

TELUS Communications Inc.

Annual Report to the Director

2023 Calendar Year

Reporting period January 1 – December 31, 2023

Submitted to: BC Ministry of Environment
Director, Extended Producer Responsibility Programs
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1. Executive Summary

Products within plan	<p><i>Telecommunication equipment:</i></p> <ul style="list-style-type: none"> ○ <i>Cordless phones and corded desktop, VOIP phones and analog terminal adapters;</i> ○ <i>Public Access Equipment;</i> ○ <i>Obsolete network infrastructure equipment (switches, servers), External customer networks, Servers</i> ○ <i>Optical network termination equipment, Internet equipment (routers, modems), Network cards;</i> ○ <i>Video and teleconferencing equipment;</i> ○ <i>TV equipment (PVRs, receivers, remote controls), Satellite TV equipment;</i> ○ <i>Global Positioning Systems (GPS);</i> ○ <i>Home Security electronic equipment</i> ○ <i>Batteries; and</i> ○ <i>Cables/accessories.</i>
Program website	<p>https://www.telus.com/en/about/policies-and-disclosures/bc-stewardship-plans</p>

Recycling Regulation Reference	Topic	Summary (5-bullet maximum)
Part 2, section 8(2)(a)	Public Education Materials and Strategies	<p>a description of educational materials and educational strategies the producer uses for the purposes of this Part</p> <ul style="list-style-type: none"> - <i>Public information posted on telus.com website providing instructions on how to return equipment to TELUS at no charge.</i> - <i>To provide information to our customers TELUS client care agents are made aware of return process by way of online system, internal communication, bulletins.</i> - <i>TELUS Technicians are made aware of return process by way of inter-company communication, bulletins.</i> - <i>Customer Mail Back instructions including a prepaid waybill.</i>
Part 2, section 8(2)(b)	Collection System and Facilities	<p>the location of its collection facilities, and any changes in the number and location of collection facilities from the previous report;</p> <p><i>Thirteen collection facility locations:</i></p> <ul style="list-style-type: none"> - <i>Communication Test Design Inc. (CTDI), Delta BC</i> - <i>Archway, Richmond BC</i> - <i>Archway, Mississauga ON</i> - <i>eCycle Solutions, Chilliwack BC</i> - <i>Quantum Lifecycle Partners LP, Edmonton AB</i> - <i>Call2Recycle, Vancouver BC</i> - <i>WiMacTel Canada Inc., Calgary AB</i> - <i>Jim Pattison Lease, Vancouver, BC</i> - <i>Ensign Pacific Lease, Vancouver, BC</i> - <i>Sumas Environmental Services Inc., Burnaby BC</i> - <i>Communication Test Design Inc. (CTDI), Mississauga, ON</i> - <i>Metalex Products Ltd, Richmond BC</i> - <i>Canadian Energy, Burnaby BC</i>

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Recycling Regulation Reference	Topic	Summary (5-bullet maximum)
Part 2, section 8(2)(c)	Product Environmental Impact Reduction, Reusability and Recyclability	<p>efforts taken by or on behalf of the producer to reduce environmental impacts throughout the product life cycle and to increase reusability or recyclability at the end of the life cycle;</p> <p><i>Although TELUS is not a manufacturer of equipment (TELUS branded or not) that we sell or rent, we endeavor to work with our manufacturers to encourage them when designing for the environment to use minimal packaging materials; FSC certified, high recycled content, and or recyclable or biodegradable materials. Where appropriate and applicable, TELUS will also endeavor to include corporate social responsibility requirements in RFPs when selecting vendors.</i></p>
Part 2, section 8(2)(d)	Pollution Prevention Hierarchy and Product / Component Management	<p>a description of how the recovered product was managed in accordance with the pollution prevention hierarchy</p> <p><i>TELUS' triage of recovered equipment enables TELUS to follow the pollution prevention hierarchy, such as the regulation requires, to ensure pollution prevention is not undertaken at one level unless or until all feasible opportunities for pollution prevention at a higher level have been taken. See section 6</i></p>
Part 2, section 8(2)(e)	Product Sold and Collected and Recovery Rate	<p>Provide a summary of the total amount of product sold, collection volumes and, if applicable, recovery rates achieved by the program based on the approach included in the approved program plan. Also provide a summary of total product recovered by regional district..</p> <p><i>Total Program Product Collection Volumes in 2023 is 468.971 metric tonnes Total Program Product Distributed into BC in 2023 is 370.299 metric tonnes Total Program Product Recovery Rate in 2023 is 126.65% See section 7 for details</i></p>
Part 2, section 8(2)(e.1)		<p>[See Section 7 for breakdown per regional district] <i>See Section 7</i></p>
Part 2, section 8(2)(f)	Summary of Deposits, Refunds, Revenues and Expenses	<p>[Provide report reference to the independently audited financial statements] <i>Not applicable as TELUS fully funds program.</i></p>

Comparison of Key Performance Targets		
Part 2 section 8(2)(g); See full list of targets in Plan Performance		
Priority Stewardship Plan Targets (as agreed with ministry file lead)	Performance	Strategies for Improvement
1. <i>2023 Target of 83.5% recovery</i>	<i>126.65% overall recovery</i>	<i>TELUS continues to look at process improvements to increase our returns as well as investigating opportunities for reusing products. The recovery rate is higher compared to previous year because we put out reduced number of products in the market.</i>

2. Program Outline

Overview

TELUS Communications Inc. (TELUS) developed its own BC Electronic Equipment Stewardship Plan to adhere to the requirements set in the BC Recycling Regulation – Electronic and Electrical Product Category.

