



Ngā Tauākī Āhuarangi
Climate Statements
2024/25



Welcome

Purpose of this document

The Kāinga Ora – Homes and Communities Climate Statements 2024/25 cover two key disclosures:

- Our climate-related disclosure focuses on how we identify, assess, manage and report on climate-related risks and opportunities across our governance, strategy and risk management activities.
- Our Greenhouse Gas Emissions Inventory provides an assessment of our emissions across our areas of activity. It also includes information about our emissions reduction targets and our progress towards meeting them.

For and on behalf of the Board.

Simon Moutter

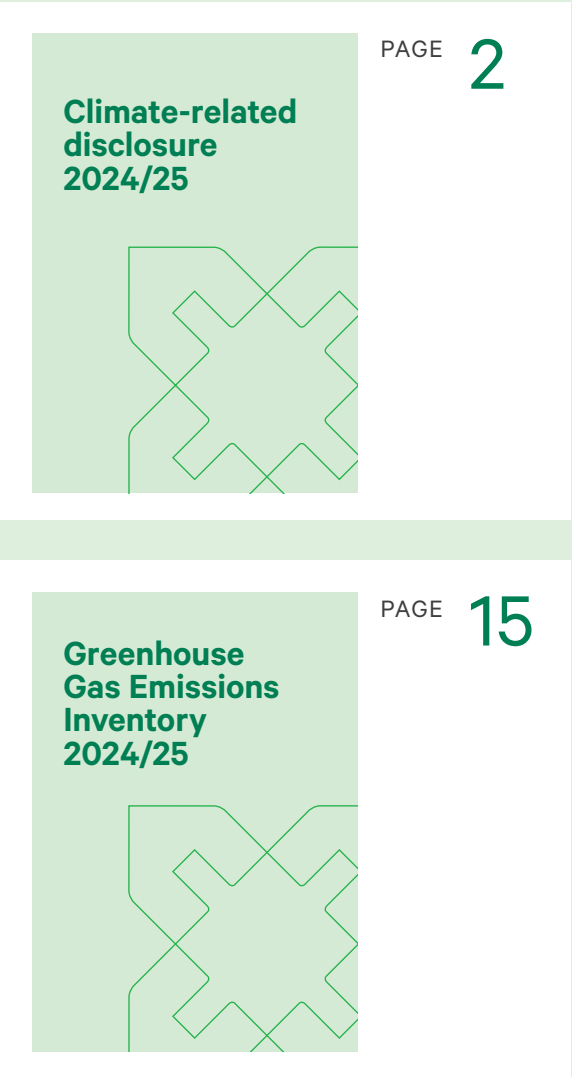
Chair

30 September 2025

Jenn Bestwick

Deputy Chair

30 September 2025



Content

Climate-related disclosure 2024/25	02
Overview of the climate-related disclosure	03
Governance	04
Board oversight	04
The role of Kāinga Ora management	04
Strategy	05
Business model and strategy	05
Current climate-related impacts	05
Expectation to report on and reduce emissions	06
Scenario analysis undertaken	08
Climate-related risks	09
Control environment	11
Climate-related opportunities	12
Climate change consideration in capital deployment	13
Risk management	14
Processes for identifying and assessing climate-related risks	14
Processes for managing climate-related risks	14
Metrics and targets	14

Greenhouse Gas Emissions Inventory 2024/25	15
Overview of the Kāinga Ora Greenhouse Gas Emissions Inventory	16
Emissions summary by scope	18
Emissions detail by scope, category and operational area	19
Scope 1 and 2 emissions separated by GHG group	22
Restatement of comparatives	23
Updated embodied carbon assumptions for new builds	23
New energy, water and maintenance assumptions for operational emissions from existing portfolio	24
Summary of targets and reduction strategies	25
Performance against targets	26
Description of the organisation	28
Organisational and reporting boundaries	29
Assurance	29
Information on emissions sources included	30
Exclusions	48
EY assurance report	50

Climate-related disclosure 2024/25

Overview of the climate-related disclosure

This is the fifth voluntary climate-related disclosure for the Kāinga Ora Group (Kāinga Ora) and its subsidiaries. It outlines how Kāinga Ora identifies, assesses and manages the risks and opportunities posed by climate change in the short, medium and long term.

The information in this disclosure is based on the Aotearoa New Zealand Climate Standards (NZ CS) issued by the External Reporting Board (XRB). While Kāinga Ora and its subsidiaries are not designated climate reporting entities, we have chosen to adhere to the NZ CS guidelines where possible.

Kāinga Ora is still maturing its climate-related risk and opportunity descriptions and assessments of impact. Analysis presented in this disclosure represents our current understanding, but this will be subject to further refinement over time as processes mature and data improves. This statement does not include the following from the NZ CS.

- **Current financial impacts** – limited current financial impacts are presented.
- **Anticipated financial impacts** – no anticipated financial impacts are presented.
- **Transition planning** – transition planning has not yet been undertaken.
- **Comparatives for Scope 3 GHG emissions** – comparatives are presented where they are available.
- **Comparatives for metrics** – no comparatives are presented for metrics.
- **Analysis of trends** – no analysis of trends has been undertaken for metrics.

These statements contain disclosures that rely on early and evolving assessments of current and forward-looking information, incomplete and estimated data, and our related judgements, opinions and assumptions. Kāinga Ora has sought to provide accurate information in respect of the year ended 30 June 2025 as at the date of publication 17 October 2025, but we caution reliance being placed on representations that are necessarily subject to significant risks, uncertainties and/or assumptions. Climate change is an evolving challenge, with high levels of uncertainty and significant data challenges, particularly over long-term horizons. Descriptions of the current and anticipated impacts of climate change on Kāinga Ora are therefore necessarily estimates only.

While Kāinga Ora has made every effort to fairly present this climate-related disclosure, it provides no representation, guarantee, warranty or assurance about the future business performance of Kāinga Ora, or that the outcomes expressed or implied in any forward-looking statement made in this document will occur. Actual outcomes may differ materially from those expressed or implied in this disclosure document. Kāinga Ora does not accept any liability whatsoever for any loss arising directly or indirectly from any use of the information contained in this disclosure report.

Governance

Board oversight

In the first half of the 2024/25 financial year, Kāinga Ora management presented an update to the Board every 2 months, informing them of the progress on managing climate-related risks and opportunities. In the second half of the period, the organisation moved away from general updates to one where specific items were brought to the Board’s attention when needed. Climate-related risks are reviewed by the Board’s Finance, Risk and Assurance Committee every 6 months.

The Board is responsible for considering climate-related risks and opportunities against other factors when making decisions. The newly appointed Board has extensive experience across public and private entities that are also required to manage climate risks and opportunities and has received an induction on the climate-related risks and opportunities specific to Kāinga Ora. To ensure visibility of climate-related risks and opportunities related to initiatives or programmes of work, all Board papers include a description of the impacts of climate change risks and opportunities.

Our Statement of Intent (SOI) and Statement of Performance Expectations (SPE) include metrics and targets related to greenhouse gas (GHG) emissions. The Board reviews these metrics, targets and performance against targets annually. Our SOI 2025/26–2028/29 includes a measure for flood exposure and one for GHG emissions.

Climate change risk and emissions reduction metrics are not connected to current remuneration policies.

The role of Kāinga Ora management

Executive Leadership Team

Where executive-level input is required, climate-related risks or opportunities are escalated to the Executive Leadership Team (ELT) – a formal forum for strategic, organisation-wide initiatives with delegations to support decision making. The ELT consists of the Chief Executive (as Chair) and all their direct reports. The ELT meets weekly, and decisions and update papers concerning climate-related risks and opportunities are tabled when required. Members of the ELT are present at Board meetings and attend Board subcommittee meetings where relevant.

