



C O R P O R A T E
S U S T A I N A B I L I T Y
R E P O R T

2020

ABOUT OUR REPORT

GLOBAL REPORT INITIATIVE STANDARDS

The Global Reporting Initiative Standards (GRI Standards) are the first global standards for sustainability reporting. GRI is an international independent organization that establishes standards designed for organizations to report about economic, social and environmental impacts from their operations. This report contains Standard Disclosures from the GRI Sustainability Reporting with a full GRI Standards index on page 41.

UNITED NATION'S SUSTAINABLE DEVELOPMENT GOALS

SUSTAINABLE DEVELOPMENT GOALS

At Summit, we are conscious that our everyday actions have a lasting impact on the environment, our communities, and the world. As such, we have ensured that our annual Environmental, Social, and Governance (ESG) goals and business practices support the United Nation's Sustainable Development Goals (UN's SDGs). We are proud to deliver a more cost-effective and environmentally sustainable fuel option to residences and businesses in rural areas where other utilities could not or would not serve with natural gas. Each of Summit's utility subsidiaries constructs and installs natural gas distribution systems with the goal of supporting economic development by providing clean, safe and reliable natural gas to residential and commercial customers through exceptional customer service and commitment to community. Through our core business, we support the UN's SDGs which is why you will see the SDG icons throughout this report.



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CEO MESSAGE STATEMENT

TO OUR COMMUNITY

Our company was founded in Colorado’s front range 23 years ago. The front range is a place where community and natural resources are valued above all else. In honor of our legacy, we have built a company committed to providing clean, safe, and affordable energy solutions to unserved and underserved communities in five states.

The challenges facing our company and the communities we serve today look very different from the ones we faced two decades ago, but one thing remains the same: as an energy provider, and a public utility, we play a pivotal role in addressing those challenges and helping build strong economically and environmentally sustainable communities.

Over the last few years, as Summit has grown, we’ve concentrated on weaving environmental, social, and governance (ESG) practices into our core business strategy. We work diligently to provide innovative solutions to help enhance our communities, improve our environmental performance, and create a safe and healthy system and workplace for our customers and team members.

In 2019, to enhance our focus on ESG practices, Summit formalized a

Sustainability Department. Through the formation of this department, we now have members of our team solely dedicated to the creation and implementation of long-term sustainability strategies, ESG planning, and goal setting.

I’M PROUD OF OUR ESG AND SUSTAINABILITY ACCOMPLISHMENTS IN 2019. THEY ARE OUTLINED IN DETAIL IN THIS REPORT. KEY HIGHLIGHTS INCLUDE:

- Earning 5 stars on the GRESB
- Being named one of the Best Places to Work in Maine
- Having no reportable injuries in Colorado three years in a row
- Being awarded the Southern Gas Association’s Community Service Award
- Launching a landmark Renewable Natural Gas Program in Maine that included matching 5 percent of our residential gas demand with renewable attributes and offering customers a renewable option for home heating.

While Summit continues to focus on long term goal setting, our company is one that is driven by action. This is particularly true when it comes to our efforts to reduce emissions and mitigate the impacts of

climate change. At Summit, we truly believe that our distribution system plays a critical role in helping the states we operate in meet their emissions reduction goals, which is why, in addition long term sustainability planning, we are committed to investing in innovative technologies that will have an immediate and real impact on greenhouse gas emissions today.

While still in development, one of our biggest sustainability initiatives that we launched in 2019 was partnering with Maine dairy farms to begin development of a Renewable Natural Gas Digester that will help spur rural economic development, support the agricultural industry, protect farmlands, and reduce emissions. Once developed, this facility will have the capacity to generate enough gas to meet forty-five percent of our residential load in Maine.

At Summit we are encouraged by the strides we have made in building a strong culture and company grounded by our mission and commitment to ESG practices. We are resilient, agile, inclusive and deeply committed to our people, our communities and building a sustainable energy future.

I look forward to sharing with you all that we accomplished in 2019.

“AT SUMMIT, WE TRULY BELIEVE THAT OUR DISTRIBUTION SYSTEM PLAYS A CRITICAL ROLE IN HELPING THE STATES WE OPERATE IN MEET THEIR EMISSIONS REDUCTION GOALS, WHICH IS WHY, IN ADDITION LONG TERM SUSTAINABILITY PLANNING, WE ARE COMMITTED TO INVESTING IN INNOVATIVE TECHNOLOGIES THAT WILL HAVE AN IMMEDIATE AND REAL IMPACT ON GREENHOUSE GAS EMISSIONS TODAY. ”



OUR COMMUNITIES

We serve more than 120 communities across the United States



SUMMIT UTILITIES, INC.

Parent company, Summit Utilities, Inc. (Summit) owns natural gas distribution and transmission subsidiaries that operate in Arkansas, Colorado, Maine, Missouri and Oklahoma. Our headquarters are located in Centennial, Colorado.

Each of Summit’s utility subsidiaries constructs and installs natural gas distribution systems with the goal of supporting economic development by providing clean-burning, safe and reliable natural gas to residential and commercial customers through exceptional customer service and commitment to community.

Counties corporate offices are located in: Arapahoe (CO), Cumberland & Kennebec (ME), Sebastian (AR)



ARKANSAS & OKLAHOMA

Arkansas Oklahoma Gas Corporation (AOG) is based in Fort Smith, Arkansas and provides natural gas to over 55,000 residential, commercial, industrial and agricultural customers in Arkansas and Oklahoma. We’ve been serving the people of Fort Smith and the surrounding area with safe and reliable service for nearly 75 years.

In 2017, AOG joined with Summit. Summit and AOG were two strong companies with two great missions. By acquiring AOG, Summit inherited decades of experience in the natural gas industry that continue to help Summit and its subsidiaries prosper and grow. Not only did this bring added expertise to the team, it brought additional financial resources for ongoing growth and investments to protect the integrity and safety of AOG’s natural gas system.

ARKANSAS:

CUSTOMERS: 45,600

T&D MAINE LINE: 1,717

COUNTIES SERVED: CRAWFORD, FRANKLIN, LOGAN, SEBASTIAN, SCOTT

OKLAHOMA:

CUSTOMERS: 12,600

T&D MAINE LINE: 832

COUNTIES SERVED: DELAWARE, HASKELL, LATIMER, LEFLORE, SEQUOYAH



COLORADO

Colorado Natural Gas (CNG) began in 1997, when two entrepreneurially-minded executives recognized a need to deliver a more cost-effective and environmentally sustainable fuel option to residences and businesses in rural areas where other utilities could not or would not serve with natural gas. Today, CNG continues to serve the needs of Colorado residents and businesses by bringing natural gas to underserved communities.

CUSTOMERS: 22,600

T&D MAINE LINE: 1,296

COUNTIES SERVED: ADAMS, ARAPAHOE, CHEYENNE, CLEAR CREEK, GILPIN, JEFFERSON, KIOWA, PARK, PUEBLO, SUMMIT, TELLER



MAINE

Summit Natural Gas of Maine (SNGME) was founded in Maine in 2012. SNGME delivers safe, clean and affordable natural gas to residences and businesses of all sizes. We currently serve customers in Augusta, Cumberland, Fairfield, Falmouth, Farmingdale, Gardiner, Hallowell, Madison, Randolph, Sidney, Waterville, and Yarmouth, with plans to expand to serve more communities in the future.

CUSTOMERS: 4,000

T&D MAINE LINE: 231

COUNTIES SERVED: CUMBERLAND, KENNEBEC, SOMERSET



MISSOURI

Summit Natural Gas of Missouri (SNGMO) has been serving the residential, business and industrial needs of Missouri since 2004. SNGMO is a natural gas distribution company that specializes in bringing natural gas to rural and under-served areas where other service providers won’t or can’t go with a pipeline that stretches from the Iowa line to the Arkansas border. Our underground systems are built using state-of-the-art materials and equipment with years of experience building safe and reliable systems in challenging terrain.

CUSTOMERS: 19,000

T&D MAINE LINE: 1,362

COUNTIES SERVED: BARRY, BENTON, CALDWELL, CAMDEN, DAVIESS, DOUGLAS, GREENE, HARRISON, HOWELL, LACLEDE, LAWRENCE, MILLER, MORGAN, PETTIS, STONE, TANEY, TEXAS, WEBSTER, WRIGHT

**OUR MISSION IS TO
DELIVER CLEAN, SAFE,
AFFORDABLE AND
RELIABLE ENERGY
SOLUTIONS TO OUR
CUSTOMERS THROUGH
EXCEPTIONAL SERVICE
AND A STRONG
COMMITMENT TO OUR
COMMUNITIES.**

OUR VALUES

every day we...

**EMBRACE
INNOVATION**

We have the passion to seek and embrace innovative ideas that drive us to our vision

**FOCUS ON
CUSTOMERS**

We honor our customers and communities by giving them the best of ourselves and by prioritizing their safety and satisfaction

ACCOUNTABLE

We take ownership for our actions and the resulting impact we have on our customers, communities and financial success

**SAFETY
FIRST**

We never compromise the safety of our colleagues, customers and/or communities

COLLABORATE

We work as a team to effectively execute on our vision and deliver our goals

**STRIVE FOR
EXCELLENCE**

We deliver consistent results by taking a strategic and aligned approach

**HONOR
DIVERSITY**

We embrace the diversity of thought in finding optional solutions for achieving our mission

OUR CULTURE



I started in the gas industry more than 30 years ago, working directly with customers and community members focusing on how to best meet their energy needs. I couldn’t be prouder to work for a company that has a culture that understands that people are always at the heart of what we do, whether it’s our customers, our communities or our team members.

Our company culture isn’t something that stops when we walk out the door of our office every day. Members of our team live and breathe our company values on and off the job. Everyone in the company is given the opportunity to make a meaningful impact and contribute to the good of the communities we serve.

**WE LIVE AND
BREATHE OUR
COMPANY VALUES
ON AND OFF THE JOB.**
”

FRED KIRKWOOD
Chief Customer Officer

PIONEERING

Summit was the recipient of the Southern Gas Association’s 2019 Engineering Innovation Award for the company’s development of the Work Order Field Application (WOFA). The WOFA is a mobile platform used to access and record information about the company’s pipeline system, allowing it to track system components from “dock” to “ditch.” The information collected has helped Summit improve purchasing, gain operational effectiveness, and garner real-time insights from construction projects.

EXCELLENCE

In 2019, Summit received its first 5-star rating in the annual Global Real Estate Sustainability Benchmarking (GRESB) assessment. Completing the GRESB each year is a large undertaking that spans across all of our departments and requires answering hundreds of questions and providing backup documentation as proof of our efforts.

