

# **TELUS Communications Inc.**

## **Annual Report to the Director**

### **2022 Calendar Year**

**Reporting period January 1 – December 31, 2022**

**Submitted to:** BC Ministry of Environment  
Director, Extended Producer Responsibility Programs  
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**Date: June 27, 2023**



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# TELUS Communications Inc. 2022 Report to Director, Waste Management

## 1. Executive Summary

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

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

## TELUS Communications Inc. 2022 Report to Director, Waste Management

Recycling Regulation Reference	Topic	Summary (5-bullet maximum)
Part 2, section 8(2)(c)	<a href="#">Product Environmental Impact Reduction, Reusability and Recyclability</a>	<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)	<a href="#">Pollution Prevention Hierarchy and Product / Component Management</a>	<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)	<a href="#">Product Sold and Collected and Recovery Rate</a>	<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 2022 is 550.08 metric tonnes Total Program Product Distributed into BC in 2022 is 768.76 metric tonnes Total Program Product Recovery Rate in 2022 is 71.55% See section 7 for details</i></p>
Part 2, section 8(2)(e.1)		[See Section 7 for breakdown per regional district] <i>See Section 7</i>
Part 2, section 8(2)(f)	<a href="#">Summary of Deposits, Refunds, Revenues and Expenses</a>	<p><b>[Provide report reference to the independently audited financial statements]</b></p> <p><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 <a href="#">Plan Performance</a>		
Priority Stewardship Plan Targets (as agreed with ministry file lead)	Performance	Strategies for Improvement
1. <i>2022 Target of 83% recovery</i>	<i>71.55% overall recovery</i>	<i>TELUS continues to look at process improvements to increase our returns as well as investigating opportunities for reusing products.</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 2022 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 2022. 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 2022 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 2022 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;

*Fourteen 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*
- *Call2Recycle, Vancouver BC*
- *WiMacTel Canada Inc., Calgary AB*
- *Jim Pattison Lease, Vancouver, BC*
- *Ensign Pacific Lease, Vancouver, BC*
- *Hub Power Ltd, Burnaby BC*
- *Sumas Environmental Services Inc., Burnaby BC*
- *Call2Recycle, Vancouver BC*
- *Metalex Products Ltd, Richmond BC*
- *Canadian Energy, Burnaby BC*

*To provide easy access to TELUS' collection facilities in all Regional Districts, Canada Post, couriers (e.g. FedEx), and TELUS technicians act a 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*

*We work to consider the impacts of our products' journey throughout our entire supply chain – from raw materials sourcing and production, to storage, delivery and all processes in between.*

*Our goal is to minimize environmental harm from factors such as energy usage, water consumption and waste production while having a positive impact on the people and communities in and around our operations.*

##### *Integrating sustainability into our supply chain*

*In late 2022, TELUS became a member of the [Joint Audit Co-operation \(JAC\)](#), an organization that facilitates collaboration among telecom companies to conduct independent on-site audits of global Information and Communication Technology (ICT) suppliers. Being a member of JAC will allow us to more effectively monitor our supply chain risks while working directly with our industry peers to foster collaboration, share resources and reduce the burden on suppliers.*

## TELUS Communications Inc. 2022 Report to Director, Waste Management

*We are committed to integrating sustainability considerations such as environmental and societal factors as part of our supplier selection and throughout our supply chain management practices and decision-making. 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, and are working to further integrate sustainability considerations into our procurement processes.*

*In 2022, we focused on refining the carbon accounting and engagement approaches for our Scope 3 (value chain) emissions. This included joining the CDP Supply Chain program and other foundational work that will inform our approach to engaging with our suppliers and targeting GHG emission reductions across our value chain in support of our ambitious Scope 3 GHG emissions reduction target.*

### *Scope 3*

*As part of our work to reduce GHG emissions across TELUS' value chain, we set a science-based target to reduce Scope 3 GHG emissions from purchased goods and services, capital goods and use of sold products by 75 per cent per million dollars revenue from a 2019 base year by 2030.*

