



GasNet Limited

2025 Default Price-Quality Path Annual Compliance Statement Gas Distribution Network Services

For the Second Assessment Period of the Third Regulatory Period
(1 October 2024 to 30 September 2025)

Pursuant to:

Gas Distribution Services Default Price-Quality Path Determination 2022
Issued 31 May 2022

Document No:	Document Name:	Approved:	18/12/2025	Version: 1.0
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1.0 PRICE PATH AND QUALITY STANDARDS COMPLIANCE STATEMENTS

1.1 Price Path

GasNet has complied with its price path for the Second Assessment Period by ensuring that Notional Revenue of \$5,838,433 is less than the Allowable Notional Revenue of \$5,867,699 by a margin of \$29,266 or 0.05%.

1.2 Quality Standards

GasNet has complied with both quality standards in respect to GasNet's response to the two Emergencies that occurred during the Assessment Period, with response times of between 6 and 14 minutes and therefore within the 60 minute and 180 minute thresholds.

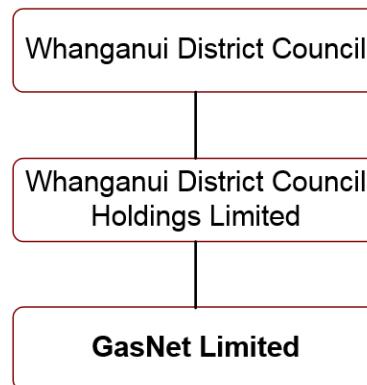
1.3 Restructure of Prices

GasNet has not undertaken a restructure of prices during this assessment period.

2.0 INTRODUCTION

2.1 About GasNet

GasNet Limited ("GasNet") is an energy company under the Energy Companies Act 1992 being 100% owned by Whanganui District Council Holdings Limited, a "Council Controlled Organisation".



GasNet commenced trading on 1 July 2008 after purchasing the network and metering business from Wanganui Gas Limited. Previously GasNet had been operating as an independent trading division of Wanganui Gas Limited and was responsible for managing the network and metering assets for the company.

On 30 June 2017 Wanganui Gas Limited and GasNet Limited were amalgamated to become GasNet.

2.2 Supply Area Coverage

GasNet's natural gas distribution network comprises approximately 9,717 live consumer connections across five discrete network distribution systems located within the Whanganui, Rangitikei and South Taranaki regions serving the following areas:

- Whanganui;
- Marton;
- Bulls;
- Flockhouse; and
- Waitotara.

With its origins as far back as the late 1800's when gas was manufactured from coal, the Whanganui network distribution system extends to virtually every street within the city, whilst the other four systems have all been constructed since the introduction of natural gas in the 1970's and as a result, are not as extensive within the urban areas.

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Default Price-quality Path Regime

As a natural monopoly service provider, GasNet is subject to government regulation under the Commerce Act 1986 (Act). Pursuant to the requirements of this Act the Commerce Commission has set a default price-quality path ("DPP") which applies to all suppliers of gas pipelines services as defined in the Act.

The default price-quality path requirements are set out in the Gas Distribution Services Default Price-Quality Path Determination 2022 [2022] NZCC 19 ("DPP Determination").

2.3 Annual Compliance Statement

This Annual Compliance Statement has been prepared in accordance with the DPP Determination to demonstrate GasNet's compliance or otherwise, with the requirements of the DPP Determination and covers the 12-month period from 1 October 2024 to 30 September 2025.

This statement has been prepared on 24 November 2025.