AGILITY

Summit Natural Gas of Missouri broke ground on a 70,000-foot natural gas pipeline expansion project in its Rogersville service area at the end of 2019. This expansion project will increase the flow of gas to communities like Lebanon and Rogersville and will support their continued economic growth. Additionally, this expansion project will potentially bring reliable and clean burning natural gas access to residential, commercial, and industrial customers in the Conway, Phillipsburg, Houston, and Mountain View communities.

OUR CULTURE IN ACTION.

KINDNESS

In 2019 Summit created a PTO donation policy for team members to donate PTO to a pool for use by their colleagues in need. This PTO pool is available to team members who have a medical emergency within their immediate family or are impacted by a qualifying natural disaster. The kindness of members of our team is one of the traits that distinguishes Summit; this program was developed as a way for us to formalize that effort.

SAFETY

In 2019, Summit was proud to report no recordable injuries for team members at CNG, SNGME, and SUI. This great track record illustrates the commitment the Summit team has made to ensuring the safety of the staff, customers, and communities.



ENVIRONMENTAL
COMMITMENT

Summit is committed to conserving natural resources, helping to solve environmental challenges, and minimizing our impact on the environment through energy efficiency, pollution reduction and forward-thinking innovation.

SOCIAL
COMMITMENT

Our team and the communities we serve are the lifeblood of our company, which is why we are committed to sustainable economic and community development while supporting our team so we can lead fulfilling and healthy lives.

GOVERNANCE
COMMITMENT

We are committed to setting the bar on being a progressive leader in structuring strong management practices that contribute to our overall resilience.

COMMITMENT TO GOVERNANCE

OWNERSHIP

Summit is owned by institutional investors advised by J.P. Morgan Asset Management.

BOARD OF DIRECTORS

Summit is governed by a Board of seven Directors. Five of the seven Directors, including the Chair, are independent. All Board members have a fiduciary responsibility to act in the best interests of the company and its shareholders. Our board members have experience across a wide range of industries and disciplines, including utilities, power generation, finance, law, asset management, and government regulation. The Board periodically reviews its membership to help ensure it will have diversity of thought, background and approach. Director biographies are featured on Summit’s public website: <https://summitutilitiesinc.com/board-of-directors/>

Six of our seven directors are non-management members. The Board appoints and oversees the Chief Executive Officer and other Officers who are charged with conducting the company’s business. Non-management Directors meet at each board meeting in executive session without management. Directors have full access to Officers and the leadership team of the company, as well as the company’s external advisors and auditors.

Board members serve on five standing committees:

- Audit
- Compensation
- Corporate Governance & Nominating
- Safety
- Strategic Planning

Each committee has adopted a formal charter that describes in detail its purpose, organizational structure and responsibilities.

IN 2019,
SUMMIT’S BOARD
WENT PAPERLESS,
REDUCING
WASTE AND OUR
ENVIRONMENTAL
FOOTPRINT!



BOARD DIVERSITY

AVERAGE TENURE

5 years

RACIAL/ETHNIC

29%

FEMALES

29%

ESG & SUSTAINABILITY GOVERNANCE

Helen Ayotte, Vice President of Engineering and Chair of the ESG Committee shares her thoughts on Summit’s ESG journey:



“

It’s exciting to be involved in Summit’s ESG efforts at such a pivotal time in our sustainability journey. Being a small utility allows us to be nimble, and our entrepreneurial roots inspire us to think big as we work on setting groundbreaking goals for the future of our company.

ESG COMMITTEE

Within Summit, a standing ESG Committee is responsible for prioritizing and implementing key ESG initiatives, which we identify through an annual materiality assessment and engagement with key stakeholders, including our shareholders. The Committee develops annual ESG-related goals and priorities that are approved by the Corporate Governance Committee and then adopted throughout all levels of the company. The Committee was created in 2018 and is made up of team members and executives from all corporate departments and has grown and continues to evolve. In 2019, the ESG Committee formalized its internal structure, and elected Helen Ayotte, Vice President of Engineering, as Chair of the Committee. The Committee plays a pivotal role in assessing Summit’s ESG performance and developing necessary company-wide policy changes.

SUSTAINABILITY DEPARTMENT

In 2019, Summit formalized a Sustainability Department to coordinate and execute our sustainability and ESG efforts. Through the creation of this department we have employees solely dedicated to the creation and implementation of long-term sustainability and ESG planning and goal setting. Members of the Sustainability Department sit on Summit’s ESG Committee and oversee and manage the execution of Summit’s ESG goals.

ESG PERFORMANCE

Each year at Summit we challenge ourselves to a higher level of performance. Our Corporate Scorecard sets out annual goals for the company to achieve, including ESG goals.

Our Corporate Scorecard includes metrics such as: safety, volunteerism, pipeline replacement, and customer erosion. At the Board Level, ESG matters are overseen by the Corporate Governance & Nominating Committee of the Board. In addition to oversight by that Committee, the company reports scorecard performance, including ESG performance, to the full Board on a quarterly basis; ESG matters are often included in the matters presented to the full Board. Additionally, Summit presents a Risk Register to the Board each quarter that captures ESG related risks facing the company along with proposed solutions and mitigation efforts. The Risk Register evaluates climate related transition risks directly facing the company and our communities.

GRESB

To benchmark our ESG performance, Summit participates in the annual Global Real Estate Sustainability Benchmarking (GRESB) assessment. In each of the last four years, our ESG performance improved and in 2019 we scored 5-out-of-5 stars. Our 2019 scores show that we are ranking above the GRESB participant average in most of the categories of the GRESB assessment, with our governance and social programs standing out as well above peer and global averages. Summit came in 15th in the Americas and 62nd world-wide with a score of 71 out of 100.

CYBER SECURITY

Summit has a deep-seated commitment to cyber security and makes significant investments in tools, resources, and training to protect our customers, team members and network from cyber threats. Summit’s cybersecurity strategy combines a defense-in-depth approach with information security awareness initiatives. Technologies deployed such as next generation firewalls and AI driven threat protection create layers of defense for data traversing our networks. Along with our digital safeguards, Summit invests in training and awareness for our team members.

HOURS OF CYBER SECURITY TRAINING

800

EMPLOYEES INFORMATION SECURITY TRAINING COMPLETED

96%

DEVICES COLLECTED DURING E-WASTE DRIVE

500

OTHER KEY ACCOMPLISHMENTS INCLUDE:

- Added a cyber security session to our yearly leadership conference
- Participated in National Cyber Security Awareness Month
- A cyber security training to Summit’s Board

PROCUREMENT POLICY

At Summit, when we do business with vendors and contractors, we want to make sure that the materials we use are of the highest quality and that they will keep us and our communities as safe as possible. We also believe that the people who build these materials should work in a safe environment, be paid fairly for their work, and not be subject to discrimination. It’s also important that our vendors and contractors be operationally and financially sustainable, to minimize risk to our supply chain, project schedules and business. Looking at ESG policies and other criteria helps give us peace of mind that we are limiting the amount of risk we are exposed to and that we are contributing to safe and fair labor practices across the country.

In 2019 Summit’s Procurement Department conducted a materiality and risk assessment to determine what changes need to be made to our Procurement Policy. As a result, the Procurement Policy was updated at the end of 2019 to reflect important ESG performance criteria, such as anti-corruption, diversity, health and safety, and environmental and labor practices when selecting vendors and sourcing goods and services.

WHISTLEBLOWER PROTECTION

We provide a workplace where employees are encouraged to report concerns and ask questions without fear of retaliation. To promote this culture, we provide a confidential compliance hotline that is available 24 hours a day, seven days a week. The hotline is available to all employees and persons outside the organization to report known or suspected illegal or unethical behavior. The hotline is managed by an independent, third-party operator and all reports are promptly investigated. We promote awareness of the company’s reporting system and non-retaliation policies through direct communications with employees, our corporate intranet and using displays in high-traffic work areas across the organization.

GOVERNANCE GOALS

At the end of 2019, Summit created its first set of formal Governance Goals. These goals have been set for completion in 2020 and will be reported on in Summit’s next Corporate Sustainability Report:



COMMITMENT TO THE ENVIRONMENT

Summit is committed to conserving natural resources and reducing our impact on the environment through energy efficiency, pollution reduction and forward-thinking innovation. In 2019, we kept our environmental commitment by launching renewable natural gas (RNG) programs, participating in methane reduction initiatives, and running energy efficiency programs. Visit Appendix A on page 36 to view our 2019 Quantitative Emissions Data.

Half a percent under our commitment of 1 percent as part of the ONE Future Coalition.

BELOW

.5%

In 2019 Summit proudly committed to maintaining a methane intensity below .5 percent. Half a percent under our commitment of 1 percent as part of the ONE Future Coalition.

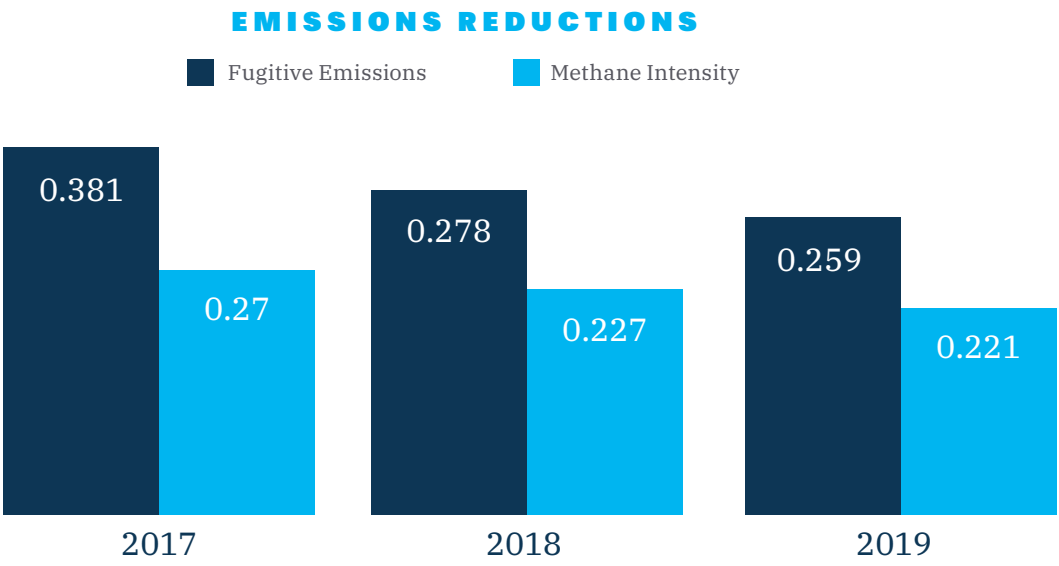
9 INDUSTRY, INNOVATION AND INFRASTRUCTURE

11 SUSTAINABLE CITIES AND COMMUNITIES

13 CLIMATE ACTION

2019 ACCOMPLISHMENTS

Across all of our subsidiaries, our cumulative fugitive methane emissions rate and methane intensity has gone down over the last three years!