*These three categories represent our most significant GHG emissions sources and areas where we can have the greatest impact. In 2022, we focused our effort on refining our carbon accounting methodologies in order to improve the quality of our future reporting and include more supplier and product specific GHG emissions data. This included formalizing our expectations for suppliers to take action on climate change in our Supplier Code of Conduct and joining the CDP Supply Chain program for 2023, enabling us to more effectively engage with our suppliers to accelerate climate action. We expect to make significant improvements to our Scope 3 reporting in 2023, such as improving the accuracy of our data and ability to track and make meaningful progress towards our target. For a detailed breakdown of our energy and GHG performance data, see our [2022 ESG Data Sheet](#).*

### *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. This includes working with our suppliers to understand, manage and reduce the impacts of our products throughout their lifecycle. We take into consideration the materials used in manufacturing, energy efficiency when customers use our products, and component assembly to facilitate refurbishment and end-of-life management.*

### *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 Certified Pre-Owned (CPO), take-home-trade-later, and online Bring-It-Back and Trade-in.*

## **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:*

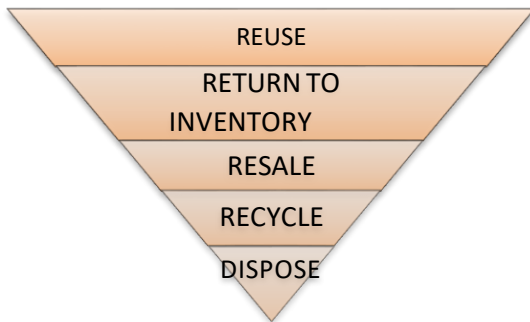


## TELUS Communications Inc. 2022 Report to Director, Waste Management

- *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 2022 FFH reuse rate was 11.4 percent and 44.6 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 2022 over 550.08 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 2022, we are happy to report that 100,500 kilograms of Alarm Force legacy electronics were recycled through TELUS' authorized electronics recycler, eCycle Solutions. We also refurbished about 9369 units of SHS equipment in the year 2022.*
- *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 2022, 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).*

### Disposition Hierarchy



### 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

## TELUS Communications Inc. 2022 Report to Director, Waste Management

### Estimated Product End of Fate Data for the year ended December 31, 2022

Product Type	Reuse (%)	Recycle (%)	Recovery (%)	Residual Waste Landfilled (%)	Unknown (%)
TELUS TV Equipment	11.4%	69.4%	0%	19.2%	0%
TELUS TV Accessories	44.6%	28.6%	0%	26.9%	0%
Network Equipment	3.9%	93.4%	0%	2.7%	0%
Telsets	0%	100%	0%	0%	0%
GPS	0%	100%	0%	0%	0%
Batteries <2 kg	0%	100%	0%	0%	0%
Batteries >2 kg	0%	100%	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	99.85%	0.15%	Processed for material recovery (nickel, cobalt, cadmium, lead, iron, copper, stainless steel) and landfill
Batteries >2 kg	100%	0%	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 2022 was 768.76 metric tonnes (mt)

## TELUS Communications Inc. 2022 Report to Director, Waste Management

*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 506.02 mt
  - >2 kg Batteries 37.84 mt
  - Consumer Batteries 6.22 mt
- Total program product collection volumes during 2022 was 550.08 mt

### Equipment Recovered by Regional District

Regional District Name	Equipment Recovered (kilograms)*
Alberni-Clayoquot	110
Bulkley-Nechako	2,585
Capital	11,937
Cariboo	4,346
Central Kootenay	4,511
Central Okanagan	17,767
Columbia-Shuswap	4,291
Comox Valley	1,320
Cowichan Valley	1,705
East Kootenay	3,686
Fraser Valley	8,801
Fraser-Fort George	7,646
Greater/Metro Vancouver	435,716
Kitimat-Stikine	1,815
Kootenay Boundary	2,035

## TELUS Communications Inc. 2022 Report to Director, Waste Management

Mount Waddington	715
Nanaimo	13,367
North Okanagan	5,061
Okanagan-Similkameen	3,245
Peace River	3,080
Powell River	880
Skeena-Queen Charlotte	0
Squamish-Lillooet	2,035
Strathcona	605
Sunshine Coast	1,375
Thompson-Nicola	11,442
<b>Provincial Total</b>	<b>550,077 kg</b>