As Kāinga Ora reshapes its operating model, it will work to ensure climate risk and opportunity management remains embedded and effective within refreshed operating models. This will include reviewing and adapting key processes, confirming accountability and delivering targeted training to build capability across the organisation.

Sustainability and climate-related responsibilities

For FY25, Kāinga Ora had a combination of dedicated and non-dedicated sustainability and climate-related resources in place across the organisation.

- Our Sustainability and Climate Strategy team was responsible for our strategies for climate change mitigation and adaptation and supporting the implementation of those strategies.
- We used a matrix management structure to ensure activities across the group were coordinated and conducted in a centrally prioritised way. We also allocated specific resourcing to respond to key risks and opportunities.
- We had collaborative management arrangements in place to ensure all other relevant parts of the organisation have oversight and ownership of the climate-related issues material to them.

Strategy

Business model and strategy

Kāinga Ora is the largest residential landlord in New Zealand. The core mission is to deliver quality social housing and be a responsible landlord who looks after our homes and tenants and serves communities well.

Our SOI 2025/2026–2028/2029 includes four strategic objectives that outline what Kāinga Ora will do to realise our core mission and achieve our vision for the future.

- We will adapt to the changing needs of our tenants by refining our tenancy services model.
- We will enhance the condition and utilisation of our homes.
- We will respond to tenant needs by actively reconfiguring and renewing our homes.
- We will be a reliably high-performing organisation.

There are two climate-related measures in the SOI.

- Decrease the number of Kāinga Ora homes exposed to flood hazards.
- Reduce carbon emissions resulting from the Kāinga Ora housing portfolio.

Current climate-related impacts

Extreme weather events

In recent years, Kāinga Ora has experienced several extreme weather events that required immediate response and resulted in repair/ maintenance requirements for affected properties. In particular, the 2023 North Island weather events, including January’s Auckland/Northland floods and February’s Cyclone Gabrielle, had a significant impact on Kāinga Ora in 2022/23 and 2023/24. In 2024/25, we have continued to deal with the ongoing financial and operational impacts of recovery. This has included ongoing assessment of future flood risk for properties that were impacted by the 2023 weather events. Where risk has been assessed as intolerable, Kāinga Ora is facing adaptation costs and reduction in net housing due to properties being vacated to reduce risk and there continues to be some uncertainty around these costs. Additionally, Kāinga Ora is experiencing the impacts of increasing flood hazard frequency and extents on planned development as local authorities adjust their flood mapping and planning and consenting requirements in response to recent events.

These events highlight the need for Kāinga Ora to standardise mid- to long-term recovery processes to reduce costs and time associated with decision making on hazard-impacted properties and also highlight the importance of organisational efforts to reduce risk through asset management and investment decision making.

The increasing prevalence of extreme weather events is expected to place upward pressure on insurance premiums.

Kāinga Ora is also experiencing hazards that are more chronic in nature such as warmer summers leading to indoor overheating. Work has been undertaken to increase our understanding of the extent to which customers experience overheating and the actions the organisation can take to reduce it (see the case study on page 7).

Expectation to report on and reduce emissions

The Ministry for the Environment (MfE) Carbon Neutral Government Programme (CNGP) sets out requirements or actions for Kāinga Ora to contribute to New Zealand’s emissions reduction efforts. The CNGP requires Kāinga Ora to:

- measure, verify and report its emissions annually
- set gross emissions reduction targets
- introduce a plan to reduce its emissions.

The CNGP requires Kāinga Ora to reduce emissions associated with corporate activity in line with a 1.5°C pathway: a 42 percent reduction from 2023 levels by 2030 with an interim target of 27 percent by FY25. The organisation has achieved the interim target through its travel optimisation project, which included reducing the fleet size, increasing the proportion of electric vehicles in the fleet and reducing corporate travel. These initiatives have also reduced costs.

Kāinga Ora also reports on emissions associated with its housing portfolio: the embodied carbon associated with the delivery of new and retrofitted housing and infrastructure as well as the operational emissions resulting from the maintenance and operation of existing housing. These Scope 3 emissions make up approximately 90 percent of the organisation’s total emissions but are harder to reduce, being associated with long-lived assets. The Kāinga Ora SOI has a target of reducing the emissions intensity of the housing portfolio (construction and operation) by 7.4 percent for the 2025/26–2028/29 period by improving the energy efficiency of the stock through the renewal programme and using cost-effective carbon reduction techniques such as low-carbon concrete in the build programme.

In 2024/25, we continued to invest in improving processes for collecting emissions input information and data quality and assumptions in our emissions calculations. We have also narrowed the scope of the inventory by no longer reporting on tenants’ travel emissions. Kāinga Ora has minimal influence on this emissions source and removing tenants’ transport emissions from the scope helps the organisation to focus on emissions sources core to our functions.

CASE STUDY

Designing for a warmer future – Kāinga Ora overheating response

Kāinga Ora identified that overheating in homes is a clear climate-related risk for the organisation. In response to this risk, Kāinga Ora has produced design requirements that require overheating risk modelling according to an industry standard approach used for building regulations in the UK. As part of this, Kāinga Ora continues to work closely with NIWA (now part of Earth Sciences New Zealand) and the Ministry of Business, Innovation and Employment (MBIE) to create the foundations to enable the UK standards to be used in New Zealand. This is being done in lieu of local building regulations that do not currently require overheating risk to be assessed or addressed in the design of housing.



Welby and Elmdon, Māngere, Auckland

Initiatives to date

- Requiring overheating risk modelling for high-risk typologies (walk-up and apartment buildings). This has been included in Ngā Paerewa Hoahoa Whare (Kāinga Ora design requirements).
- Collaborated with NIWA and MBIE to update weather files for building simulation in New Zealand. This included the creation of weather files for overly hot summers to align with UK methods of overheating risk modelling. The new weather files are warmer in summer and winter, reflecting the fact that overheating risk today is greater than it was at the time the past weather files were created in 2008. This enables better prediction of overheating risk.
- Measured overheating in 200 Kāinga Ora homes through the Internal Environment Monitoring programme. The analysis estimated that 15 percent of Kāinga Ora homes are at high risk of overheating to a point where thermal comfort and wellbeing of tenants is impacted.
- Kāinga Ora is participating in an expert review panel with MBIE where a potential future Building Code clause for overheating assessment is being considered.
- Kāinga Ora is investigating simple solutions for existing homes, such as releasable window stays, to help tenants manage overheating.
- The installation of heat pumps in most homes for Healthy Homes compliance also provides the option of artificial cooling in living areas.

The organisation requires walk-up and apartment buildings to be assessed for overheating risk at design and mitigations identified. This will continue to ensure the risk is known and addressed where necessary and means Kāinga Ora will be ready to implement new Building Code clauses relating to overheating should they be introduced.