RENEWABLE NATURAL GAS

In the spring of 2019, Summit Natural Gas of Maine launched a landmark RNG program to further the company’s commitment to building a sustainable energy future. As part of that program, we matched five percent of our residential gas demand for one year with RNG attributes at no cost to our customers to help reduce our carbon footprint. In addition, with PUC approval, we began giving our customers a renewable choice when it comes to their home heating needs by allowing them to match 10 to 100 percent of their average annual gas usage voluntary RNG attributes. This program will help jumpstart the renewable biofuels market and spur investment in new technologies that mitigate of the impacts of climate change.

To further our commitment to investing in RNG and innovative technologies that reduce greenhouse gas emissions, Summit launched a state of the art RNG development project. While still in development, Summit is partnering with family dairy farms throughout central Maine to turn the manure from their daily operations into RNG. Once in the digester, the manure will be heated and decomposed, creating biogas. The gas will then be cleaned to remove impurities and injected into our system. The gas from this facility will be put directly into our LDC pipelines and used to heat homes and businesses throughout our service territories.

RNG is nearly identical to traditional natural gas and can be used for heating, cooking and other processes. The renewable attributes from the digester

will be sold to third parties to help them meet their emissions reduction goals. We anticipate that the digester will supply approximately 125,000 MMBtu of gas a year. To put that in perspective, that is about 45 percent of our annual residential demand in Maine.

“
They say one man’s trash is another man’s treasure. That’s particularly true with this project. Where most people saw waste from the dairy industry, Summit saw an opportunity to generate a truly home-grown energy source that has the potential to benefit Maine’s environment, our economy and our dairy industry. I look forward to learning more about the project and seeing how it progresses.”

– Senate President Troy Jackson

Our renewable attributes are derived from biomethane. When biomethane is produced, two products are created simultaneously, methane and renewable attributes. Methane is the physical, tangible commodity that is used in homes and businesses. Renewable attributes are the intangible benefits associated with the creation of methane from renewable materials. Renewable attributes from biomethane are similar to Renewable Energy Certificates (RECs), the intangible benefits created by the generation of electricity using renewable sources (solar, wind, hydro, etc.). Currently, the source of the renewable attributes is not in Maine, and Summit is not purchasing the methane itself. The company is simply purchasing the attributes and matching them with the methane that we normally deliver to our customers in Maine.



GREEN BUILDING CERTIFIED HEADQUARTERS!

After months of planning, Summit’s headquarters moved from Littleton, Colorado to our new Silver LEED Certified headquarters in Centennial. Not only is the new office certified as a leader in energy and environmentally responsible design, but it also provides essential amenities and better access to public transport to our team members.



E-WASTE DRIVE

In 2019 we recycled approximately 8,992 pounds of e-waste through company sponsored e-waste drives in all five states. This equates to 25.3 metrics tons of CO2 which is like taking 5.5 cars off the road for one year!

ONGOING INITIATIVES

COMMITMENT TO METHANE
EMISSIONS REDUCTION

Summit is committed to strengthening our energy system’s contributions to a sustainable energy future. In addition to finding new and innovative ways to contribute to environmental responsibility, we continue to follow through on our energy commitments. A key aspect of our environmental planning is our commitment to reducing methane emissions on our system including setting a goal of maintaining a methane intensity score of .5 percent, well below the industry average. Our

ongoing methane reduction initiatives include:

- Natural Gas STAR Methane Challenge: Through our participation in the U.S. Environmental Protection Agency’s voluntary Methane Challenge Program, we commit to transparently reporting our methane emissions and describing the systematic and comprehensive actions we are taking to reduce our methane emissions. Through this program, we make our system safer, reduce operational risk and increase efficiency. Beyond that, we also share information and best practices with

- our peers across the country to further enhance methane mitigation efforts industrywide. Our specific Methane Challenge commitments are to reduce emissions through distribution excavation damage prevention and better transmission purge practices.
- Excavation damage prevention: As part of our commitment under the Methane Challenge Program, we have completed several new public outreach initiatives to reduce excavation damages. These initiatives included the distribution of a pipeline safety brochure to

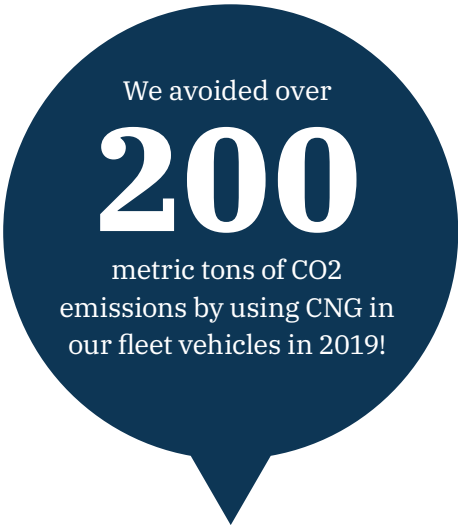
thousands of excavators across our service territories, a fully integrated and enhanced public awareness campaign, and a school outreach program.

- **ONE Future Coalition:** Summit is a committed member of the ONE Future Coalition, an organization made up of energy companies from across the natural gas supply chain that are committed to achieving a science-based average rate of methane emissions across facilities equivalent to one percent or less of total natural gas production. With company leaders serving on ONE Future’s Board of Directors and other policy and technical committees, we work together to report emissions data, mitigation efforts and best practices with the goal of leading the industry to a sustainable path of lower emissions and more efficient operations. Our company methane emissions intensity goal is .5 percent, and through our mitigation efforts, our methane emissions intensity for 2019 is just 0.221 percent, beating our own goal and ONE Future’s goal of one percent by 2025.

- **Pipeline Replacement:** To increase safety, reduce methane emissions, and enhance system efficiency, we are systematically replacing and upgrading aging pipe through a multi-year capital investment program. To build on our 2018 efforts, in 2019 we retired over 35 miles of additional aging pipe in Arkansas and Oklahoma. Through this effort, we have been and will continue to be able to reduce our methane emissions and promote the ongoing safety and efficiency of our system.
- To reduce methane emission on our system and institute best practices, Summit created a new Standard Operating Procedure (SOP) in 2019 to reduce emissions during planned purges. This SOP requires the Summit team to incorporate ways to reduce or mitigate the amount of gas to be released into the atmosphere during planned purges. Considerations for this SOP include reducing gas volume by diverting gas into connecting systems, consider methane recapture technology for high volume purges, and flaring when other alternatives are unavailable.

REDUCING EMISSIONS THROUGH COMPRESSED NATURAL GAS

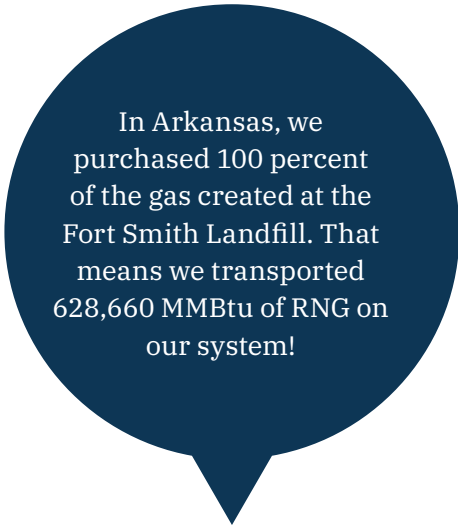
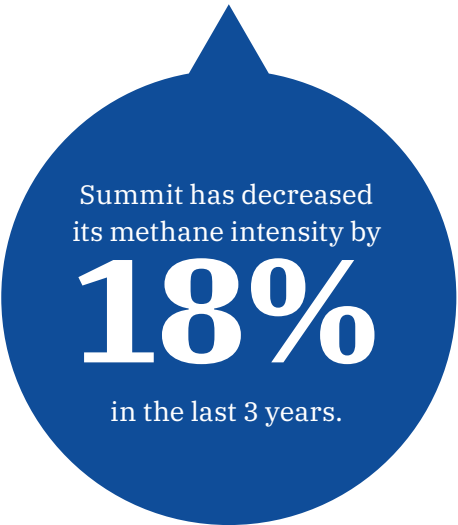
Compressed Natural Gas (CNG) is an abundant clean burning alternative to gasoline and other transportation fuel. At AOG, 76 percent of our fleet vehicles run on low-emission CNG. By converting one vehicle to CNG from gasoline you can reduce carbon emissions by an estimated 20 to 30 percent.



AOG currently owns and operates three CNG fueling stations in the Fort Smith area that are available to the public 24 hours per day, 7 days per week. Commercial fleets and City of Fort Smith transit buses have access to our low-cost alternative fuel. Through these CNG fueling stations, local citizens of Fort Smith have been able to experience the firsthand benefits of clean burning CNG.

REDUCING EMISSIONS THROUGH ENERGY EFFICIENCY PROGRAMS

At Summit, we are committed to reducing carbon emissions and providing affordable energy solutions to our customers. One of the ways we do that is



by investing in energy efficiency. Each year, we invest more than \$3.0 million in energy efficiency programs that directly benefit our customers. By reducing the energy usage of those we serve, we help our customers keep more money in their pockets, while reducing their carbon footprint.

In Maine, where oil is commonly used to heat homes and power industry, we have helped large industrial users like paper mills, rail yards and construction companies, as well as thousands of residential customers, convert from oil to natural gas. Heating with oil generates 27 percent more carbon emissions than heating with natural gas and adding efficient equipment can reduce emissions by an additional 11 percent. This means a typical customer can reduce their carbon emissions by 38 percent by switching from old oil equipment to efficient natural gas equipment. By converting customers from oil and propane to natural gas and investing millions in energy efficiency rebates, we have reduced carbon emissions by an estimated 69,000 metric tons a year in Maine. That’s equivalent to taking nearly 15,000 cars off the road.