The TELUS team's dedication to preserving and protecting our environment contributes to our role as a leading socially responsible corporation. Consistently recognized for our sustainability practices, TELUS has been listed on the Dow Jones Sustainability North America Index for 18 years and was added to its World Index as of 2016, one of only nine telecommunications companies globally to be recognized with this distinction. Notably, we are one of only six Canadian companies to be named to the World Index across 24 sectors.

Environmental compliance

TELUS believes that an effective environmental management system provides the foundation for our environmental sustainability initiatives. In 2023 TELUS completed the required external audits to maintain our ISO 14001 certification. The globally recognized ISO 14001 standard has recently been updated (ISO14001:2015) and we worked to adapt our current system to the new version through 2023. Maintaining this ISO standard also requires continual improvements to our environmental management processes, and TELUS is committed to identifying even more ways to better our performance.

Products Collected

TELUS has been collecting, refurbishing for reuse, reselling, and recycling electronics using our reverse logistics processes that are established, controlled and monitored on a national basis. TELUS' Plan addresses rental and retail TELUS customer premise equipment as well as our internal use equipment. Mobile devices are not included in this Stewardship Plan as TELUS (as a remitter) submits the data to the Electronic Product Recycling Association in BC (EPRA-BC).

The following is a general list of categories of equipment with regards to the requirements outlined by the BC Recycling Regulation – Electronic and Electrical Product Category. This list is an overview and does not list accessories or additional paraphernalia that might be associated with each equipment category. TELUS is committed to be responsible for all new products TELUS introduces into the marketplace.

- *TELUS TV Equipment (Set-top boxes, PVRs, Receivers, Remote Controls)*
- *TELUS Internet Equipment (Routers, Modems, Gateways)*
- *Network Printed Circuit Cards*
- *Public Access Equipment*
- *Cordless and Corded Phones (wireline)*
- *VOIP phones*
- *VOIP Analog Terminal Adapter*
- *Satellite TV equipment*
- *Global Positioning System (GPS) equipment*
- *Video and telephone conferencing equipment*
- *Home Security Equipment*
- *Batteries associated with these electronics*

Website:

<https://www.telus.com/en/support/article/equipment-warranty-upgrades-returns>

3. Public Education Materials and Strategies

Reference: Recycling Regulation – Part 2, section 8(2)

(a) a description of educational materials and educational strategies the producer uses for the purposes of this Part

Education and Strategies

1. *Call Centre Awareness – call centre representatives are informed about the program and are equipped with the online information necessary to advise customers of their equipment return options.*
2. *TELUS Call Centre representatives coordinate pickup and return of business customer equipment to TELUS.*
3. *Return mailer kits including return instructions, carton, pre-paid waybill, provided to TELUS TV and TELUS Satellite TV customers. This program was expanded to include all TELUS TV and high speed internet access (HSIA) customers.*
4. *TELUS Website – our website contains information for customers on how to return items.
<https://www.telus.com/en/support/article/equipment-warranty-upgrades-returns>.*
5. *TELUS is a member of the Recycling Council of BC and participates in the BC Recycling Hotline service.*
6. *TELUS Technician Awareness – our technicians are informed about the program and TELUS' commitments to our customers with respect to equipment being returned.*
7. *TELUS Team Members Awareness – team members are provided with current information regarding the return of electronic equipment in this plan through a number of mechanisms. Mechanisms include online process information on our internal company website, inter-company bulletins, TELUS Green Teams, internal social media, and as required one on one email and phone conversations.*
8. *TELUS' Nudge Rewards app to all TELUS team members. Nudge Rewards is a mobile app that engages employees via push notifications with tidbits about the energy use of the buildings and recyclable office materials in the form of trivia, fast-facts and contests. It also calls for brainstorming. Pop-ups appear to get feedback from app users to create company-wide initiatives that everyone has a stake in.*
9. *TELUS sales contracts offer a recovery service for end of life equipment. A clause to this effect can be included on a sales contract if customers wish to use this service.*
10. *Online Training for TELUS Team Members: TELUS Integrity Course is one of the Company's key policies and is reviewed by all TELUS team members on an annual basis. This compulsory course is deployed as an online training tool which covers the legal and regulatory requirements that TELUS team members must follow while carrying out their duties. The course includes environmental case studies specific to electronic waste.*

All of our key business units and stakeholders are involved in reducing the amount of material sent to landfills and improving recycling and re-use. Our biggest successes in 2023 include:

- *TELUS' Waste Reduction Working Group is tasked with the implementing projects in our Waste Reduction Strategy*
- *Continuing to rely on our Green Teams and National Sustainability Council to build engagement and behavior change toward reducing waste across TELUS*

These information-gathering exercises helped us identify factors that are influencing our diversion rates. Over the course of 2023 we continued on scouting a path to 90 per cent diversion, while implementing practical improvements in our operations.

4. Collection System and Facilities

Reference: Recycling Regulation – Part 2, section 8(2)

(b) the location of its collection facilities, and any changes in the number and location of collection facilities from the previous report;

Thirteen collection facilities owned by TELUS or TELUS Contractors/Vendors receive customer returns through recovery mechanisms. Both TELUS Technicians and TELUS Contractors recover equipment from customers and return to collection facilities. To ensure that all of our customers have access to a collection facility, TELUS provides a mail back program. TELUS residential customers have access to a Canada Post retail outlet in their area and TELUS business customer are provided with a courier pickup service.