3.0 ALLOWABLE NOTIONAL REVENUE

In accordance with Equation 2 of Schedule 4 of the DPP Determination the Allowable Notional Revenue for the Pricing Period ending in 2025 (ANR₂₀₂₅) is equal to:

$$\text{ANR}_{2025} = (\sum_i P_{i,2024} \times Q_{i,2023} - (K_{2024} + V_{2024}) + (\text{ANR}_{2024} - \text{NR}_{2024})) \times (1 + \Delta\text{CPI}_{2025}) \times (1 - X)$$

Where:

$\sum_i P_{i,2024} \times Q_{i,2023}$ is the revenue from all Load Groups based on the 2023 quantities and the 2024 prices for each individual Load Group as calculated in the Prices & Quantities Schedule in Appendix 1 (\$2,621,872 for the Fixed Charges and \$2,671,274 for the Variable Charges); and

K_{2024} is the sum of all Pass-through Costs for the Pricing Year ending in 2024 as previously disclosed and shown in Appendix 2 (\$107,093); and

V_{2024} is the sum of all Recoverable Costs for the Pricing Year ending in 2024, as previously disclosed and shown in Appendix 2 (\$nil); and

ANR_{2024} is the Allowable Notional Revenue for the Pricing Period ending in 2024 (ANR₂₀₂₄) as previously disclosed and shown in Appendix 2 (\$5,267,512); and

NR_{2024} is the Notional Revenue for the Pricing Period ending in 2024 as previously disclosed and shown in Appendix 2 (\$5,152,981); and

ΔCPI_{2025} is the derived change in the CPI to be applied for the pricing Period ending in 2025 being equal to:

$$\Delta\text{CPI}_{2025} = \frac{(CPI_{\text{Jun} 2023} + CPI_{\text{Sep} 2023} + CPI_{\text{Dec} 2023} + CPI_{\text{Mar} 2024})}{(CPI_{\text{Jun} 2022} + CPI_{\text{Sep} 2022} + CPI_{\text{Dec} 2022} + CPI_{\text{Mar} 2023})} - 1$$

$$= 0.051$$

X is the rate of change specified in Schedule 2 of the DPP Determination (-5.50%).

Therefore:

$$\text{ANR}_{2025} = \$5,867,699$$

4.0 PASS-THROUGH AND RECOVERABLE COSTS

Pass-through costs incurred by GasNet include rates on system fixed assets payable to territorial local authorities, levies payable for the Utilities Disputes Scheme (previously Electricity and Gas Complaints Commission Scheme), and levies payable under the Commerce (Levy for Control of Natural Gas Services) Regulations 2005.

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Recoverable costs only relates to a capex wash-up adjustment. The formula to calculate the capex wash-up adjustment is prescribed by the equation set in clause 3.1.3(1)(h) of the Gas Distribution Services Input Methodologies Determination 2012. The result of \$36,100 is derived by subtracting the actual building blocks allowable revenue (BBAR) from the forecast BBAR, using a discount rate of 5.67% as set in the Input Methodologies.

The following table provides the breakdown of Pass-through Costs incurred by GasNet for the Pricing Year ending in 2024.

	Timing of Payment			Total
	Prior to 1 October 2024		1 October 2024 to 30 September 2025	
	Cost Incurred	Time Value Adjustments	Cost Incurred	
Commerce Commission		\$ -	\$ 31,621	\$ 31,621
Utilities Disputes Scheme	\$ -	\$ -	\$ 6,900	\$ 6,900
Rates		\$ -	\$ 37,792	\$ 37,792
	\$ -	\$ -	\$ 76,313	\$ 76,313

5.0 NOTIONAL REVENUE

In accordance with Clause 8.4 of the DPP Determination the Notional Revenue for the Pricing Period ending in 2025 (NR₂₀₂₅) is equal to:

$$NR_{2025} = \sum_i P_{i,2025} \times Q_{i,2023} - (K_{2025} + V_{2025})$$

Where:

$\sum_i P_{i,2025} \times Q_{i,2023}$ is the revenue from all Load Groups based on the 2023 quantities and the 2025 prices for each individual Load Group as calculated in the Prices & Quantities Schedule in Appendix 1 (\$2,947,653 for the Fixed Charges and \$3,003,193 for the Variable Charges); and

K_{2025} is the sum of all Pass-through Costs for the Pricing Year ending in 2025 as calculated in Pass-through Costs (Section 4.0) above (\$76,313); and

V_{2025} is the sum of all Recoverable Costs for the Pricing Year ending in 2025, which is \$36,100.