IN 2019, OUR ENERGY EFFICIENCY PROGRAMS IN ARKANSAS, OKLAHOMA, COLORADO AND MISSOURI RESULTED IN A CARBON AVOIDANCE OF APPROXIMATELY 2,943 METRIC TONS OF CARBON DIOXIDE. THAT IS EQUIVALENT TO TAKING OVER 636 CARS OFF THE ROAD, OFFSETTING THE TOTAL ENERGY USAGE OF ALMOST 340 HOMES, OR CHARGING ALMOST 400 MILLION SMARTPHONES.

ENVIRONMENTAL GOALS

At the end of 2019, Summit created its first set of formal Environmental Goals. These goals have been set for completion in 2020 and will be reported on in Summit’s next Corporate Sustainability Report:

MAINTAIN A METHANE INTENSITY BELOW .5 PERCENT	PRODUCE 100% OF ALL PRINTED MARKETING MATERIALS FROM SUSTAINABLY CERTIFIED PAPER PRODUCTS TO REDUCE WASTE	DEVELOP AN EMISSIONS INVENTORY FOR SCOPE 1 AND 2 EMISSIONS
STUDY THE FEASIBILITY OF IMPLEMENTING METHANE RECAPTURE IN OUR OPERATIONS	ELIMINATE THE USE OF SINGLE USE CUPS IN COMPANY OFFICES	CONDUCT AN ENVIRONMENTAL RISK ASSESSMENT AND ADDRESS FINDINGS

COMMITMENT TO SAFETY

A message about safety from Jason Weekley
our Chief Operations Officer:



”
Safety is the number one priority at Summit. I am honored to be a part of a team that works tirelessly to ensure the safety of our staff, customers, and our communities. For years, Summit has strived to build a culture of proactive safety and our metrics reflect that. In 2019, we proudly reported zero injuries in Colorado, Maine, and at our corporate offices. We focused on training team members to recognize hazards and then took preventative measures to eliminate or mitigate those hazards, so that everyone stays safe. Nothing makes me happier than knowing our team members go home to their families each night.”

3

GOOD HEALTH AND WELL-BEING

8

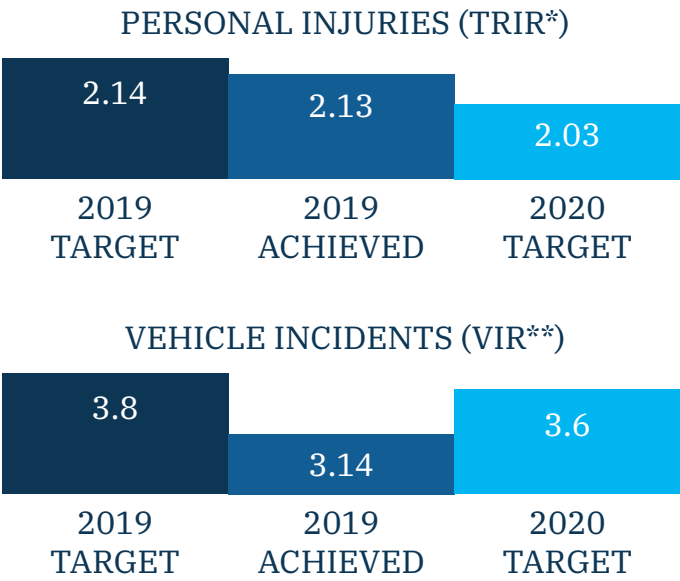
DECENT WORK AND ECONOMIC GROWTH

11

SUSTAINABLE CITIES AND COMMUNITIES

2019 WORKPLACE & COMMUNITY SAFETY ACCOMPLISHMENTS

IN 2019 WE CELEBRATED 3 CONSECUTIVE YEARS WITH NO RECORDABLE INJURIES IN COLORADO! TO ADD TO THAT, THERE WERE NO RECORDABLE INJURIES IN MAINE OR OUR CORPORATE OFFICES.



SAFETY GOALS

As a part of our Corporate Scorecard, Summit tracks key safety metrics to gauge our quarterly and annual performance. As a company, we came in below target for both personal injuries and vehicle incidents in 2019. Due to our excellent safety performance in 2019, we set our 2020 targets even lower.

*TRIR is the Total Recordable Incident Rate which is calculated by the number of OSHA recordable incidents per year and the total number of hours worked.
**VIR is the Vehicle Incident Rate which is calculated by the number of vehicles incidents per year and total miles driven.



2019 DART AWARD WINNER

For the second year in a row, Summit received an “Industry Leader Accident Prevention Award” for excellence in safety performance from the American Gas Association. In fact, in 2019 we came in second place in our category with a 0.27 DART incident rate.

The DART incident rate measures recordable cases involving days away from work, days of restricted work activity or job transfer. This accomplishment is a testament to the strength of our safety culture and to the commitment our team places on safety every day.

SAFETY UPDATES

NURSE TRIAGE

Proper work-related incident reporting is an important aspect of our operations here at Summit, and we are constantly looking for ways to improve and streamline the process. At the beginning of 2019, we integrated a Nurse Triage service to improve injury treatment and reporting for our team. Nurse Triage is an outside vendor that allows our employees to call in and speak with a registered nurse in the case of work-related injuries or illnesses that do not require an emergency room or hospital.

By using Nurse Triage, our staff is able to call in when injured or ill and speak with a medical professional who can help with advice on the best way to pursue treatment. The registered nurse may recommend different paths of treatment depending on each case from going to the hospital or seeking ways to self-treat with over the counter medication. The availability of this service is a great advantage to our team as they will no longer have to make the determination on their own as to what kind of care should be provided.

Our injury reporting process went through some changes with the inclusion of Nurse Triage. Through this service, our process for injury reporting became more streamlined for everyone involved and placed the decision for proper care away from the employee or supervisor and into the hands of an experienced professional. Nurse Triage provided the team with confidence that they are getting the proper care in response to injuries without needing to worry about the reporting process while having better resources at their disposal.

The Nurse Triage service has eased the process for everyone involved, especially the injured party who can rely on professional, knowledgeable advice.

NEAR-MISS PROGRAM

Summit continued to use and improve our near-miss entry program that was developed in 2018. This data collection program provides Summit staff and contractors the ability to document when they witness or encounter a “near-miss”. Near-miss awareness and evaluation helps us identify and possibly avoid or mitigate future hazards. The near-miss data helps us track contributors that create these hazards and develop processes or equipment to neutralize those contributors when necessary.

IN 2019, THE SUMMIT TEAM REPORTED OVER 850 POSSIBLE NEAR MISSES, WHICH RESULTED IN NUMEROUS FOLLOW-UP ACTIONS TOWARD IMPROVING THE SAFETY OF OUR EMPLOYEES, CUSTOMERS, AND THE PUBLIC IN GENERAL.

SAFETY SUGGESTIONS

Summit launched a Safety Suggestion tool in 2019. This tool is a supplement to the near miss program in that employees are given the ability to recommend safety

initiatives. Over 150 safety suggestions were submitted in 2019 and many have resulted in changes that have improved safety, including additional equipment, vehicle lighting and reflective marking, vehicle reversing sensors and cameras, facility housekeeping issues and many more.

QUALITY ASSURANCE AND PIPELINE SAFETY

The Quality Assurance (QA) program allows Summit to monitor field work activities performed during the construction, installation, operation and maintenance of our facilities. Summit staff and contractor performance is critical in maintaining gas system integrity, protecting public safety, and providing effective maintenance and expansion of our natural gas system.

IN 2019, THE SUMMIT TEAM PARTICIPATED IN AND/OR CONDUCTED APPROXIMATELY 167 ENVIRONMENTAL, HEALTH AND SAFETY AUDITS.

The key to QA is the construction procedures/practices and the quality of the work that is carried out. Summit is always looking for opportunities to improve by developing and implementing

more efficient QA program procedures. In 2019 we worked on developing and rolling out a comprehensive library of Standard Operating Procedures and training to improve field task consistency by placing greater emphasis on consistent execution and inspection of specific field level tasks. Summit’s Management of Change program provides a prescribed process to manage system change through risk evaluation, risk mitigation, communication and closed loop verification that all required action items are completed.

ENHANCED SAFETY OPERATIONS

At Summit we recognize that the knowledge and hard work of our team is what keeps us safe. To help our teams perform at their best, we strengthened and formalized two additional departments to concentrate on safety and provided our staff with necessary resources to maximize their safety training.

PIPELINE SAFETY DEPARTMENT

Expertise from throughout the company was brought together to create a standalone Pipeline Safety Department in 2019. Responsibilities that had previously belonged to several teams were gathered together under the leadership of a Pipeline Safety expert for maximum performance. This team ensures the safety and integrity of our natural gas system and offers training to first responders, schools, and other members of the community through our Public Awareness Program (PAP). We communicate our PAP and related messaging via ads on television, radio and outdoor, direct mail, presentations and school materials that educate the public about pipeline purpose, reliability, potential hazards and preventive

measures. Additional topics include leak recognition and response, emergency preparedness and damage prevention, including 811 requirements.



IN 2019, THE PIPELINE SAFETY DEPARTMENT HELD 45 GAS SAFETY TRAININGS FOR FIRST RESPONDERS AND SCHOOLS AND DISTRIBUTED OVER 500,000 SAFETY RELATED MAILINGS TO CUSTOMER, CONTRACTORS, AND OTHER STAKEHOLDERS.

TECHNICAL TRAINING DEPARTMENT

Summit is proud of our commitment to provide the safest possible work environment for our team. Safety initiatives are designed to facilitate a holistic view of the work environment with a focus on identifying possible hazards employees may encounter. Training and technology resources are instrumental for all Summit employees for the proper hazard recognition and response. Summit’s Environmental, Health, and Safety Department (EH&S) added Training to their list of responsibilities in 2019. By housing training within EH&S we are able

to ensure that all technical and safety training go hand in hand for maximum benefits for all staff members.

Trainings conducted by the Environmental, Health, Safety & Training department:

- Slips, Trips and Falls
- Lockout/Tagout
- Driver Safety Training
- Blood Borne Pathogens
- Fall Protection
- Ladder Safety
- Fire Extinguisher
- Respiratory Protection
- Hearing Conservation
- Hazard Communication
- Compressed Gas Cylinders
- Hand and Power Tools
- Personal Protective Equipment
- Emergency Action Plan
- Emergency Response Plan
- Incident/Accident Reporting
- Excavation & Trenching
- Near Miss Reporting
- Job Hazard Analysis
- Insect/Pest Training
- Uniform Program

DRIVER SAFETY

Whether driving around town in personal vehicles or driving on the job, at Summit we take driver safety very seriously. All members of the Summit team are given necessary resources for safe driver training. Staff who drive as a function of their work duties complete annual driver training and in-person training every three years. For additional safety, in 2019 company vehicles were outfitted with utility lights, reflective tape, back up cameras and sensors, and camper shells were replaced with utility beds for better sightlines.