Collection facility locations:

- *Communication Test Design Inc. (CTDI), Delta BC*
- *Archway, Richmond BC*
- *Archway, Mississauga ON*
- *eCycle Solutions, Chilliwack BC*
- *Quantum Lifecycle Partners LP, Edmonton AB*
- *Communication Test Design Inc. (CTDI), Mississauga ON*
- *WiMacTel Canada Inc., Calgary AB*
- *Jim Pattison Lease, Vancouver, BC*
- *Ensign Pacific Lease, Vancouver, BC*
- *Sumas Environmental Services Inc., Burnaby BC*
- *Call2Recycle, Vancouver BC*
- *Metalex Products Ltd, Richmond BC*
- *Canadian Energy, Burnaby BC*

We used 14 facilities in 2022. In year 2023 we used only 13 facilities. Hub Power Ltd, Burnaby BC which was used in 2022, was not used in 2023.

To provide easy access to TELUS' collection facilities in all Regional Districts, Canada Post, couriers (e.g. FedEx), and TELUS technicians act as recovery mechanisms that increase public access to the Collection Facilities. For example, Canada Post has over 6,600 retail outlets across Canada. The Canada Post retail outlets and the location of each are available on the Canada Post website at <http://www.canadapost.ca/cpotools/apps/fpo/personal/findPostOffice>

5. Product Environmental Impact Reduction, Reusability and Recyclability

Reference: Recycling Regulation – Part 2, section 8(2)

(c) efforts taken by or on behalf of the producer to reduce environmental impacts throughout the product life cycle and to increase reusability or recyclability at the end of the life cycle;

Overview of National Supply Chain Sustainability

As we work to provide the highest quality products and services to our customers, we have a responsibility to do so in a way that considers the environmental and social impacts across our value chain. Our aim is to work collaboratively with our suppliers to consider the full lifecycle of our products - from raw materials sourcing to end-of-life treatment.

In 2023, highlights include,

- *engaging our suppliers on our expectations for climate action - including disclosing and setting science based targets to reduce their GHG emissions*
- *completing our first year in the CDP Supply Chain Program, achieving an 84 per cent response rate from requested suppliers*

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- *becoming a signatory of CDP's Science-Based Targets initiative (SBTi) Campaign, to accelerate the adoption of science-based climate targets across our supply chain ó leading our first Joint Alliance for CSR (JAC) facility audits as a member of the collaborative association of telecom operators*
- *garnering several awards and recognitions for our TELUS Supplier Diversity and Indigenous Procurement program including:*
 - o *Canadian Aboriginal and Minority Supplier Council (CAMSC) Collaboration Award*
 - o *CAMSC Social Good Award: Ashifa Jumani (TELUS procurement director)*
 - o *WBE President's Award*
- *creating a standalone Indigenous procurement program separate from supplier diversity that is better tied to TELUS' economic reconciliation and sustainability goals ó initiating our first TELUS Indigenous Partner Day, creating opportunities for business and collaboration with Indigenous communities.*

We aim to work with suppliers and partners that demonstrate the same strong commitment to sustainability as TELUS. This begins with establishing clear expectations for suppliers through our TELUS [Supplier Code of Conduct](#) (the Supplier Code) and only contracting with suppliers that accept the Supplier Code or have equivalent high standards, as well as complying with applicable laws and regulations wherever they operate. We have also integrated our company-wide [Sustainable Paper and Packaging Policy](#) into the Supplier Code.

We continue to implement a 10 per cent minimum scoring weight requirement for environmental and social responsibility considerations consistent with the Supplier Code in all sourcing events. TELUS' procurement practices are continuously reviewed to determine alignment with the Supplier Code, our sustainability strategy, and evolving industry standards and expectations.

TELUS is a member of the Joint Alliance for CSR (JAC), a non-profit association of telecommunications operators aiming to verify, assess and apply responsible practices across manufacturing sites of its key suppliers. The benefits of this collaboration include reducing audit fatigue, increasing the scale of visibility and transparency, and standardizing the audit process for suppliers. JAC members share resources and best practices, ensuring that audit findings are shared and corrective actions plans implemented where necessary to raise standards.

JAC has also established working groups to address specific areas of interest to members. In 2023, TELUS participated in both the climate change and human rights working groups, focused on accelerating progress towards net zero and addressing human rights risks in the supply chain. For a detailed breakdown of JAC audit data, see our [2023 ESG Data Sheet](#). For a full report on JAC's 2023 progress, see the [JAC Annual Audit Report](#)

In order to deliver on our ambition of achieving net zero emissions across our value chain, we are engaging strategically with our suppliers through our Sustainable Supplier Program to mobilize climate action. As part of the program, we engage with our most impactful suppliers to share our expectations for climate action, including disclosing and setting science based targets to reduce GHG emissions along our supply chain. We also provide resources, training and capacity building to enable them to better understand and act on these expectations.

In 2023, we leveraged our [CDP Supply Chain](#) membership to drive priority suppliers to take action on disclosing and reducing their GHG emissions. We use the CDP Climate Change Questionnaire to obtain primary GHG emissions data from suppliers, including information about emissions allocated specifically to TELUS and areas for collaboration.

By the end of 2028, we aim to enable 70 per cent of TELUS' suppliers by emissions (covering purchased goods and services and capital goods) to have set their own science-based targets. This additional Scope 3 target has been submitted for validation and is pending approval from the Science Based Targets initiative (SBTi).

For more information on TELUS' Scope 3 emissions, see [page 22](#). For a detailed breakdown of our GHG performance data, see our [2023 ESG Data Sheet](#).