Scenario analysis undertaken

Table 1: Scenario analysis summary

Time horizons	Orderly Limit temperature rise to 1.5°C (with overshoot)	Disorderly Limit temperature rise to 2°C	Hot House World Temperature rise >3°C
	‘Short term’ refers to the 1 to 3-year period (2028), to align with the central government electoral cycle in New Zealand.		
	‘Medium term’ refers to the 4 to 30-year period (2055), to align with Kāinga Ora strategies.		
	‘Long term’ refers to the 31 to 50-year period (2075), to align with the expected useful life of dwellings before significant renewal activities are required.		
Reference scenarios	SSP1-2.6 CCC Tailwinds NZGBC Orderly	SSP2-4.5 CCC Headwinds NZGBC Disorderly	SSP3-8.5 CCC Current Policy Reference NZGBC Hot house
Key assumptions	An ‘Orderly’ 1.5°C scenario where decarbonisation policies are enacted immediately and smoothly (globally, in New Zealand and within the sector). Rapid but coordinated transition. Whole-of-life carbon emissions reduction requirements for buildings is at 90% by 2050.	A ‘Disorderly’ scenario where significant decarbonisation is delayed until 2030 (globally, within New Zealand and within the sector). This leads to global warming being limited to <2°C by 2100. The sector faces high transition risk after 2030 as entities rush to decarbonise.	A ‘Hot House World’ scenario where global warming reaches >3°C above pre-industrial levels by 2100. No further decarbonisation policies are enacted (globally, within New Zealand and within the sector). Emissions continue to rise. The sector faces limited transition risks but extreme physical climate risks, particularly towards the end of the century.
	The construction sector grows significantly as carbon-supporting infrastructure is replaced with greener, low-carbon infrastructure. It is assumed the New Zealand Government’s response is consistent with the global response.	Initially, the construction and property sector is slow to decarbonise, but ‘fast movers’ get the opportunity to utilise materials, capital and knowledge. It is assumed the New Zealand Government’s response is consistent with the global response.	It is assumed the New Zealand Government’s response is consistent with the global response.
Impact on Kāinga Ora	Kāinga Ora is put under pressure as struggling communities face further challenges associated with the cost of transition and there is an increased need for social housing. Funding is available to account for the costs of upgrading homes to be climate resilient and delivering new builds with lower emissions.	Kāinga Ora is faced with needing to deliver more housing, repair damages from more frequent and intense weather events and compete with other developers to access resources, all with no additional funding. From the 2030s onwards, directives for improving the climate performance of new and existing builds are given without adequate financial support.	Food insecurity, cost rises, unemployment and immigration have all created huge and growing demand for social housing. Without additional funding, Kāinga Ora is unable to provide enough housing to meet demand. Where government funding is available, it is directed towards the comfort and safety of Kāinga Ora customers in a changing climate instead of reducing the emissions caused by new and existing builds.

Climate-related risks

Table 2: Physical risks

Risk	Description	Time horizon	Impact on Kāinga Ora
Buildings and/or land experience substantial damage from extreme weather events.	Increased frequency and severity of flooding and land instability driven by extreme rainfall events leading to significant damage to Kāinga Ora assets. Exposure to one-off large losses is partially mitigated by geographic spread of portfolio. However, this spread also increases frequency and likelihood of smaller, regionally distributed losses.	It is likely Kāinga Ora could see this risk materialise from the short term onwards.	Repair and recovery costs, asset write-offs, revenue losses and adaptation costs. Redirection of personnel from business as usual to recovery. Pressure on available housing. Tenant displacement and property damage.
Kāinga Ora-constructed infrastructure or housing development inadequately manages natural hazards, impacting neighbouring properties.	Uncertainty about how much climate change will increase the intensity of natural hazards could lead to infrastructure or onsite mitigation measures being under-designed.	It is possible Kāinga Ora could see this risk materialise from the medium term onwards.	Repair and recovery costs, litigation costs. Reputational impact and impact on social licence to operate.
Tenant outcomes negatively impacted by extreme weather events affecting properties.	Extreme weather events can pose risk of potential harm to Kāinga Ora tenants on hazard-exposed property. This can occur both during an event (physical injury or loss of life) and in its aftermath (illness and mental wellbeing impacts).	It is likely Kāinga Ora could see this risk materialise for a small proportion of our homes from the short term onwards .	Tenant outcomes such as health and wellbeing negatively impacted, including loss of life, injury, illness and degradation to mental health. Tenant service levels reduced. Reputational impact and impact on social licence to operate.
Kāinga Ora homes and features do not provide an adequate level of protection from heat stress as climate change increases the intensity and frequency of heatwaves and hot days.	Rising average temperatures, combined with building standards that do not adequately account for overheating risks, may increase the likelihood of indoor heat discomfort. Certain housing typologies such as smaller units with limited cross-ventilation or poor insulation may be particularly prone to overheating, impacting tenant outcomes and increasing the need for retrofit interventions.	It is almost certain Kāinga Ora could see this risk materialise in the medium term .	Reduced customer wellbeing, particularly for vulnerable groups (e.g. elderly, children), due to inadequate thermal performance and increased heat-related health risks. Higher operational costs from retrofitting homes, customer education and managing enquiries on cooling and ventilation.

Risk	Description	Time horizon	Impact on Kāinga Ora
Supply chain significantly disrupted by acute and chronic climate-related impacts.	Increased frequency and severity of weather events may lead to construction supply chain disruption and shortages as well as vulnerability of trades to changing costs. This could result in increased costs and uncertainty/delays in the Kāinga Ora renewals and maintenance pipeline. In turn, this could lead to an inability to meet contractual agreements and SPE targets.	It is possible Kāinga Ora could see this risk materialise from the medium term onwards.	Increased material costs, delays to delivery, variances in SPE targets and KPIs, reputational impacts tied to delayed or unrealised delivery.

Table 3: Transition risks

Risk	Description	Time horizon	Impact on Kāinga Ora
Land becomes unviable for residential use as a result of changing natural hazards policy and mitigation requirements.	Increases in frequency and/or intensity of climate-related events and land-use policy changes driven by climate change lead to land becoming uninhabitable and/or unviable for development.	It is likely Kāinga Ora could see this risk materialise in the short term .	Reduced land and property value, higher development and insurance costs and feasibility constraints may impact housing targets. Revenue loss from unsellable or devalued assets and reputational impacts due to delays, displacement or uncertainty.
Inadequate adaptation or maladaptation due to policy and funding not keeping up with risk exposure.	Without a dedicated funding framework and adaptation policy from central government, Kāinga Ora is limited in how it can implement adaptation within its portfolio. A property-by-property approach to renewals limits adaptation feasibility. With funding for the organisation’s urban development function restricted, there are reduced opportunities for programme-level risk reduction. Without clear policy direction and associated funding, adaptation in high-risk areas is limited.	It is likely Kāinga Ora could see this risk materialise in the short term .	Delays to adaptation increasing the costs associated with future repair, losses and eventual adaptation delivery.

Control environment

Kāinga Ora has established management controls to identify, assess and manage climate-related risks and opportunities within the constraints of current funding settings. As an asset owner, Kāinga Ora has a commercial imperative to understand and respond to climate-related risks, particularly for higher-risk assets, and to meet legislative and policy expectations around emissions reduction.

Climate-related risks are incorporated into Kāinga Ora’s enterprise risk management processes, with prioritisation based on the level of exposure, commercial feasibility and policy alignment. Tables 2 and 3 present the potential impacts if risks are untreated, highlighting where management action is most critical.

In the current funding environment, Kāinga Ora can build an understanding of its exposure to climate-related risks and develop appropriate controls. Implementation of controls and emissions reduction measures are undertaken where commercially and operationally appropriate.

The government is tasked with balancing the potential impacts of these risks with their associated costs in making funding decisions. Allocation of additional funding would allow for acceleration of risk assessment and treatment activities as well as improved ability to address non-financial elements of risks.



Felix Street, Onehunga, Auckland

Climate-related opportunities

Table 4: Physical opportunity

Opportunity	Description	Anticipated impacts
Increased portfolio resilience results in lower cost/resource impacts when extreme weather events occur.	We are actively working on setting organisational guidance on climate risk assessment criteria, roles and responsibilities and risk appetite. This could result in changes to our criteria for acquiring or redeveloping on land.	It is likely Kāinga Ora could see the following impacts in the medium term . Reduced land and building remediation costs resulting from acute climate-related events relative to if this work was not undertaken.
	We have included the reduction of portfolio exposure to flood hazards in our SOI and will include this in our asset management plans.	Reduced resource impacts resulting from acute climate-related events relative to if this work was not undertaken.
	We are shifting from reactive repairs to scheduled upkeep, being proactive about asset maintenance and keeping our homes weathertight and resilient in extreme weather events.	Increased average value of land held as land in non-hazard-prone areas is likely to increase in value.

