

Climate Statements 2026

For the 12 months ended 30 June 2026

Climate-Related Disclosures under
Part 7A of the FMCA

Important note

This report includes climate-related data, assessments, and forward-looking statements that are by their nature subject to significant uncertainty, assumptions, and limitations. Inputs may be incomplete or unreliable, and modelling methodologies are still evolving. As such, information may change and should not be relied upon as definitive. Forward-looking statements, including targets, forecasts, anticipated impacts and strategic plans, may not eventuate as expected including due to factors beyond Chorus' control. Chorus does not guarantee the accuracy of these statements and cautions against reliance being placed on these statements which are necessarily less reliable than Chorus' other external reporting.

This report is not an offer or investment advice. For financial performance, please refer to Chorus' [Annual Report](#). For further information, please read the limitations detailed throughout this report and in **Appendix 1**.

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Foreword



Mark Cross
Director and Board Chair

Dated 24 August 2026



Kate Jorgensen
Director and ARMC Chair

Dated 24 August 2026

High-quality connectivity is increasingly central to New Zealand's economic productivity and societal wellbeing.¹ Chorus' corporate purpose — **Unleashing potential through connectivity. Enabling better futures for Aotearoa** — and our commitment to transition to an all-fibre network help shape our approach to sustainability.

In FY26, we entered the next phase of our sustainability journey, building on the foundations established through our sustainability work of previous years which centred on emissions reduction and compliance. Our focus is now evolving to reflect the realities of what a changing climate means for Aotearoa and the continued supply of reliable, accessible digital connectivity.

This has included sharpening our focus on how we deliver against our purpose, identifying three strategic focus areas to guide our sustainability efforts over the coming period:

- **Resilient connectivity** - Our ecosystem is ready to withstand future challenges and adapt to change.
- **Equitable connectivity** - Our ecosystem works together to drive fairer access to the benefits of connectivity.
- **Future fit connectivity** - Our ecosystem reflects a changing population, with the skills and mindsets to meet tomorrow's needs.

Through this purpose-led lens, our practical sustainability programmes aim to strengthen our resilience and adaptive capacity, while we continue to work towards emissions reduction. Together, these efforts position Chorus to contribute to a low-emissions, climate-resilient future while helping to keep Aotearoa connected.

Chorus remains committed to reducing greenhouse gas emissions in ways that are credible and impactful, through our established science-based targets.² In addition, in FY26 we sharpened our focus on resilience and asset management systems. This included a renewed evaluation of asset exposure to climate hazards, and updating our Transition Plan – key aspects of which are highlighted in this report. As a company, we continued to improve our asset management capability over FY26, establishing a centralised asset management framework supported by improved documentation and governance.

New Zealand has experienced a number of extreme weather events over the last year. While these events did not materially impact Chorus' network physically or financially, they underscore the importance of robust business continuity systems, rapid deployment and coordinated stakeholder engagement to minimise network damage and maintain service continuity. Resilience is core to Chorus' business, from network planning and technology through to risk and response.

Global fuel supply pressures also presented challenges for our sector over the period. We are continuing to pay close attention to fuel supply contingency and energy security, alongside domestic electricity supply challenges. In FY26, we commissioned an independent energy review from Smart Power to evaluate our electricity requirements and supply options, as part of considering our long-term energy options.

Beyond FY26, we plan to deepen our understanding of the physical effects climate change poses to our assets and business longer term, and respond accordingly. We are unwavering in our commitment to purpose, and remain focussed on playing our part to support the climate transition and deliver the reliable connectivity that enables better futures for Aotearoa.

¹ Deloitte (2024), 'Unleashing the power of digital fibre infrastructure in New Zealand', which notes that digital fibre infrastructure could add \$163 billion to the New Zealand economy by 2033.

² Our scope 1, 2 and 3 emissions targets were validated by the Science Based Targets initiative (SBTi) in 2024, and our progress against them is described in this report.

Overview

Chorus Limited is a climate reporting entity under the Financial Markets Conduct Act 2013 (**FMCA**).

This report contains Chorus' group climate statements under the mandatory reporting regime for financial year 1 July 2025 – 30 June 2026 (**FY26**) and relates to Chorus Limited and its wholly owned subsidiary (and operating company) Chorus New Zealand Limited (together, Chorus).³ The scope of reporting entity is consistent with Chorus' FY26 financial statements.

Chorus is New Zealand's largest fixed line telecommunications network operator providing wholesale telecommunications services to broadband retailers along with other non-connectivity services such as colocation in our exchange buildings. Our fibre network offers access to high-speed, reliable, energy efficient broadband.

Statement of compliance

NZ CS 3, 55-56

Chorus' climate statements have been prepared in accordance with the requirements of the FMCA, and the Aotearoa New Zealand Climate Standards 1, 2 and 3 (**NZ CS**) across the four thematic areas of Governance, Strategy, Risk Management and Metrics & Targets.

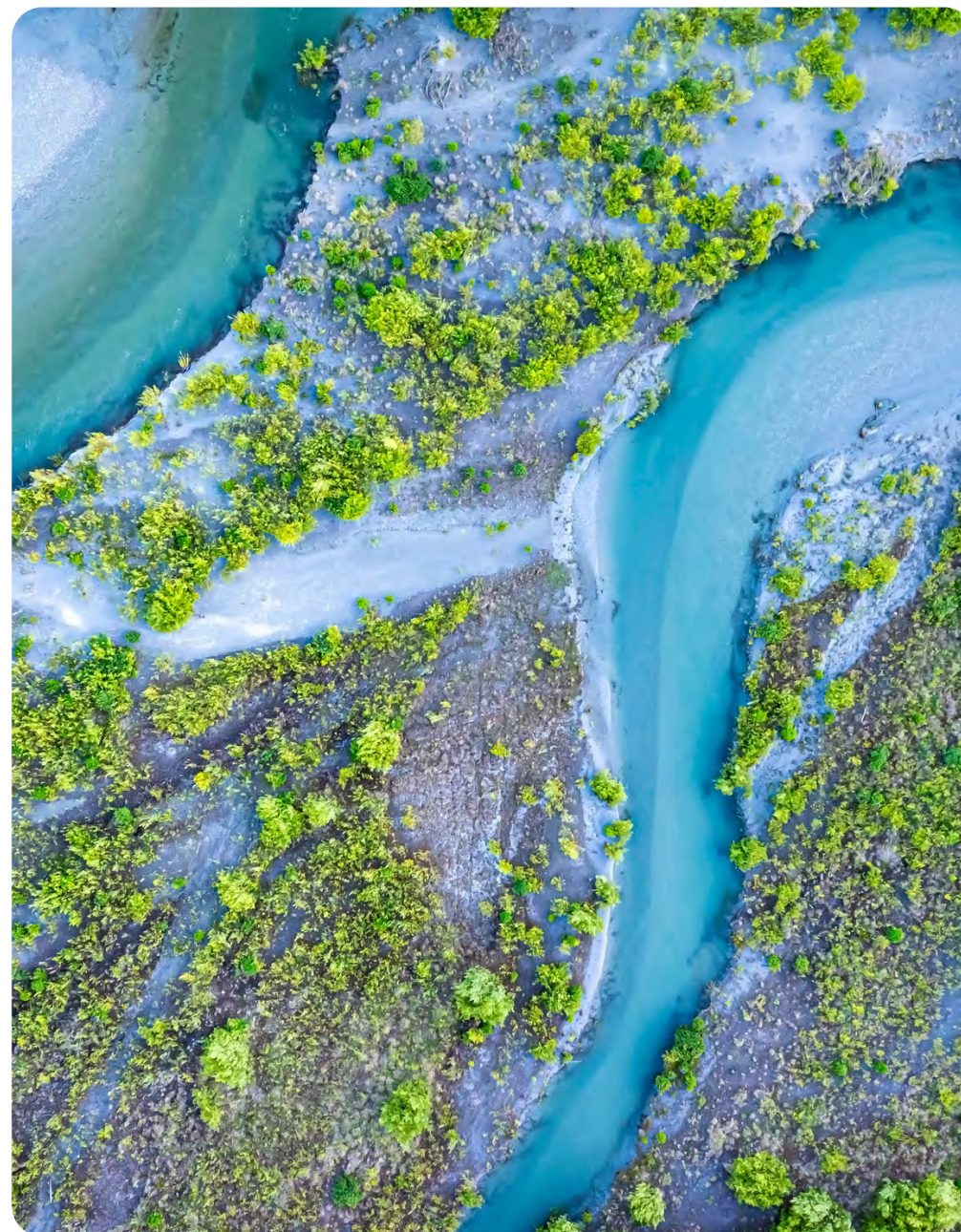
The table in Appendix 2 summarises where key disclosures can be found in this report, for ease of reference. We have also included NZ CS references alongside key headings in this report.

For FY26, Chorus has used Adoption Provision 2 (anticipated financial impacts) available under NZ CS 2.

Materiality

NZ CS 3, 27-39

This report builds on Chorus' previous disclosures from FY24-FY25 and is intended to inform primary users of how Chorus is positioning itself to manage the material climate-related risks and opportunities that may affect our business over time. It is not an exhaustive discussion of our work in this space. In line with the requirements of NZ CS 3, and FMA and XRB guidance, we have sought to provide information that is material to our primary users and relevant to their investment decisions.



³ Unless the context otherwise requires, all references in this report to "we", "us", "our" and "Chorus" should be interpreted to relate to Chorus Limited.

Strategy

Current business model and strategy

NZ CS 1, 16(a)

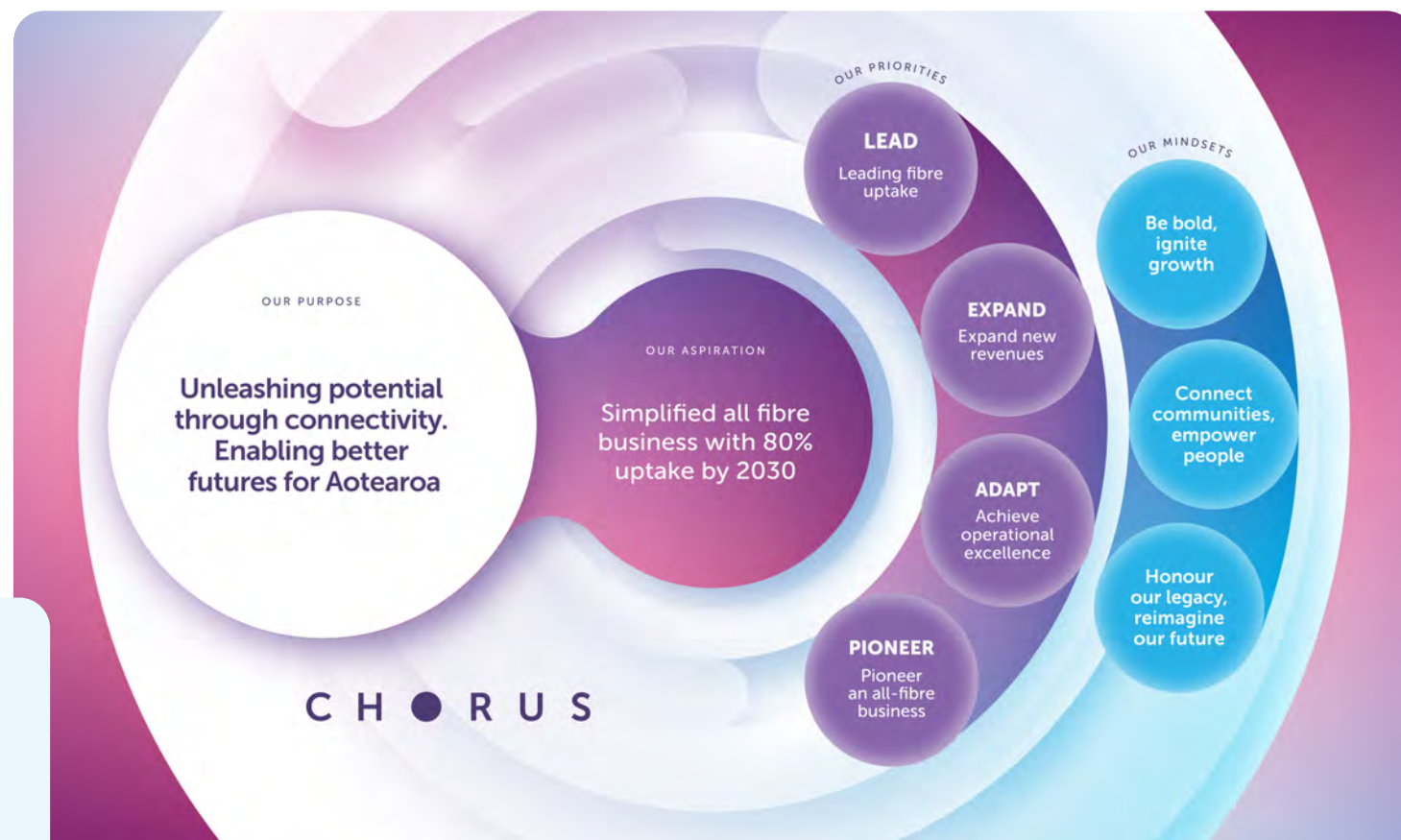
Chorus is New Zealand's largest fixed line telecommunications network operator providing wholesale telecommunications services to broadband retailers along with other non-connectivity services such as colocation in our exchange buildings.

Having constructed the majority of New Zealand's Ultra-Fast Broadband (UFB) network, Chorus' business strategy is focused on transitioning from a "build to operate" phase, and towards an all-fibre network. Our network assets include cables, ducts, poles, network buildings, network electronics and IT systems.

Our corporate strategy

Chorus updated its corporate strategy in FY25. This strategic reset saw us identify a renewed company purpose: **Unleashing potential through connectivity. Enabling better futures for Aotearoa**. Underpinning that purpose is our company aspiration to become a simplified all-fibre business with 80% uptake by 2030.

This strategy reflects the inter-generational role we see fibre broadband playing in enabling better futures across our country. There are four strategic pillars that frame our focus, priorities and decision-making across Chorus.



We see fibre as a strategic asset that will help enable the next wave of technological and economic growth. As demand for bandwidth, low latency and reliability continues to accelerate, fibre provides the scalable, energy efficient infrastructure to support that growth. Its strengths, including symmetrical speeds, ultra-low latency, scalability and energy efficiency,⁴ make it well suited to meeting the high-performance connectivity needs of Aotearoa's future.

Chorus plans for this strategy to be implemented over a 10-year horizon, with three distinct phases:

- **Horizon 1 (FY25)** was about getting 'future fit for purpose', embedding strategy, changing organisation structure and building new capability.
- **Horizon 2 (FY26 to FY29)** is where the benefits of change are realised progressively and Chorus is reflective of a simpler, more efficient, innovative and competitive business.
- **Horizon 3 (FY30 onwards)** describes our planned transition to a single state technology.

⁴ See World Broadband Association, 'Importance of Environmental Sustainability in Telecom Service Providers' Strategy', 2022.

Current business model and strategy (continued)

NZ CS 1, 16(a)

In FY26, we continued implementation of the strategy,⁵ and announced that the planned retirement of Chorus' copper network would be brought forward to 2028.⁶ This acceleration will also benefit Chorus' sustainability progress. Fibre is more energy efficient than copper, less prone to faults and more resilient to weather events.⁷

Further commentary on the status of our copper withdrawal programme and our broader work in resilience is set out in Chorus' [Annual Report](#).

Our sustainability strategy

Chorus' corporate strategy is underpinned by a series of sub-strategies. These include a sustainability strategy, which works alongside a number of other strategies and policies relevant to our climate response including network technology, risk management, asset management, business continuity and resilience.

As a company, our continued focus on sustainability is aligned to Chorus' overall corporate strategy and contributes to achieving our purpose and aspiration – it is part of how Chorus enables better futures for Aotearoa. Chorus' sustainability strategy aligns to the same four ecosystems Chorus seeks to support through our purpose: Environment, Communities, Customers & Partners, and People, as shown in the diagram.