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Promoting Community Circularity

TELUS continues to partner with the Circular Innovation Council's Circular Economy Month, an event designed to raise awareness about the importance of corporations promoting circularity within their operations. During the month of October, we promoted our Certified Pre-Owned (CPO) device program that encourages the purchase of used devices, our repair services at Mobile Klinik and our in-store device recycling program.

In 2023, we continued to partner with the Toronto Region Conservation Authority to run the Circular Economy Leaders Consortium, a group of industry leaders committed to implementing new practices within their organizations. The group includes TELUS, Air Canada, Canadian Tire, City of Mississauga, Longos, Ontario Green Screen, Region of Peel, Seneca College, Sheridan College, Toronto Metropolitan University, Toronto Pearson, University Health Network, Velcro Canada, Wilfred Laurier University, Woodbine Entertainment and York Region. In addition, we participate on the advisory board for the Circular Opportunity Innovation Launchpad and National Zero Waste Council.

Responsible Product Design

We are placing a growing emphasis on sustainable product design in the responsible management of our TV, internet, wireless and SmartHome Security devices. By working with third party facilities that manage refurbishment and recycling, we gain a better understanding of the design for environment requirements to determine our products are durable and can be refurbished and recycled at end-of-life. We work closely with suppliers to understand, manage and reduce the impact of our products through the entire lifecycle and to enable the implementation of our circularity requirements in product design. We take into consideration the use of recycled plastics in manufacturing, energy efficiency when customers use our products, and component assembly to facilitate refurbishment and end-of-life management. In 2023, we launched a hardware sustainability guideline with an emphasis on responsible and circular product design. These guidelines are referenced throughout our product development process.

Maximizing Reuse

Reuse is an important element of the circular economy. We look at opportunities to reuse internally to improve program efficiency and externally to support our customers. Reuse extends the life of the materials and prevents the need for additional extraction, manufacturing and end-of-life management.

Our Supply Operations team focuses on the management of end-of-life products and devices returned or recovered from our customers, including new product innovations such as CPO, take-home-trade-later, and online Bring-It-Back and Trade-in. In 2023, TELUS collected 393,328 devices for reuse and recycling through these programs.

At TELUS, we have been refurbishing our customer premises equipment whenever possible since 2004. Typically, equipment comes back to us from a customer, usually through a technician. During the refurbishment process, we assess the device to confirm its reusability, clean the device, reset and do a complete data wipe, upgrade firmware and upgrade the device housing. By implementing a refurbishment program, we can extend the average product life from three years to six years. Some equipment can be reused three to four times. In 2023, the three most refurbished products included set top boxes, modems and optical network terminals

Our equipment spares program allows us to reutilize our equipment by repairing the defective unit instead of replacing the spare equipment inventory with new units. This provides an opportunity for us to use the full life of the equipment until it can no longer be repaired and therefore limits the amount of parts going into the landfill or needing to be recycled. It also means that fewer new parts are being manufactured as we can avoid purchasing unnecessary new parts until the full life of the spare part has been diminished.

Waste diversion

Waste diversion remains a key focus across our operations. In 2023, we diverted 67 per cent of our waste from landfill. The waste diversion rate for our real estate assets (both owned and leased properties) was 57 per cent in 2023.

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Technology is an integral part of the path to circularity. TELUS Smart Waste Management solution sensor technology allows us to gain realtime information about our waste and recycling practices. We are piloting 32 sensors across our Quebec operations with TELUS Internet of Things (IoT) and TELUS Smart City. In addition, our partnership with [Intuitive AI](#) provides for gamification of our waste and recycling at 4 facilities across Canada. Oscar Sort allows us to educate our team members about proper sorting techniques using a screen that tells our customers where to place their unwanted items.

Electronic waste

Our customers can reduce their waste by repairing devices or buying refurbished devices and other electronic equipment, giving people options that are better for the planet while improving affordability.

In 2023, we reused and recycled 1,108 metric tonnes of e-waste and 55 metric tonnes of mobile devices totaling 393,328 devices. For a detailed breakdown of our historical, year-over-year waste and recycling performance data, see our [2023 ESG Data Sheet](#).

6. Pollution Prevention Hierarchy and Product / Component Management

Reference: Recycling Regulation – Part 2, section 8(2)

(d) a description of how the recovered product was managed in accordance with the pollution prevention hierarchy;

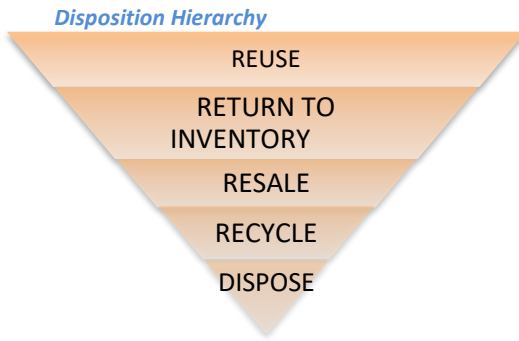
By virtue of the triage system TELUS utilizes for its electronics, pollution hierarchy is considered throughout the process. All recovered items are reused where possible and recycling is used as the last resort. TELUS defines what items are to be refurbished for reuse; what equipment can be sold for reuse; what is to be returned to our vendor under warranty; and what products must be recycled. Upon TELUS receiving the rental equipment it is tested. Working units are refurbished and restocked for reuse; defective units under warranty are returned to the manufacturer; defective units not under warranty that are beyond economical repair are recycled by TELUS' authorized electronics recycling contractor.