Table 5: Transition opportunities

Opportunity	Description	Anticipated impacts
Corporate emissions reductions/efficiencies provide cost savings.	The CNGP requires us to reduce our corporate emissions by 42% by 2030.	It is almost certain Kāinga Ora will see the following impacts in the short term .
	To meet these requirements, we have started a travel optimisation project, which has committed to: - reduce travel budgets by 8% each year up to 32% in 2027/28 - reduce the size of our corporate vehicle fleet each year up to a 38% reduction in 2027/28.	- Reduced travel budgets resulting in lower costs associated with flights, accommodation, rental cars, hotels and spending on meals. - Reduced fleet size resulting in decreased spending on maintenance and replacement of vehicles as well as a reduction in fuel spend and emissions.
		These emissions reduction initiatives also reduce the cost of offsets should they be introduced.

Opportunity	Description	Anticipated impacts
Climate-related migration increases potential rental income.	We receive funding based on the market rental value of our homes. Migrants moving to New Zealand to avoid acute or chronic climate change impacts overseas may increase demand pressure or reduce supply in the country’s housing market, increasing market rents.	It is possible Kāinga Ora could see increased rental income in the long term .
Contributing to our customer wellbeing outcomes through our renewal programmes when replacing flood-prone homes.	There is an opportunity to contribute towards our customer wellbeing outcomes by using our residential build and renewal programmes to: - increase the energy efficiency of our social and supported housing - ensure appropriate density is delivered in areas with good amenity and public/active transport options.	It is possible for Kāinga Ora to deliver improved customer wellbeing outcomes in the medium term related to improved housing such as improved health outcomes, reduced travel costs and energy bills. It is possible Kāinga Ora will realise some operational efficiencies because of this in the medium term such as reduced maintenance activity due to newer housing stock.

Climate change consideration in capital deployment

Climate-related risks and opportunities are factored into investment decision making through our regional planning process, neighbourhood plans and in more detail in the early stages of development project planning. Development projects working through the Kāinga Ora investment management pathway are required to identify and assess the exposure and vulnerability of housing, customers and community to climate hazards. If a flood or land instability risk is

identified through due diligence, a detailed risk assessment must be completed. Hazard exposure as well as transport emissions are included in the option analysis step pre-business case.

Conclusions on climate risks and opportunities relevant to a project are included in the upfront recommendations to the approving committee. They are considered alongside other factors such as purchase price and return on investment.

Risk management

Processes for identifying and assessing climate-related risks

Kāinga Ora undertakes a formal climate-related risk identification and assessment process annually. This year’s process built on risks identified in previous scenario analysis workshops and was informed by ongoing engagement with senior leaders. Existing risks were reviewed and updated to reflect changes in the operating context. Assessment continues to apply a climate change-specific methodology alongside the Kāinga Ora Risk Management Framework. All parts of the value chain are included.

The climate change-specific methodology aligns with the National Climate Change Risk Assessment produced by MfE. Physical risks are assessed using exposure and vulnerability criteria on a risk matrix with a four-point scale (low, moderate, high, extreme).

The Kāinga Ora Risk Management Framework is based on ISO 31000:2018. Absolute (inherent) risk ratings are determined using five-point scales for likelihood (rare, unlikely, possible, likely, almost certain) and consequence (minimal, minor, moderate, major, massive). Both physical and transition risks are assessed using these likelihood and consequence criteria.

Risk ratings derived from exposure/vulnerability and likelihood/consequence are provided for both present day as well as future timeframes and scenarios in Table 1.

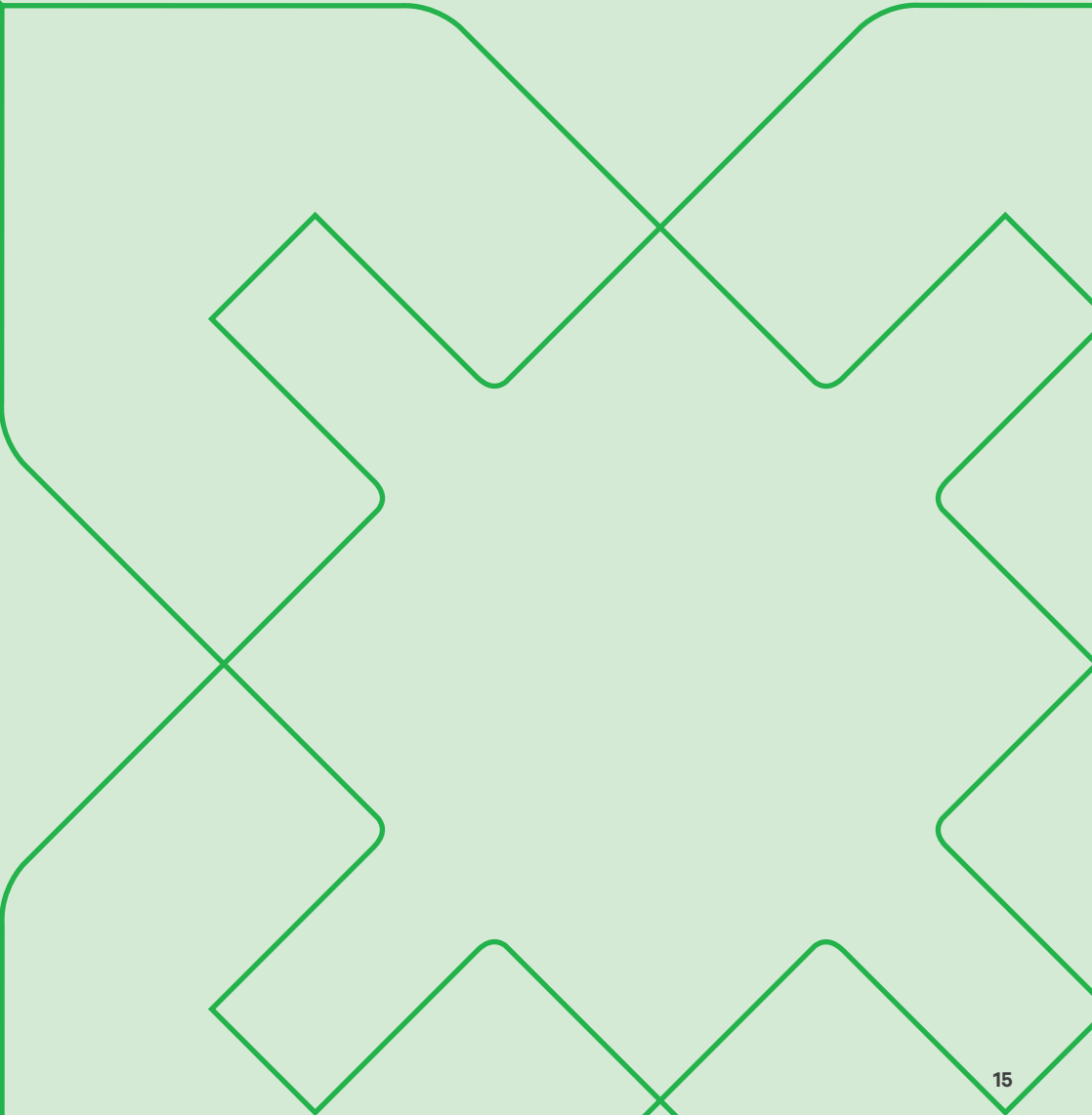
Processes for managing climate-related risks

Climate-related risks are tracked in the Kāinga Ora Active Risk Manager (ARM) system. Within ARM, we document relevant controls for each identified climate risk along with risk treatment actions where existing controls are inadequate to reduce residual risk to an acceptable level. Individual climate-related risks are aggregated into a single overarching risk – impact of climate change on our assets and operations – for the purposes of presentation in the organisational Top Risk Report. This is presented alongside other strategic level risks and has a high controlled risk rating. For 2024/25, risks on the Top Risk Report were tracked and reviewed by the Board’s Finance, Risk and Assurance Committee on a 6-monthly basis.