Therefore:

$$NR_{2025} = \$5,838,433$$

6.0 COMPLIANCE WITH THE PRICE PATH

In accordance with Clause 8.4 of the DPP Determination the Notional Revenue (NR) for the Assessment Period must not exceed the Allowable Notional Revenue (ANR) for the same period:

$$ANR_{2025} \geq NR_{2025}$$

Where:

ANR_{2025} is the Allowable Notional Revenue for the Pricing Period ending in 2025 as calculated above (\$5,867,699); and

NR_{2025} is the Notional Revenue for the Pricing Period ending in 2025 as calculated above (\$5,838,433); and

Therefore:

$$\$5,867,699; > \$5,838,433$$

So the condition is satisfied

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7.0 EMERGENCIES DURING THE ASSESSMENT PERIOD

There were two events that occurred during the Assessment Period that met the criteria as an Emergency pursuant to the DPP Determination.

On 23 April 2025 Fire Service called in gas leak outside a property on Maire Street. Leak located and repaired.

On 8 September 2025 a resident and passing pedestrian rang Fire Service as a strong smell of gas. Leak located and repaired.

Date of Event	Type of Event	Emergency Criteria			Response Time
		Emergency Services Involved	Number of Supplies (ICP's) Affected	Properties Evacuated	
23 April 2025	Gas Leak	Fire Service	0	No	6 mins
8 September 2025	Gas Leak	Fire Service	0	No	14 mins
Average Response Time <u>10 mins</u>					

Date source: GasNet's work management system (FieldGo & Univerus Field)

8.0 COMPLIANCE WITH THE QUALITY STANDARDS

In accordance with Clause 9.1 of the DPP Determination GasNet's Response Time to Emergencies (RTE) for the Assessment Period must be such that:

$$(i) \frac{\text{RTE60}}{\text{RTE}} \geq 0.80 ; \text{ and}$$

$$(ii) \frac{\text{RTE180}}{(\text{RTE} - \text{RTE}_{\text{excl}})} = 1$$

Where:

RTE is the total number of Emergencies in the Assessment Period (total count of 2 as stated above);

RTE_{excl} is the total number of Emergencies in the Assessment Period for which the Commission has granted an exclusion in writing, which is nil for GasNet for this Assessment Period;

RTE60 is the total number of Emergencies in the Assessment Period where GasNet's RTE was less than or equal to 60 Minutes (total count of 2 as stated above); and

RTE180 is the total number of Emergencies in the Assessment Period where GasNet's RTE was less than or equal to 180 Minutes (total count of 2 as stated above).

Therefore:

$$(i) \frac{\text{RTE60}}{\text{RTE}} = \frac{2}{2} = 1 \geq 0.80 \text{ so condition is satisfied; and}$$

$$(ii) \frac{\text{RTE180}}{(\text{RTE} - \text{RTE}_{\text{excl}})} = \frac{2}{(2-0)} = 1 \text{ so condition is satisfied.}$$

9.0 POLICIES & PROCEDURES FOR RESPONDING TO EMERGENCIES

Notifications of an emergency or event on any network are received at GasNet's offices in Cooks Street, Whanganui during business hours and at GasNet's after-hours service provider outside business hours. Information received at the time of the initial report including event details, date and time the call was received is recorded in the company's work management system and then a response is initiated.

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All personnel involved in telephone call handling are trained to record the details of the emergency, provide the standard safety information and under no circumstance transfer a call and risk losing it. A telephone management system logs call information and is used for collection and reporting of call statistics.

During business hours the details of the emergency are provided to the designated Emergency Response Coordinator (ERC) or the Technician depending on the nature of the event. A response is initiated based on the event type and procedural requirements. Using mobile devices the responding technicians have access to the work management system and the ability to progressively update the records adding information as actions are taken, including such details as arrival on site time, departure time and interruption to supply times.