Program Products collected are reported by End of Fate by level on the Pollution Prevention Hierarchy:

- *Reuse: These are TELUS TV Future Friendly Home (FFH) devices that are either reused by TELUS or sold for the purpose of reuse or refurbishment for reuse. Our 2023 FFH reuse rate was 37.9 percent and 84.6 percent reuse rate of our accessories.*
- *Recycle: These are products that are processed into an End of fate commodity (e.g. Ferrous Steel, Plastics, Aluminum, Copper, Glass, Lead, etc.). In 2023 over 468.971 mt of electronics and the associated batteries was recycled from our products collected in BC. TELUS purchased a portion of Alarm Force in the Spring of 2021. As a result, TELUS technicians have been recovering legacy equipment from Alarm Force customers to ensure the products are kept out of the landfill. In 2023, we are happy to report that 27,669 kilograms of Alarm Force legacy electronics were recycled through TELUS' authorized electronics recycler, eCycle Solutions. We also refurbished about 2862 units of SHS equipment in the year 2023.*
- *Recover into energy: There currently are no processes for recovery into Energy although TELUS closely monitors developments in this industry.*

Residual Waste: waste going to landfill or hazardous waste from all sources that is not reusable. For products and materials that cannot be reused or resold, TELUS pursues opportunities to recycle and divert these assets from landfills. We continue to enhance our recycling and diversion programs in our operations and are collaborating with our property managers and waste haulers with the goal of establishing waste diversion targets. In 2023, non-hazardous waste was sent to the landfill by our electronics recyclers due to not being a recyclable or reusable commodity within the product (examples are non-recyclable packaging materials, rubber feet).

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Acceptable Product End of Fate

Product Type	Reuse	Recycle	Energy Recovery	Residual Waste
TELUS TV Equipment and accessories	Preferred	Optional	N/A	Optional
Telsets	Preferred	Optional	N/A	Optional
Network Equipment	Preferred	Optional	N/A	Optional
GPS Equipment	Preferred	Optional	N/A	Optional
Batteries <2 kg	N/A	Preferred	N/A	Optional
Batteries >2 kg	N/A	Preferred	N/A	Optional

Estimated Product End of Fate Data for the year ended December 31, 2023

Product Type	Reuse (%)	Recycle (%)	Recovery (%)	Residual Waste Landfilled (%)	Unknown (%)
TELUS TV Equipment	25.4%	74.6%	0.0%	0.03%	0.0%
TELUS TV Accessories	48.6%	51.2%	0.0%	0.18%	0.0%
Network Equipment	69.7%	30.3%	0.0%	0.0%	0.0%
Telsets	0.0%	0.0%	0.0%	0.0%	100.0%
GPS	0.0%	0.0%	0.0%	0.0%	100.0%
Batteries <2 kg	0.0%	100.0%	0.0%	0.0%	0.0%
Batteries >2 kg	0.0%	100.0%	0.0%	0.0%	0.0%

TELUS’ processors provided TELUS with an end of fate flow chart that describes where our products are recycled (City and Province or Country) and the material recovered from them such as steel, copper, aluminum, precious metals, and plastics. This processing flow takes the material recovered to a point where the processor sells the material recovered to their buyers for further processing. Our electronics recycler even sends the dust from the bag-houses for processing.

Processing Pathways

Product Type	Transfer to direct processor in BC (%)	Transfer to direct processor or multi-step processor in North America (%)	End of Fate Description
TELUS TV Equipment and accessories		100%	Processed for material recovery (metals, precious metals, plastics) and landfill
Telsets		100%	Processed for material recovery (metals, precious metals, plastics) and landfill
GPS		100%	Processed for material recovery (metals, precious metals, plastics) and landfill
Network Equipment		100%	Processed for material recovery (metals, precious metals, plastics) and landfill
Batteries <2 kg	99.01%	0.99%	Processed for material recovery (nickel, cobalt, cadmium, lead, iron, copper, stainless steel) and landfill
Batteries >2 kg	99.98%	0.02%	Processed down to commodities for reuse or further processing (lead, acid, plastic, sulfur)

7. Product Distributed and Collected and Recovery Rate

Reference: Recycling Regulation – Part 2, section 8(2)

- (e) the total amount of the producer's product distributed and collected and, if applicable, the producer's recovery rate;
- (e.1) effective for a report required on or before July 1 and for every report required under subsection (1) after that date, the total amount of the producer's product recovered in each regional district;

7.1 Program Product Distributed into BC (by weight)

- *Total program product distributed into BC during 2023 was 370.299 metric tonnes (mt)
The amount of circuit cards (network) distributed was based on self-reporting as 1-1 as we do not have the data indicating the distribution of circuit cards. However, we do know that for each card removed from our switch a new card is installed in its place.*

7.2 Program Product Collection Volumes (by weight):

- *Program product equipment 394.586 mt*
 - *>2 kg Batteries 64.296 mt*
 - *Consumer Batteries 10.089 mt*
- Total program product collection volumes during 2023 was 468.971 mt*

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Equipment Recovered by Regional District

Regional District Name	Equipment Recovered (kilograms)*
Alberni-Clayoquot	94
Bulkley-Nechako	2,204
Capital	10,177
Cariboo	3,705
Central Kootenay	3,846
Central Okanagan	15,148
Columbia-Shuswap	3,658
Comox Valley	1,126
Cowichan Valley	1,454
East Kootenay	3,142
Fraser Valley	7,504
Fraser-Fort George	6,519
Greater/Metro Vancouver	371,472
Kitimat-Stikine	1,548
Kootenay Boundary	1,735
Mount Waddington	610
Nanaimo	11,396
North Okanagan	4,315
Okanagan-Similkameen	2,767
Peace River	2,626
Powell River	750

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Skeena-Queen Charlotte	0
Squamish-Lillooet	1,735
Strathcona	516
Sunshine Coast	1,172
Thompson-Nicola	9,755
Provincial Total	468,971 kgs

7.3 Program Product Recovery Rate:

- Overall program product recovery rate for 2023 was 126.65%; this is based on the weight of units collected and the weight of units distributed.
- TELUS' Customer Premise Equipment (Rental) Return Improvement Implementation Plan Development & Project commenced where TELUS provided return kits to our customers in an effort to increase the recovery of rental set top boxes, modems, receivers, and remotes.