In FY26, we refreshed our sustainability strategy, identifying what purpose-led areas matter most for Chorus and reviewing areas where Chorus' sustainability efforts could have the greatest impact. This has led to us agreeing three interconnected strategic focus areas anchored by our purpose. These are:

- **Resilient connectivity** - Our ecosystem is ready to withstand future challenges and adapt to change.
- **Equitable connectivity** - Our ecosystem works together to drive fairer access to the benefits of connectivity.
- **Future fit connectivity** - Our ecosystem reflects a changing population, with the skills and mindsets to meet tomorrow's needs.

These renewed strategic focus areas represent an evolution of our sustainability strategy, rather than a fundamental change in approach to existing environmental commitments.⁸

Our ecosystem endures, recognising that our Environment, Communities, Customers & Partners and People are the resources and relationships that Chorus relies on to create value. Our aspirations for Communities, Customers & Partners and Environment (including our established SBTi targets and related electricity consumption goals) continue and are discussed further below. We have made some adjustments to our Thriving People aspiration, to better reflect our focus on 'Future-fit', and broader efforts of the organisation in relation to our people. This is reflected in the infographic above.

⁵ See Chorus, [Half Year Results financial presentation](#), February 2026.

⁶ In April 2026, we announced that we would bring forward our planned retirement of our copper network to 2028, accelerating our transition to an all-fibre business. See Chorus, [Q3 FY26 Connections Update](#).

⁷ Sapere Report, 'Assessing the emissions footprint of the fibre networks relative to other fixed broadband options in NZ', 2021, at 4.1.

⁸ These new sustainability focus areas formed part of the evolved sustainability strategy and were approved by the Board in June 2026.

Transition Plan on a Page

NZ CS 1, 16(b)

This diagram reflects the material aspects of Chorus' Transition Plan as at the end of FY26. Our Transition Plan (see further detail in the following section) is designed to help address our climate related risks and opportunities (see Table 1 below) and chart a pathway for progress against our climate targets.



Transition planning

NZ CS 1, 16(b)

Chorus developed its first consolidated Transition Plan in FY25, building on existing programmes that support decarbonisation and build resilience. The plan brought together a number of initiatives, intended to help facilitate an integrated approach to support our climate goals.

Our Transition Plan specifically describes how we intend to leverage our corporate strategy by working to address Chorus' material climate-related risks, and charts the pathway for progress against our climate targets. It highlights that our transition planning is a dynamic, evolving and iterative process, with a number of assumptions and dependencies that may impact our progress over time.⁹

Chorus' Audit and Risk Management Committee (**ARMC**) approved our first Transition Plan in FY25. We updated our Transition Plan in FY26 (see bullet points below), with the update approved by Chorus management in May 2026, and noted by the ARMC in June 2026.

Our Transition Plan supports both our corporate and sustainability targets, and renewed focus on resilient connectivity, by helping to ensure we can maintain network reliability under climate disruption.

We continue to leverage fibre as a low-emissions,¹⁰ resilient broadband technology, embed climate mitigation and adaptation considerations into more of our core business processes over time, and work towards aligning climate priorities with our long-term asset and network planning.

Points incorporated as part of our FY26 update of the Transition Plan included:

- incorporation of our new strategic focus areas for sustainability
- discussion of shifting regulatory expectations around emergency management and essential infrastructure
- recognition of the challenges posed to the telecommunications sector by recent geopolitical and fuel supply issues from a security of supply perspective
- noting the uplift in Chorus' asset management capability and establishment of new asset management frameworks, and
- growing maturity of our energy efficiency programme, and potential future opportunities for additional electricity reduction.

Further detail regarding the key workstreams that inform our Transition Plan is provided on the following page.

⁹ This was acknowledged in the XRB's transition planning guidance document from December 2024. See XRB, [Climate-related Disclosures - Staff Guidance for Transition Planning Disclosures](#), 2024.

¹⁰ By comparison to alternative broadband technologies such as copper. See Sapere Report, ['Assessing the emissions footprint of fibre networks relative to other fixed broadband options in NZ'](#), 2021 at 4.1.

Assumptions and dependencies

NZ CS 3, 49

Below are the key assumptions, dependencies and potential barriers that may impact Chorus' progress towards delivering its climate goals and supporting initiatives. These remain largely consistent with our FY25 assumptions and dependencies.

CLIMATE GOAL	ASSUMPTIONS AND DEPENDENCIES
Scope 1 and 2 emissions reduction by FY30	• Progress assumes Chorus can smoothly transition to an all-fibre business and out of copper by end of 2028, with operating model and settings consistent with continued decarbonisation. • Solar, battery back-up and energy efficiency opportunities are proven feasible for Chorus. • Renewable generation and storage from the national grid continue to improve. • Collaborative effort with industry to pursue joint decarbonisation initiatives where appropriate.
Scope 3 emissions engagement by FY29	• Stable supply chain, with access to alternative suppliers if required. • Minimal changes to trade settings that could negatively impact supplier emissions. • All major suppliers meet their contractual obligations to Chorus, in relation to having SBTi targets in place by FY29 and providing emissions data.
Electricity reduction by FY30	• As above – this relies on similar assumptions to Chorus' scope 1 and 2 targets. • Supplier emission reduction commitments remain on track and technology supports Chorus' overall consumption decreasing over time. • Replacement of legacy metering equipment proves feasible and improves electricity monitoring capacity over time.
Net Zero ambition by 2050, across scope 1, 2 & 3 emissions	• Continued all-fibre business model, with scope for operations simplification and emissions reduction, and timely exit from copper network. • Chorus' climate targets continue to reflect latest climate science and are achievable by the specified dates. • Supply chain plays its part to reduce emissions and other environmental impacts on the Chorus network. • Government maintains its Net Zero commitment with enabling Emissions Reduction Plan aligned to Paris Agreement. • Broader policy and regulatory settings consistent with pathway to Net Zero, including scope for collective industry action and innovation. • Chorus' regulatory framework enables adequate climate investment. • Chorus' climate-related expenditure framework in place by end of FY28. • Scope for carbon offsets where required in line with applicable Corporate Net-Zero Standards.

Key workstreams that underpin our Transition Plan

Climate Mitigation

Key enabling initiatives to reduce our emissions include:

- **Emissions Reduction Plan (ERP):** Our ERP tracks how we intend to reach our target of reducing 62% of our scope 1 and 2 emissions by FY30 (against FY20 levels). The most material contributor to achieving this target is reducing our electricity usage. We update our modelling for electricity consumption reduction each year alongside Chorus' 10-year financial planning cycle (**Long Range Plan**) to ensure the assumptions we use when calculating future reductions remain consistent and aligned.

In FY26, Chorus' scope 1 & 2 emissions decreased, primarily due to the ongoing retirement of the copper network - see the Metrics & Targets section below for information on Chorus' performance against these targets in FY26. The Ministry for the Environment (**MfE**) emission factors for electricity (released in May 2026) also contributed to the overall decrease. Chorus remains on track overall to reach its 62% reduction in scope 1 & 2 emissions by FY30.

- **Energy Efficiency Programme:** Our energy efficiency programme supports the ERP and is a key driver of our sustainability strategy and purpose, driving electricity reductions across Chorus. Building on the findings of the energy audit conducted by our Sustainability team in FY25, in FY26 we established a governance forum and working groups to monitor the three key workstreams of the Energy Efficiency Programme – reduce electricity costs, drive consumption efficiency and improve data and reporting to help decision making. Key work over FY26 to make the business more efficient included the ongoing retirement of the copper network and legacy equipment, and an increase to temperature setpoints in our exchanges (see the 'Climate-related Opportunities' section at page 22 below).
- **Electricity Reduction Options Review:** In FY26, we commissioned an independent energy review by Smart Power to ensure our approach to purchasing electricity delivers long-term value, supports our decarbonisation goals, and increases resilience to price volatility. This work considered a range of procurement options, including hedging strategies, and evaluated them against key factors such as cost, risk, flexibility, and sustainability outcomes. Results are due to be considered by the Chorus Board in Q1 FY27.
- **Vehicle fleet electrification:** In FY26 we replaced 13 diesel vehicles with a hybrid alternative. This means we now operate a 92% hybrid and EV fleet.
- **Investigating renewable energy solutions:** In FY26, we paused further roof mounted solar panel installations while we assess findings from the first stage of the trial and consider how related workstreams may impact selection and feasibility of future solar sites, including property optimisation, resilience planning and alternative energy storage projects.

We have also continued to trial the Internal Emissions Price (**IEP**) through our enterprise project management office (**EPMO**) to test carbon costs against appropriate investment and operational decision-making, supporting alignment between financial and climate objectives. The IEP is discussed further in Metrics & Targets below at page 23.

Climate Adaptation and Resilience

In FY26, we worked to enhance the resilience of our network and operations by:

- continuing efforts to integrate climate considerations into asset management and investment planning
- commissioning a climate exposure assessment of key fibre assets (further details set out in the 'Physical Risks' section on page 22)
- strengthening our disaster response and business continuity capabilities, and
- participating in industry and regulatory processes on adaptation and resilience, including via the Telecommunications Forum (**TCF**) and on proposed regulatory reforms such as the Emergency Management Bill (No 2).

Physical risks such as extreme weather events are currently considered to be our most material climate-related risk category due to our extensive infrastructure footprint. Accordingly, a significant focus for Chorus in FY26 was understanding the exposure of our key fibre assets to climate hazards, based on the latest data. Details of our latest assessment are set out under 'Physical Risks' on page 22, based on work we commissioned from Aon.

Asset management focus

FY26 saw a significant uplift in Chorus' asset management capability. Becoming a mature asset operator forms a key part of our corporate strategy. This is also captured in our latest Asset Management Policy, which records our aspiration to: ***"Optimise our assets to deliver effortless customer experience and innovate for growth to ensure we maximise the long-term value for our customers and shareholders whilst optimising our total cost of ownership."***

A focus for our business in recent years has been improving asset management capability, to gain more value from capital and operational expenditure and manage risks that may impact the future resilience of our business. This has seen us establish a centralised asset management framework supported by improved documentation and governance. Further details will be provided as part of Chorus' Price Quality Period 3 regulatory proposal due to the Commerce Commission in 2027. This renewed framework reflects improved strategic asset documentation, as well as individual Portfolio Asset Management Plans (**PAMPs**), improved lifecycle planning, data and modelling.

From a climate perspective, we still have ongoing work to do to integrate climate considerations into the latest documentation including the PAMPs, and appropriate business planning and asset planning cycles. This will be an ongoing focus area, as systems mature and our understanding of the materiality of physical climate hazards posed to our network and assets develops further.

Alignment of transition planning to financial deployment processes

NZ CS 1, 16(c)

Chorus' transition plan initiatives are aligned with, and integrated within, our broader organisational capital deployment and financial management processes – they are funded by standard capital and opex expenditure processes. This includes our annual business planning cycles and preparation of Long Range Plans.

Individual business units submit funding proposals, including those related to transition plan initiatives, as part of the annual business planning process, based on identified investment drivers and organisational need. Chorus also prepares a Long Range Plan, which focuses on our planned investment profile over the next 10 years. Both are approved by Chorus management and the Board.

Climate considerations are being integrated into capital deployment and financial decision-making, including the trial of our IEP in investment appraisal and decision-making, and incorporation of climate criteria into asset management planning documentation.

Consideration of the need for climate-related spend (including on resilience initiatives) also occurs as part of our regulatory planning processes, including expenditure proposals we submit to the Commerce Commission as part of our price-quality regulatory framework.

Scenario analysis

NZ CS 1, 13

Chorus' sustainability programme continues to be informed by the telecommunications sector scenario analysis commissioned by the TCF Climate Change Working Group in 2024.¹¹ For FY26, we consider this scenario analysis remains robust and relevant to our sector (see further detail under 'Process' on page 11 below), and it continued to inform our consideration of climate-related risks and opportunities and the resilience of our business model and strategic focus areas for sustainability.

The following section describes the methods, assumptions and process employed to prepare these sector scenarios in further detail, as required by NZ CS 3 para 51, and mirrors the content we previously disclosed in FY25.

¹¹ See Tonkin & Taylor, [Telecommunications Sector Climate Change Scenarios | NZ Telecommunications Forum](#), dated 15 July 2024. Chorus did not conduct any independent modelling beyond that reflected in the TCF Scenarios. RCP and NIWA data sets are contained at Table 4.2 on page 20 of the Telecommunications Sector Climate Change Scenarios.

Climate-related scenarios

NZ CS 3, 51(a)

The three climate scenarios Chorus has adopted based on the telecommunications sector scenario analysis are as follows:

- Scenario 1:** Orderly Transition (Paris Agreement aligned transition scenario).
- Scenario 2:** Hot House World (high-warming scenario).
- Scenario 3:** Disorderly Transition (additional scenario).

The Orderly Transition and Hot House World scenarios were selected to align with the 1.5C and >3C scenarios mandated by the New Zealand Climate Standards. Disorderly Transition was selected as a third scenario as it contains a mix of physical and transition impacts that test the resilience of Chorus’ business model and strategy. Shortlisted drivers, being the key factors outside of Chorus’ or the telecommunications sector’s control that could have the greatest influence in shaping outcomes for its sector, were identified and mapped across three climate scenarios. These included policy, socioeconomic, technological, environmental and economic factors, with legislation, supply chains, access to finance, digital dependence and climate hazards identified as key influences. The scenarios also incorporate assumptions about energy transition pathways, future decarbonisation rates, and the deployment of low-emissions and carbon removal technologies as determinants of climate outcomes. A select number of drivers were chosen to be ‘featured’ or key to the scenario narrative, while others were ‘supporting’.¹²

Process
NZ CS 3, 51(b)

Chorus contributed to the climate scenario analysis commissioned by the TCF and prepared by Tonkin & Taylor in 2024 as part of a project management team and wider stakeholder group to support and oversee this work. The review also considered the extent to which the scenarios reflected the key external drivers most likely to influence Chorus’ operating environment, business model and strategic objectives. This provided a foundation for assessing the resilience of Chorus’ strategy and climate-related risk and opportunity profile under different climate-related futures.

Chorus management and the ARMC provided oversight of the development of the climate scenarios and scenario analysis process at the time, including having an opportunity to provide feedback on the draft scenarios prior to finalisation of the report. The scenario analysis process was conducted externally and separate to Chorus’ strategy processes, although findings continued to inform internal workstreams in FY26. We expect the scenarios will require review over time to reflect changes in our operating environment and emerging climate-related developments.

Given Chorus’ participation in the telecommunications sector analysis, these scenarios were adopted by Chorus in FY25 and used to progress work in FY26. In particular, the scenarios were used as a basis to deepen Chorus’ assessment of resilience to climate-related risks and opportunities and have informed the annual review of our climate register including mitigations and action plans. The scenario analysis also informed the preparation of our first documented Transition Plan in FY25, including key dependencies and assumptions relevant to maintaining the resilience of the Chorus network.

TELECOMMUNICATIONS SECTOR CLIMATE SCENARIOS – SUMMARY OF NARRATIVES

	ORDERLY TRANSITION	HOT HOUSE WORLD	DISORDERLY TRANSITION
GLOBAL CLIMATE AND SOCIO-ECONOMIC PARAMETERS	SSP1-1.9 (IPCC)	SSP3-7.0 (IPCC)	SSP2-4.5 (IPCC)
NZ SPECIFIC CLIMATE PARAMETERS	RCP 2.6 (NIWA DOWNSCALED REPORTING)	RCP 8.5 (NIWA DOWNSCALED REPORTING)	RCP 4.5 (NIWA DOWNSCALED REPORTING)
SUMMARY	Aotearoa New Zealand (NZ) and the world transitions to net zero by 2050 with strong policy and market changes clearly signalled by the government. Physical impacts from climate change are limited and align with the SSP1-1.9 scenario. Average global temperatures are limited to 1.5 degrees above preindustrial levels by 2050.	NZ and the world abandon net zero targets, and there is no national or global movement to reduce emissions. Existing policies are reversed, and fossil fuel use continues. Physical impacts from climate change are severe with annual average global temperatures rising to 2 degrees above pre-industrial levels by 2050 and 3.6 degrees by 2100 (in alignment with SSP3–7.0)	NZ and the developed world are delayed in their transition to net zero and continue to use fossil fuels over the short-term. This results in a steady increase in temperature and physical impacts in alignment with SSP2–4.5 (2 degrees by mid-century). By 2030, NZ and the developed world realise that urgent action is needed to reach net zero, which results in abrupt and poorly signalled policy and market changes.