COMMITMENT TO COMMUNITY

Summit is only as strong as our communities which is why we focus on helping build sustainable and successful communities everywhere we serve. We take our responsibility of being a good corporate citizen and neighbor seriously and are energized by the opportunity to give back to our communities. In 2019, we were proud to far exceed our ambitious volunteer contribution goals and were happy to aid nonprofit organizations in their commitments to building a stronger community and supporting future generations.



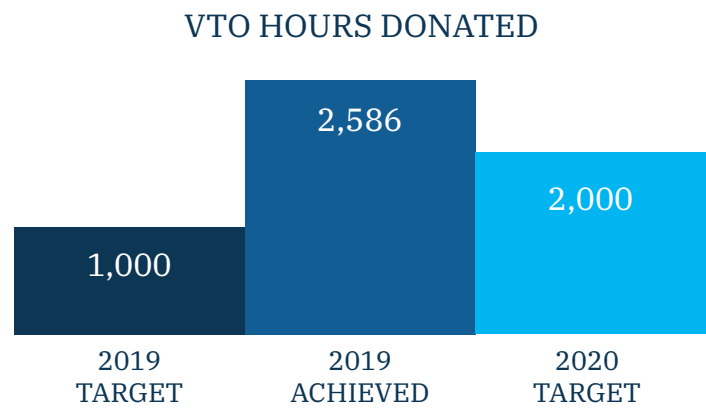
2019 ACCOMPLISHMENTS

Summit was the 2019 winner of the Southern Gas Associations (SGA) Community Service Award for our Volunteer Time Off (VTO) program. The SGA gives an annual award to recognize the most effective service or outreach program that improves the community.

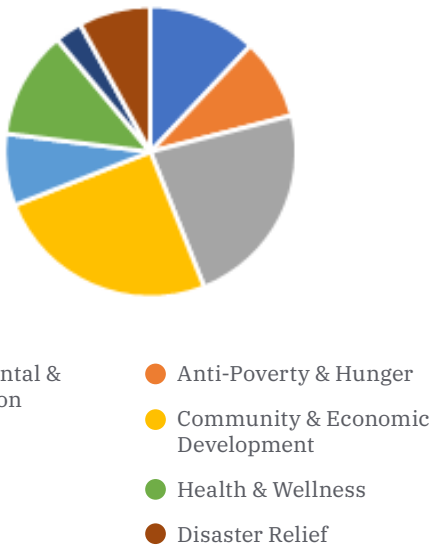
In 2019, Summit provided \$40,000 in sponsorships and \$90,500 in donations to non-profit organizations in the communities we serve.

VOLUNTEER TIME OFF GOAL

As a part of our Corporate Scorecard, Summit tracks our participation in our VTO to gauge our quarterly and annual performance. We were extremely excited by our team’s enthusiastic adoption of the VTO program.



VOLUNTEER EFFORTS



SUPPORTING OUR COMMUNITIES

Each year, Summit supports its communities through volunteerism, community giving, sponsorships, and more! Here are some of our 2019 highlights:

ARKANSAS FLOOD RELIEF



In the spring/early summer of 2019, historic flooding inundated Fort Smith and the surrounding communities. The Summit team worked overtime turning off gas meters in affected areas and making sure customers were safe. In June, we donated \$10,000 to the United Way of Fort Smith to assist with their flood relief efforts. Our team volunteered to prepare food for flood victims and donated supplies to help families recover from their losses. Once the floodwaters receded, we also jumped in to help rebuild. Summit sent a large team to assist with the rebuilding efforts at Moffett Elementary School and donated \$10,000 to help the school recover from the destruction.

PARTNERS IN EDUCATION

Each year, our Arkansas office participates in The Partners in Education Program, which establishes mutually beneficial relationships between businesses and

schools. Participating businesses and schools commit themselves to reciprocal activities that are based on their needs and resources. This year, we began a new partnership with Darby Junior High School in Arkansas. Over 600 students attend Darby Junior High, and 93 percent of those students are from a low-income background. Our team partnered with the students through mentoring, visiting classes as guest speakers, and volunteering in the Darby Store and Resale Shop.



MAINE’S CLOTHING CLOSET

In Maine, we donated to The Augusta School Department’s “Clothing Closet.” The “Clothing Closet” located at Cony High School furnishes Augusta school students with necessary articles of clothing that they are otherwise unable to afford. Many schools in the Augusta area use the Clothing Closet as a resource for mittens, boots, snow pants, and other articles of clothing. While the Clothing Closet receives donations from local churches, the public and “Diddos for Kiddos”, the closet doesn’t always have enough supplies for students’ needs. Our funding went directly to purchase items for the Clothing Closet.

MISSOURI HEART HEALTH AWARENESS



In Missouri, Summit has proudly partnered with the Campaign American Heart Association for the past three years, sponsoring their Little Hats, Big Hearts™ program to help raise awareness of congenital heart defects in infants. In 2019, we donated \$4,000 to the program. Little Hats, Big Hearts™ honors babies, moms and heart-healthy lives while raising awareness about congenital heart disease by giving newborn children hand-knitted crochet hats. In addition, parents are provided information about how to keep a healthy heart and what to do if a child suffers from a heart condition. Summit also provided all parents with a congratulatory letter educating them about the Little Hats, Big Hearts™ Program.

COLORADO ARBOR DAY FOUNDATION

In Colorado we launched a new partnership with the Arbor Day Foundation Time for Trees® initiative in 2019. To celebrate Earth Day and Arbor Day, Summit donated 100 trees to customers in Colorado. Planting trees is one way to reduce household heating and cooling costs, plus it increases a home’s energy efficiency. In addition, planting trees in the yard can provide tangible community benefits like stormwater runoff reduction, improved air quality, and beautification

of neighborhoods. Customers were able to choose between three tree species options and use an online tool provided by the Arbor Day Foundation to help determine the best location in their yard to plant the tree for maximum energy savings.



VOLUNTEERISM

Kindness is a core value at Summit, and our team’s volunteerism efforts are an illustration of everyone’s commitment to the cause. In 2019, members of the Summit team spent more than 2,500 hours giving back to their communities through our VTO program. Most of our team took advantage of the VTO program, and many used the full 20 hours Summit offers for volunteer opportunities. Several team members went above and beyond the 20 hours provided and used countless personal hours to volunteer in their communities. Summit’s Diversity & Engagement Committee awarded four of their colleagues with a Citizen Award for their outstanding commitment to their communities. Summit donated \$250 in each awardees name to a charity of their choosing.

OUR CITIZEN AWARD WINNERS FOR OUTSTANDING VOLUNTEERISM IN 2019:

[Jessica Jaymalin](#) used her VTO doing what she loves to do: helping the helpless. The majority of her VTO was spent – and is still – every Tuesday night as a Volunteer “Cuddler” for the babies in the NICU at Mercy Hospital. Jessica says, “there are times when it is difficult, not because I already worked the whole day [at Summit]... but because sometimes these babies are in very difficult situations and I cannot help feeling sorry for them. What encourages me to continue is no matter how good or bad my day is, it makes my heart happy that I am able to make babies feel love while their parents are not or cannot be with them. I just sing and pray while I have them in my arms.”

[Scott Thurston's](#) community service efforts bring the gift of music to nursing homes, independent living homes, and the Maine Veterans Home in Scarborough. The group, called the Maine Peace Singers, performs for those whose mobility is compromised, who are wheelchair-bound, or who suffer from dementia and other ailments. Scott says that the most special performance is the one they play every year at the Maine Veterans Home, where they get to serve those who have served us, and who oftentimes still bear the scars they suffered in that service. “Those folks are generally the most appreciative of the music, which includes patriotic songs and songs that call for peace in the world, because they are the folks who most understand the sacrifices required to earn that peace.”

[Randy Davis](#) found several opportunities to use his skills and passion to actively serve his hometown of Greenwood, Arkansas. Randy serves on the Greenwood Volunteer Fire Department and is active in the Greenwood Chamber of Commerce, where he serves on several committees for local events and parades, as well as the Greenwood Economic Development Committee. In addition, Randy has also directed and organized two 5K races in Greenwood every year for over 15 years. He starts working in March for the July 4th Greenwood 5K Freedom Fest Run, which is now one of the largest races in the state, followed by planning the annual Yule Run 5K in December.

[Chrisara Smith](#) is a leader in organizing several volunteer programs, raising money and resources for special causes, and has a knack for engaging the entire Maine Summit team in her activities. Her focus is clear: giving back to those in need, and supporting cancer research and care, a cause close to her heart after losing Summit teammate, Terry, to cancer last year. Chrisara volunteered to set-up and participate in the Maine General Walk for Hope 5k, and her team raised over \$700 for the Harold Alfond Center for Cancer Care. She also worked with Erika Bennett and others to organize a year-long Cans for a Cure drive, raising over \$2,000 to benefit the Dempsey Center, which provides free services for Mainers fighting breast cancer.

EACH YEAR, SUMMIT PARTNERS WITH THE UNITED WAY TO RAISE MONEY FOR CHARITABLE ORGANIZATIONS THROUGHOUT OUR COMMUNITIES. THROUGH THIS PARTNERSHIP OUR TEAM FINDS VOLUNTEER OPPORTUNITIES AND HAS THE ABILITY TO DONATE FUNDS DIRECTLY FROM THEIR PAYCHECK. SUMMIT MATCHES UP TO \$20,000 OF STAFF CONTRIBUTIONS COMPANY-WIDE.



SUPPORTING LOW INCOME CUSTOMERS

Summit continues to partner with state and federal agencies in the communities we serve to provide support to low income customers struggling to pay their bills. Each year we partner with the federal government to distribute funds made available through the Low-Income Home Energy Assistance Program. In addition, in Colorado we provide additional support to low-income customers through our Customer Assistance Program. For the 2018-2019 heating season, we distributed more than \$100,000 to customers. Additionally, we seek ways to donate to organizations that will provide additional assistance to customers who may struggle to pay their home heating bills.

ECONOMIC IMPACT

In addition to our community engagement and charitable giving, Summit drives value annually to the communities we serve through tax payments, providing good paying jobs with benefits and by purchasing goods and services for maintain our natural gas infrastructure.