Metrics and targets

As well as having emissions reduction targets under the CNGP (see the Greenhouse Gas Emissions Inventory below), Kāinga Ora has introduced a new metric as part of our SOI 2025/26–2028/29 to decrease the number of Kāinga Ora homes exposed to flood hazards compared to the 2024/25 year.

Greenhouse Gas Emissions Inventory 2024/25



Overview of the Kāinga Ora Greenhouse Gas Emissions Inventory

This section describes the Kāinga Ora Greenhouse Gas Emissions Inventory and the methods used in its calculation. It also sets out details of restatements to comparative figures and our targets set through the Kāinga Ora Emissions Reduction Plan. The last section includes detailed information on inclusions, exclusions and assumptions applied in the preparation of the inventory.

This inventory is prepared in line with the requirements of the Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard and the Corporate Value Chain (Scope 3) Accounting and Reporting Standards. It also complies with the emissions reporting requirements of the CNGP. It includes emissions from our corporate activities, purchased goods and services and capital goods as well as emissions from sources related to buildings (social and supported housing) and infrastructure development. Customer transport emissions have previously been reported (FY24: 237,558 tCO₂e and FY23: 225,131 tCO₂e) but are excluded this year on the basis that Kāinga Ora has very little influence over tenants’ transport choices.



Table 6: Kāinga Ora emissions groups and their requirements

Kāinga Ora emissions group	Description	CNGP requirements
Corporate emissions	Emissions from our corporate and employee-related activities.	• Measure emissions. • Set a target in line with a 1.5°C pathway. • Report emissions.
Buildings emissions	Emissions from construction and maintenance of Kāinga Ora homes (embodied emissions), building design and consenting services as well as energy and water consumed (operational emissions) in the homes.	• Measure emissions. • Set a target, where possible, based on the reduction potential within the organisation. • Report emissions.
Infrastructure emissions	Emissions from the energy and materials used to construct infrastructure we develop (embodied emissions).	• Measure emissions. • Set a target, where possible, based on the reduction potential within the organisation. • Report emissions.
Other purchased goods and services and capital goods emissions	Emissions from purchased goods and services and capital goods not related to construction or infrastructure development.	• Measure emissions. • Set a target, where possible, based on the reduction potential within the organisation. • Report emissions.

Emissions summary by scope

Table 7: Summary of emissions by scope

	tCO ₂ e 2024/25	tCO ₂ e 2023/24	tCO ₂ e 2022/23	tCO ₂ e intensity 2024/25	tCO ₂ e intensity 2023/24	tCO ₂ e intensity 2022/23	Intensity metric
Scope 1	362	770	961	0.12	0.22	0.30	per FTE ¹
Scope 2	1,021	726	350	0.34	0.21	0.11	per FTE
Scope 3	209,015	301,960	220,648	1.00	1.47	1.10	per occupant ²
Total	210,398	303,456	221,959	1.01	1.48	1.10	per occupant

1. Average full-time equivalent employees (FTE) was 3,014 in 2024/25, 3,462 in 2023/24 and 3,206 in 2022/23.

2. Intensity measure is based on occupants housed across the combined portfolio of social and supported housing at an average of 209,166 in 2024/25, 205,308 in 2023/24 and 200,941 in 2022/23.

Emissions detail by scope, category and operational area

Table 8: Kāinga Ora 2024/25 emissions inventory and baseline comparison

	tCO ₂ e 2024/25	tCO ₂ e 2023/24	tCO ₂ e 2022/23	tCO ₂ e intensity 2024/25	tCO ₂ e intensity 2023/24	tCO ₂ e intensity 2022/23	Intensity metric
Corporate							
Scope 1							
Direct fuel use	362	770	961	0.12	0.22	0.30	per FTE
Scope 2							
Purchased electricity for corporate activities (location-based)	377	289	203	0.13	0.08	0.06	per FTE
Scope 3							
Category 6: Business travel	973	1,546	2,110	0.32	0.45	0.66	per FTE
Category 7: Staff working from home	122	102	113	0.04	0.03	0.04	per FTE
Category 7: Employee commuting	2,025	2,343	2,372	0.67	0.68	0.74	per FTE
Category 3: Direct fuel use well-to-tank	88	188	227	0.03	0.05	0.07	per FTE
Category 2: Embodied emissions in purchased fleet vehicles	880	1,920	2,226	0.29	0.55	0.69	per FTE
Category 5: Waste to landfill	166	145	52	0.06	0.04	0.02	per FTE
Category 3: Corporate electricity transmission and distribution losses	29	29	41	0.01	0.01	0.01	per FTE
Category 5: Wastewater treatment	158	178	179	0.05	0.05	0.06	per FTE
Category 3: Water supply	18	16	16	0.01	0.01	0.01	per FTE
Total corporate emissions (SPE Org_1.8 and Org_1.9)³	5,199	7,526	8,500	1.72	2.17	2.65	per FTE

3. Kāinga Ora SPE measures.

	tCO ₂ e 2024/25	tCO ₂ e 2023/24	tCO ₂ e 2022/23	tCO ₂ e intensity 2024/25	tCO ₂ e intensity 2023/24	tCO ₂ e intensity 2022/23	Intensity metric
Buildings							
Scope 2							
Electricity purchased by Kāinga Ora for social and supported housing (location-based)	644	437	147	0.003	0.002	0.001	per occupant
Scope 3							
Category 2: Embodied emissions from:							
– Existing portfolio	14,701	14,329*	13,629*	0.07	0.07*	0.07*	per occupant ²
– New builds (SOI 5.2) ⁴	85,244	152,556*	82,171*	9.58	12.71*	12.10*	per occupant ⁵
– Retrofits	3,115	3,176	2,722	1.48	1.45	1.74	per occupant ⁶
Category 1: Emissions from building design and consenting services	11,418	23,447	20,046	87	100	89	per \$m spent
Category 3: Social and supported housing transmission and distribution losses	49	32	13	0.0002	0.0002	0.0001	per occupant ⁵
Category 13: Operational emissions from existing portfolio (SOI 5.3)	71,604	51,742*	50,333*	0.34	0.25*	0.25*	per occupant ²
Category 15: Embodied construction emissions financed through home ownership products	1,647	19,265	13,126	159	169	169	per \$m financed
Total building emissions	188,422	264,984*	182,186*	0.89	1.23*	0.87*	per occupant ²

* Restatement as detailed on pages 23-24.

	tCO ₂ e 2024/25	tCO ₂ e 2023/24	tCO ₂ e 2022/23	tCO ₂ e intensity 2024/25	tCO ₂ e intensity 2023/24	tCO ₂ e intensity 2022/23	Intensity metric
Infrastructure							
Scope 3							
Category 2: Embodied emissions from infrastructure development	8,277	19,143	18,089	111	124	116	per \$m spent
Other purchased goods and services and capital goods							
Scope 3							
Category 1 & 2: Other purchased goods and services and capital goods	8,501	11,803	13,183	55	57	59	per \$m spent
Total emissions	210,398	303,456*	221,959*	1.01	1.51*	1.14*	per occupant ²

* Restatement as detailed on pages 23-24.

4. Kāinga Ora SOI measures.
 5. Measure based on the estimated 8,896 tenants accommodated in new builds in 2024/25.
 6. Measure based on the estimated 2,107 tenants accommodated in homes retrofitted during 2024/25.