The sector scenario analysis was produced using international and national scenario parameters, including global climate and socio-economic parameters, and NZ specific climate and transition pathways parameters.

The time horizons (applied from 2025) were as follows:

- 1. Short-term (5 years: 2030)** – Aligns to telecommunications organisations’ emissions reduction targets (including Chorus).
- 2. Medium-term (15 years: 2040)** – Aligns with Chorus’ 10-year strategic planning horizon, along with average life of electronic network equipment.
- 3. Long-term (30+ years: 2055+)** – Aligns with potential materialisation of physical risks, particularly infrastructure impacts and aligns to New Zealand’s 2050 net zero ambition).

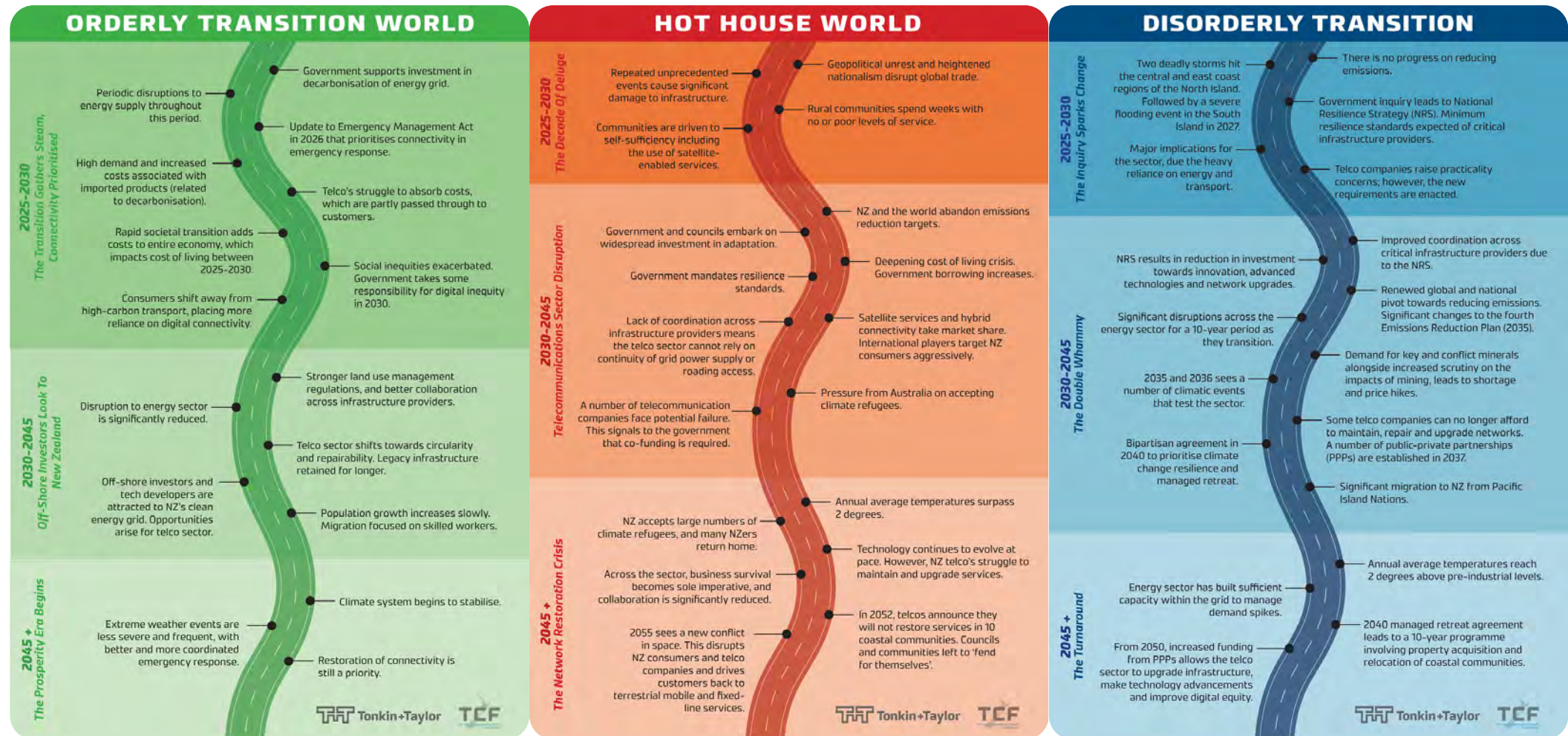
The pathway assumptions for each scenario are summarised on the next page.

¹² While carbon sequestration from afforestation and nature-based solutions were part of the underlying SSPs used to build the scenarios, they were not shortlisted drivers, and therefore not included in the sector scenarios.

Climate-related scenarios (continued)

NZ CS 3, 51(a)

The pathway assumptions for each scenario are summarised below¹³.



¹³ See Tonkin & Taylor, [Telecommunications Sector Climate Change Scenarios | NZ Telecommunications Forum](#), dated 15 July 2024, on pages 7-9.

Climate risks, opportunities and impacts

Overview

Chorus’ risk management frameworks allow us to proactively manage risk. The climate risk and opportunity approach that applied in FY26 is aligned to, and integrated within, Chorus’ enterprise-wide risk framework with oversight from the ARMC. This framework is discussed in further detail in the Risk Management section (see pages 28 and 29).

Accordingly, climate risks can show up in both our enterprise-level risk registers (for example as ‘Principal Risks’ or ‘Emerging Risks’), as well as our dedicated climate risk register.

In FY26, the following risks were identified at the enterprise level, with relevance to climate:

- **Principal Risks** – Risks to service availability and network assets in light of increasing weather, climate events and other outages, including potential stakeholder and regulatory implications, were identified as a Principal Risk area.
- **Emerging Risks** – Climate and nature driven risks were identified as an Emerging Risk area, defined as potential longer-term impacts on Chorus and broader infrastructure, assets and operations including increased pressure around emissions targets.

Within Chorus’ dedicated climate register, specific risks and opportunities are identified, assessed and managed.

The table below describes the specific climate risks and opportunities identified by Chorus in FY26 (column 1). The risks are consistent with those disclosed in Chorus’ FY25 climate statements. Our view is that each remains current and relevant to the business, reflecting a relatively consistent and stable risk profile, and the comprehensive multi-year assessment now embedded into ongoing monitoring and review. Updates to impacts and mitigations are

captured in columns 2 and 3 of the below table, and build upon those disclosed in previous climate statements. These highlight some of our key operational initiatives to manage short term impacts, including weather-related faults, while monitoring for longer term opportunities to enhance resilience and support sustained risk mitigation.

Current impacts

NZ CS 1, 12(a)

In terms of current impacts, despite numerous weather events experienced across Aotearoa in FY26, Chorus did not experience any material impacts (including any material financial impacts) from climate change in FY26. Although Chorus is not required to assess or disclose current impacts with respect to specific risks, we have nonetheless described some of the ways current impacts show up for our business with respect to key risks (see table below), consistent with our previous disclosures. While these impacts were not material for FY26, we include these to provide primary users with an insight into the ways climate risks can manifest, and the types of developments we monitor for and mitigate where possible.

We also note that climate events can have cumulative and cascading effects, including financial effects, over multiple years. For example, while Cyclone Gabrielle occurred in FY23, Chorus has incurred expenditure associated with its impacts across multiple years due to trailing costs and external dependencies delaying some works (such as the need to coordinate with third parties, for instance, roading authorities). While costs may not therefore be material in a single reporting period, it is important to appreciate that climate events can generate impacts that continue across a number of years.

Our biggest risk area remains extreme weather events, followed by volatility in electricity supply as set out below.

TABLE 1: Chorus climate-related risks, opportunities & impacts – FY26

RISK / OPPORTUNITY / TYPE	SUMMARY OF CURRENT (FY26) AND ANTICIPATED IMPACTS	CURRENT CONTROLS ¹⁴ AND ADDITIONAL MITIGATIONS ¹⁵
Risk: Increase in frequency and intensity of extreme climate-related weather events, including storms, extreme wind, rainfall, drought, and wildfire. The increased severity and frequency of these events could expose our network assets to flooding, slips and washouts, wind damage, extreme heat or fire causing network damage or service outages. Type: Physical. Time horizon: Short to medium term.	Current impact: Chorus experienced localised weather events in certain regions (primarily flooding from heavy rainfall) causing outages and faults in its copper and fibre networks, issuing Force Majeure notices as required. Anticipated impact: Prolonged service disruption may have a detrimental operational, financial and/or reputational impact, particularly where it impacts a large area or number of consumers (e.g. damage to key fibre routes or widespread loss of electricity). This will be especially true as we, Aotearoa and Chorus, experience cascading and cumulative effects of climate change, such as service interruptions from multiple climate-related events or forced displacement from affected areas. Significant damage may require replacement or relocation of assets. Extreme temperatures (medium term) or cumulative climate related events affect Chorus people’s ability to work.	Controls: • Business continuity, resilience and force majeure processes. • Asset-level climate risk exposure assessments updated to inform flood mapping and strategic planning. • Ongoing fibre route surveillance informing asset management of deterioration and enabling proactive maintenance (e.g. slips, erosion, bridge crossings). • Internal project codes track operational expenditure attributable to extreme weather events. Mitigations: • Ongoing investment programmes to enhance network resiliency, including in relation to dual fibre paths, functionality limits and critical spares. • Chorus uses data, mapping, and insights for planning and assessing climate impact and strengthening network resilience, and prioritising fibre uptake and copper shutdown (noting fibre is less susceptible to weather-related faults). • Applying a climate lens where appropriate to asset management and investment planning. • Co-ordinated and proactive engagement with stakeholders during weather events to ensure timely, consistent support planning and response.

¹⁴ Controls are measures that help us identify, track and be notified of an upcoming risk.

¹⁵ Mitigations are measures that help manage and reduce the magnitude of that risk.

Climate risks, opportunities and impacts

RISK / OPPORTUNITY / TYPE	SUMMARY OF CURRENT (FY26) AND ANTICIPATED IMPACTS	CURRENT CONTROLS AND ADDITIONAL MITIGATIONS
Risk: Increase in frequency of planned and unplanned power outages due to demand, supply, weather events (such as high rainfall causing flooding and power outages) and delayed decarbonisation of the New Zealand grid. The increased severity of these events could expose our networks to power blackouts causing network service outages and increased energy costs. Type: Physical. Time horizon: Short to medium term.	Current impact: Minimal. Chorus experienced outages due to weather related events (primarily flooding from heavy rainfall), however no significant network level impacts occurred. Anticipated impact: Energy rolling blackouts could increase, especially during peak energy use times, which could affect the delivery of telecommunications services to customers. Could also see increased carbon emissions and increased electricity prices.	Controls: • Battery reserves at exchanges. • Diesel back-up generators. Mitigations: • Energy efficiency programme (described above). • Copper network retirement will significantly reduce Chorus' electricity use. • Alternative back-up generation including solar is being investigated as part of Chorus' transition planning.
Risk: Projected risk of damage to Chorus' network assets from sea-level rise or coastal flooding. Type: Physical. Time horizon: Long term.	Current impact: Nil. Anticipated impact: Damage to assets such as cabinets, poles, cables or buildings could affect the delivery of telecommunications services to customers.	Mitigations: • Asset impact assessments allow us to incorporate findings into long-term asset management planning as appropriate. • Our asset investment framework provides a criteria to decide on where we invest and adapt current sites where needed. • Chorus continues to use data, mapping, and insights to assess climate impact and build resilience across its network.
Risk: Supply chain disruption due to major weather events, raw materials shortages, supply and demand volatility and geo-political issues could lead to network outages and loss of revenue if we are unable to replace essential equipment or materials. Type: Physical. Time horizon: Short to medium term.	Current impact: Minimal. Chorus experienced some delays and price increases in FY26 with certain types of chipsets and fibre cable from international suppliers, caused by geopolitical events in the Middle East and Ukraine impacting demand and shipping. However no significant network level impacts occurred. Anticipated impact: Climate-related events including increase in the frequency and intensity of severe weather patterns could disrupt global supply channels. These impacts may be compounded by geopolitical volatility, trade restrictions, and material or component shortages, which could affect the availability and lead times of telecommunications or network equipment, particularly where Chorus relies on international suppliers. This in turn could lead to network outages and loss of revenue if we are unable to replace essential equipment or materials. Fuel constraints (particularly diesel) caused by geopolitical uncertainty may impact service companies' ability to respond to extreme weather events, as well as generator refuelling for remote sites if mains power fails. It may also result in higher costs from our service companies.	Controls: • Regular supplier and supply chain risk reporting. Mitigations: • Supply chain management measures, including: ◦ engaging geographically diverse suppliers; ◦ reviewing performance and exposure to climate risk; ◦ implementing contingency measures (for high risk geographies) such as dual sourcing and product substitution strategies. • Business continuity processes response where a key supplier is likely to be materially impacted.
Risk: Insufficient priority of, and investment in, climate mitigation and adaptation initiatives by Chorus or its suppliers could result in delays reducing our emissions, meeting our science-based targets and adapting our assets. Type: Transition. Time horizon: Short to medium term.	Current impact: Nil. There has been no impact around insufficient investment in FY26. Chorus has an emissions reduction target for scope 1 & 2 emissions, along with our supporting ERP. Key activities include energy efficiency, energy reduction and switching to EV/Hybrid fleet. Investment to support Chorus achieving its target is already in the 10-year financial plan. Chorus has also recently updated its resiliency strategy. Anticipated impact: Potential increase in unplanned capital expenditure for frequent and extensive service and network restoration activities. Regulatory framework could see insufficient future allowances for weather related expenditure or asset investment.	Mitigations: • Climate-related expenditure framework in development. • Regulatory engagement to maximise allowances in future Chorus price-quality regulatory periods. • Climate exposure assessment of our assets updated for future integration into existing asset management documents. Continued collaboration with NZTA to assess the least exposed build option. • Copper withdrawal programme, and focus on key fibre asset resilience.

Climate risks, opportunities and impacts

RISK / OPPORTUNITY / TYPE	SUMMARY OF CURRENT (FY26) AND ANTICIPATED IMPACTS	CURRENT CONTROLS AND ADDITIONAL MITIGATIONS
Risk: Government policy & regulation restricts Chorus' ability to act leading to funding shortfalls that impact our climate-related initiatives. Alternately, additional investment mandated by Government could redirect resources from our core activities. Type: Transition. Time horizon: Medium to long term.	Current impact: Minimal. Chorus' price-quality regulatory regime is well understood and managed by the business. Chorus has been subject to this regime since 2022. The Commerce Commission determines a multi-year "price-quality path" that dictates the maximum revenue Chorus can earn as well as minimum quality standards we must meet. Chorus will submit its third regulatory proposal in August 2027, to inform future allowances for the upcoming regulatory period (RP3) which runs from January 2029 to December 2033, capturing planned sustainability and resilience-related investments. Anticipated impact: The Commerce Commission or the New Zealand Government could in future limit Chorus' ability to invest in climate mitigation or adaptation, or mandate requirements that are unanticipated and/or problematic for the business. For example, insufficient future expenditure allowances for asset management, resilience, and adaptation planning could result in Chorus needing to deprioritise climate-resilience initiatives in favour of core activities, including to ensure service quality standards are met. More broadly, Government could mandate 'over-investment' requirements where this is deemed necessary to provide climate futureproofing or avoid a disorderly transition scenario. Depending on the scale and timing of such requirements, and the extent of alignment to Chorus' existing strategy and investments, such requirements could result in a low return, and redirect focus from core activities.	Mitigations: • Strong regulatory engagement and expenditure forecasting processes, through which we work to secure appropriate expenditure allowances. • Strong stakeholder relationships. • Robust asset management planning documentation supports Chorus through RP3 proposal to become resilient and adaptive to a changing future.
Risk: Economic and social risks (such as the need for managed retreat from low-lying areas) could impact the access or affordability of core digital services for small or low-socio economic communities. Type: Transition. Time horizon: Medium term.	Current impact: Minimal. Anticipated impact: Physical or transitional climate impacts could widen the digital divide for low socio-economic communities and reduce access to telecommunications services. The need for managed retreat from low-lying areas could exacerbate inequality, with community disruption and increased affordability challenges for customers, as well as wellbeing impacts on our workforce.	Mitigations: • Our Whiria Te Aka Matihiko programme¹⁶ aims to help close the digital divide, and has strong community and stakeholder engagement. • Introduction of a targeted fibre product in FY26 (Equity Fibre 100) designed to improve access for those most in need, with pricing set at an affordable level. • Business continuity and resilience measures designed to ensure services are quickly restored.
Opportunity: Network efficiency and operational decarbonisation. Type: Opportunity – Physical. Time horizon: Short to medium term.	Current impact: Electricity made up 88% of Chorus' Scope 1 and 2 emissions in FY26 and presented our best opportunity for emissions reduction. Our Energy Efficiency Programme contains a mix of climate-driven opportunities (including increasing the set point for cooling of air conditioned rooms in exchanges and our solar trial), and workstreams related primarily to network efficiency that also provide climate-related benefits (including copper retirement and the associated review of our property portfolio) to support our energy efficiency and emission reduction goals. For more detail, see 'Opportunities' on the following page. Anticipated impact: Ongoing scoping of emission and cost reductions.	Progress: • FY26 saw completion of a number of initiatives, including conversion of 44 sites to a higher set point for cooling of airconditioned rooms (rollout to continue in FY27). • In FY25 Chorus completed the installation of its roof mounted solar build on six trial exchange buildings to evaluate the feasibility of self-generation. The data from this trial, alongside work to optimise our property portfolio, will be used to support a considered decision on any broader solar installation roll out. • Chorus continues to monitor for emissions reduction opportunities to reduce its overall footprint and increase security of supply.

