topics	<p>Refer to the chapter-level introductions throughout this report for Summit's management approach to each material topic, including our Environment, Safety, Our People, Our Communities, and Governance sections on pages 8, 14, 22, 36, 45. Each section describes our policies, programs, targets, and performance related to that topic.</p>

GRI 200: ECONOMIC TOPICS		
GRI STANDARD	DISCLOSURE	LOCATION / RESPONSE
<b>GRI 200: Economic Topics</b>	201-1 Direct economic value generated and distributed	Refer to the About Summit section on page 4 for our economic footprint and Our Communities on page 45 for details on local investments, including capital expenditures, taxes paid, employee compensation, and community donations.
	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 reducing emissions and providing affordable energy solutions for 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.
	203-1 Infrastructure investments and services supported	Refer to the Community Economic Impact section on page 53 for Summit’s capital investment figures, including the \$390.9M in infrastructure investment in 2025 that strengthened and expanded our natural gas systems across our six-state service territory.
	203-2 Significant indirect economic impacts	See the Community Economic Impact section on page 53 for a summary of Summit’s indirect economic contributions, including taxes paid, job creation, charitable giving, and the broader economic multiplier effects of our infrastructure investments in the communities we serve.
	204-1 Proportion of spending on local suppliers	Partially addressed in Summit’s Procurement Policy, where vendor evaluation criteria include efforts to include small and local business owners, as well as veteran, and service-disabled veteran owned businesses. Refer also to Supply Chain Responsibility on page 57 for our strategic emphasis on local economic development through procurement.
	205-1 Operations assessed for risks related to corruption	Refer to the Anti-corruption section on page 12 for Summit’s approach to assessing corruption risk across our operations. Additionally, page 2 of Summit’s Code of Business Conduct contains several specific references to prohibited practices that relate to anti-corruption, including restrictions on gifts, kickbacks, and improper payments.
	205-3 Confirmed incidents of corruption and actions taken	No confirmed incidents of corruption were identified during the reporting period. Summit maintains a zero-tolerance policy for bribery and corruption, as outlined in our Code of Business Conduct and Ethics.
	206-1 Legal actions for anti-competitive behavior, anti-trust, and monopoly practices	Refer to Anti-trust and Monopoly Guidelines on page 12 for Summit’s policy framework governing competitive conduct and the absence of any material legal actions related to anti-competitive behavior during the reporting period.
	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.
	207-2 Tax governance, control, and risk management	
207-3 Stakeholder engagement and management of concerns related to tax		

GRI 300: ENVIRONMENTAL TOPICS		
GRI STANDARD	DISCLOSURE	LOCATION / RESPONSE
GRI 300: Environmental Topics	302-1 Energy consumption within the organization	Refer to the By the Numbers table on page 64
	302-3 Energy intensity	
	303-1 Interactions with water as a shared resource	Refer to the Environment chapter on pages 22-35, 64 for Summit's approach to water stewardship, including the limited nature of water use in natural gas distribution operations and any significant interactions with shared water resources.
	303-2 Management of water discharge-related impacts	Refer to the Environment chapter on pages 22-35 for Summit's policies and practices governing the management and discharge of water from our operations, including compliance with applicable state and federal standards.
	304-2 Significant impacts of activities, products and services on biodiversity	Refer to the Environment chapter on page 30 for Summit's assessment of potential biodiversity impacts from pipeline installation and maintenance activities, including our burrowing owl protection project in Colorado and other habitat mitigation efforts.
	304-3 Habitats protected or restored	Refer to the Environment chapter on pages 30, 64 for details on Summit's habitat protection and restoration activities in 2025, including land restoration following pipeline projects and our ongoing biodiversity initiatives across the service territory.
	305-1 Direct (Scope 1) GHG emissions	See the By the Numbers table on page 64 for Summit's GHG emissions metrics.
	305-2 Energy indirect (Scope 2) GHG emissions	
	305-3 Other indirect (Scope 3) GHG emissions	
	305-4 GHG emissions intensity	
	305-5 Reduction of GHG emissions	Refer to Advanced Leak Detection on pages 17-18 and Pipeline Replacement on pages 24-26 for the operational strategies that resulted in the emission reductions reported in 2025, including the deployment of methane detection units and the replacement of leak-prone legacy pipe
	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 <sub>4</sub> ), is not classified as an ozone-depleting substance.
	305-7 Nitrogen oxides (NOx), sulfur oxides (SOx), and other significant air emissions	Refer to the By the Numbers table on page 64 for Summit's 2025 air emissions data, including NOx, SOx, PM2.5, and PM10 values derived from EIA-176 filings and operational monitoring across our distribution system.
	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. Refer also to the By the Numbers table on page 64.
	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 the release 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; and maintaining necessary documentation and records. Refer also to the By the Numbers table on page 64.
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.	

GRI STANDARD	DISCLOSURE	LOCATION / RESPONSE
<b>GRI 300: Environmental Topics (continued)</b>	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; and 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/manifolds as part of our best management practices to ensure proper waste management.
	308-1 New suppliers that were screened using environmental criteria	Addressed in our Procurement Policy, which details environmental evaluation criteria for suppliers including environmental violations history, ISO 14001 certification status, Environmental, Social and Governance Policy, and 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 ESG issues. Our vendor evaluation criteria include assessment of environmental violations, waste management practices, ISO 14001 certification, ESG policies, and business continuity plans. This framework establishes environmental considerations as a component of our procurement decisions.