Scope 1 and 2 emissions separated by GHG group

Table 9: Direct emissions separated by GHG group

	2024/25			2023/24			2022/23		
	t	GWP	tCO ₂ e	t	GWP	tCO ₂ e	t	GWP	tCO ₂ e
Scope 1									
Direct fuel use									
Carbon dioxide (CO ₂)	347	1	347	737	1	737	922	1	922
Methane (CH ₄)	0.16	28	5	0.35	28	10	0.43	28	12
Nitrous oxide (N ₂ O)	0.04	265	11	0.09	265	23	0.11	265	28
Scope 2									
Purchased electricity for corporate activities									
Carbon dioxide (CO ₂)	366	1	366	278	1	278	197	1	197
Methane (CH ₄)	0.36	28	10	0.37	28	10	0.18	28	5
Nitrous oxide (N ₂ O)	0.003	265	0.7	0.001	265	0.3	0.001	265	0.24
Electricity purchased by Kāinga Ora for social and supported housing									
Carbon dioxide (CO ₂)	625	1	625	420	1	420	143	1	143
Methane (CH ₄)	0.62	28	17	0.56	28	16	0.14	28	4
Nitrous oxide (N ₂ O)	0.005	265	1.2	0.002	265	0.5	0.001	265	0.17
Total direct emissions (Scope 1 and 2)									
Carbon dioxide (CO ₂)	1,338	1	1,338	1,435	1	1,435	1,262	1	1,262
Methane (CH ₄)	1.15	28	32	1.28	28	36	0.75	28	21
Nitrous oxide (N ₂ O)	0.05	265	12	0.09	265	23	0.11	265	28
Combined total direct emissions	1,383			1,494			1,311		

GHG quantities have been converted to tCO₂e using the global warming potential (GWP) from the Intergovernmental Panel on Climate Change (IPCC) Fifth Assessment Report. The time horizon is 100 years.

Restatement of comparatives

The following changes have been made to comparative figures. The reason for these changes is noted in further detail below. Restatements align to the Kāinga Ora recalculation policy set out on page 29. Restated comparatives presented below have not been subject to assurance procedures.

Updated embodied carbon assumptions for new builds

Kāinga Ora reviewed the embodied carbon modelling for its reference buildings, checking modelled quantities and updating to the latest version of BRANZ LCAQuick for stand-alone and duplex buildings. In addition, the models were updated to include the embodied carbon of the heat pump present in most buildings as well as estimated heat pump refrigerant leakage. These changes resulted in a reduction in new build embodied carbon for the 2023/24 year of 6.5 percent. This equates to a 1.9 percent decrease in the total 2023/24 embodied carbon footprint, which is below the restatement threshold, but Kāinga Ora has opted to restate it to allow a more accurate comparison.

Table 10: Restatement of comparative emissions intensities for new builds

	tCO ₂ e intensity 2023/24 restated	tCO ₂ e intensity 2023/24	tCO ₂ e intensity 2022/23 restated	tCO ₂ e intensity 2022/23
Embodied emissions from new builds	152,556	163,212	82,171	89,337
Intensity measure per new build occupant	12.71	13.06	12.10	12.41

New energy, water and maintenance assumptions for operational emissions from existing portfolio

Operational energy emissions from the housing portfolio were previously calculated based on data from the BRANZ Household Energy End-use Project (HEEP1). However, as acknowledged at the time, this data is around 20 years old and mainly relates to owner-occupied homes, not rental properties. During the year, new data became available from the Kāinga Ora Winter Energy Study and Indoor Environment Monitoring study of homes in Auckland and Christchurch. This data was compared against the original assumptions from the HEEP1 study, showing Kāinga Ora homes were using approximately 8 percent less energy than originally assumed, so the model was adjusted accordingly.

In addition, the water use assumptions were also reviewed and updated to align with the most recent BRANZ factors, reducing assumed water use per person in pre-2008 homes by 15 percent.

The embodied carbon associated with maintenance operations was also updated based on the updated embodied carbon assumptions discussed above for new builds, resulting in a 5.9 percent increase for this emissions source.

Finally, the model used to calculate the operational emissions was reviewed and updated to more accurately account for the number of occupants and total area of the properties being modelled. The sum of all these changes is an 8.5 percent increase in operational emissions, equivalent to 0.9 percent of the total 2023/24 Kāinga Ora footprint. This is below the restatement threshold, but Kāinga Ora has chosen to restate it to allow a more accurate comparison.

Table 11: Restatement of comparative emissions intensities for existing portfolio

	tCO ₂ e 2023/24 restated	tCO ₂ e 2023/24	tCO ₂ e 2022/23 restated	tCO ₂ e 2022/23
Operational emissions from existing portfolio (energy, water, maintenance)	66,072	61,007	63,962	59,007
Intensity measure per existing occupant	0.3218	0.3046	0.3183	0.3027

Summary of targets and reduction strategies

GHG emissions reduction targets have been included to meet the MfE CNGP requirements. These were set as part of our 2023 Emissions Reduction Plan, which has been provided to MfE but has not been made publicly available. Reduction targets are set as a percentage, so restatements of the base year have not impacted the targets set out below. No target has been set for the “other purchased goods and services and capital goods” emissions group due to the uncertainty in using spend-based emissions factors for measurement and the low reduction potential of this category.

Table 12: Emissions reduction targets as set out in the 2023 Kāinga Ora Emissions Reduction Plan

	Corporate	Buildings	Infrastructure	Transport
What we expect to do within our current funding and operational settings	Reduce corporate emissions by 27% by 2024/25 and 42% by 2029/30 compared to CNGP baseline for 2022/23	Reduce buildings emissions by 14% by 2034/35 compared to 2019	Reduce infrastructure emissions by 0% by 2029/30 compared to 2022/23	Reduce transport emissions by 26% by 2034/35 compared to 2019
What we would need to do to have 1.5°C aligned targets		Reduce buildings emissions by 41% by 2034/35 compared to 2019	Reduce infrastructure emissions by 42% by 2029/30 compared to 2022/23	Reduce transport emissions by 41% by 2034/35 compared to 2019
Reduction strategies to achieve this	- Reduce business travel - Downsize our fleet - Electrify our fleet - Have a sustainable taxi policy	- Improve our design and build standards - Install hot water heat pumps - Install mechanical ventilation with heat recovery - Explore low-carbon structural materials	- Roll out successful pilots across our portfolio - Concentrate and intensify housing in the right locations - Adopt low-carbon materials - Research and trial new low-carbon materials and technologies	- Concentrate and intensify housing in the right locations - Support access to bikes and e-bikes - Reduce barriers to electric vehicles for our social housing customers

Reductions for buildings and transport in the Kāinga Ora Emissions Reduction Plan refer to 2035 (rather than 2030) and are compared to 2019 industry settings (rather than our 2022/23 base year). The CNGP requires us to report on our gross emissions reduction that can be achieved based on our reduction potential for 2024/25 and 2029/30 against our 2022/23 baseline. They are based on what we expect is achievable within our current funding and operational settings. For CNGP purposes, targets have been translated as shown in Table 13.

Table 13: Emissions reduction targets for CNGP purposes

	Corporate	Buildings	Infrastructure	Transport
CNGP targets	Reduce corporate emissions by 27% by 2024/25 and 42% by 2029/30.	Reduce absolute operational emissions from existing portfolio by 0% by 2024/25 and 13% by 2029/30. Reduce new build emissions intensity (per occupant) by 1% by 2024/25 and 2% by 2029/30.	Reduce infrastructure emissions intensity by 0% by 2024/25 and 0% by 2029/30.	Reduce customer transport emissions intensity (per occupant) by 0.44% by 2024/25 and 2.82% by 2029/30.

Performance against targets

The information on performance against targets below is presented to align with CNGP requirements.

Kāinga Ora is currently experiencing changes to its mandate and operating settings. This introduces uncertainty in the future trajectory of buildings, transport and infrastructure emissions. Several work programmes are progressing feasible initiatives that aim to reduce emissions intensity in these areas. Future absolute emissions depend on the organisation’s appetite for low-carbon solutions, and this is unknown currently.