7.4 Reuse Rate:

- TELUS' FFH reuse rate on the products collected in 2023 was 37.9% as a result of TELUS' disposition process.
- TELUS will reuse most consumer products up to four times during its lifecycle. This demonstrates the results of our focus on the Pollution Prevention hierarchy.

8. Summary of Deposits, Refunds, Revenues and Expenditures

Reference: Recycling Regulation – Part 2, Section 8(2)

(f) independently audited financial statements detailing

- (i) all deposits received and refunds paid by the producers covered by the approved plan, and
- (ii) revenues and expenditures for any fees associated with the approved plan that are charged separately and identified on the consumer receipt of sale;

TELUS funds the TELUS BC Electronics Stewardship Plan. No customers are charged an environment handling fee.

9. Plan Performance

Reference: Recycling Regulation – Part 2, section 8(2)

(g) a comparison of the approved plan's performance for the year with the performance requirements and targets in this regulation and the approved plan

TELUS Communications Inc. 2023 Report to Director, Waste Management

Plan Target	2023 Results	Strategies for Improvement
<i>1. Target of 83.5% recovery was committed for 2023</i>	<i>Overall recovery rate was 126.65%</i>	<i>TELUS continues to look at process improvements to increase our returns as well as investigating opportunities for reusing products. The recovery rate is higher compared to previous year because we put out reduced number of products in the market.</i>

Appendices / Additional Information and Third Party Assurance

Appendix A - *Third Party Assurance Statement for Non-Financial Information*

Reference: Recycling Regulation – Part 2, section 8(2)

Including section 8(2)(h), any other information specified by the director



Independent practitioner’s reasonable assurance report on the subject matter as presented in TELUS’s Annual Report to the Director, of the British Columbia Ministry of Environment & Climate Change Strategy

To: The Management of Telus Communications Inc. (TELUS)

We have undertaken a reasonable assurance engagement of the subject matter detailed in Appendix A of Telus’s Annual Report to the Director (the Report) of the British Columbia Ministry of Environment & Climate Change Strategy (the Ministry) for the year ended December 31, 2023.

TELUS’s responsibility for the subject matter

TELUS is responsible for the preparation of the subject matter in accordance with the sections 8(2)(b), 8(2)(d), 8(2)(e), and 8(2)(g) of the British Columbia Recycling Regulation 449/2004 established in Appendix A (the applicable criteria). TELUS is also responsible for the design, implementation and maintenance of internal control relevant to the preparation of the subject matter that is free from material misstatement, whether due to fraud or error.

Our responsibility

Our responsibility is to express a reasonable assurance opinion on the subject matter based on the evidence we have obtained. We conducted our reasonable assurance engagement in accordance with Canadian Standard on Assurance Engagements (CSAE) 3000, *Attestation Engagements Other than Audits or Reviews of Historical Financial Information*.

This standard requires that we plan and perform this engagement to obtain reasonable assurance about whether the subject matter is free from material misstatement.

Reasonable assurance is a high level of assurance, but is not a guarantee that an engagement conducted in accordance with this standard will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the decisions of users of our report. The nature, timing and extent of procedures performed depends on our professional judgment, including an assessment of the risks of material misstatement, whether due to fraud or error, and involves obtaining evidence about the preparation of the subject matter in accordance with the applicable criteria.

Our engagement included, among others, the following procedures performed:

- making enquiries to obtain an understanding of the overall governance and internal control environment and risk management processes relevant to the management and reporting of the Report;
- analytical reviews and trend analysis of reported data;
- testing the processes, documents and underlying data on a sample basis;

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- recalculating quantitative data on a sample basis as it pertains to the subject matter information; and
- evaluating the presentation and disclosure of the subject matter information in the Report.

We believe the evidence we obtained is sufficient and appropriate to provide a basis for our opinion.

Our independence and quality management

We have complied with independence and other ethical requirements of the relevant rules of professional conduct / code of ethics applicable to the practice of public accounting and related to assurance engagements, issued by various professional accounting bodies, which are founded on fundamental principles of integrity, objectivity, professional competence and due care, confidentiality and professional behaviour.

The firm applies Canadian Standard on Quality Management 1, *Quality Management for Firms that Perform Audits or Reviews of Financial Statements, or Other Assurance or Related Services Engagements*, which requires the 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.

Significant inherent limitations

Non-financial data is subject to more limitations than financial data, given both the nature and the methods used for determining, calculating, sampling or estimating such data. Qualitative interpretations of relevance, materiality and the accuracy of data are subject to individual assumptions and judgments.

Opinion

In our opinion, TELUS's subject matter for the year ended December 31, 2023 is prepared, in all material respects, in accordance with the applicable criteria.