¹⁶ See Chorus, [Whiria Te Aka Matihiko – Enabling better futures through digital equity](#).

Opportunities

We continued to investigate climate opportunities for our business across a number of work programmes. Our main climate related opportunities are two-fold – identifying ways to reduce our electricity use through network efficiency and operational decarbonisation, and investigating how to improve our energy and network resilience.

Network efficiency and operational decarbonisation

Despite not being driven exclusively as climate-related opportunities, certain network efficiency workstreams contribute to the Energy Efficiency Programme and provide both climate-related and cost benefits. Our ongoing retirement of the copper network continues to reduce emissions as the copper network is taken offline and copper faults decrease. Given our property portfolio was originally designed to support the copper rather than fibre network, copper retirement is expected to create opportunities over time to consolidate and reconfigure our property portfolio in ways that better support a modern fibre network. Over time, the optimisation of the property portfolio may deliver a significant reduction in our emissions as our sites and equipment are rationalised.

Energy and network resilience

We continue to investigate renewable energy opportunities in solar and electricity supply. We also reviewed how we purchase electricity to ensure our approach delivers long-term value, supports our decarbonisation goals, and increases resilience to price volatility.

While we continue to scope additional opportunities, including in our supply chain, none had a material impact in FY26. If this changes as we explore new opportunities, we will update primary users in subsequent climate disclosures.

We have nonetheless updated our assessment of which parts of our business are most aligned to potential climate opportunities in the Metrics & Targets section below.

Climate as an input to capital deployment

NZ CS 1, 14(c)

Climate risk framework

Climate-related risks and opportunities serve as an input into Chorus' business planning and capital deployment processes where relevant. Through these processes, individual business units specify the financial resources required (including capex and opex) for planned initiatives. These may include sustainability, energy or resilience-related projects, where climate risk reduction or climate-related opportunities are among the investment drivers.

Climate risks and opportunities are also incorporated into Chorus' asset management documentation including our PAMPs, and associated asset planning and investment processes. For example, we anticipate Aon's latest exposure assessment of fibre assets to inform internal modelling over time, facilitating a more focused 'climate lens' being applied to asset decisions based on the latest physical data.

Chorus has financial deployment processes available to meet both proactive and reactive expenditure requirements. This is particularly important when it comes to extreme weather events that necessitate rapid financial deployment. While overall the financial impact arising from such events was not material for Chorus in FY26, these processes ensure our flexibility to respond quickly where needed.

Climate considerations are being integrated into selected governance and decision-making processes. For example, as part of our Go to Market forum, initiative owners complete a sustainability checklist and engage with our Sustainability Team where required. A similar criterion is used by our Procurement team in purchasing decisions. We have also applied an IEP within our enterprise portfolio management office processes. While still being trialled, this enables emissions pricing to be considered in relevant investment and portfolio decisions, supported by our Sustainability and Finance Teams.

Expenditure framework still in development

Chorus previously noted our plans with respect to development of a Climate Expenditure Framework. This was in part driven by incoming mandatory disclosure requirements regarding anticipated financial impacts, in respect of which the XRB has since determined suitable for extended adoption relief. Accordingly, we made progress in FY26 but have not prioritised the finalisation of this document, preferring to await additional guidance.

Metrics & targets

Targets

NZ CS 1, 23

Chorus' climate targets remain a key part of our sustainability strategy, reflecting our ongoing focus on decarbonisation and minimising environmental impact.

We have reported on our emissions reduction progress in sustainability reporting since FY21, and in our climate statements since FY24. Our emissions targets are science-based, having been validated by the SBTi in 2024. This means they are aligned to keeping global warming within 1.5 degrees.¹⁷

Chorus has an absolute scope 1 & 2 target and a scope 3 engagement target (as described in the below table), which are developed in accordance with the SBTi's guidance for the Information and Communication Technology sector.¹⁸ Neither SBTi-validated target relies on offsets.

TABLE 2: Summary of Chorus' climate targets as at FY26

AMBITION	TARGETS / OUTCOMES	PROGRESS	SUPPORTING INITIATIVES
Chorus has decarbonised and accelerated its journey to be net zero by 2050	Verified science-based target – scope 1 and 2 emissions reduction: Reduce absolute scope 1 & 2 emissions 62% by 2030 from a FY20 base year ¹⁹ (using location-based method).	FY20: 10,536 tCO ₂ e FY24: 6,387 tCO ₂ e FY25: 7,877 tCO ₂ e FY26: 5,998 tCO₂e - representing a 43% reduction achieved from FY20 to FY26.	Emissions Reduction Plan: - Scope 1: Proactive aircon maintenance has delivered a reduction in refrigerant leaks. - Scope 2: Scope 2 emissions have decreased by 45% against base year, using the 2026 MfE latest electricity emission factor.²⁰ Note: Chorus' FY20-FY23 sustainability reports describe scope 1 & 2 emissions since the base year for its emissions reduction target (FY20). ²¹
	Electricity reduction goal: Reduce electricity use by 25% by FY30 against FY20 baseline, with interim milestone to reduce electricity use in FY26 by 6-9% against FY25.	FY20: 80.4 GWh FY24: 75.1 GWh FY25: 71.5 GWh FY26: 66.7 GWh - representing a 17% reduction achieved from FY20 to FY26.	- Reduced our electricity consumption against FY25 by 6.7%. - Chorus ERP modelling and copper withdrawal planning indicated Chorus' longer range target of 25% electricity reduction by FY30 remains on track.
	Verified science-based target – scope 3 engagement: Scope 3 engagement goal with 70% of suppliers by spend to have a science-based target by FY29.	FY24: 30% FY25: 43% FY26: 55% ²²	- Chorus continues to work with top suppliers to ensure plans are in place to set SBTi-validated targets and have emission reporting in-place. - Large new contracts and tenders include requirement for SBTi target commitment and reporting on emissions data.
	Chorus vehicle fleet reduction goal: 100% EV or hybrid fleet by the end of FY28.	FY23: 30% FY24: 37% FY25: 56% FY26: 92%	In FY26 we replaced 13 of our diesel vehicles for a hybrid alternative, meaning our fleet is now 92% EV or hybrid and will continue to move towards hybrid or EV alternatives.

¹⁷ <https://sciencebasedtargets.org/target-dashboard>

¹⁸ Science Based Target Initiative, Information and Communication Technology (ICT) sector specific guidance, [Guidance for ICT companies including fixed line operators](#).

¹⁹ In FY25, Chorus restated its base year (FY20) numbers after receiving third party assurance over its FY20 GHG inventory by KPMG. The updated numbers were not materially different to previously disclosed numbers in Chorus' historical sustainability reports.

²⁰ The 2026 emission factor for electricity is 22.5% lower than last year.

²¹ Chorus' sustainability reports describe scope 1 & 2 emissions over FY20 - FY23. As above, Chorus obtained assurance over its FY20 inventory from KPMG in FY25 and have restated these in Table 2 above, however previous inventories were not assured.

²² This represents the percentage (%) of Chorus suppliers who have already set a science-based target.

Metrics & targets (continued)

GHG Emissions Inventory

NZ CS 1, 23

GHG EMISSIONS

Table 3 provides an overview of Chorus' scope 1 & 2 emissions against base year. Table 4 provides Chorus' total Greenhouse Gas emissions for FY26 and previous years. To review the details of the calculation methods, data quality, uncertainty and other information, please refer to **Appendix 4**.

KPMG was engaged to carry out a limited assurance review of Chorus' GHG Scope 1, 2 & 3 Emissions Inventory for the reporting period (1 July 2025 to 30 June 2026) as required by NZ CS 1. KPMG's limited assurance opinion is attached as **Appendix 5**.

TABLE 3: Chorus' GHG emissions (scope 1 & 2) in metric tonnes of carbon dioxide equivalent (t-CO₂e)

SCOPE / CATEGORY	FY20 (BASE YEAR)	FY24	FY25	FY26
Scope 1 (totals)	962	913	644	743
Stationary combustion <i>Includes diesel generators and natural gas</i>	279	340	401	523
Fugitive emissions	479	442	112	128
Mobile Combustion	203	131	131	92
Scope 2 - (totals – location based)	9,574	5,474	7,233	5,255
Scope 1 & 2 totals	10,536	6,387	7,877	5,998

TABLE 4: Chorus' GHG emissions (all scopes) in metric tonnes of carbon dioxide equivalent (t-CO₂e)

SCOPE / CATEGORY	FY24	FY25	FY26
Stationary combustion <i>Includes Diesel generators and Natural gas</i>	340	401	523
Fugitive emissions	442	112	128
Mobile Combustion	131	131	92
Scope 1 (totals)	913	644	743
Electricity Location based	5,474	7,233	5,255
Electricity Market based ²³	604	903	475
Scope 2 - (totals – location based)	5,474	7,233	5,255
Category 1 & 2 – Purchased goods and services & Capital goods (spend based)	24,337	22,398	25,981
Category 1 & 2 – Purchased goods and services & Capital goods (supplier specific data)	11,470	8,410	4,717
Category 3 – Fuel and energy use Includes T&D Losses and Well-to-Tank (WTT) from fuel use	3,736	3,213	2,066
Category 4 – Upstream Transportation and distribution	929	822	233
Category 5 – Waste generated in operations	13	11	14
Category 6 – Business travel <i>Includes Air travel, accommodation, taxis, rental car, mileage claims and EV charging</i>	513	497	464
Category 7 – Employee commuting <i>Includes employee commuting and working from home</i>	323	325	497
Category 11 – Use of sold products ²⁴	3,883	5,718	4,472
Category 13 – Downstream leased assets	735	855	416
Scope 3 (totals)	45,939	42,249	38,859
Scope 1, 2 and 3 totals	52,326	50,126	44,857

²³ Scope 2 market-based emissions reflect the generation fuel mix from which the reporting company contractually purchases electricity and/or is directly provided electricity via a direct line transfer.

²⁴ According to the GSM Association (GSMA) Global Enabling Sustainability Initiative (GeSI) scope 3 guidance for telecommunications operators, ONT could be reported either in Category 11 and Category 13. It is noted that according to the Greenhouse Gas Protocol Value Chain standard, Category 11 should report on emission using lifetime emissions. After careful consideration, internal discussion and external comparison of industry best practice, Chorus decided to report the ONT emissions under category 11 for consistency with the Telecommunication industry without applying the lifetime reporting requirements as Chorus has access to more accurate information (actual annual electricity consumption until the ONT is disconnected).

Metrics & targets (continued)

Trends analysis

Our Scope 1 & 2 emissions (5,998 tCO₂e) trended down in FY26, representing a 24% reduction compared to FY25 (7,877 tCO₂e) and a 6% reduction compared to FY24 (6,387 tCO₂e). These FY26 reductions are the result of:

- **Scope 1:** Proactive air conditioning unit maintenance delivering a reduction in refrigerant leaks, removal of natural gas from one of our sites and the transition of 13 diesel vehicles to hybrid and electric.
- **Scope 2:** A decrease in emissions driven by both a reduction in electricity consumption (Chorus reduced its electricity consumption against FY25 by 6% (see Table 2 for progress against targets)), and a reduction in MfE's national electricity emission factor (the 2026 emission factor for electricity is 22.5% lower than FY25).²⁵ Given these emission factors are out of our direct control and fluctuate year-to-year, they will continue to have an impact on our emissions profile, which is why we focus our efforts on overall electricity consumption reduction and efficient network operation.

Our Scope 3 emissions reduced by 3,390 tCO₂e between FY25 and FY26, compared to a 3,689 reduction between FY24 and FY25. The reduction in Scope 3 emissions in FY26 is primarily due to:

- **Category 13 leased assets** – Spark removed outdated technology and equipment from co-location and leased space.
- **Freight** – As Chorus moved from building the network to operating it, our requirement for raw materials and associated freight also reduced.
- **Field Service Agreements (FSA)** – Improved data quality to assess fuel use by service companies delivering Chorus services has helped reduce emissions.

Consolidation approach and standards

NZ CS 1, 24(a)-(c)

Consolidation approach: In measuring GHG emissions, Chorus uses an operational control consolidation approach (defined by the GHG Protocol) that includes Chorus New Zealand Limited only, as its operating company and sole subsidiary of its parent company, Chorus Limited.

GHG emissions standards: Chorus' GHG emissions have been measured in accordance with:

- Greenhouse Gas Protocol – A Corporate Accounting and Reporting Standard (Revised Edition).²⁶
- Greenhouse Gas Protocol - GHG Protocol scope 2 Guidance: An amendment to the GHG Protocol Corporate Standard.²⁷
- Greenhouse Gas Protocol – Corporate Value Chain (Scope 3) Accounting and Reporting Standard.²⁸
- Greenhouse Gas Protocol – Technical Guidance for Calculating Scope 3 Emissions.²⁹

Other guidance used:

- ISO 14064 – 1:2018 – Greenhouse gases Part 1.
- GSM Association (**GSMA**), the Global Enabling Sustainability Initiative (**GeSI**) and the International Telecommunication Union (ITU-T) – Scope 3 Guidance for Telecommunication Operators.³⁰
- Ministry for Environment – Measuring emissions: A guide for organisations.³¹

Source of emission factors and Global Warming Potential (GWP) rates: Chorus reports its GHG emissions in tonnes of CO₂ equivalents (tCO₂e). As part of its reporting, activities contributing to all relevant seven Kyoto Protocol gases were considered: carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), sulphur hexafluoride (SF₆) and nitrogen trifluoride (NF₃) in compliance with the requirements set by the GHG emissions standards listed above.

²⁵ The MfE publishes an updated electricity emission factor each year, reflecting shifts in the mix of electricity generation (e.g. hydro, wind, geothermal, gas, coal), storage levels and demand conditions. As the majority of Chorus' scope 1 and 2 emissions are associated with electricity consumption and we calculate our scope 2 emissions using the average emissions from New Zealand's national grid, changes in the MfE electricity emission factor each year increase or decrease our emissions profile.

²⁶ Greenhouse Gas Protocol – A Corporate Accounting and Reporting Standard.

²⁷ GHG Protocol scope 2 Guidance: An amendment to the GHG Protocol Corporate Standard.

²⁸ Greenhouse Gas Protocol – Corporate Value Chain (Scope 3) Accounting and Reporting Standard.

²⁹ Greenhouse Gas Protocol – Technical Guidance for Calculating Scope 3 Emissions.

³⁰ GSM Association (GSMA), the Global Enabling Sustainability Initiative (GeSI) and the International Telecommunication Union (ITU-T) – Scope 3 Guidance for Telecommunication Operators.