2019 ECONOMIC IMPACT SUMMARY	
EMPLOYEE COMPENSATION (Wages & Benefits)*	\$43,800,000
SUPPLIER PAYMENTS	\$44,700,000
PROPERTY TAXES	\$8,000,000
SALES & USE TAX**	\$3,400,000
CITY FRANCHISE FEES***	\$6,500,000

* Benefits include employer contributions for health and welfare benefits as well as 401(k) and retirement contributions.
** Depending on state and local laws, we are required to collect sales tax from customers on taxable sales of goods and services. We also pay taxes on certain purchases made by Summit that have not been previously taxed by the vendor or service provider.
***Payments made to local governments for use of public right-of-ways.

STAKEHOLDER ENGAGEMENT

Summit is committed to being a good friend and neighbor to its customers, the communities that we serve along with regulatory, safety and government stakeholders. As a regulated public utility, Summit is actively engaged with stakeholders in Arkansas, Colorado, Maine, Missouri, and Oklahoma. Our stakeholder relations plan includes cooperative engagement with regulators, law makers, local officials, first responders, and schools. These relationships allow us to educate our stakeholders on natural gas safety, provide meaningful input on energy policy, and to be better able to withstand challenges, transitions, or crises, be they economic, operational, or political. In 2019, we held meetings with our stakeholders providing them updates about our company and the state of the natural gas industry. The Summit team also actively attends and participates in industry related conferences and panel discussions where discuss innovative ideas for increasing the sustainability of our industry.

MEMBERSHIPS & ASSOCIATIONS

- ACP-Association of Continuity Professionals
- American Biogas Council
- American Gas Association
- Appalachian Gas Measurement Short Course
- Arkansas Advanced Energy Association
- Arkansas Gas Association
- Arkansas GIS Users Group
- Arkansas State Heating, Venting, Air Conditioning, and Refrigeration Association

- Augusta Rotary
- Avaya Alumni Network
- Avaya Professionals
- Central Maine Apartment Owners Association
- Central Maine Growth Council
- COGA
- Colorado One Call
- Colorado Pipeline Association
- Common Ground Alliance
- Crawford County Board of Realtors
- DNG-ISAC
- E2Tech
- EAM CAB -- Oracle Enterprise Asset Management Customer Advisory Board
- EC-Council
- Energy & Utilities Network
- Energy Solutions Center
- Financial Research Institute
- Fort Smith Board of Relators
- Fort Smith Regional Alliance
- Fort Smith Regional Council
- Fort Smith School District Partners In Education
- Greater Fort Smith Association of Homebuilders
- Infraguard
- ISC2
- Kennebec Valley Board of Realtors
- Leadership Fort Smith
- Maine Association of Plumbing, Heating, and Cooling Contractors
- Missouri Association of Natural Gas

- Operators
- Missouri Energy Cybersecurity Coalition
- Missouri Energy Development Association
- Missouri One Call
- MUST
- National Association of Homebuilders
- National Energy Foundation
- Natural Gas Vehicles of America
- Northeast Gas Association
- Oklahoma Gas Association
- One Future
- Oracle Application Users Experts
- Our Nations Energy Future Coalition
- PAPA
- Pine Tree Society
- Pipeline Association for Public Awareness
- Pipeline Association of Missouri
- Poteau Chapter Ducks Unlimited
- Poteau Kiwanis Club
- Renewable Natural Gas Coalition
- River Valley IT Professionals
- Saas Group
- Scrum Alliance
- Southern Gas Association
- The Poultry Federation
- United Way
- US-CERT
- Van Buren Rotary Club
- VMUG
- Western Arkansas Human Resources Association
- Women's Energy Network

CHAMBERS OF COMMERCE

- Alma Area Chamber of Commerce
- Arkansas State Chamber of Commerce
- Ava Chamber of Commerce
- Branson Chamber of Commerce
- Branson Lakes Area Chamber of Commerce
- Camdenton Area Chamber of Commerce
- Cumberland Falmouth Community Chamber of Commerce
- Fort Smith Chamber of Commerce
- Gallatin Chamber of Commerce
- Greater West Plains Chamber of Commerce
- Hollister Chamber of Commerce
- Kennebec Valley Chamber of Commerce
- Lake Area Chamber of Commerce
- Lake of the Ozarks Chamber of Commerce
- Lake West Chamber of Commerce
- Lebanon Chamber of Commerce
- Maine State Chamber of Commerce
- Mid-Maine Chamber of Commerce
- Missouri Chamber of Commerce
- Mountain Grove Chamber of Commerce
- Muldraw Chamber of Commerce
- Oklahoma State Chamber of Commerce
- Portland Regional Chamber
- Poteau Chamber of Commerce
- Sallisaw Chamber of Commerce
- Van Buren Chamber of Commerce
- Warsaw Chamber of Commerce
- Yarmouth Chamber of Commerce

2020 COMMUNITY GOALS

In 2019, to add to our VTO goals, Summit wrote expanded goals to continue to help our communities. We look forward to reporting our progress in our next Corporate Sustainability Report:

DONATE 2,000 OR MORE VTO HOURS COMPANY-WIDE

CHANNEL AT LEAST 80 PERCENT OF THE CHARITABLE GIVING FUNDS TO EFFORTS THAT REINFORCE OUR ENVIRONMENTAL, SOCIAL AND GOVERNANCE COMMITMENTS

STRENGTHEN CYBER SECURITY MEASURES

INSTITUTE NET-PROMOTER CUSTOMER SURVEYING COMPANY-WIDE

COMMITMENT TO PEOPLE



At Summit, we recognize that our strength comes directly from our team. We are proud that our team members embody our culture of embracing excellence, diversity and innovation, committing to safety each and every day, and doing all we can to serve each other, our customers and the communities we serve.

As a company, we have always valued the diversity of our workforce as one of our great strengths. Summit is constantly seeking ways to create and foster a more inclusive work community where all team members feel not only accepted, but empowered to be who they are, create opportunities and own their ideas.

2019 ACCOMPLISHMENTS

BEST PLACES TO WORK IN MAINE

In September of 2019, Summit Natural Gas of Maine was named as one of the 2019 Best Places to Work in Maine. The awards program was created in 2006 and is a project of the Society for Human Resource Management - Maine State Council and Best Companies Group.

Companies from across the state entered the two-part process to determine the Best Places to Work in Maine. The first part was worth 25 percent of the evaluation and consisted of evaluating each nominated company’s workplace policies, practices, and demographics. In addition, each company sent out an employee survey to measure the employee experience, which was worth 75 percent of the total evaluation.

BLUE & YOU FITNESS CHALLENGE

Ensuring the health of our team is pivotal to our operations. Each year, Summit competes in the Blue & You Fitness Challenge against other companies of similar size. This competition gives members of the Summit team the opportunity to participate in friendly interoffice competitions while logging steps and exercise minutes for three months. To encourage participants, various prizes are awarded at milestones throughout the competition. In 2019, Summit once again took home the grand prize in the competition with the most points logged and highest participation rate as compared to other companies. This fun competition brings people closer together while working for a common goal of greater fitness.

P.E.A.K.S. AWARDS

In 2019 Summit continued its P.E.A.K.S. Awards program. The purpose of the program is to elevate the P.E.A.K.S. values throughout Summit and recognize members of the Summit team who demonstrate our core cultural values every day. Each month, colleagues nominate their peers for actions that exhibit Pioneering, Excellence, Agility, Kindness, or Safety and the Recognition Committee chooses up to six nominees monthly to receive a \$100 reward each along with a personal note and signed certificate of thanks from Kurt Adams, our President and CEO.



BLUE FLAME PROGRAM

Early in 2019, Summit launched a Blue Flame recognition program to increase employee engagement around our core values throughout the company. It was designed to provide Managers an avenue to recognize group and individual efforts on a more local and frequent basis as an enhancement to the existing peer-recognition awards. “Blue Flame” stickers are awarded based on defined criteria developed at a departmental or business unit level and affixed to hard hats.

DIVERSITY & INCLUSION

In 2019, we wanted to pursue our diversity initiatives further and created a specific diversity strategy for implementation in 2020 to help achieve our goals.

DIVERSITY IN THE WORKFORCE

Summit recognizes that our performance as a company will be better if we are drawing on more diverse talent and if our team reflects the communities we serve. The lack of diversity in the natural gas industry has not gone unnoticed by us. That is why, in 2019, we doubled our efforts to make sure that we instituted best practices and partnered with the right organizations to attract top talent from a variety of backgrounds.

In 2019 we set a goal of 80 percent gender diversity on interview panels for office-based roles and 25 percent gender diversity on interview panels for field-based roles.

As part of that effort, we’ve enhanced the diversity of our interview teams and interview pools to ensure we receive a broad variety of perspectives and candidates. In addition, we’ve enhanced our stakeholder outreach and engagement with universities and a variety of organizations to increase the diversity of our applicant pool and create a more inclusive environment where women and people of all backgrounds can thrive.

INCLUSION PROGRAMS

Summit’s inclusion programs were created to foster belonging, provide equal access to opportunity and allow all team members to contribute fully to the company’s success. To kickstart this process and speed the integration of new hires into the Summit family, we launched an onboarding pilot program branded the BRIDGE Program (Building on our culture of: Retention, Inclusion, Diversity, Guidance and Engagement). The BRIDGE Program involves a select group of Summit team members, many from our Diversity

and Engagement Committee, who welcome new hires to the company and help them integrate into our culture. A BRIDGE Ambassador is paired with a new team member and spends 12 weeks helping that individual get settled into the company. The BRIDGE Ambassador helps newcomers learn about the company and culture, get connected to team members outside their work group and helps them navigate through things to do and places to eat in and around their office.

VETERANS OUTREACH

There is no question that the Armed Forces provides extraordinary leadership training. At Summit, we recognize the hard work veterans have put into their careers and the loyalty and perseverance they bring to their civilian jobs. In 2019, we engaged our existing veteran team members to brainstorm ways in which we could better retain and attract veterans and serve the veteran community. We look forward to implementing what we have learned from this team to add the

invaluable leadership and grace under pressure that veterans can bring to Summit.

We also feel that it is important to recognize the veterans in our workplace and communities. At the end of 2019, Summit sponsored the American Legion-Post 31 membership breakfast in our Fort Smith, AR region. Special guests Mayor George McGill and Representative Jay Richardson were in attendance, both of whom echoed our thoughtful expression of gratitude toward the veteran community in Fort Smith.

