

30 September 2026

External Reporting Board (XRB)

By email: sustainability@xrb.govt.nz

Chorus Submission: XRB consultation on draft climate reporting roadmap

Background

1. Chorus welcomes the opportunity to comment on XRB's draft climate reporting roadmap (**Roadmap**) that proposes adoption of a new internationally aligned climate standard (**NZ IFRS S2**) tailored for New Zealand.
2. Chorus operates New Zealand's largest open-access fibre network, providing wholesale access services to retail providers who use our network to deliver broadband services to end customers and businesses. Chorus has been a climate reporting entity (**CRE**) since 2023 and supports the policy objectives of New Zealand's climate-related disclosures (**CRD**) regime.

Response to consultation questions

3. Chorus addresses the following questions in XRB's consultation document dated June 2026:

Q1 Do you support the strategic direction for climate reporting set out in the draft climate reporting roadmap?

4. Yes. Chorus supports:
 - a) The issue of a New Zealand standard with closer international alignment with IFRS S2 Climate-related Disclosures (**IFRS S2**) and the equivalent Australian Accounting Standards Board standards (**AASB S2**). IFRS S2 (together with the climate-relevant requirements of IFRS S1) has become the preferred climate-reporting benchmark internationally, so adopting a New Zealand equivalent will support consistency and comparability with international climate-related disclosures. It would also reduce the risk of New Zealand's disclosure regime falling out of step with international standards over successive amendment cycles.
 - b) A phased approach to any proposed changes over a long transition period to allow CREs to leverage their existing capability. As a CRE, Chorus has spent considerable time and resources (both internal and external) to upskill and comply with New Zealand's climate-reporting regime over the first three years of mandatory reporting. Any move to a New Zealand equivalent of IFRS S2 will necessarily involve additional time and compliance costs for CREs, so the proposed transition period (to 2033) is important to ensure the transition is manageable and give CREs sufficient time to develop the necessary capabilities and embed any new reporting requirements into existing processes.
 - c) Harmonisation with Australia where Australian modifications to IFRS S2 are also appropriate in the New Zealand context. As well as its NZX listing, Chorus holds a foreign-exempt listing on the ASX with a significant Australian shareholder base and, like many CREs, an ongoing programme to attract and retain international investment. Aligning New Zealand requirements to substantially the same metrics, methodologies and disclosures as AASB S2 would provide investors analysing New Zealand CREs against Australian reporting entities with more consistent and comparable information. The proposed transition period would also

allow New Zealand CREs to leverage off the lessons and guidance from Australia's implementation of the AASB S2 framework.

Q4 From a CRE perspective, should any of the IFRS S2 requirements (or incorporated climate-relevant portions of IFRS S1) be removed or changed?

5. Subject to our views on Australian harmonisation below, we consider that NZ IFRS S2 should be as closely aligned to IFRS S2 and AASB S2 as possible to get the benefits of adopting a new internationally aligned framework. The proposed long transition period should allow CREs time to develop the capability to respond to international requirements before NZ IFRS S2 becomes mandatory.

Q5 What are your views on the Australian harmonisation options for industry-based disclosures?

6. As noted in the consultation document, AASB has, as an interim measure, decided not to apply the IFRS S2 industry-based disclosures while they assess the requirements for the Australian market. We consider, given the ISSB's industry-based guidance is substantial and applying a different approach to Australia would immediately put us out of step for those CREs that dual report, option 1 (full deletion of all text in IFRS S2 relating to industry-based metrics and guidance) would be the preferred option. Retaining the full IFRS S2 industry-based requirements will likely make it difficult for early adoption of a NZ IFRS S2 standard.

Q6 With regard to Australian harmonisation, what are your views on how we should approach scenario analysis?

7. To ensure international alignment, we suggest NZ IFRS S2 does not prescribe the number of climate-related scenarios or any temperature outcomes, allowing a CRE to select scenarios and temperature pathways that are most relevant to their business.

Q8 Do you support the proposed implementation timeline?

8. Yes. A long transition period (with the option to adopt early) will allow CREs to develop the capability to respond to the additional disclosures required under IFRS S2 as well as learn from the implementation of AASB S2 in Australia. This lead time will help provide greater certainty for New Zealand CREs as they transition to an IFRS S2-aligned standard. The provision for early adoption enables those who will benefit from international alignment to move to the new standard as soon as they have built the capability.
9. Importantly, the proposed transition period does not create an information gap for investors. CREs will continue to report under the existing NZ CS regime until they opt into the new NZ IFRS S2 regime, meaning investors will continue to receive material climate-related information during the transition period. That differs from other jurisdictions that are transitioning into their mandatory climate-reporting frameworks for the first time.

Chorus appreciates the opportunity to provide feedback on the draft climate reporting roadmap and would welcome continued engagement for any proposed exposure draft of NZ IFRS S2.

We are happy to answer any questions the XRB may have on the views set out in this submission. Please contact [redacted] in the first instance.