³¹ Ministry for Environment – Measuring emissions: A guide for organisations.

Metrics & targets (continued)

All purchased and generated energy emissions are dual reported³² using both location based and market-based methods.

The sources of emissions factors and associated GWP rates for Chorus' emissions are:

- New Zealand Ministry for the Environment's 2026 Guidance for Voluntary Greenhouse Gas Reporting.
- Business, Energy & Industrial Strategy Formerly, Department for Environment, Food, and Rural Affairs (**Defra**) (UK) – Greenhouse gas reporting: conversion factors 2026.
- Thinkstep-anz – Greenhouse Gas Emissions for Commodities and Industries v3.0c March 2026.³³
- Bravetrace interim residual supply factor for Market based reporting, June 2026.³⁴

All reported greenhouse gas emissions are presented in gross tonnes of carbon dioxide equivalent (tCO₂-e) and have been calculated using IPCC AR5 global warming potential factors over a 100-year time horizon.³⁵

It is a requirement under ISO14064–1:2018 and the Greenhouse Gas Protocol to consider, assess and disclose the uncertainty associated with a Greenhouse Gas Inventory. The nature of GHG emissions inventory reporting means there will always be a level of uncertainty, especially within scope 3. To minimise this uncertainty, source data has been used where possible. Where uncertainty exists or source data is unavailable, a conservative estimation approach has been taken. Where emission factors are historical (i.e. Thinkstepanz – Greenhouse Gas Emissions for Commodities and Industries v3.0c March 2026), an adjustment for inflation has been applied. These estimation uncertainties have been disclosed in the table in **Appendix 4**, in alignment with the requirements of the standards (listed above).

Exclusions

NZ CS 1, 24(d)

Specific emission sources have been identified and excluded from Chorus' GHG emissions calculation in FY26. These sources are either not applicable to Chorus' operations or are relevant but are either not material in the context of the GHG inventory (less than 5% of overall emissions), not material to stakeholders, and/or not technically feasible or cost effective to be quantified at present.

TABLE 5: Exclusions

Scope / category	Greenhouse emission source or sink	Reason for exclusion	Est. size of exclusion tCO ₂ e	% of total inventory
Scope 3 / Category 1	Purchased goods and services	Our top 146 suppliers provided coverage for 96% of our corporate spend in FY26. The remaining 4% of spend consists of a high volume of low value suppliers. Noting the extensive work that would be required to estimate emissions for these suppliers, and their low business impact given their individual dollar value, we have assessed these as immaterial.	2,016	4.5%
Scope 3 / Category 2	Capital goods			
Scope 3 / Category 4	Upstream transportation and distribution	We have done a spend based estimate testing and the potential additional freight has been assessed as immaterial.	80	0.18%
Scope 3 / Category 9	Downstream transportation and distribution			
Scope 3 / Category 8	Upstream leased assets	Chorus does lease some assets, but these emissions are accounted for within our scope 1 and 2 respectively.	n/a	n/a
Scope 3 / Category 10	Processing of sold products	This Category includes the further processing of intermediate products (e.g. material, component) sold to downstream companies and is normally not considered relevant to telecommunication operators.	n/a	n/a
Scope 3 / Category 12	End of life treatment of sold products	Inclusion of end-of-life treatment of sold goods is particularly challenging because of lack of access to accurate data, the need for assumptions about end-of-life preferences of customers, low accuracy of supplier emission factors (EFs) and limited availability of country specific data.	n/a	n/a
Scope 3 / Category 14	Franchises	Chorus does not have any franchises.	n/a	n/a
Scope 3 / Category 15	Investments	Chorus does not have any relevant investments.	n/a	n/a

³² Dual reporting illustrates the role of supplier choice, onsite renewable energy generation and contractual instruments in managing indirect emissions from energy alongside any ongoing energy efficiency and reduction efforts.

³³ Thinkstep-anz – Greenhouse Gas Emissions for Commodities and Industries v3.0c March 2026.

³⁴ Bravetrace, Residual Supply Mix factor publication, June 2026.

Metrics & targets (continued)

Emissions intensity

NZ CS 1, 22(b)

Chorus monitors emissions intensity against the amount of data transmitted across its network in petabytes (PB). As the amount of data transmitted on its network steadily increases as more people and devices connect, its emissions intensity decreases. While this is not a formal target, Chorus aims to achieve and maintain an emissions intensity of under 1 (tCO₂e/PB). Chorus calculates the emission sources in the intensity calculation using scope 1 & 2 emissions only. Chorus chose a per petabyte measure as this measure is the most relevant to its business. Additionally, Chorus reports on scope 1, 2 & 3 per million dollars of revenue as it is the most relevant intensity measure when covering all emissions scopes.

TABLE 6: Scope 1 & 2 GHG Emissions intensity (tCO₂e / PB)

Financial year	Data traffic (PB)	Scope 1 and 2 (tCO ₂ e)	Emissions intensity (tCO ₂ e/PB)
FY24	7,974	6,387	0.80
FY25	8,741	7,877	0.90
FY26	9,601	5,998	0.62

TABLE 7: Scope 1, 2 and 3 GHG emissions intensity per million-dollar revenue (tCO₂e/M\$)

Financial year	Million-dollar revenue (M\$)	Scope 1, 2 and 3 (tCO ₂ e)	Emissions intensity (tCO ₂ e/M\$)
FY24	1,010	52,326	52
FY25	1,014	50,126	49
FY26	1,029	44,857	44

Trends analysis

The amount of data traffic has increased in each of the past three financial years. Emissions intensity has continued to trend downwards from FY24 to FY26 because, as the amount of data transmitted on the Chorus network steadily increases (i.e. as more people and devices connect), our emissions intensity decreases.³⁵

OTHER METRICS

Transition risks

NZ CS 1, 22(c)

Chorus conservatively estimates that all (100%) of our business activities are vulnerable to climate-related transition risks to some degree (FY25: 100%; FY24: 100%). These include risks related to the transition to a low-emissions, climate-resilient global and domestic economy arising from policy, legal, technology, market, and reputation changes.

By way of example, as a regulated entity, Chorus is subject to price-quality regulation and a revenue cap set by the Commerce Commission. The expenditure allowances set by the Commerce Commission for asset management practices, resilience, and adaptation planning need to be sufficient for Chorus to deliver climate resilience initiatives. Chorus continues to manage exposure to this risk by monitoring regulatory change and advocating for appropriate regulatory outcomes. The mitigation measures we apply to other identified transition risks are set out in Table 1 above.

In FY26, we workshopped the extent of our exposure to transition risks and concluded that a conservative estimate of 100% vulnerability remains prudent at this time, noting the high levels of uncertainty in this area. As our understanding of transition risks continues to mature, Chorus intends to further refine its methodology, improving our asset vulnerability assessments, financial impact analysis and climate risk quantification to strengthen our assessment of transition risks over time.

Trends analysis

Consistent with its FY25 and FY24 climate statements, Chorus estimates that all (100%) of its business activities remain vulnerable to climate-related transition risks.

³⁵ Chorus monitors emissions intensity against the amount of data transmitted across its network in petabytes (PB).

Metrics & targets (continued)

Physical risks

NZ CS 1, 22(d)

In FY26, we engaged Aon to update its assessment of Chorus' fibre assets exposure to physical climate hazards, based on updated scenarios³⁶ and data mapping. This also included expanding the scope of hazards to capture wind, temperature and landslide.

We consider that asset exposure remains the best proxy measure for assessing Chorus' climate vulnerability to physical risk at this time, which was the focus of Aon's assessment.³⁷ Chorus integrated Aon's 2023 site-level exposure mapping data (primarily flood hazard information) into its site investment categorisation to ensure that physical climate risk exposure is considered when assessing site condition, prioritising investment decisions, and planning future works. We intend to use Aon's latest exposure assessment of fibre assets to further inform our internal modelling over time.

Aon's results indicate:

- exposure is concentrated in a relatively small number of regions and hazards
- fluvial flooding (rivers and streams breaking their banks and flooding adjacent low-lying areas) continues to be the dominant driver of exposure (as was the case in FY24 and FY25), with coastal flooding representing a secondary contributor, and
- other hazards, including pluvial flooding (surface water flooding caused by intense rainfall exceeding local drainage capacity) and landslide, are more localised in nature and contribute less at a portfolio level.

Exposure also varies across asset types:

- exchanges and fibre infrastructure exhibited the highest levels of exposure. While 24% of exchanges (FY25: 23%; FY24: 23%) would potentially face exposure from fluvial flooding under the two global emissions scenarios used by Aon, only 4% have high to very high exposure (FY25: 11%; FY24: 11%). Similarly, 20% of our underground fibre (FY25: 18%; FY24: 18%) faced some exposure from fluvial flooding under the two global emissions scenarios, but only 4% has high to very high exposure.³⁸ Our fibre infrastructure has higher exposure because the network extends across New Zealand and intersects with multiple hazard zones, particularly along transport corridors and river crossings.

Trends analysis

Aon's FY26 updated assessment of Chorus' fibre assets exposure to physical climate hazards has not resulted in any material increase in exposure compared to Aon's previous assessment in 2023 (which formed the basis for our physical risk exposure in FY24 and FY25). Differences are due primarily to updated hazard datasets, revised exposure classifications and methodological changes between the assessments. While additional hazards were included in the FY26 assessment (landslips, wind and temperature), the analysis also supported our existing internal view of network exposure from direct climate hazards. The FY26 assessment also focused on Chorus' fibre network, whereas the 2023 assessment considered a broader network asset base that included copper-related infrastructure.

Climate-related opportunities

NZ CS 1, 22(e)

For FY26, we have taken a different approach to our opportunities reporting, choosing to report on our wider Energy Efficiency Programme (under the 'network efficiency and operational decarbonisation' heading) as a climate-related opportunity.

Chorus progressed the following climate-related opportunities in FY26 under the Energy Efficiency Programme:

- Increase the temperature set point required in exchanges before active cooling is triggered. In FY26, 44 (approximately 10%) of the identified sites were converted, with work due to continue in FY27.
- Solar trial - following a feasibility study in FY24, Chorus installed roof mounted solar on six trial sites in FY25, covering approximately 1% of suitable exchange sites. In FY26, we paused installation on further sites (existing coverage remains at 1%) to evaluate findings from the first stage of the trial. The trial is also paused while we assess related workstreams that may impact selection and feasibility of future solar sites, including property optimisation, resilience planning and alternative energy storage projects.
- Continued retirement of the copper network. At 30 June FY26, 44,000 copper connections remain out of 1,191,000 total fibre and copper connections (a reduction of 48,000 copper lines in FY26).

While retirement of the copper network was noted as a climate-related opportunity in Chorus' FY24 climate statements, we did not recognise it as a material climate-related opportunity in FY25, so did not provide comparative information. Information is provided for copper retirement in FY26 as one of the initiatives that sits within the Energy Efficiency Programme.

Trends analysis

Chorus continues to review opportunities as they arise – in FY26, we paused further roof mounted solar installations while we assess findings from the first stage of the trial and consider how related workstreams may impact selection and feasibility of future solar sites, including property optimisation, resilience planning and alternative energy storage projects. Our Energy Efficiency Programme continues to provide energy reduction opportunities.

Other opportunities have been reviewed but none are considered material in FY26.

³⁶ Aon's assessment scenarios were aligned with the IPCC Sixth Assessment Report (AR6) and NIWA downscaled CMIP6 datasets across present-day, mid-century (2040), and late-century (2090) conditions under SSP2-4.5 and SSP3-7.0 scenarios. These SSP2-4.5 and SSP3-7.0 scenarios are aligned with those used for the Telecommunications Sector Scenario analysis referred to on pages 10-11.

³⁷ Aon's assessment did not consider the extent of Chorus' existing mitigations and adaptive capacity of our assets.

³⁸ The 2023 Aon report did not record any high to very high exposure metrics for fluvial flooding for underground fibre routes.

Metrics & targets (continued)

Capital deployment

NZ CS 1, 22(f)

FY26 climate-related capital and operating expenditure was ~\$3 million (FY25: <\$1 million; FY24 ~\$4.2 million). This includes expenditure related to capital and operational cost in response to several extreme weather events during FY26 and continued capital expenditure for projects relating to Cyclone Gabrielle (approximately \$1.3 million in FY26, bringing total investment across FY24–FY26 to approximately \$8.4 million). This highlights that the financial impacts of significant climate events can extend across multiple reporting periods, particularly for infrastructure-intensive networks where restoration and resilience works are staged over time.

The Cyclone Gabrielle recovery also underscored Chorus' dependence on other critical infrastructure providers—including power and transport networks—for timely restoration, reinforcing findings from New Zealand's National Climate Change Risk Assessment that effective climate resilience requires coordinated, cross-sector collaboration.³⁹

Consistent with FY25, capital expenditure in FY26 did not meet Chorus' quantitative financial materiality threshold, with Chorus not experiencing any material impacts from climate change during FY26.

Trends analysis

Climate-related expenditure in FY26 increased compared to FY25 as a result of numerous weather events during the year and ongoing capital expenditure for work relating to Cyclone Gabrielle. The bulk of our climate-related expenditure was in FY24 and was Cyclone Gabrielle related.

While the majority of our climate related capital deployment was spent responding to weather events, we also deployed expenditure on network efficiency and investigating renewables opportunities.

Internal Emissions Price (IEP)

NZ CS 1, 22(g)

Chorus adopted an IEP in FY25 which remains the same in FY26 (no IEP was in place for FY24). This is an interim shadow carbon price of \$140/tCO₂e, informed by the Climate Change Commission's 2021 guidance which we are using while we test how best to integrate the IEP across the business. Through the IEP, we aim to incorporate the cost of carbon into appropriate business decision-making and support alignment with our emissions reduction targets. The IEP is intended to enhance visibility of any emissions impacts a project may have, enabling these to be considered alongside financial metrics.

In FY25, Chorus also established an Emissions Committee to govern development of the framework.

The IEP was piloted across selected projects over FY25–FY26 to test integration into business cases, assess impacts on project evaluation, and build organisational capability.

³⁹ New Zealand's National Climate Change Risk Assessment 2026.

At this stage, the IEP operates as a supplementary analytical tool for our existing financial decision frameworks. Chorus intends to progressively expand testing and application of the IEP to appropriate procurement and operational decision-making over time, supporting consideration of low-emissions options and incorporation of emissions costs into total cost assessments.

Ongoing oversight by the Emissions Committee is intended to include periodic review of the carbon price (we intend to review the interim shadow price in FY27) to ensure alignment with industry and market developments, regulatory expectations and Chorus' climate objectives.

Our IEP therefore remains under development, with future priorities focused on considering the extent of integration with financial modelling processes, and improving data consistency.

Trends analysis

There has been no change in our IEP of \$140/tCO₂e from FY25 to FY26 (no IEP was in place for FY24). The IEP currently operates as a supplementary analytical tool for our existing financial decision frameworks.

Remuneration

NZ CS 1, 22(h)

All Chorus Executives have a strategy execution (company scorecard) KPI linked to their short-term incentives (consistent with FY24 and FY25), which includes components relating to implementation of Chorus' sustainability strategy and achieving progress towards Chorus' sustainability targets set out in Table 2 (such as reducing emissions and with a key FY26 focus on electricity consumption).

The Executive General Manager – Frontier, as the executive responsible for Chorus' sustainability programme, has the execution of that programme (including climate-related risks and opportunities) taken into account as part of their annual performance and remuneration review.

Trends analysis

While there has been no change in the underlying short term incentive framework from FY24 to FY26, the performance goals are set and reviewed each year by the Chorus Board. There has been an emissions reduction component over each of the three years, reflecting Chorus' commitment to achieving its emissions targets.

Other industry-based metrics

NZ CS 1, 21(b)-(c)

Chorus does not use any other industry-based metrics used to measure and manage climate-related risks and opportunities.

Governance

GOVERNANCE BODY OVERSIGHT

Identity of governance body

NZ CS 1, 7(a)

The Chorus Board oversees Chorus' strategy, risk management and governance frameworks, with primary oversight of our climate response, including climate-related risks and opportunities, provided by the ARMC. There were no material changes to these climate-related governance arrangements in FY26.