LEADERSHIP TRAINING

In 2019, we held our second annual Leadership Summit. This summit provides new and high-potential leaders with exposure to senior leaders, while focusing on enhancing industry knowledge and further developing their leadership skill set. Training each year includes a detailed overview of Summit’s Diversity & Inclusion programs and a two-hour session with an outside expert doing a deep dive into unconscious bias. We focus heavily on training as we work to build a team of effective and empathetic leaders.

LMS PLATFORM

Much of 2019 was spent as a development year for implementing a Learning Management System to provide a wide variety of training resources for all team members at Summit. Legal, IT, EHS&T and HR resources were involved in the selection and implementation of this system that went live by the end of 2019.

COMPENSATION & BENEFITS

Summit offers competitive pay and benefits which provide flexibility, choice and support to our employees when they need it most. We understand that home and family are essential to our employees, and our benefits are designed to support them both at work and at home. Here is some of what we offer*:

- Competitive pay, including pay-for-performance incentives
- Robust medical, dental and vision plans
- Employer contributions to Health Savings Accounts
- Company-paid life and disability coverage
- 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
- Wellness program that encourages healthy living
- Education reimbursement to support growth and skill development
- Employee Assistance Program

*Benefits for some positions in Arkansas and Oklahoma are governed by a Collective Bargaining Agreement and may differ from the benefits we provide to our other employees.

NEW BENEFITS

To attract and retain our team, we are committed to making sure that Summit adapts its benefit programs to keep up with the needs of our staff. In 2019, we added the following benefits to the ones listed above:

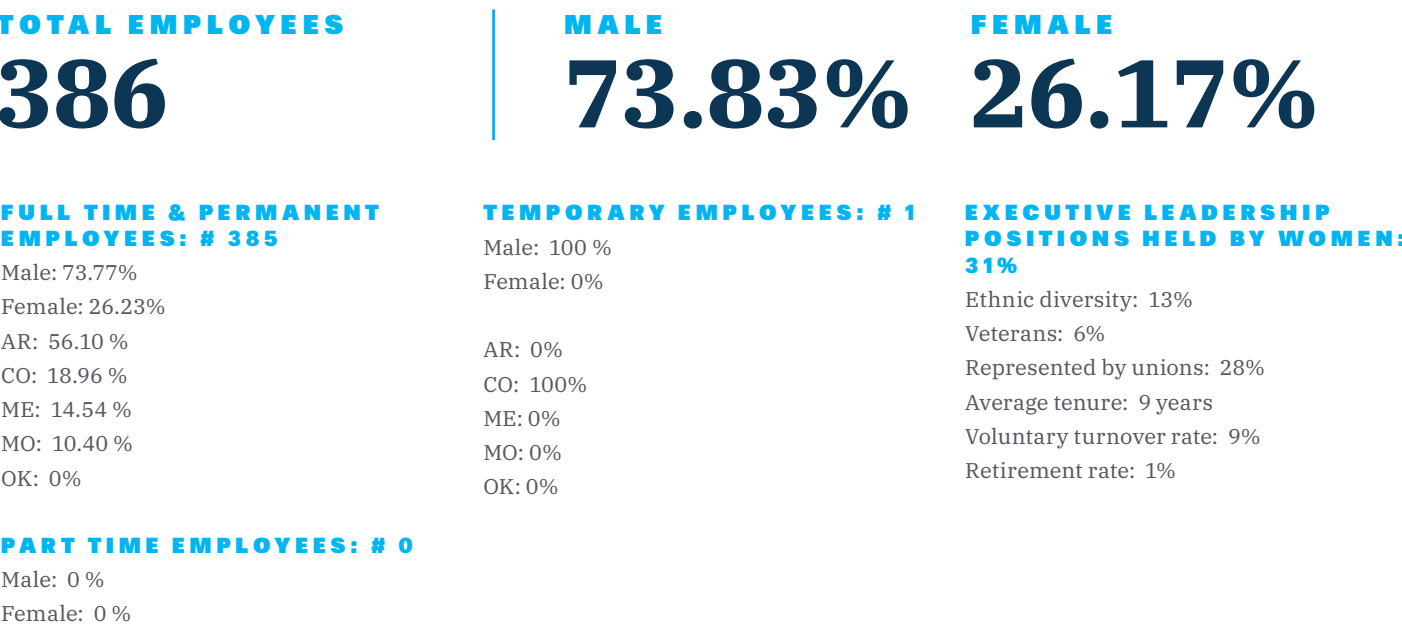
PTO donation- The kindness of our employees is one of the traits that

distinguishes Summit. In 2019, we were excited to formalize a PTO donation policy that provided employees the opportunity to donate PTO to a pool for use by employees in need. Specifically, this pool is available to employees who have a medical emergency within their immediate family and to employees impacted by a qualifying natural disaster.

Work from home policy- To better serve the needs of our team members, Summit formalized a work from home policy in 2019. This policy allows individuals to work from home when necessary or on a scheduled basis. The addition of this policy has allowed staff to achieve a greater work-life balance and reduce emissions while saving time when not commuting into the office.

Teledoc- Summit began offering the Teladoc program in January of 2019. This program provides employees and their family members on our medical plan with the ability to speak to a licensed physician over the phone at any time day or night and receive prescriptions and medical expertise at no cost. Summit team members have been able to utilize this service to avoid trips to the doctor for simple colds and prescription refills, saving both time and money.

2019 WORKFORCE DEMOGRAPHICS



SOCIAL GOALS

At the end of 2019, Summit created its first set of formal Social Goals. These goals have been set for completion in 2020 and will be reported on in Summit’s next Corporate Sustainability Report:

FINALIZE THE IMPLEMENTATION OF A COMPREHENSIVE LEADERSHIP AND TECHNICAL TRAINING PROGRAM TO STRENGTHEN EMPLOYEE RETENTION, DEVELOPMENT AND SAFETY	IMPLEMENT A COMPREHENSIVE DIVERSITY AND INCLUSION INITIATIVE	IMPLEMENT UNCONSCIOUS BIAS TRAINING COMPANY WIDE
CONDUCT A COMPREHENSIVE REVIEW OF SUMMIT’S BENEFITS PROGRAM TO BETTER ALIGN BENEFIT OFFERINGS TO EMPLOYEE NEEDS	DEVELOP AN EMPLOYEE WELLNESS PROGRAM THAT FOSTERS AND ENHANCES EMPLOYEE WELLNESS AND HEALTH WHILE EMPHASIZING THE COMPANY’S COMMITMENT TO EXCELLENCE AND FAMILY	INSTITUTE YEARLY ANTI-CORRUPTION AND BRIBERY TRAINING FOR ALL EMPLOYEES



METHANE EMISSIONS AND MITIGATION FROM DISTRIBUTION MAINS - 2018	
Number of Gas Distribution Customers	122,520
Distribution Mains in Service	
Plastic (miles)	3,853
Cathodically Protected Steel - Bare & Coated (miles)	1,165
Unprotected Steel - Bare & Coated (miles)	10
Cast Iron / Wrought Iron - without upgrades (miles)	0
Plan/Commitment to Replace / Upgrade Remaining Miles of Distribution Mains (# years to complete)	
Unprotected Steel (Bare & Coated) (# years to complete)	8
Cast Iron / Wrought Iron (# years to complete)	0
DISTRIBUTION CO2E FUGITIVE EMISSIONS	
CO2e Fugitive Methane Emissions from Gas Distribution Operations (metric tons)	22,890
CH4 Fugitive Methane Emissions from Gas Distribution Operations (metric tons)	915.6
CH4 Fugitive Methane Emissions from Gas Distribution Operations (MMSCF/year)	47.7
Annual Natural Gas Throughput from Gas Distribution Operations in thousands of standard cubic feet (Mscf/year)	19,390,121
Annual Methane Gas Throughput from Gas Distribution Operations in millions of standard cubic feet (MMscf/year)	18,420.6
Fugitive Methane Emissions Rate (Percent MMscf of Methane Emissions per MMscf of Methane Throughput)	0.259%



METHANE EMISSIONS AND MITIGATION FROM DISTRIBUTION MAINS - 2018	
Number of Gas Distribution Customers	72,030
Distribution Mains in Service	
Plastic (miles)	1,402
Cathodically Protected Steel - Bare & Coated (miles)	999
Unprotected Steel - Bare & Coated (miles)	10
Cast Iron / Wrought Iron - without upgrades (miles)	0
Plan/Commitment to Replace / Upgrade Remaining Miles of Distribution Mains (# years to complete)	
Unprotected Steel (Bare & Coated) (# years to complete)	8
Cast Iron / Wrought Iron (# years to complete)	0
DISTRIBUTION CO2E FUGITIVE EMISSIONS	
CO2e Fugitive Methane Emissions from Gas Distribution Operations (metric tons)	10,777.5
CH4 Fugitive Methane Emissions from Gas Distribution Operations (metric tons)	431.1
CH4 Fugitive Methane Emissions from Gas Distribution Operations (MMSCF/year)	22.2
Annual Natural Gas Throughput from Gas Distribution Operations in thousands of standard cubic feet (Mscf/year)	9,606,234
Annual Methane Gas Throughput from Gas Distribution Operations in millions of standard cubic feet (MMscf/year)	91259
Fugitive Methane Emissions Rate (Percent MMscf of Methane Emissions per MMscf of Methane Throughput)	0.246%



METHANE EMISSIONS AND MITIGATION FROM DISTRIBUTION MAINS - 2018	
Number of Gas Distribution Customers	23,228
Distribution Mains in Service	
Plastic (miles)	1,189
Cathodically Protected Steel - Bare & Coated (miles)	106
Unprotected Steel - Bare & Coated (miles)	0
Cast Iron / Wrought Iron - without upgrades (miles)	0
Plan/Commitment to Replace / Upgrade Remaining Miles of Distribution Mains (# years to complete)	
Unprotected Steel (Bare & Coated) (# years to complete)	0
Cast Iron / Wrought Iron (# years to complete)	0
DISTRIBUTION CO2E FUGITIVE EMISSIONS	
CO2e Fugitive Methane Emissions from Gas Distribution Operations (metric tons)	5,910
CH4 Fugitive Methane Emissions from Gas Distribution Operations (metric tons)	236.4
CH4 Fugitive Methane Emissions from Gas Distribution Operations (MMSCF/year)	12.3
Annual Natural Gas Throughput from Gas Distribution Operations in thousands of standard cubic feet (Mscf/year)	2,720,646
Annual Methane Gas Throughput from Gas Distribution Operations in millions of standard cubic feet (MMscf/year)	2584.6
Fugitive Methane Emissions Rate (Percent MMscf of Methane Emissions per MMscf of Methane Throughput)	0.476%