**GRI 400: SOCIAL TOPICS**

GRI STANDARD	DISCLOSURE	LOCATION / RESPONSE
<b>GRI 400: Social Topics</b>	403-1 Occupational health and safety management system	See the Commitment to Health and Safety section on page 14-15 for our safety framework and the transition to ISO 31000 risk management standards, including the structure of our safety management system, governance responsibilities, and how safety performance is tracked and reported.
	403-2 Hazard identification, risk assessment, and incident investigation	Refer to the Commitment to Health and Safety section on page 15 for our proactive hazard identification training and the use of probabilistic risk modeling to manage infrastructure integrity, including our processes for investigating incidents and implementing corrective actions.
	403-3 Occupational health services	Refer to the Safety Culture section on page 16 for Summit's occupational health services.
	403-4 Worker participation, consultation, and communication on occupational health and safety	See the Safety Culture section on page 16 for how Summit engages workers in health and safety matters, including safety committees, the Speak Up program, and mechanisms for employees to raise safety concerns without fear of retaliation.
	403-5 Worker training on occupational health and safety	The Commitment to Health and Safety section on page 15-16, 19 provides details on Summit's mandatory safety training programs, including new hire orientation, annual refresher training, OSHA compliance modules, and role-specific field safety certifications.
	403-6 Promotion of worker health	Refer to the Safety Culture section on page 16 for Summit's initiatives to promote worker health beyond regulatory compliance, including wellness programs, employee assistance resources, and our Safety First Mentorship Program.
	403-7 Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	Refer to the Contractor Safety and Construction Activity Management section on page 20 for Summit's approach to managing safety risks arising from contractor and supplier relationships. This is also addressed in our Procurement Policy, which includes supplier evaluation criteria for: OSHA 300/300a Logs, Contractor Safety Manual, preventable vehicle incident rate, and Federal Motor Carrier Safety Administration safety rating.
	403-9 Work-related injuries	Refer to the Commitment to Health and Safety on page 15 and the Safety First Mentorship Program for our approach to injury prevention. Full safety metrics, including DART rate, TRIR, and lost-time incidents, are reported on the By the Numbers table on page 63.

GRI STANDARD	DISCLOSURE	LOCATION / RESPONSE
<b>GRI 400: Social Topics (continued)</b>	404-2 Programs for upgrading employee skills and transition assistance programs	Refer to the Professional Development section on page 41 for details on our learning and development programs.
	404-3 Percentage of employees receiving regular performance and career development reviews	100% of Summit's eligible employees receive annual performance and career development reviews through our structured review process
	405-1 Diversity of governance bodies and employees	Refer to the Meet Summit's Board of Directors on page 11 for details on the demographics of our Board and to the Workforce Demographics on page 40 for employee-level diversity data by gender, race/ethnicity, and employment category.
	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. Summit respects employees' rights to organize and bargain collectively in accordance with applicable law.
	408-1 Operations and suppliers at significant risk for incidents of child labor	Per our internal procurement policy, the evaluation criteria for construction services includes a labor policy requirement containing a written assertion of no use of slave or child labor in the supply chain. Additionally, according to our Code of Ethics and Business Conduct, Summit unequivocally condemns modern slavery in all its forms. We have not identified any operations or suppliers where there is significant risk of child labor or forced or compulsory labor.
	409-1 Operations and suppliers at significant risk for incidents of forced or compulsory labor	Summit has not identified any operations or suppliers at significant risk for incidents of forced or compulsory labor. Our Procurement Policy requires suppliers to affirm the absence of forced labor in their supply chains, and our domestic operations are subject to U.S. labor law protections. Refer to Supply Chain Responsibility on page 57-60 for additional context on our vendor ethics requirements.
	411-1 Incidents of violations involving rights of indigenous peoples	No incidents involving violations of the rights of indigenous peoples have been identified during the reporting period. This topic does not present a specific operational risk given the nature of our regulated natural gas distribution activities within established service territories.
	413-1 Operations with local community engagement, impact assessments, and development programs	Refer to Our Communities on page 45-47 for details on regional impact assessments, volunteer programs, and local giving initiatives, including Summit's Heating Assistance Fund, Summit Cares grant program, LivingWise school kit program, and employee volunteering.
	414-1 New suppliers that were screened using social criteria	Addressed in our Procurement Policy, in which social evaluation criteria include efforts to expand to small and local businesses in the communities that Summit serves, and veteran, and service-disabled veteran owned businesses, ESG/Resiliency/Business Continuity Plan, and cybersecurity measures.
	414-2 Negative social impacts in the supply chain and actions taken	Per Summit's Procurement Policy, Summit addresses potential negative social impacts in our supply chain through several measures. The policy includes requiring consideration of anti-corruption practices, health and safety records, and labor practices when selecting suppliers. For large purchases of construction services and materials, Summit evaluates suppliers on OSHA safety logs, environmental violations, and labor policies (including written assertions of no slave or child labor), among other criteria.. The policy also enables the exclusion of vendors who fail to comply with Summit's requirements or who demonstrate unsatisfactory performance on previous contracts.
	415-1 Political contributions	Refer to Governance on page 8 for oversight of Summit's political engagement activities and the Summit PAC summary on page 13, including total contributions made during the reporting period and the governance process for approving political expenditures.
	416-1 Assessment of the health and safety impacts of product and service categories	Refer to Safety on page 14-21 for Summit's systematic assessment of the public health and safety impacts associated with our natural gas distribution operations, including pipeline integrity management, leak survey programs, and emergency response protocols.
	418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data	Refer to the Cybersecurity section on page 10 for our management approach on cybersecurity.



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