The Board's Charter includes the following responsibilities relevant to our climate programme:⁴⁰

- establishing Chorus' governance-level strategic direction
- approving Chorus' risk strategy and setting its risk appetite
- monitoring Chorus' financial performance and overseeing Chorus' achievement of its strategic objectives
- monitoring compliance with regulatory and other external requirements.

Specifically in relation to governance and sustainability matters, the Board is responsible for:

- adopting and monitoring the effectiveness of Chorus' governance policies and practices, including satisfying itself that an appropriate framework exists for information to be reported by Management to the Board
- approving Chorus' sustainability strategy
- overseeing the social, ethical, and environmental impact of Chorus' activities.

The Board's delegation of certain functions to Board Committees is set out in Committee Charters. The ARMC is responsible for overseeing Chorus' climate-related risks and opportunities, and also oversees and monitors progress regarding implementation of Chorus' sustainability strategy and preparation of our climate disclosures. The ARMC's work underpins the Board's strategic oversight of Chorus' sustainability performance.

⁴⁰ [Chorus Board Charter](#) (as at April 2026).

Governance (continued)

Climate governance structure chart FY26

NZ CS 1, 9(b)

ORGANISATION CHART AND INFORMATION FLOW	REGULARLY (MONTHLY TO QUARTERLY)	ANNUALLY / BIANNUALLY	AS REQUIRED
<pre> graph TD Board[CHORUS BOARD OF DIRECTORS] --> ARMC[AUDIT AND RISK MANAGEMENT COMMITTEE (ARMC)] Board --> Exec[CHORUS EXECUTIVE TEAM] Board --> HCS[HEAD OF CORPORATE AFFAIRS & SUSTAINABILITY] ARMC --> Exec Exec --> HCS Exec --> ST[STABILITY TEAM / ASSET MANAGERS KEY INTERNAL STAKEHOLDERS] HCS --> ST ST --> All[ALL CHORUS PEOPLE] </pre> CHORUS BOARD OF DIRECTORS Approves Business Strategy and Sustainability Strategy AUDIT AND RISK MANAGEMENT COMMITTEE (ARMC) Oversees the implementation of Chorus' Sustainability Strategy CHORUS EXECUTIVE TEAM Endorses Sustainability Strategy Proposes new sustainability targets & programmes of work. Reviews climate risks and opportunities to present to ARMC annually Proposes Business Strategy HEAD OF CORPORATE AFFAIRS & SUSTAINABILITY Monitors and reports progress on risks and opportunities, targets and metrics annually Designs and implements Sustainability Strategy / identifies material focus areas to guide business activity and internal resource allocation STABILITY TEAM / ASSET MANAGERS KEY INTERNAL STAKEHOLDERS Climate assessments underway for climate mitigation and adaptation Monitors and reports on progress on strategy, risks and opportunities and disclosure compliance Provide sustainability guidance and engagement ALL CHORUS PEOPLE	- As part of its broader leadership and oversight role, oversees the social, ethical and environmental impact of Chorus' activities. - Oversees and monitors progress in the implementation of Chorus' Sustainability Strategy and compliance with the CRD regime. - Provides sustainability leadership within Chorus. - Designs and implements the Sustainability Strategy. - Work across Chorus to improve sustainability performance and integrate sustainability initiatives into the business. - Develop and communicate quarterly emission reduction dashboards to senior leaders (executive members and their direct reports). - Provide input into sustainability programmes and activities to help us progress towards our targets. - Aware of Sustainability Strategy, support execution of sustainability priorities and consider sustainability impacts in decision making, where applicable.	- Reviews sustainability progress (including targets) annually. - Reviews climate-related risks and opportunities (annually). - Reviews Chorus' climate-related disclosures compliance and recommends climate statement for approval by Board (annually). - Monitors progress against the Sustainability Strategy (bi-annually). - Reviews any new sustainability targets proposed by the Head of Sustainability (annually). - Reviews climate related risks and opportunities. - Receives a general sustainability progress report (bi-annually). - Reports on sustainability progress to Executive, ARMC and Board (bi-annually). - Review the climate-related risks and opportunities register (annually). - Assess climate mitigation and adaptation risks and mitigations and incorporate into asset management plans and financial planning as appropriate.	- Sets the business strategy. - Proposes the business strategy for Board endorsement. - Reviews any new sustainability targets proposed by the Head of Sustainability. - CEO reviews Sustainability Policy. - Proposes Sustainability Strategy, targets, goals and programmes of work to CEO and executive team. - Communicates Sustainability Strategy and progress with key stakeholders. - Reviews Sustainability Policy. - Inputs into the Chorus sustainability strategy and targets as required.

Governance (continued)

Climate reporting processes and frequency – governance body

NZ CS 1, 8(a)

Chorus' dedicated climate-related risks and opportunities register is reviewed annually. This is facilitated by the Corporate Affairs & Sustainability Team.⁴¹ It is then reviewed by Chorus management, and endorsed by the ARMC.

The ARMC meets four times a year (including in FY26), with all directors invited to attend. It received climate-related disclosure updates at each meeting in FY26. The Board receives a report back from the ARMC (containing any recommendations by the ARMC to the Board) at each subsequent Board meeting.

A broader sustainability update (that is not specific to climate-related matters and includes strategy, environmental and social/digital equity initiatives and progress updates) is provided at least annually to the Board by the Head of Corporate Affairs & Sustainability. One such update was provided in FY26. The ARMC also approved the process for the preparation of Chorus' climate statements again in FY26, supported by advice from external advisers, and reviewed and approved Chorus' FY26 climate statements.

Skills and competencies

NZ CS 1, 8(b)

Chorus uses a skills matrix to ensure directors have an appropriate range of skills and competencies. Directors build sustainability and climate expertise through ongoing education, training from external experts, and engagement with the Corporate Affairs & Sustainability Team. This complements directors' broader skills and competencies maintained across related disciplines such as governance, regulation, and infrastructure.

In FY26, directors participated in two climate-related briefings by an external provider, focussing on nature-related impacts and disclosures and developments in climate-related disclosures respectively.

Sustainability and climate governance expertise is also a consideration when recruiting new Chorus directors.

Consideration of climate-related risks and opportunities in Chorus strategy

NZ CS 1, 8(c)

The Board is ultimately responsible for Chorus' strategic direction and performance. This includes establishing Chorus' governance-level strategic direction. As noted above, the Board also approves Chorus' sustainability strategy and is responsible for overseeing the social, ethical and environmental impact of Chorus activities.

The ARMC is specifically responsible for monitoring progress in the implementation of Chorus' climate strategy (meaning the climate aspects of our sustainability strategy), including oversight of climate-related risks and opportunities.

These responsibilities are reflected in the Board and ARMC Charters that applied in FY26.

In FY26, climate-related considerations (including climate-related risks and opportunities) sat under the 'Thriving Environment' element of Chorus' sustainability strategy.

Strategic focus areas underpinning this are described in the strategy section above. These are anchored in our corporate purpose.

Chorus' sustainability strategy was updated in FY26, led by the Head of Corporate Affairs & Sustainability, with the evolved strategic focus areas endorsed by Management and approved by Board.

Implementation of workstreams under the sustainability strategy is primarily overseen by the ARMC, with additional sustainability updates to Board. This includes reporting progress against the sustainability strategy and associated targets.

Setting and overseeing climate targets and metrics

NZ CS 1, 8(d)

Targets

Under Chorus' Sustainability Policy, the Board and/or ARMC:

- provide oversight of Chorus' sustainability direction, including strategy, climate-related risks and opportunities and external disclosures, and
- review, consider and provide feedback on Chorus' sustainability reporting including the endorsement of any new sustainability targets or strategy.

The Corporate Affairs & Sustainability Team are responsible for developing and recommending sustainability targets, in consultation with the wider business and in alignment with corporate strategy. New targets must be agreed by Management, before being provided for director endorsement.

The climate targets noted in the Metrics & Targets section above were put in place prior to these governance requirements, and were designed by Chorus' then Head of Sustainability, approved by Management and noted by the Board.

Progress against targets

Similarly, in relation to Chorus' progress against climate targets, this is monitored by the Corporate Affairs & Sustainability Team who also provide advice to the wider business on sustainability performance. Progress updates are provided as part of standing Management and Board/ARMC engagements.

Remuneration policies

All Chorus Executives have a sustainability strategy execution component for their short-term incentives (consistent with FY24 and FY25). The key metrics for FY26 include achieving progress towards Chorus' sustainability targets set out in Table 2 (such as reducing emissions), with the key FY26 focus being on electricity consumption. The Executive General Manager – Frontier, as the executive responsible for Chorus' sustainability programme has the execution of that programme (including climate-related risks and opportunities) taken into account as part of their annual performance and remuneration review.

The Board oversees achievement of such metrics and targets through reports from the ARMC, sustainability updates, and the annual performance review process for the CEO. The CEO's performance is reviewed by the People, Performance and Culture Committee each year, which makes recommendations to the Board in respect of key performance objectives.

⁴⁰ These teams were merged in FY26.

Governance (continued)

MANAGEMENT'S ROLE

Management's role in relation to climate risks and opportunities

The Board delegates management responsibility for Chorus' risks to the CEO and Executive Team.

Executives and their respective teams are given appropriate guidelines for the day-to-day management of risk, including climate risk where applicable, through Chorus' Managing Risk Policy and Sustainability Policy. Further details of Chorus' climate risk management framework are set out in section 5 below.

Under the Managing Risk Policy, the CEO is responsible for promoting a proactive risk management culture aligned to the Board's risk appetite, reviewing and reporting any changes to principal risks to the ARMC, and monitoring action plans to mitigate material risks. The CEO and Executive Leadership Team are responsible for providing leadership on risk management including by owning relevant principal, business units and emerging risks, establishing clear responsibilities for the management of risks, and ensuring appropriate mitigations are in place and effect.

Under the Sustainability Policy, Executive Leadership (in particular the Executive General Manager – Frontier) is responsible for providing sustainability leadership within Chorus by integrating sustainability considerations, including climate risks and opportunities, across strategic planning, day-to-day operations, cultural initiatives, and external relationships.

Delegation of climate responsibilities

NZ CS 1, 9(a)

Chorus' Corporate Affairs & Sustainability Team coordinates development and implementation of the sustainability strategy, including climate targets and key programmes of work, as well as reporting to the Executive, ARMC and Board on sustainability progress.

This team works across Chorus within a cross-functional 'sustainability network' that aims to improve sustainability performance and integrate sustainability considerations into day-to-day business planning and strategy, risk management, processes, and culture.

The Head of Corporate Affairs & Sustainability reports to the Executive General Manager – Frontier.

The Assistant General Counsel for Regulation, Risk & Compliance (**RR&C**) is responsible for enterprise-wide risk assessment and management, including the incorporation of risks into Chorus' risk register and reporting to the CEO, Executive, ARMC and Board. The Assistant General Counsel RR&C reports to the General Counsel. Risks are assigned to relevant members of the Executive responsible for their management and mitigation. For example, the Chief Technology Officer is responsible for technological and operational risks related to Chorus' nationwide physical network. The CEO and Executive hold collective responsibility for considering how risks and events may interrelate across categories, and for managing Chorus' overall risk profile. Mitigation measures include planning for network deployment and protection, as well as ongoing maintenance and fault management.

In addition, the Corporate Affairs & Sustainability Team and Executive responsible for sustainability (Executive General Manager – Frontier) share specific climate-related risks and opportunities with the ARMC annually, and broader sustainability updates are provided to the ARMC and/or the Board at least annually.

Climate reporting processes and frequency – management

NZ CS 1, 9 (c)

Chorus' Executive Team reviews the management of climate-related risks and opportunities assigned to their areas of the business annually, as well as ensuring key decisions take risk factors into account and are consistent with the Board's risk appetite.

Climate-related risks and opportunities were reviewed by the full Executive in FY26 and endorsed by the ARMC.

The Corporate Affairs & Sustainability Team, including the responsible Executive, updates wider Executive during the year on progress against sustainability targets and discusses new strategy initiatives ahead of those being presented to the ARMC.

During FY26, three updates were provided to Executives covering our emission reduction plan modelling, climate risks and opportunities and on the updated Corporate Affairs & Sustainability Strategy. Emissions reduction dashboards are also included in the quarterly financial report presented to Executives. Sustainability and climate considerations are also embedded into different operational workstreams at Chorus, such as our Go to Market process and EPMO, as noted in the 'Climate as an input to capital deployment' section above.

Risk management

Chorus' risk management frameworks allow us to proactively manage risk. We define 'risk' as anything that could impact on Chorus' ability to achieve its goals. The climate risk and opportunity framework that applied in FY26 (described below) is aligned and integrated into Chorus' enterprise-wide risk framework.

Our Managing Risk Policy sets out Chorus' enterprise-wide risk management framework, including the processes we apply to risk identification, reporting, mitigation and ownership allocation.

The Board is ultimately responsible for risk management governance. Its responsibilities include:

- approving the Risk Management Policy and supporting frameworks to promote a proactive risk management culture, setting Chorus' risk appetite and reviewing Chorus' principal and emerging risks annually
- through the ARMC, providing oversight and monitoring, including through receipt of regular reporting from the Executive on principal risks (in FY26, the ARMC received quarterly risk reporting), and
- annual review of the risk appetite and tolerance statements and principal and emerging risks.

Responsibility for day-to-day risk management is delegated to the CEO and relevant Executives.

Our enterprise framework is described in the following section. This is supplemented by dedicated risk registers maintained by specific business units, including for climate. These dedicated risk registers are compiled using consistent risk processes and principles, and integrated into our broader framework.

Chorus enterprise-level risk management process

NZ CS 1, 17 and 18

Enterprise risk management is the process we apply to identify potential elements that may impact Chorus' ability to achieve its strategic objectives, and ensure risks are managed within the relevant risk appetites set by the Board.

The diagram opposite depicts the enterprise-wide risk management framework that applied in FY26.

This framework supports Chorus' Managing Risk Policy and is approved by the Board and updated periodically. There were no material updates in FY26.

Chorus' overall risk approach is shaped around four interlinking risk elements: Principal Risks, Business Unit Risks, Emerging Risks and Unforeseen Risks. Principal Risks are reviewed annually by the Executive team and endorsed by the Board.

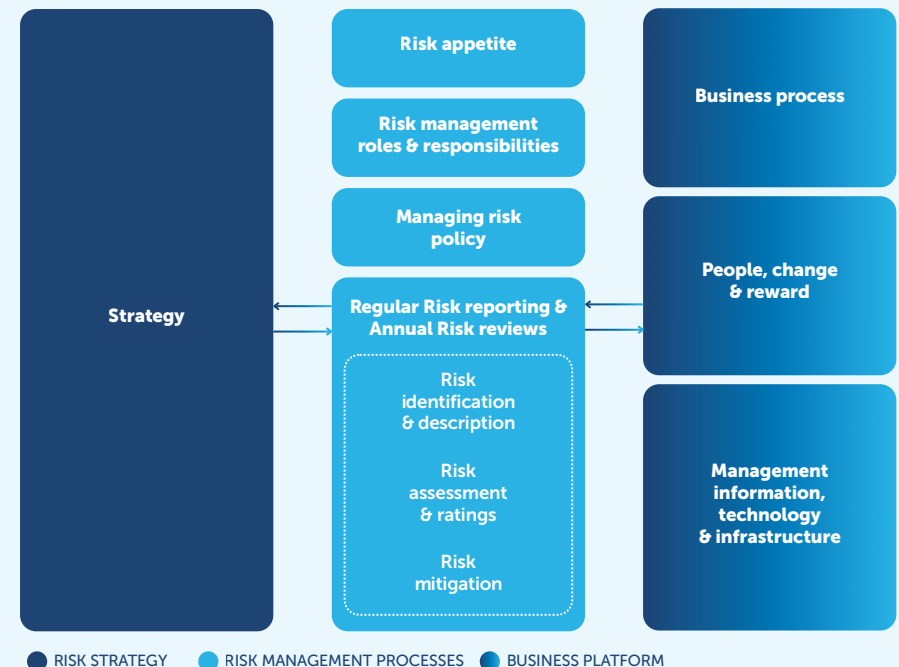
Within this framework, potential impacts associated with climate change were identified as both 'Principal risk' and 'Emerging risk' in FY26:

- **Principal Risks** – Risks to service availability and network assets in light of increasing weather, climate events and other outages, including potential stakeholder and regulatory implications, were identified as a Principal Risk area.
- **Emerging Risks** – Climate and nature driven risks were identified as an Emerging Risk area, defined as potential longer-term impacts on Chorus and broader infrastructure, assets and operations including increased pressure around emissions targets.