Absolute targets

Table 14: Performance against absolute targets

	Effective CNGP target (tCO ₂ e)		Actual results (tCO ₂ e)			
	2024/25	2029/30	2024/25	2022/23	% change	
Corporate emissions	6,205	4,930	5,199	8,503	39%	↓
Operational emissions from existing portfolio (energy and water)	No reduction	45,920	71,604	50,333	43%	↑

Corporate emissions

Kāinga Ora reduced its corporate emissions in 2024/25 through targeted initiatives such as the Travel Optimisation Programme. This programme is ongoing and involves reducing the size of the vehicle fleet, increasing the proportion of electric vehicles and extending the length of time the vehicles are held (thus reducing embodied carbon impacts) as well as reducing business travel. The average FTE was also lower in 2024/25 than 2022/23, further contributing to reductions. These changes have meant that the organisation has achieved larger reductions than the 2024/25 target and is on track to achieve the 2029/30 target, which is mandatory under the CNGP.

Operational emissions from existing portfolio

Absolute operational emissions from existing Kāinga Ora social and supported housing have increased because of a greater number of homes in the portfolio and a significant increase in the emissions factors for electricity and water and wastewater supply and treatment during the period. Kāinga Ora is currently designing homes to meet New Zealand Building Code clause H1 *Energy efficiency* 5th edition requirements and expects this to increase the average energy efficiency of its stock, although most of the benefits are expected to manifest as warmer homes for Kāinga Ora tenants rather than reduced energy use and emissions.

Intensity targets

Table 15: Performance against intensity targets

	Effective CNGP target (tCO ₂ e)		Actual results (tCO ₂ e)			
	2024/25	2029/30	2024/25	2022/23	% change	
Emissions from new builds (per occupant)	12.29	12.16	9.58	12.10	21%	↓
Infrastructure emissions (per \$m spent)	No reduction	No reduction	111	116	4%	↓

Emissions from new builds (per occupant)

Emissions intensity from new builds decreased due to the lower embodied construction emissions associated with lower-density typologies, which Kāinga Ora delivered more of in 2024/25 compared to the base year.

Infrastructure emissions (per \$m spent)

Emissions intensity from infrastructure projects decreased due to the mix of the projects delivered in 2024/25 tending slightly more towards lower-carbon-intensity activities.

Description of the organisation

Kāinga Ora was established as a Crown agent (for the purposes of the Crown Entities Act 2004) on 1 October 2019 under the Kāinga Ora–Homes and Communities Act 2019.

We are governed by a Board appointed by the Minister of Housing and the Minister of Finance. As a Crown agent, Kāinga Ora must give effect to Government policy when directed by the Minister of Housing and must comply with directions to support the whole-of-government approach made by the Minister for the Public Service and Minister of Finance.

We are the largest tenancy services provider in New Zealand with a total portfolio of over 78,000 homes. We currently provide housing for over 200,000 tenants.

Our portfolio includes almost 4,000 supported housing homes, and a further 900 homes have been leased since 2020 by Te Āhuru Mōwai, the community housing arm of Ngāti Toa in Porirua.

We are responsible for the delivery of our funded large-scale projects in Auckland and Eastern Porirua. In collaboration with local councils, these projects upgrade vital infrastructure and unlock land for a mix of social and market housing.



Everitt Road and Ross Place, Otara, Auckland

Organisational and reporting boundaries

This inventory covers the Kāinga Ora Group, which consists of Kāinga Ora – Homes and Communities (Parent) and its 100 percent subsidiaries Housing New Zealand Limited (HNZL) and Housing New Zealand Build Limited (HNZB). The Parent is responsible for all corporate emissions. HNZL is responsible for embodied and operational emissions from our social and supported housing. HNZB is responsible for embodied emissions from infrastructure development. HNZB prepares land for development and sells it to third parties for the delivery of market and affordable housing. Ongoing emissions from assets vested or sold to third parties are outside the boundary.

We have used the operational consolidation approach to account for our emissions. Significant emissions are defined as those that make up at least 1 percent of the total inventory.

Persons responsible for the inventory

Ultimate responsibility for this inventory sits with the Kāinga Ora Board. The Strategy team has responsibility for compiling the inventory on behalf of the organisation.

Reporting period covered

This inventory covers the financial year from 1 July 2024 to 30 June 2025 (2024/25).

Biogenic removals

Biogenic removals are excluded from the inventory.

Historical base year

The historical base year used is the financial year 1 July 2022 to 30 June 2023 (2022/23). This was the first year Kāinga Ora measured and reported all Scope 1, 2 and 3 emissions from its operations and represents a normal operating year for the organisation. It aligns with the Kāinga Ora base year used for CNGP purposes.

Historical base year restatement policy

The Kāinga Ora base year restatement significance threshold is 5 percent. This threshold applies to both increases and decreases in emissions. Restatements may be triggered by single large changes or from several small changes that are cumulatively significant.

Situations that may trigger a restatement of base year emissions include structural changes, inclusion of emissions sources not previously measured, methodological changes or correction of errors. Restatements will not be triggered for operations that did not exist in the base year, organisational growth or decline, or insourcing or outsourcing of activities.

Assurance

Ernst & Young Limited has provided independent third-party limited assurance on the emissions inventory report for the year ended 30 June 2025. See page 50 for EY's limited assurance report. Ernst & Young is also the appointed audit service provider of Kāinga Ora on behalf of the Office of the Auditor-General.

Information on emissions sources included

Table 16: Information on emissions sources included

Kāinga Ora Group	GHG Protocol scope	Emissions source	Data source	Method	Emissions factors used	Assumptions and associated uncertainties
Corporate	1	Direct fuel use	Summary of fuel card purchases from our fuel provider.	Average-data method: Calculated total litres of fuel purchased from suppliers.	MfE emissions factors (2025): Transport fuels.	- It is assumed staff have used their fuel card to make fuel purchases and that the listing supplied by the provider is complete. - A control is in place to prevent fuel card use for personal vehicles. Vehicle mileage is logged upon refuelling, and any anomaly will trigger investigation. - Uncertainty exists due to the use of a volume-based emissions factor.
	2	Purchased electricity for corporate activities	Summaries of billed kWh volumes from our energy providers.	Average-data method: Calculated total kWh used.	MfE emissions factors (2025): Purchased grid-average electricity – annual average.	- Reporting of purchased electricity is location-based. - It is assumed providers have supplied data for all ICPs. - It is assumed the purchased grid-average electricity – annual average emissions factor adequately represents the emissions impact of all kWh used throughout the year. This is a limitation because, in reality, it will vary based on generation mix. - Uncertainty exists due to the use of an annual average volume-based emissions factor.
		On-road EV charging	Summary of billed kWh volumes from our on-road charging providers.	Average-data method: Calculated total Wh used converted to kWh.		- It is assumed the provider has supplied data for all chargers. - Uncertainty exists due to the use of an annual average volume-based emissions factor.
		Staff EV home charging claims	Report of staff claims for EV home charging.	Spend-based method: \$ amount claimed for home charging converted into kWh using MBIE energy prices (2025): real annual average energy prices – regular petrol – 2024.		- It is assumed staff have made claims for all home charging and that staff energy prices align with MBIE annual average prices. - Uncertainty exists due to: - the use of average energy prices - the use of an annual average volume-based emissions factor.