### 7.3 Program Product Recovery Rate:

- Overall program product recovery rate for 2022 was 71.55%; 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 2022 was 11.4% as a result of TELUS' disposition process.
- TELUS will reuse most consumer products up to three 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)

## TELUS Communications Inc. 2022 Report to Director, Waste Management

- (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

Plan Target	2022 Results	Strategies for Improvement
1. <i>Target of 83% recovery was committed for 2022</i>	<i>Overall recovery rate was 71.55%</i>	<i>Process improvement projects are in progress</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

[Insert PWC assurance here](#)



## **Independent practitioner's reasonable assurance report on select performance indicators 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 on the subject matter detailed in Appendix A as presented in TELUS's Annual Report to the Director (the Report) of the British Columbia Ministry of Environment & Climate Change Strategy (the Ministry) as hosted on the TELUS' Website<sup>1</sup> for the year ended December 31, 2022.

### **Management's responsibility**

Management 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 (the criteria) detailed in Appendix A. Management is also responsible for such internal control as management determines necessary to enable 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 selected 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 reasonable assurance procedures included, but were not limited to the following:

- 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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<sup>1</sup> The maintenance and integrity of the TELUS Website (<https://www.telus.com/en/about/policies-and-disclosures/bc-stewardship-plans>) is the responsibility of TELUS; the work carried out by PricewaterhouseCoopers LLP does not involve consideration of these matters and, accordingly, PricewaterhouseCoopers LLP accepts no responsibility for any changes that may have occurred to the reported information or criteria since they were posted on the Website.

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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 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 and 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.

#### **Opinion**

In our opinion, TELUS's subject matter as presented in the Report for the year ended December 31, 2022 has been prepared, in all material respects, in accordance with the applicable criteria.

#### **Purpose and restriction of use**

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

We acknowledge the disclosure of our report, in full only, by TELUS at its discretion, to the Ministry without assuming or accepting any responsibility or liability to the Ministry or any other third party in respect of this report.

**/s/PricewaterhouseCoopers LLP**

Chartered Professional Accountants

Vancouver, British Columbia  
June 27, 2023



## 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 14.

Reference: Pages 3 and 7 of TELUS's 2022 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, 2022

Product Type	Reuse (%)	Recycle (%)	Recovery (%)	Residual (%)	Unknown (%)
TELUS TV Equipment	11.4%	69.4%	0%	19.2%	0%
TELUS TV Accessories	44.6%	28.6%	0%	26.9%	0%
Network Equipment	3.9%	93.4%	0%	2.7%	0%
Telsets	0%	100%	0%	0%	0%
GPS	0%	100%	0%	0%	0%
Batteries <2 kg	0%	100%	0%	0%	0%
Batteries >2 kg	0%	100%	0%	0%	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**

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	99.85%	0.15%	Processed for material recovery (nickel, cobalt, cadmium, lead, iron, copper, stainless steel) and landfill
Batteries >2 kg	100%	0%	Processed down to commodities for reuse or further processing (lead, acid, plastic, sulfur)

Reference: pages 9 and 10 of TELUS's 2022 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).



## 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

- “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.

### 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 768.76 metric tonnes

Total amount of producer's product collected is estimated as 550.08 metric tonnes

Reference: pages 4, 9, 10, 11, and 12 of TELUS's 2022 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
    - 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
  - 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



**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**

- 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:

71.55% recovery rate for the year ended December 31, 2022 compared to a target of 83%  
Reference: pages 4, 12 and 13 of TELUS's 2022 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. 2022 Report to Director, Waste Management

## TELUS Corporation ISO 14001:2015 Certificate

Certificate CA15/640105.00

The management system of

### TELUS Corporation

3777 Kingsway  
Burnaby, BC V5H 3Z7, Canada

has been assessed and certified as meeting the requirements of

### ISO 14001:2015

For the following activities:

Provision of Telecommunication Services

This certificate is valid from 20 July 2018 until 19 July 2021  
and remains valid subject to satisfactory surveillance audits.  
Re certification audit due before 23 April 2021.  
Issue 2. Certified since 20 July 2015.

Authorized by



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