The Board's current risk appetite statement also provides that Chorus will ensure climate mitigation and adaptation is part of how it achieves its strategic objectives.

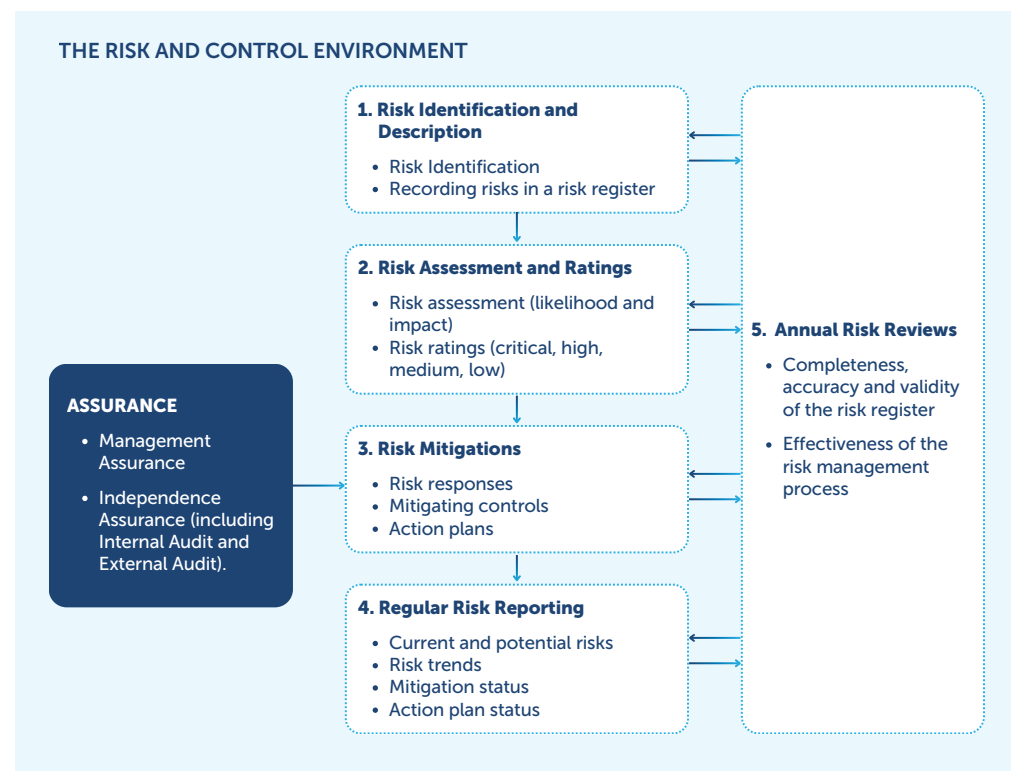
Specific climate risks and opportunities have also been managed under a dedicated climate risk management framework since 2023. This framework is aligned to, and consistent with, Chorus' broader risk management framework, and uses similar processes to identify, assess, prioritise, and manage climate risks which are tracked in a dedicated register. It is through this process and risk register reporting that Chorus identifies its material risks for disclosure purposes, as set out in the above section.

THE ENTERPRISE RISK MANAGEMENT STRATEGIC PROCESS



Risk management (continued)

The diagram below depicts the key elements of Chorus' risk management processes, which are applied in the climate context. This follows the principles of ISO-31000 – Risk management across each core process.



Climate risk and opportunities – identification, assessment, prioritisation, and management

NZ CS 1, 18 and 19

Chorus' core processes for identifying, assessing, prioritising, and managing climate risk and opportunities remained consistent with FY24 and FY25.

For simplicity, key aspects are set out in the table below:

CHORUS' APPROACH TO CLIMATE RISK	
1. Identify	• Chorus' climate-related risks and opportunities register operates within our enterprise-wide risk management framework. • Key elements identified are the risk trigger, risk type (physical, transitional or both), risk category, time horizon, likelihood and impact, and responsibility. • Annual reviews consider whether new/existing key risks remain appropriate having regard to any recent events, reports, and stakeholder feedback. • Climate risks can also be identified through additional channels, including workshops, third party assessments, stakeholder feedback, involvement in sector-wide analysis, and 1-to-1 conversations.
2. Assess	• Mitigating controls for risks are evaluated and actions assigned. • Consistent with Chorus' enterprise-wide framework, climate risk is assessed based on a combination of the impact and likelihood of an event occurring, resulting in a risk rating of 'critical', 'high', 'medium' or 'low'. Chorus' methodology utilises both financial and nonfinancial measures to allow for consistency in assessment across all risk types, including climate risks. • Outside of the annual review, updates to mitigating controls take place as needed. In FY26, this was led by the Environmental Lead for Governance and Compliance.
3. Prioritise	• The assignment of ratings to key risk areas inherently involves prioritisation, and reflects Chorus' hierarchy of 'principal risks', 'business unit risks', 'emerging risks' and 'unforeseen risks'. • Within the climate risk register individual risks are similarly afforded a 'critical', 'high', 'medium' or 'low' rating. Risks are assigned to a risk owner for management, and risk mitigation initiatives are identified. • Management and mitigation initiatives are prioritised to reflect, among other things, those which have the most significant potential impact, any cost/benefit analysis undertaken, Executive preference and resource availability.
4. Manage	• Business owners are assigned to each climate risk, including annual reviews. • The overall purpose of risk reporting is to enable effective and ongoing assessments of whether current risk positions are acceptable. This includes considering the acceptability of inflight/proposed actions and timelines and whether additional actions, budget and/or resources are required to mitigate the risk. • The ARMC receives quarterly reporting outlining how principal risks are being managed to assist in the achievement of strategy, risk drivers and areas for potential discussion.

Risk management (continued)

Time horizons

NZ CS 1, 19(b)

Chorus' climate risk horizons (applied from 2025) are based on short, medium, and long-term timeframes, as outlined below:

- **Short term (5 years: 2030)** – Aligns to telecommunications emissions reduction targets and Chorus' regulatory periods.
- **Medium term (15 years: 2040)** – Aligns with Chorus' 10-year strategic planning horizon, along with average life of electronic network equipment.
- **Long term (30+ years: 2055+)** – Aligns with potential materialisation of physical risks, particularly infrastructure impacts and New Zealand's 2050 net zero ambition.

These time horizons also align to the telecommunications sector scenario analysis. Under our corporate strategy, Chorus' strategic horizons include FY26-FY30 (Growth, Simplicity & Efficiency) and FY30-FY35 (All Fibre Business), which are a focus when looking at climate related opportunities.

Value chain exclusions

NZ CS 1, 19(c)

Chorus does not specifically exclude any parts of the value chain from our climate risk processes.

Appendix 1 – Information limitations

As noted above, this report contains climate statements that are based on data, methodologies, assessments and judgements which are by their nature subject to significant uncertainty, limitations and assumptions and which may change. While Chorus has sought to provide accurate information in respect of the reporting period ended 30 June 2026 and is committed to progressing our response to climate-related risks and opportunities over time, information in this report may be less certain than other aspects of our annual reporting.

Climate-related data and other inputs used (including from third parties and our supply chain) by their nature may be inconsistent, unreliable or unavailable, and in certain cases, we have had to rely on certain assumptions, estimates or proxies. Descriptions of the qualitative and quantitative current and anticipated impacts and financial impacts of climate change draw on and/or represent estimated figures only. Similarly, climate modelling and scenarios are emerging methodologies that rely on assumptions and judgements and may not reliably predict future events.

Forward-looking statements

This report also contains forward-looking statements and opinions, including in relation to climate scenarios, impacts, targets and goals, forecasts and projections, as well as Chorus' business plans and operations, future operating environment, and market conditions. These may not eventuate as predicted. The risks and opportunities described may not eventuate or may be more or less significant than anticipated. There are many factors that could cause Chorus' actual results, performance, or achievement of climate metrics (including targets) to differ materially from that described, including economic and technological viability, as well as climatic, government, consumer, and market factors outside of Chorus' control.

Such statements and opinions are necessarily subject to significant risk, uncertainty, and assumptions. We have based our statements and opinions on reasonable information known to us at the time of publication, but these may change including for reasons beyond Chorus' control. We reserve the right to update such statements in future, as the quality and completeness of inputs and information improves, and our organisational strategy evolves.

General

This note should be read with the specific limitations, dependencies, uncertainties set out above, in particular the discussion of climate scenarios, targets, anticipated impacts and transition planning.

Chorus gives no representation, guarantee, warranty or assurance that actual outcomes or performance will occur in line with forward-looking statements and accepts no liability for any loss arising from use of any information contained in this report. To the maximum extent permitted by law, Chorus shall not be liable for any loss or damage arising in any way from or in connection with any information provided or omitted as part of these Climate-Related Disclosures.

This report is not an offer document and does not constitute an offer or invitation or investment recommendation to distribute or purchase securities, shares, or other interests. Nothing in this report should be interpreted as capital growth, earnings or any other legal, financial, tax or other advice or guidance. For detailed information on our financial performance, please refer to our Annual Report.

Appendix 2 – Compliance table

The table below contains a summary of where key disclosures can be found in this report.

NZCS REQUIREMENT	LOCATION
Governance	
Identity of governance body responsible for oversight of climate-related risks and opportunities – para 7(a)	Page 24
Governance body oversight – para 8(a), (b), (c) and (d)	Page 26
Management's role – para 9(a), (b) and (c)	Pages 25, 27
Strategy	
Current physical and transition impacts – para 12(a)	Page 13-15
Current financial impacts – para 12(b) and (c)	Page 13
Scenario analysis undertaken – para 13	Pages 10-12
Climate-related risks and opportunities – para 14(a), (b) and (c)	Pages 13-16
Anticipated impacts – para 15(a)	Page 13 (Table 1)
Anticipated financial impacts – para 15(b), (c) and (d)	Adoption relief taken for FY26 per NZ CS 2
Transition planning: current business model and strategy – para 16(a)	Pages 5-6
Transition planning: transition plan aspects of strategy – para 16(b)	Pages 7-8
Transition planning: alignment with capital deployment – para 16(c)	10
Risk Management	
Processes for identifying, assessing, and managing climate-related risks – para 18(a), and para 19 (a), (b), (c), (d) and (e)	Pages 28-30
Integration into overall risk management processes – para 18(b)	Pages 28-29
Metrics and Targets	
GHG emissions, emissions intensity and additional information – para 22(a) and (b), and para 24 (a), (b) and (c)	Page 18-21
Transition risks – para 22(c)	Page 21
Physical risks – para 22(d)	Page 22
Climate opportunities – para 22(e)	Page 22
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Internal emissions price – para 22(g)	Page 23
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Comparatives and trends for metrics – para 40 to 42 of NZ CS 3	Pages 19-23
Assurance of GHG emissions	
GHG emissions subject to assurance engagement – para 25 to 26	Appendix 5

Appendix 3 – Glossary of terms

Key terms are as defined in NZ CS 1, unless otherwise indicated with an asterisk (*) below:

Absolute target	A target defined by a change in absolute GHG emissions over time. For example, reducing scope 1 GHG emissions by 50% by 2030 from a 2019 base year.
Base year	A historic datum (a specific year or an average over multiple years) against which a company's emissions are tracked over time.
Board*	Chorus Limited's Board of Directors.
Cabinets*	A cabinet is an enclosed structure containing telecommunications equipment, used for copper and/or fibre services. Chorus cabinets are often small roadside non-building structures but can vary.
CO₂e	Carbon dioxide equivalent. The universal unit of measurement to indicate the global warming potential of each of the seven GHGs, expressed in terms of the global warming potential of one unit of carbon dioxide for 100 years. It is used to evaluate releasing (or avoiding releasing) any GHGs against a common basis.
Electricity – location based reporting	The location-based method uses an emission factor calculated from all electricity delivered to the grid in a year or quarter (in New Zealand this is published by MfE).
Electricity – market based reporting	Scope 2 market based emissions reflect the generation fuel mix from which the reporting company contractually purchases electricity and/or is directly provided electricity via a direct line transfer.
Emissions*	Emission sources are categorised by scope to manage risks and impacts of double counting. There are three scopes in greenhouse gas reporting.
Exchange*	A local fibre company (LFC) owned or leased building, or leased or licensed area within a building, with a floor area of at least 15 square metres (or, since UFB2 (the second phase of the New Zealand Government's fibre broadband rollout programme), can include a cabinet) and a main distribution frame terminating copper or fibre network connected to end-user premises.
Fluvial*	River flooding.
FY*	Financial Year—1st of July to 30th of June periods.
GHG	Greenhouse gas. The following greenhouse gases are listed in the Kyoto Protocol: carbon dioxide (CO ₂); methane (CH ₄), nitrous oxide (N ₂ O), hydrofluorocarbons (HFCs), nitrogen trifluoride (NF ₃), perfluorocarbons (PFCs), and sulphur hexafluoride (SF ₆).
GHG Inventory*	A quantification of an organisation's greenhouse gas sources, sinks, emissions, and removals.
ICP or IEP*	Internal Carbon Price or Internal Emissions Price. A monetary value on GHG emissions that an entity uses internally to guide its decision-making process in relation to climate-related impacts, risks, and opportunities.

ONT*	Optical Network Terminal, or the termination point of fibre in the home or business.
Petabyte*	One million gigabytes (GB), which is a measure of data volume.
Pluvial*	Surface water flood.
Physical risks	Risks related to the physical impacts of climate change. Physical risks emanating from climate change can be event-driven (acute) such as increased severity of extreme weather events. They can also relate to longer-term shifts (chronic) in precipitation and temperature and increased variability in weather patterns, such as sea level rise.
SBTi*	Science Based Targets initiative: https://sciencebasedtargets.org/ .
Scenario analysis	A process for systematically exploring the effects of a range of plausible future events under conditions of uncertainty. Engaging in this process helps an entity to identify its climate-related risks and opportunities and develop a better understanding of the resilience of its business model and strategy.
Scope 1	Direct emissions from sources that are owned or controlled by a company.
Scope 2	A reporting organisation's emissions associated with the generation of electricity, heating/cooling, or steam purchased for its own consumption.
Scope 3	A reporting organisation's indirect emissions (value chain) other than those covered in scope 2.
tCO₂e	Tonnes (t) of carbon dioxide (CO ₂) equivalent (e).
T&D losses	Transmission and Distribution losses, which refer to the difference between the electricity generated and the electricity actually delivered.
Transition plan	An aspect of an entity's overall strategy that describes an entity's targets, including any interim targets, and actions for its transition towards a low-emissions, climate-resilient future.
Transition risks	Risks related to the transition to a low-emissions, climate-resilient global and domestic economy, such as policy, legal, technology, market and reputation changes associated with the mitigation and adaptation requirements relating to climate change.
Verification*	An independent assessment of the reliability (considering completeness and accuracy) of a GHG inventory.
WTT	Well-to-Tank (WTT) refers to a method used to calculate the energy consumed and GHG emitted from the moment of production of a transport fuel.

Appendix 4 – GHG emissions methodology

The table below provides an overview of all our emission sources in Chorus' inventory, including data sources, calculation methods, any assumptions and estimations made in the calculation process and an assessment of uncertainty. GHG emissions accounting relies on assumptions and estimates that lead to uncertainty. The effect of this uncertainty is that emissions might be over or understated, so the corresponding categories' emissions data should be interpreted accordingly.

Chorus uses a qualitative assessment of uncertainty as a measure of data quality, with a focus on parameter uncertainty. Uncertainty is highest where data limitations require us to adopt the spend-based method or necessitate high estimations, or the emission factor itself has a high level of built-in assumptions.