In order to ensure the necessary date and time information has been recorded to enable GasNet to meet its obligations for reporting SAIDI and SAIFI, the attending technician is required to complete a specific form. A check is made when a job is completed that the form has been submitted and required data provided.

Outside business hours the details of the emergency are recorded by the after-hours service provider and then relayed by telephone to the designated On Call Technician with a text sent to their mobile phone as a backup and to provide verification that the details are correct. An email is sent by the after-hour's provider to senior GasNet personnel shortly after the first call is received and followed up with an email when the technician has arrived on site, and another when the technician has left the site. Regular welfare checks are made to ensure their ongoing safety by contacting the technician via mobile phone every 30 minutes.

All unplanned events and emergencies are subject to an investigation in accordance with the Company's Incident Reporting and Investigation Policy and recorded in GasNet's Risk Management software application.

All incident information is reviewed and managed by the Engineering Manager to ensure correct decisions have been made on reporting criteria including reliability, interruption classes, system condition and integrity based on company Work Instructions.

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Appendix 1 – Price and Quantities Schedule

Load Group	Fixed Charges (\$ per day)			Variable Charges (\$ per GJ)		
	Q ₂₀₂₃	P ₂₀₂₄	P ₂₀₂₄ x Q ₂₀₂₃	Q ₂₀₂₃	P ₂₀₂₄	P ₂₀₂₄ x Q ₂₀₂₃
G12	3,603,581	\$ 0.585	\$ 2,109,856	230,931	\$ 8.527	\$ 1,969,249
G50	42,755	\$ 1.974	\$ 84,379	41,378	\$ 7.976	\$ 330,009
G180	13,741	\$ 6.907	\$ 94,915	60,345	\$ 5.708	\$ 344,450
G450	1,460	\$ 52.628	\$ 76,837	35,959	\$ 0.767	\$ 27,566
G1000 (C12323)	365	\$ 52.633	\$ 19,211	114,326	\$ -	\$ -
G1000 (C12329)	365	\$ 25.888	\$ 9,449	48,011	\$ -	\$ -
G1000 (C12337)	365	\$ 35.128	\$ 12,822	34,831	\$ -	\$ -
G1000 (C16459)	365	\$ 22.167	\$ 8,091	1,565	\$ -	\$ -
G1000 (C26262)	365	\$ 34.100	\$ 12,447	19,862	\$ -	\$ -
G1000 (C26444)	365	\$ 20.968	\$ 7,653	119,114	\$ -	\$ -
G1000 (C26779)	365	\$ 201.386	\$ 73,506	13,229	\$ -	\$ -
G1000 (C31266)	365	\$ 72.172	\$ 26,343	277,332	\$ -	\$ -
G1000 (C31778)	365	\$ 72.587	\$ 26,494	192,050	\$ -	\$ -
G1000 (C32121)	365	\$ 164.022	\$ 59,868	9,618	\$ -	\$ -
	<u>3,665,187</u>		<u>\$ 2,621,872</u> $\Sigma_i P_{i,2024} \times Q_{i,2023}$	<u>1,198,551</u>		<u>\$ 2,671,274</u> $\Sigma_i P_{i,2024} \times Q_{i,2023}$