Purpose of the subject matter and restriction on use of our report

The subject matter has been prepared in accordance with the applicable criteria to assist TELUS in reporting to the Ministry. As a result, the subject matter may not be suitable for another purpose. Our report is intended solely for TELUS and the Ministry.

We neither assume nor accept any responsibility or liability to any third party in respect of this report.

PricewaterhouseCoopers LLP

Chartered Professional Accountants

Vancouver, BC
September 10, 2024



Appendix A

Subject matter and applicable criteria

1. Section 8(2)(b) of the Recycling Regulation - the location of collection facilities, and any changes in the number and location of collection facilities from the previous report

TELUS's reported result:

The number of collection facility locations is 13.

Reference: Pages 3 and 7 of TELUS's 2023 Annual Report to the Director

Basis of preparation:

- “Collection Facilities” are centres that were owned by TELUS, had a signed contract with TELUS, or non-contracted with selected TELUS vendors, for the collection of Program Products as of December 31st of the reporting year. Collection facilities owned by TELUS or TELUS Contractors/Vendors receive customer returns through recovery mechanisms. Both TELUS technicians and TELUS contractors recover equipment from customers and return to collection facilities. Additionally, TELUS has a mail-back program whereby residential customers can return items via Canada Post outlets and business customers are provided with a courier pickup service.
- “Collection Facilities” are one of the following types of centres:
 - Reverse Logistics/Triage Centres – e.g., CTDI and Archway;
 - Processors - e.g., GEEP, Metalex, Edmonds Recycling;
 - Spare Central Stock – e.g., CTDI warehouse location for spare network equipment; or
 - Redeployment Centres/Forward logistics - e.g., TELUS, CTDI and Archway warehouse locations for used equipment brought back into inventory.
- “Collection Facilities” are not Canada Post, courier service providers (e.g., FedEx), technicians or Tier 2 locations (“Tier 2 locations” are TELUS locations where the technicians drop off material for return. These then are forwarded to any of the collection facilities).



2. Section 8 (2) (d) of the Recycling Regulation - the description of how the recovered product was managed in accordance with the pollution prevention hierarchy

TELUS's reported result:
Acceptable Product End of Fate

Product Type	Reuse	Recycle	Recovery	Residual
TELUS TV Equipment and accessories	Preferred	Optional	N/A	Optional
Telsets	Preferred	Optional	N/A	Optional
Network Equipment	Preferred	Optional	N/A	Optional
GPS Equipment	Preferred	Optional	N/A	Optional
Batteries <2 kg	N/A	Preferred	N/A	Optional
Batteries >2 kg	N/A	Preferred	N/A	Optional

Estimated Product End of Fate Data for the year ended December 31, 2023

Product Type	Reuse (%)	Recycle (%)	Recovery (%)	Residual (%)	Unknown (%)
TELUS TV Equipment	25.4%	74.6%	0.0%	0.03%	0.0%
TELUS TV Accessories	48.6%	51.2%	0.0%	0.18%	0.0%
Network Equipment	69.7%	30.3%	0.0%	0.0%	0.0%
Telsets	0.0%	0.0%	0.0%	0.0%	100.0%
GPS	0.0%	0.0%	0.0%	0.0%	100.0%



2. Section 8 (2) (d) of the Recycling Regulation - the description of how the recovered product was managed in accordance with the pollution prevention hierarchy

Product Type	Reuse (%)	Recycle (%)	Recovery (%)	Residual (%)	Unknown (%)
Batteries <2 kg	0.0%	100.0%	0.0%	0.0%	0.0%
Batteries >2 kg	0.0%	100.0%	0.0%	0.0%	0.0%

Processing Pathways

Product Type	Estimated transfer to direct processor in British Columbia (%)	Estimated transfer to direct processor or multi-step processor in North America (%)	End of Fate Description
TELUS TV Equipment and accessories		100%	Processed for material recovery (metals, precious metals, plastics) and landfill
Telsets		100%	Processed for material recovery (metals, precious metals, plastics) and landfill
GPS		100%	Processed for material recovery (metals, precious metals, plastics) and landfill
Network Equipment		100%	Processed for material recovery (metals, precious metals, plastics) and landfill
Batteries <2 kg	99.01%	0.99%	Processed for material recovery (nickel, cobalt, cadmium, lead, iron, copper, stainless steel) and landfill



2. Section 8 (2) (d) of the Recycling Regulation - the description of how the recovered product was managed in accordance with the pollution prevention hierarchy

Product Type	Estimated transfer to direct processor in British Columbia (%)	Estimated transfer to direct processor or multi-step processor in North America (%)	End of Fate Description
Batteries >2 kg	99.98%	0.02%	Processed down to commodities for reuse or further processing (lead, acid, plastic, sulfur)

Reference: pages 11 and 12 of TELUS’s 2023 Annual Report to the Director

Basis of preparation:

- “Product type” is groups of products included in the program as listed in the currently approved product stewardship plan.
- “Reuse” is any Program Product which has been either reused by TELUS or sold for the purpose of reuse.
- “Recycle” refers to the process of treating or processing a Program Product into an End of Fate commodity (e.g. Ferrous Steel, Plastics, Aluminium, Copper, Glass, Lead).
- “Recovery” is the process of generating energy in the form of electricity and/or heat from the incineration of waste.
- “Residual” refers to Program Products which have been sent to landfill or hazardous waste that is not reusable.
- “End of fate” is defined as the point where the product, component, and/or material is handled as a recognized commodity, is destroyed (e.g., through energy recovery), or is disposed of as waste.
- “Estimated Product End of Fate Data” is an estimate of the end fate of the type of product based on information provided by processors.
- Direct processors are those where the Program Product is processed on a single site.
- Multi-step processors are those where the Program Product is processed over more than one site.