Scope / Category	Emission source	Calculation method	Methodology, data source and assumptions / estimations	Uncertainties	Emission factor and GWP source All aligned with IPCC AR5
Stationary combustion	Diesel generator fuel	Fuel-based method	Invoices and excel reports records of fuel purchased. No estimation, direct from invoices.	Low uncertainty	MfE (2026) - Diesel - stationary combustion - commercial (L)
Stationary combustion	Natural gas (LPG use in exchanges)	Fuel-based method	Invoices with monthly meter readings. No estimation, direct from invoices.	Low uncertainty	MfE (2026) - Natural Gas (kWh)
Fugitive emissions	Fugitive emissions from air-conditioning systems	Supplier-specific method	Records from service providers maintenance reports (based on top-ups) and supporting invoices.	Medium uncertainty	MfE (2026) - Hydrofluorocarbons, Refrigerant blends: Zeotropes, Defra (2025) – Refrigerant & other. Blends
Mobile Combustion	Chorus vehicle fleet fuel	Fuel-based method	Invoices and excel reports records of litres of fuel purchased. Assume no top ups are done without using fuel cards.	Low uncertainty	MfE (2026) – Transport fuels
Electricity	Location based	Hybrid-based method (supplier and estimated)	Suppliers excel report, small suppliers' invoices with meter reading. Accurate records of electricity purchased. Within multiple exchanges, we rent space from Spark sites and due to limited sub-metering, Spark, and Chorus invoice each other electricity usage based on a usage (kWh) per equipment type from an historical audit.	Low uncertainty	MfE (2026) – Purchased electricity annual average 2025
	Market based			Moderate uncertainty from emission factor	NZECS – Market based, interim residual supply mix (RSM), June 2026.
	EV charging	Supplier specific method		Low uncertainty	MfE (2026) – Purchased electricity annual average 2025
Category 1 – Purchased goods and services	Financial annual spend records of all suppliers	Spend-based method	Where no supplier specific information was available or the data was too uncertain, we used a spend based method from internal finance annual spend records by service type x emission factor sourced from GHG emissions for Commodities and Industries emissions modelling.	High uncertainty from emission factors	Thinkstep-anz (2025) - Emission Factors for New Zealand: Greenhouse Gas Emission Intensities for Commodities and Industries. v3.0.
Category 2 – Capital goods	Suppliers fuel data (service delivery partners)	Hybrid-based method (fuel based and estimated)	All major suppliers (spend >\$7M a year) contacted for information on the portion of their footprint attributable to activities performed on behalf of Chorus. Fuel use is most of the emissions, especially for our Field Service Agreement (Downer, UCG and Ventia), who provide monthly fuel information, which includes their own sub-contractors fuel use which is estimated.	Moderate uncertainty	MfE (2026) – Transport fuels Thinkstep-anz. (2025). Emission Factors for New Zealand: Greenhouse Gas Emission Intensities for Commodities and Industries. v3.0, using commodities where possible.

Appendix 4 – GHG emissions methodology (continued)

Scope / Category	Emission source	Calculation method	Methodology, data source and assumptions / estimations	Uncertainties	Emission factor and GWP source All aligned with IPCC AR5
Category 3 – Fuel and energy use	Transmission and distribution (T&D) line losses from electricity	Average data method	All data based on fuel data and location-based electricity consumption data provided for scope 1 and 2. Chorus voluntarily reports on T&D losses from our scope 3 electricity use (ONT and customers).	Moderate uncertainty from emission factors	MfE (2026) – Transmission and distribution losses for electricity (2025)
	Well-to-tank (WTT) emissions from upstream fuel use	Average-data method	Fuel records for Chorus own fleet. Estimates of the amount of fuel used and our scope 3 (contractor fuel details).	Moderate uncertainty from emission factors	Defra (2025) – WTT - fuels
Category 4 – Upstream Transportation and distribution	Air and Sea freight from overseas to New Zealand and road and rail within New Zealand	Distance-based method	Includes all transport and distribution paid by Chorus regardless of whether the transport occurs upstream or downstream according to the Telecommunication guidance. ⁴¹ Supplier report (Nokia) provides the distance and weight for packages. Distance is determined using international freight distance databases and weight is based on supplier records per product type. Mainfreight provides a supplier specific emission factor that is externally verified. The information is based on accurate tracking by mode of transport and weight and distance per mode type.	Moderate uncertainty	MfE (2026) – Air Freight. W/ radiative forcing multiplier, International Sea Freight. Container ship: Average
Category 5 – Waste generated in operations	Waste to landfill produced at Chorus's offices	Average-data method	Third-party building managers provide a report for each Chorus office. Information is broken down by type and weight of waste generated.	Moderate uncertainty	MfE (2026) - Waste (unknown composition) – Office waste to landfill without gas recovery / Waste (unknown composition) – Office waste Biological treatment of waste – composting
Category 6 – Business travel	Air travel and Accommodation	Supplier-specific method	Supplier records (Tandem Travel) with type of travel class and distance travelled per passenger. Tandem is audited annually on their methodology and reporting. Outputs are calculated using the distances travelled by sector split into domestic, short haul and long haul split by class of travel (business, first class, economy).	Moderate uncertainty	MfE (2026) - Accommodation (relevant countries in MfE factors) / Air travel (short haul, domestic and international) with radiative forcing
	Taxis	Spend-based method	Records from general ledger.	Moderate uncertainty from emission factors	MfE (2026) - Taxi Travel Regular – dollars spent
	Rental car	Distance-based method	Supplier records itineraries and rental car companies' information (kms travelled). Some assumptions made around the type of vehicle driven.	Moderate uncertainty	MfE (2026) - Light Passenger Vehicle. Rental car default– dollars spent
	Mileage claims	Distance-based method	Records from general ledger. (kms travelled). Data is extracted from our internal expense claim system and assumes kms travelled to be accurate and a reflection of work-related travels	Moderate uncertainty	MfE (2026) - Light Passenger Vehicle. Private car default (Diesel, Petrol Hybrid, Electric) (Km)

⁴¹ GSM Association (GSMA), the Global Enabling Sustainability Initiative (GeSI) and the International Telecommunication Union (ITU-T) – Scope 3 Guidance for Telecommunication Operators

Appendix 4 – GHG emissions methodology (continued)

Scope / Category	Emission source	Calculation method	Methodology, data source and assumptions / estimations	Uncertainties	Emission factor and GWP source All aligned with IPCC AR5
Category 7 – Employee commuting	Travel to and from work (in private vehicles and public transport)	Distance-based method	Data gathered on travel modes, distance to work via staff survey and office occupancy via tracking. Extrapolated for the full year assuming that travel habits are stable across the year.	High uncertainty	MfE (2026) – Light Passenger Vehicle. Private car (petrol, hybrid, electric), Bus, Train, Ferry, Taxis (Kms)
	Working from home	Hybrid-based method	Chorus internal office occupancy tracks occupancy per location, this was used to estimate working from home days.	Moderate uncertainty from emission factors	MfE (2026) – Working From Home. Working from home – Default (days)
Category 11 – Use of sold products	Electricity use within customer devices	Direct use-phase method	Chorus internal tracking of number of ONT (Optical Network Terminal) deployed. This is based on the manufacturing estimated electricity use of the ONT (Optical Network Terminal) installed in premises or powered by end users. It excludes energy use from Wi-Fi gateways provided by Retail Service Providers or customers.	Moderate uncertainty	MfE (2026) – Purchased electricity annual average 2025
Category 13 – Downstream leased assets	Electricity use on-charged to customers	Hybrid-based method (supplier-based and estimated)	Within multiple exchanges, we rent some of our space to Spark and must estimate the electricity (using some assumptions).	Moderate uncertainty	MfE (2026) – Purchased electricity annual average 2025



Appendix 5: KPMG Independent Limited Assurance Report

Conclusion

Our limited assurance conclusion has been formed on the basis of the matters outlined in this report.

Based on our limited assurance engagement, which is not a reasonable assurance engagement or an audit, nothing has come to our attention that would lead us to believe that, in all material respects, the scope 1, 2 and 3 gross greenhouse gas emissions, additional required disclosures of gross greenhouse gas emissions and gross greenhouse gas emissions methods, assumptions and estimation uncertainty disclosures included in the Climate Statement (GHG disclosures) are not fairly presented and prepared in accordance with the Aotearoa New Zealand Climate Standards (NZ CSs) issued by the External Reporting Board (the Criteria) for the period 1 July 2025 to 30 June 2026.

Information subject to assurance

We have performed an engagement to provide limited assurance in relation to Chorus Limited's GHG disclosures for the period 1 July 2025 to 30 June 2026. The locations of the GHG disclosures subject to assurance are:

- Total Scope 1, 2 and 3 (both location and market-based approach) GHG emissions contained in the climate statement within table 3 and table 4 (page 18)
- The additional required disclosures within the consolidation approach and standards (pages 19 to 20) and exclusions within table 5 (page 20)
- The greenhouse gas emissions methods, assumptions and estimation uncertainty disclosures included in the Climate Statement within Appendix 4 (pages 33 to 35) of the report.

Our conclusion on the GHG disclosures does not extend to any other information included, or referred to, in the Climate Statement or other information that accompanies or contains the Climate Statement and our assurance report (other information). We have not performed any procedures with respect to the other information.

Criteria

The criteria used as the basis of reporting include the NZ CSs. As disclosed on page 19 of the Climate Statement, the greenhouse gas emissions have been measured in accordance with:

- The Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard (revised edition)
- The Greenhouse Gas Protocol: GHG Protocol Scope 2 Guidance: An amendment to the GHG Protocol Corporate Standard
- The Greenhouse Gas Protocol: Corporate Value Chain (scope 3) Accounting and Reporting Standard.

As a result, this report may not be suitable for another purpose.

Standards we followed

We conducted our limited assurance engagement in accordance with New Zealand Standard on Assurance Engagements 1 (**NZ SAE 1**) Assurance Engagements over Greenhouse Gas Emissions Disclosures and International Standard on Assurance Engagements (New Zealand) 3410 Assurance Engagements on

Greenhouse Gas Statements (**ISAE (NZ) 3410**) issued by the New Zealand Auditing and Assurance Standards Board (**Standard**). We believe that the evidence we have obtained is sufficient and appropriate to provide a basis for our conclusion. Our responsibilities under the Standard are further described in the 'Our responsibility' section of our report.

Other Matter – Assurance of the prior year comparative information

We previously expressed an opinion over the GHG disclosures for the period 1 July 2024 to 30 June 2025, and our report dated 22 August 2025 included an unmodified opinion. Our conclusion is not modified in respect of this matter.

How to interpret limited assurance and material misstatement

A limited assurance engagement is substantially less in scope than a reasonable assurance engagement in relation to both the risk assessment procedures, including an understanding of internal control, and the procedures performed in response to the assessed risks.

Misstatements, including omissions, within the GHG disclosures are considered material if, individually or in the aggregate, they could reasonably be expected to influence the relevant decisions of the intended users taken on the basis of the GHG disclosures.

Inherent limitations

GHG quantification is subject to inherent uncertainty because of incomplete scientific knowledge used to determine emission factors and the values needed to combine emissions of different gases.

Use of this assurance report

Our report is made solely for Chorus Limited. Our assurance work has been undertaken so that we might state to Chorus Limited those matters we are required to state to them in the assurance report and for no other purpose.

Our report should not be regarded as suitable to be used or relied on by anyone other than Chorus Limited for any purpose or in any context. Any other person who obtains access to our report or a copy thereof and chooses to rely on our report (or any part thereof) will do so at its own risk.

To the fullest extent permitted by law, none of KPMG, any entities directly or indirectly controlled by KPMG, or any of their respective members or employees accept or assume any responsibility and deny all liability to anyone other than Chorus Limited for our work, for this independent assurance report, and/or for the opinions or conclusions we have reached. Our conclusion is not modified in respect of this matter.

Chorus Limited's responsibility for the GHG disclosures

The Directors of Chorus Limited are responsible for the preparation and fair presentation of the GHG disclosures in accordance with the Criteria. This responsibility includes the design, implementation and maintenance of such internal control as Directors determine is relevant to enable the preparation of the GHG disclosures that are free from material misstatement whether due to fraud or error.

The Directors of Chorus Limited are also responsible for selecting or developing suitable criteria for preparing the GHG disclosures and appropriately referring to or describing the criteria used.



Appendix 5: KPMG Independent Limited Assurance Report continued

Our responsibility

We have responsibility for:

- planning and performing the engagement to obtain limited assurance about whether the GHG disclosures are free from material misstatement, whether due to fraud or error;
- forming an independent conclusion based on the procedures we have performed and the evidence we have obtained; and
- reporting our conclusion to Chorus Limited.

Summary of the work we performed as the basis for our conclusion

A limited assurance engagement performed in accordance with the Standard involves assessing the suitability in the circumstances of Chorus Limited's use of the Criteria as the basis for the preparation of the GHG disclosures, assessing the risks of material misstatement of the GHG disclosures whether due to fraud or error, responding to the assessed risks as necessary in the circumstances, and evaluating the overall presentation of the GHG disclosures.

We exercised professional judgment and maintained professional scepticism throughout the engagement. We designed and performed our procedures to obtain evidence about the GHG disclosures that is sufficient and appropriate to provide a basis for our conclusion.

Our procedures selected depended on the understanding of the GHG disclosures that is sufficient and appropriate to provide a basis for our conclusion. The procedures we performed were based on our professional judgment and included

inquiries, observation of processes performed, inspection of documents, analytical procedures, evaluating the appropriateness of quantification methods and reporting policies, and agreeing or reconciling with underlying records.

In undertaking limited assurance on the GHG disclosures the procedures we primarily performed were:

- obtained, through inquiries, an understanding of Chorus Limited's control environment, processes and information systems relevant to the preparation of the GHG disclosures. We did not evaluate the design of particular control activities, or obtain evidence about their implementation;
- evaluated organisational and operational boundaries to test completeness of GHG emission sources;
- evaluated whether Chorus Limited's methods for developing estimates are appropriate and had been consistently applied. Our procedures did not include testing the data on which the estimates are based or separately developing our own estimates against which to evaluate Chorus Limited's estimates;
- evaluated the appropriateness of emission factors applied;
- performed analytical procedures on particular emission categories by comparing the expected GHGs emitted to actual GHGs emitted and made inquiries of management to obtain explanations for any significant differences we identified;
- performed recalculations of selected GHG emissions;
- tested a limited number of items to supporting records, and
- considered the presentation and disclosure of the GHG disclosures.

The procedures performed in a limited assurance engagement vary in nature and timing from, and are less in extent than for a reasonable assurance engagement. Consequently, the level of assurance obtained in a limited assurance engagement is substantially lower than the assurance that would have been obtained had a reasonable assurance engagement been performed.

Our independence and quality management

This assurance engagement was undertaken in accordance with NZ SAE 1. NZ SAE 1 is founded on the fundamental principles of independence, integrity, objectivity, professional competence and due care, confidentiality and professional behaviour.

We have complied with the independence and other ethical requirements of Professional and Ethical Standard 1 *International Code of Ethics for Assurance Practitioners (including International Independence Standards)* (New Zealand) (PES 1) issued by the New Zealand Auditing and Assurance Standards Board, which is founded on fundamental principles of integrity, objectivity, professional competence and due care, confidentiality and professional behaviour.

The firm applies Professional and Ethical Standard 3 *Quality Management for Firms that Perform Audits or Reviews of Financial Statements, or Other Assurance or Related Services Engagements* (PES 3), which requires the firm to design, implement and operate a system of quality control including policies or procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

We have also complied with Professional and Ethical Standard 4 *Engagement Quality Reviews* (PES 4) which deals with the appointment and eligibility of the engagement quality reviewer and the engagement quality reviewer's responsibilities relating to the performance and documentation of an engagement quality review.

Our firm has also provided financial statement audit, regulatory assurance, and trustee supervisor reporting services to Chorus Limited. Subject to certain restrictions, partners and employees of our firm may also deal with Chorus Limited on normal terms within the ordinary course of trading activities of the business of Chorus Limited. These matters have not impaired our independence as assurance providers of Chorus Limited for this engagement. The firm has no other relationship with, or interest in, Chorus Limited.

As we are engaged to form an independent conclusion on the GHG disclosures prepared by Chorus Limited, we are not permitted to be involved in the preparation of the GHG information as doing so may compromise our independence.

The engagement partner on the assurance engagement resulting in this independent assurance report is David Gates.

KPMG Wellington
24 August 2026

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