Load Group	Fixed Charges (\$ per day)			Variable Charges (\$ per GJ)		
	Q ₂₀₂₃	P ₂₀₂₅	P ₂₀₂₅ x Q ₂₀₂₃	Q ₂₀₂₃	P ₂₀₂₅	P ₂₀₂₅ x Q ₂₀₂₃
G12	3,603,581	\$ 0.658	\$ 2,372,016	230,931	\$ 9.587	\$ 2,213,939
G50	42,755	\$ 2.219	\$ 94,864	41,378	\$ 8.967	\$ 371,014
G180	13,741	\$ 7.766	\$ 106,709	60,345	\$ 6.417	\$ 387,249
G450	1,460	\$ 59.168	\$ 86,385	35,959	\$ 0.862	\$ 30,992
G1000 (C12323)	365	\$ 59.173	\$ 21,598	114,326	\$ -	\$ -
G1000 (C12329)	365	\$ 29.105	\$ 10,623	48,011	\$ -	\$ -
G1000 (C12337)	365	\$ 39.493	\$ 14,415	34,831	\$ -	\$ -
G1000 (C16459)	365	\$ 24.921	\$ 9,096	1,565	\$ -	\$ -
G1000 (C26262)	365	\$ 38.338	\$ 13,993	19,862	\$ -	\$ -
G1000 (C26444)	365	\$ 23.574	\$ 8,604	119,114	\$ -	\$ -
G1000 (C26779)	365	\$ 226.409	\$ 82,639	13,229	\$ -	\$ -
G1000 (C31266)	365	\$ 81.139	\$ 29,616	277,332	\$ -	\$ -
G1000 (C31778)	365	\$ 81.607	\$ 29,786	192,050	\$ -	\$ -
G1000 (C32121)	365	\$ 184.403	\$ 67,307	9,618	\$ -	\$ -
	<u>3,665,187</u>		<u>\$ 2,947,653</u> $\Sigma_i P_{i,2025} \times Q_{i,2023}$	<u>1,198,551</u>		<u>\$ 3,003,193</u> $\Sigma_i P_{i,2025} \times Q_{i,2023}$

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Appendix 2 – Data from Previous Compliance Statements

The following supporting data, information and calculations were disclosed and published within the GasNet Limited “2023 Default Price-Quality Path Annual Compliance Statement – Gas Distribution Network Services”, a copy of which is available on GasNet’s website <http://www.gasnet.co.nz/gasnet-disclosures>.

Attribute	Description	Value
K_{2024}	is the sum of all Pass-through Costs for the Pricing Year ending in 2024	\$107,093
V_{2024}	is the sum of all Recoverable Costs for the Pricing Year ending in 2024	\$ nil
ANR_{2024}	is the Allowable Notional Revenue for the Pricing Period ending in 2024	\$5,267,512
NR_{2024}	is the Notional Revenue for the Pricing Period ending in 2024	\$5,152,981

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Appendix 3 - Director Certification

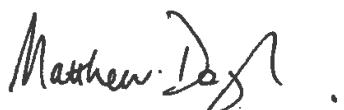
(Pursuant to the Gas Distribution Services Default Price-Quality Path Determination 2022)

Schedule 7: Form of Directors' Certificate for Compliance Statement

We, Charles Peter Hazledine and Matthew Doyle being Directors of GasNet Limited certify that, having made all reasonable enquiry, to the best of our knowledge and belief, the attached compliance statement of GasNet Limited, and related information, prepared for the purposes of the Gas Distribution Services Default Price-Quality Path Determination 2022 has been prepared in accordance with all the relevant requirements.



Peter Hazledine
Director



Matthew Doyle
Director

18 December 2025

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Appendix 4 – Auditor's Report

AUDIT NEW ZEALAND
Mana Arotake Aotearoa

Independent Assurance Report

**To the directors of GasNet Limited and to the Commerce Commission
on the annual Compliance Statement
for the assessment period ended 30 September 2025
as required by the Notice to Supply Information to the Commerce Commission
under section 53N of the Commerce Act 1986**

The Auditor-General is the auditor of GasNet Limited (the company). The Auditor-General has appointed me, Debbie Perera, using the staff and resources of Audit New Zealand, to provide reasonable assurance, on his behalf, on whether the Compliance Statement on pages 3 to 9 (the Compliance Statement) for the assessment period ended on 30 September 2025 complies, in all material respects, with the Gas Distribution Services Default Price-Quality Path Determination 2022 [2022] NZCC 19 (the Determination) as specified in the notice to supply information to the Commerce Commission under section 53N of the Commerce Act 1986 (Section 53N notice).

- **Opinion**

In our opinion, in all material respects:

- as far as appears from our examination, the information used in the preparation of the Compliance Statement has been properly extracted from the company's accounting and other records, sourced from its financial and non-financial systems; and
- the company has complied with paragraphs A5 and A6 of the Section 53N notice in preparing the Compliance Statement for the assessment period ended 30 September 2025.