2. Section 8 (2) (d) of the Recycling Regulation - the description of how the recovered product was managed in accordance with the pollution prevention hierarchy

Method of reporting:

- Program Products collected are reported by end of fate both by product type and by process on the Pollution Prevention Hierarchy:
 - Reuse: Reused products are reported by weight reused or sold for reuse.
 - Recycle: Recycled products are reported by weight.
 - Recovery: N/A - No Program Products are recovered.
 - Residual: N/A – all Program Products collected are expected to be 100% recyclable. Non-program products that may be included in shipments are not recorded or reported by the program but efforts are made to dispose of them in accordance with the pollution prevention hierarchy.

3. Section 8 (2) (e) of the Recycling Regulation - the description of the total amounts of the producer's product sold and collected and, if applicable, the producers' recovery rate

TELUS's reported result:

Total amount of producer's product sold is 370.299 metric tonnes

Total amount of producer's product collected is estimated as 468.971 metric tonnes

Reference: pages 4, 10, 12, and 14 of TELUS's 2023 Annual Report to the Director

The recovery rate is reported under criteria 4 below.

Basis of preparation:

- "Product Sold" is the amount of all Program Products distributed into BC by TELUS.
- "Product Collected" is the amount of all Program Products collected from sources known to be located within the province of BC that occurred through the Collection Facilities.
- "Program Products" are all products included in the program as listed in the currently approved product stewardship plan. These include:
 - Program equipment utilized externally by customers
 - TELUS TV equipment (Set-top boxes, PVRs, Receivers, Remote Controls).
 - TELUS Internet Equipment (Routers, Modems, Gateways).
 - Satellite TV equipment.



3. Section 8 (2) (e) of the Recycling Regulation - the description of the total amounts of the producer's product sold and collected and, if applicable, the producers' recovery rate

- Cordless Phones (wireline).
- Corded Phones.
- VOIP phones.
- VOIP Analog Terminal Adapter.
- GPS equipment.
- Optical Network Terminal Battery (GPON battery).
- Video and telephone conferencing equipment.
- Servers.
- TELUS Smart Home Security.
- o Program equipment utilized by TELUS
 - Cordless and corded desktop phones.
 - VOIP Over IP (VOIP) phones.
 - Global Positioning Systems (GPS) equipment.
 - Obsolete network equipment (switches, servers, mainframes, circuit cards, etc.).
 - Public Access Equipment (payphones, smartcard readers).
 - External Customer Network Infrastructure Equipment – but located on TELUS premises (servers, mainframes, tapes etc.).
 - Video and telephone conferencing equipment.
 - Optical Network Termination Equipment located on customers' premises.
 - Batteries associated with these electronics.
- Products not included in the program are mobile devices and their associated accessories.



4. Section 8 (2) (g) of the Recycling Regulation - the performance for the year in relation to targets in the approved stewardship plan under Sections 8(2)(b), (d), and (e)

TELUS's reported result:

126.65% recovery rate for the year ended December 31, 2023 compared to a target of 83.5%

Reference: pages 4 and 14 of TELUS's 2023 Annual Report to the Director

Basis of preparation:

- Recovery rate is calculated as:
 - $\text{Total weight of units collected} / \text{Total weight of units distributed (sold)}$.

TELUS Communications Inc. 2023 Report to Director, Waste Management



July 30, 2024

Telus Communications Inc.
510 West Georgia Street
Vancouver, BC V6B 0M3 Canada

RE: LETTER OF INTENT

To Whom It May Concern:

SGS would like to document the current certification status for **Telus Communications Inc.** to the ISO 14001:2015 Environmental Management System standard.

The **Telus Communications Inc.** organization has successfully completed their re-certification audit to the requirements of ISO 14001:2015. The audit concluded on June 21, 2024.

This multi-site certification includes a total of 4,256 sites located throughout Canada and include such site types as Data Centers, MSO's, RR's, CO's, Cell Sites, Plant Centers, Call Centers, etc.

As many sites are unmanned, with some only having a GPS coordinate as an 'address', it was decided to group all the sites under four locations:

- BC: 510 West Georgia Street, Vancouver, BC, V6B 0M3, Canada (Corporate Office), representing British Columbia, Manitoba, and Saskatchewan.
- AB: 10020 – 100th Street NW, Edmonton, AB, T5J 0N5, Canada (Regional Office), representing only Alberta.
- ON: 25 York Street, Toronto, ON, M5J 2V5, Canada (Regional Office), representing Ontario, and Nova Scotia.
- QC: 630 Boulevard Rene-Levesque Ouest, Montreal, QC, H3B 3C1, Canada, representing Quebec, New Brunswick and Newfoundland.

SGS follows the guidelines as set out in IAF MD 1 for the sample size of the sites to be audited, and IAF MD 5 to determine the duration of an audit per site. To date, the actual number of sites selected to be assessed, exceeded the requirements of IAF MD 1.

The audit package containing the SGS Lead Auditor's recommendation to continue certification is currently under review by the SGS Technical Team. Upon successful completion of this review process, **Telus Communications Inc.** will receive the updated 3-year UKAS Accredited ISO 14001:2015 certificate.

Once the certificate is generated a copy will be sent immediately to **Telus Communications**.

Any further clarifications for **Telus Communications Inc.** certification status may be obtained by contacting the SGS Business Assurance office.

Sincerely,

Laune Pucciarella
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Key Account Specialist
Business Assurance

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