METHANE EMISSIONS AND MITIGATION FROM DISTRIBUTION MAINS - 2018	
Number of Gas Distribution Customers	4,327
Distribution Mains in Service	
Plastic (miles)	211
Cathodically Protected Steel - Bare & Coated (miles)	0.5
Unprotected Steel - Bare & Coated (miles)	0
Cast Iron / Wrought Iron - without upgrades (miles)	0
Plan/Commitment to Replace / Upgrade Remaining Miles of Distribution Mains (# years to complete)	
Unprotected Steel (Bare & Coated) (# years to complete)	0
Cast Iron / Wrought Iron (# years to complete)	0
DISTRIBUTION CO2E FUGITIVE EMISSIONS	
CO2e Fugitive Methane Emissions from Gas Distribution Operations (metric tons)	1022.5
CH4 Fugitive Methane Emissions from Gas Distribution Operations (metric tons)	40.9
CH4 Fugitive Methane Emissions from Gas Distribution Operations (MMSCF/year)	2.1
Annual Natural Gas Throughput from Gas Distribution Operations in thousands of standard cubic feet (Mscf/year)	3,680,628
Annual Methane Gas Throughput from Gas Distribution Operations in millions of standard cubic feet (MMscf/year)	3,496.6
Fugitive Methane Emissions Rate (Percent MMscf of Methane Emissions per MMscf of Methane Throughput)	0.061%



METHANE EMISSIONS AND MITIGATION FROM DISTRIBUTION MAINS - 2018

Number of Gas Distribution Customers	22,847
Distribution Mains in Service	
Plastic (miles)	1,051
Cathodically Protected Steel - Bare & Coated (miles)	60
Unprotected Steel - Bare & Coated (miles)	0
Cast Iron / Wrought Iron - without upgrades (miles)	0
Plan/Commitment to Replace / Upgrade Remaining Miles of Distribution Mains (# years to complete)	
Unprotected Steel (Bare & Coated) (# years to complete)	0
Cast Iron / Wrought Iron (# years to complete)	0

DISTRIBUTION CO2E FUGITIVE EMISSIONS

CO2e Fugitive Methane Emissions from Gas Distribution Operations (metric tons)	5,180
CH4 Fugitive Methane Emissions from Gas Distribution Operations (metric tons)	207.2
CH4 Fugitive Methane Emissions from Gas Distribution Operations (MMSCF/year)	10.8
Annual Natural Gas Throughput from Gas Distribution Operations in thousands of standard cubic feet (Mscf/year)	3,382,613
Annual Methane Gas Throughput from Gas Distribution Operations in millions of standard cubic feet (MMscf/year)	3,213.5
Fugitive Methane Emissions Rate (Percent MMscf of Methane Emissions per MMscf of Methane Throughput)	0.336%

GRI STANDARDS

GRI 101: FOUNDATION

GRI 102: GENERAL DISCLOSURES

102-1	Name of the organization	Our Communities, page 6
102-2-a	Activities, brands, products, and services	Our Communities, page 6
102-2-b		
102-3	Location of headquarters	Our Communities, page 6
102-4	Location of operations	Our Communities, page 6
102-5	Ownership and legal form	Commitment to Governance, page 13
102-6-a	Markets served	Our Company, page 6
102-6-a-i		
102-6-a-ii		
102-6-a-iii		
102-7-a	Scale of the organization	Commitment to People, page 35
102-7-a-i		
102-7-a-ii		Our Communities, page 6
102-7-a-iii		Appendix A, page 36
102-7-a-iv		n/a
102-7-a-v		Appendix A, page 36
102-8-a	Information on employees and other workers	
102-8-b		Commitment to People, page 35
102-8-c		
102-8-d		n/a
102-8-e		
102-8-f		Data is compiled through Summit's ADP program.
102-9	Supply chain	n/a
102-10-a	Significant changes to the organization and its supply chain	n/a
102-10-a-i		
102-10-a-ii		
102-10-a-iii		
102-11	Precautionary Principle or approach	n/a
102-12	External initiatives	n/a

102-13	Membership of associations	Commitment to Community, page 31
102-14	Statement from senior decision-maker	A Message from President and CEO Kurt Adams, page 4
102-15	Key impacts, risks, and opportunities	A Message from President and CEO Kurt Adams, page 4
102-16	Values, principles, standards, and norms of behavior	Our Culture & Our Values, page 9
102-17-a	Mechanisms for advice and concerns about ethics	Commitment to Governance, page 13
102-17-a-i		
102-17-a-ii		
102-18-a	Governance structure	Commitment to Governance, page 13
102-18- b		
102-19	Delegating authority	Commitment to Governance, page 13
102-20-a	Executive-level responsibility for economic, environmental, and social topics	Commitment to Governance, page 13
102-20-b		
102-21-a	Consulting stakeholders on economic, environmental, and social topics	Commitment to Governance, page 14
102-21-b		
102-22-a	Composition of the highest governance body and its committees	Commitment to Governance, page 13
102-22-a-i		
102-22-a-ii		
102-22-a-iii		
102-22-a-iv		
102-22-a-v		
102-22-a-vi		
102-22-a-vii		
102-22-a-viii		Commitment to Community, page 13
102-23-a	Chair of the highest governance body	Commitment to Governance, page 13
102-23-b		Commitment to Governance, page 13
102-24-a	Nominating and selecting the highest governance body	Commitment to Governance, page 13
102-24-b		
102-24-b-i		
102-24-b-ii		
102-24-b-iii		
102-24-b-iv		

102-25-a	Conflicts of interest	n/a
102-25-b		
102-25-b-i		
102-25-b-ii		
102-25-b-iii	Evaluating the highest governance body’s performance	Commitment to Governance, page 13
102-25-b-iv		
102-26	Role of highest governance body in setting purpose, values, and strategy	Commitment to Governance, page 13
102-27	Collective knowledge of highest governance body	Commitment to Governance, page 13
102-28-a	Identifying and managing economic, environmental, and social impacts	Commitment to Governance, page 13
102-28-b		
102-28-c		
102-28-d		
102-29-a	Effectiveness of risk management processes	Commitment to Governance, page 13
102-29-b		
102-30	Review of economic, environmental, and social topics	Commitment to Governance, page 13
102-31	Highest governance body’s role in sustainability reporting	Commitment to Governance, page 13
102-32	Communicating critical concerns	Commitment to Governance, page 13
102-33	Communicating critical concerns	Commitment to Governance, page 13
102-34-a		
102-34-b		
102-35-a	Remuneration policies	n/a
102-35-a-i		
102-35-a-ii		
102-35-a-iii		
102-35-a-iv		
102-35-a-v	Process for determining remuneration	n/a
102-35-b		
102-36-a		
102-36-b	Stakeholders’ involvement in remuneration	n/a
102-36-c		
102-37-a		

102-37-b	Stakeholders' involvement in remuneration	n/a
102-38	Annual total compensation ratio	n/a
102-39	Percentage increase in annual total compensation ratio	n/a
102-40	List of stakeholder groups	Commitment to Community, page 30
102-41	Collective bargaining agreements	Commitment to People, page 35
102-42	Identifying and selecting stakeholders	Commitment to Community, page 30
102-43	Approach to stakeholder engagement	Commitment to Community, page 30
102-44-a	Key topics and concerns raised	Commitment to Community, page 26
102-44-a-i		Commitment to Community, page 26
102-44-a-ii		Commitment to Community, page 26
102-45-a	Entities included in the consolidated financial statements	Our Company, page 6
102-45-b		
102-46-a	Defining report content and topic Boundaries	About our Report, page 2
102-46-b		About our Report, page 2
102-47	List of material topics	About our Report, page 2
102-48	Restatements of information	n/a
102-49	Changes in reporting	n/a
102-50	Reporting period	2019 calendar year
102-51	Date of most recent report	n/a
102-52	Reporting cycle	Calendar year
102-53	Contact point for questions regarding the report	Lizzy Reinholt, Senior Director of Sustainability and Corporate Affairs

102-54	Information on the company's website	Our Company, page 6
102-55	Information on the company's website	Our Company, page 6
102-56	Information on the company's website	Our Company, page 6
102-57	Information on the company's website	Our Company, page 6
102-58	Information on the company's website	Our Company, page 6
102-59	Information on the company's website	Our Company, page 6
102-60	Information on the company's website	Our Company, page 6
102-61	Information on the company's website	Our Company, page 6
102-62	Information on the company's website	Our Company, page 6
102-63	Information on the company's website	Our Company, page 6
102-64	Information on the company's website	Our Company, page 6
102-65	Information on the company's website	Our Company, page 6
102-66	Information on the company's website	Our Company, page 6
102-67	Information on the company's website	Our Company, page 6
102-68	Information on the company's website	Our Company, page 6
102-69	Information on the company's website	Our Company, page 6
102-70	Information on the company's website	Our Company, page 6
102-71	Information on the company's website	Our Company, page 6
102-72	Information on the company's website	Our Company, page 6
102-73	Information on the company's website	Our Company, page 6
102-74	Information on the company's website	Our Company, page 6
102-75	Information on the company's website	Our Company, page 6
102-76	Information on the company's website	Our Company, page 6
102-77	Information on the company's website	Our Company, page 6
102-78	Information on the company's website	Our Company, page 6
102-79	Information on the company's website	Our Company, page 6
102-80	Information on the company's website	Our Company, page 6
102-81	Information on the company's website	Our Company, page 6
102-82	Information on the company's website	Our Company, page 6
102-83	Information on the company's website	Our Company, page 6
102-84	Information on the company's website	Our Company, page 6
102-85	Information on the company's website	Our Company, page 6
102-86	Information on the company's website	Our Company, page 6
102-87	Information on the company's website	Our Company, page 6
102-88	Information on the company's website	Our Company, page 6
102-89	Information on the company's website	Our Company, page 6
102-90	Information on the company's website	Our Company, page 6
102-91	Information on the company's website	Our Company, page 6
102-92	Information on the company's website	Our Company, page 6
102-93	Information on the company's website	Our Company, page 6
102-94	Information on the company's website	Our Company, page 6
102-95	Information on the company's website	Our Company, page 6
102-96	Information on the company's website	Our Company, page 6
102-97	Information on the company's website	Our Company, page 6
102-98	Information on the company's website	Our Company, page 6
102-99	Information on the company's website	Our Company, page 6
102-100	Information on the company's website	Our Company, page 6