- **Basis of opinion**

We conducted our engagement in accordance with the International Standard on Assurance Engagements (New Zealand) 3000 (Revised) Assurance Engagements Other Than Audits or Reviews of Historical Financial Information ("ISAE (NZ) 3000 (Revised)") and the Standard on Assurance Engagements (SAE) 3100 (Revised) Compliance Engagements ("SAE 3100 (Revised)"), issued by the New Zealand Auditing and Assurance Standards Board.

We have obtained sufficient recorded evidence and explanations that we required to provide a basis for our opinion.

- **Directors' responsibilities**

The directors of the company are responsible for the:

- preparation of the Compliance Statement under paragraph A3 and in accordance with the requirements in paragraphs A5 and A6 of the Section 53N notice; and

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- identification of risks that may threaten compliance with the clauses identified above and controls which will mitigate those risks and monitor ongoing compliance.

- Auditor's responsibilities**

Our responsibilities in terms of paragraphs A3(d), A10(b)(vi), and A10(c) of the Section 53N notice, are to express an opinion on whether:

- as far as appears from an examination, the information used in the preparation of the Compliance Statement has been properly extracted from the company's accounting and other records, sourced from its financial and non-financial systems; and
- the company has complied, for the assessment period ended 30 September 2025, in all material respects, with the Determination in preparing the Compliance Statement.

To meet these responsibilities, we planned and performed procedures in accordance with ISAE (NZ) 3000 (Revised) and SAE 3100 (Revised), to obtain reasonable assurance about whether the company has complied, in all material respects, with paragraphs A5 and A6 of the Section 53N notice.

In relation to the price path set out in clause 8 of the Determination, our assurance engagement included examination, on a test basis, of evidence relevant to the amounts and disclosures contained on pages 4 to 5 and 8 of the Compliance Statement.

In relation to the annual quality assessment formula set out in clause 9 of the Determination, our assurance engagement included examination, on a test basis, of evidence relevant to the amounts and disclosures contained on pages 5 to 7 of the Compliance Statement.

An assurance engagement to report on the company's compliance with the Determination involves performing procedures to obtain evidence about the compliance activity and controls implemented to meet the requirements. The procedures selected depend on our judgement, including the identification and assessment of the risks of material non-compliance with the requirements.

- Inherent limitations**

Because of the inherent limitations of an assurance engagement, together with the internal control structure, it is possible that fraud, error or non-compliance with paragraphs A5 and A6 of the Section 53N notice may occur and not be detected. A reasonable assurance engagement throughout the assessment period does not provide assurance on whether compliance with paragraphs A5 and A6 of the Section 53N notice will continue in the future.

- Restricted use**

This report has been prepared for use by the directors of the company and the Commerce Commission in accordance with paragraph A3(d) of the Section 53N notice and is provided solely for the purpose of establishing whether the compliance requirements have been met. We disclaim any assumption of responsibility for any reliance on this report to any person other than the directors of the company or the Commerce Commission, or for any other purpose than that for which it was prepared.

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- **Independence and quality control**

We complied with the Auditor-General's independence and other ethical requirements, which incorporate the 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. PES 1 is founded on the fundamental principles of integrity, objectivity, professional competence and due care, confidentiality and professional behaviour.

We have also complied with the Auditor-General's quality management requirements, which incorporate the requirements of 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) issued by the New Zealand Auditing and Assurance Standards Board. PES 3 requires our firm to design, implement and operate a system of quality management including policies or procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

The Auditor-General, and his employees, and Audit New Zealand and its employees may deal with the company on normal terms within the ordinary course of trading activities of the company. Other than any dealings on normal terms within the ordinary course of business, this engagement, the assurance engagement on the Information Disclosures and the annual audit of the company's financial statements and performance information, we have no relationship with, or interests in, the company.



Debbie Perera
Audit New
Zealand
On behalf of the Auditor-
General Palmerston North,
New Zealand 18 December
2025

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