Kāinga Ora Group	GHG Protocol scope	Emissions source	Data source	Method	Emissions factors used	Assumptions and associated uncertainties
Corporate	3	Category 6: Business travel – air travel	Travel bookings report from supplier.	Average-data method: Outputs for air travel are calculated using the distance travelled (in km) by plane type and split by domestic, international short-haul, international long-haul and class type.	MfE emissions factors (2025): Air travel. UK DEFRA well-to-tank emissions factors (2024): Air travel.	- It is assumed data source represents a complete and accurate account of all travel activity. The organisation has a rule that all staff must book via the company travel provider. - There is a limitation where factors for specific plane types are not provided by MfE. The factor for the plane type that is most similar is used. - It is assumed air travel distances are the exact distance between origin and destination and do not include changes in route due to weather conditions or other factors. This is a limitation.
		Category 6: Business travel – hotel stays	Travel bookings report from supplier.	Average-data method: Hotel nights provided by travel provider, split by country.	MfE emissions factors (2025): Hotel stay (individual countries).	There is a limitation where UK well-to-tank factors have been used because well-to-tank emissions information is not yet available in New Zealand. These factors are considered the best approximation because the UK is also an island nation that imports fossil fuels from overseas.
		Category 6: Business travel – car hire	Travel bookings report from supplier.	Average-data method: Record of hire cars booked through travel provider and km distance travelled.	MfE emissions factors (2025): Default rental car emissions factors per km travelled.	- Uncertainty exists due to: – variations in actual flight distances travelled – variations in energy usage between different hotels – variation in efficiency between different rental cars – the use of volume-based emissions factors.
		Category 6: Staff claims for purchased fuel and mileage	Internal expense management system.	Spend-based method: \$ spend claimed converted to litres of petrol using MBIE energy prices (2025).	MfE emissions factors (2025): Transport fuel – regular petrol. UK DEFRA well-to-tank emissions factors (2024): Petrol (average biofuel blend), litre. 0% is calculated using data from suppliers or other value chain partners.	- There is a limitation where it is assumed that the amount claimed for mileage entirely represents fuel use and does not include reimbursement for vehicle wear and tear. - There is a limitation where it is assumed that staff-owned vehicles use regular petrol and that prices paid for petrol are consistent with the national average. - UK well-to-tank factors have been used as per above. – Uncertainty exists due to: – the use of average energy prices – the use of volume-based emissions factors.
		Category 6: Car travel by taxi and rideshare	Internal expense management system.	Spend-based method: \$ spend converted to km travelled using MfE emissions factors (2025): Taxi travel – regular – dollars spent.	MfE emissions factors (2025): Taxi travel – regular. UK DEFRA well-to-tank emissions factors (2024): Passenger vehicles and travel – land; Taxis – regular taxi, km. 0% is calculated using data from suppliers or other value chain partners.	- It is assumed taxis use regular petrol. This is a limitation because some taxis may use other fuel types. - UK well-to-tank factors have been used as above. - Uncertainty exists due to: – variation in efficiency between different taxi or rideshare vehicles – the use of a derived spend-based emissions factor.

Kāinga Ora Group	GHG Protocol scope	Emissions source	Data source	Method	Emissions factors used	Assumptions and associated uncertainties
Corporate	3	Category 7: Staff working from home	Employee commuter survey by Abley – CarbonWise tool.	Average-data method: An organisation-wide survey that captured typical weekly patterns of working from home and commuting journeys by vehicle type – a third party calculated the annual emissions.	MfE emissions factors (2025): Working from home.	- One survey was undertaken in autumn 2024 and extrapolated to represent the entire year. A limitation exists as a single survey does not capture the potential variation in staff travel/working from home habits between seasons. - The response rate for the survey was 27%. This sample has been extrapolated across all staff. It is assumed the survey respondents are representative of the entire population of Kāinga Ora employees. This is a limitation. - Uncertainty exists due to: - survey data being used to represent the population - the use of a volume-based emissions factor.
		Category 7: Employee commuting	Employee commuter survey by Abley – CarbonWise tool.		Factors obtained from Toitū Envirocare for e-bikes and e-scooters. MfE emissions factors (2025): Various transport modes. 0% is calculated using data from suppliers or other value chain partners.	- It is assumed staff have used their fuel card to make fuel purchases and that the listing supplied by the provider is complete. - A control is in place to prevent fuel card use for personal vehicles. Vehicle mileage is logged upon refuelling, and any anomaly will trigger investigation. - UK well-to-tank factors have been used as above. - Uncertainty exists due to the use of a volume-based emissions factor.
		Category 3: Direct fuel use well-to-tank	Purchased fuel report.	Average-data method: Accurate records of litres of fuel purchased from supplier.	UK DEFRA well-to-tank emissions factors (2024): Petrol (average biofuel blend), litre; Diesel (average biofuel blend), litre.	- There is a limitation where it is assumed PHEV vehicles have the same embodied emissions impact as BEV vehicles. - Uncertainty exists due to: - variation in life-cycle emissions of different vehicles - the use of a volume-based emissions factor.
		Category 2: Embodied emissions in purchased fleet vehicles	Internal records of vehicles purchased in 2024/25.	Average-data method: Applied emissions factor information from International Energy Agency to the total number of vehicles purchased.	International Energy Agency comparative life-cycle GHG emissions of a mid-size BEV and ICE vehicle (2021) – Battery electric vehicle base case: Vehicle manufacturing; Batteries – assembly and other; Batteries – minerals.	

Kāinga Ora Group	GHG Protocol scope	Emissions source	Data source	Method	Emissions factors used	Assumptions and associated uncertainties
Corporate	3	Category 5: Waste to landfill	Reporting from our waste provider for our Wellington office.	Average-data method: Collected data for tonnes of waste produced for the entire 7 Waterloo Quay building and calculated percentage of office space Kāinga Ora has. Calculated tonnes of waste produced per person at this office. Calculated average employee office access nationwide multiplied by average tonnes of waste per person.	MfE emissions factors (2025): Waste disposal to municipal (class 1) landfills with gas recovery – office waste.	- It is assumed per-person waste generated at 7 Waterloo Quay is consistent with per-person waste generated at other Kāinga Ora offices. This is a limitation. - It is assumed Kāinga Ora generates waste in a proportion consistent with its floor area in the buildings. - It is assumed the proportion of people who come into the office at offices with automated access information is consistent with the proportion who come into other Kāinga Ora offices. This is a limitation. - It is assumed each employee only uses a single access card on a given day and that no tailgating occurs. - It is assumed all waste goes to landfills with landfill gas recovery. - Uncertainty exists due to: - the approach of using waste generated at a single office to represent all offices - the use of a volume-based emissions factor.
		Category 3: Electricity transmission and distribution losses	Summaries of billed kWh volumes from our energy providers.	Average-data method: Calculated total kWh used.	MfE emissions factors (2025): Transmission and distribution losses for energy consumption.	- It is assumed the providers have supplied data for all ICPs. - It is assumed the purchased grid-average electricity – annual average emissions factor adequately represents the emissions impact of all kWh used throughout the year. This is a limitation because in reality it will vary based on generation mix. - Uncertainty exists due to: - likely variation in emissions based on geographical location - the use of a volume-based emissions factor.
		Category 5: Wastewater treatment	Average employees in the period.	Average-data method: Calculated using the average number of employees in the period and applied the per capita emissions factor.	MfE emissions factors (2025): Domestic wastewater treatment – average for wastewater.	- It is assumed usage by employees is consistent with the average applied by MfE in determining the factor. - It is assumed permanent employees, fixed-term employees, contractors and casual employees use Kāinga Ora offices at the same rate. This is a limitation.
		Category 3: Water supply	Average employees in the period.	Average-data method: Calculated using the average number of employees in the period and applied the per capita emissions factor.	MfE emissions factors (2025): Water supply. 0% is calculated using data from suppliers or other value chain partners.	- Uncertainty exists due to: - likely variation in emissions based on geographical location - the use of a volume-based emissions factor.

Kāinga Ora Group	GHG Protocol scope	Emissions source	Data source	Method	Emissions factors used	Assumptions and associated uncertainties
Buildings	2	Purchased electricity for social and supported housing communal areas	Summary of billed kWh volumes from our energy providers.	Average-data method: Accurate records of kWh used.	MfE emissions factors (2025): Purchased grid-average electricity – annual average.	• Reporting of purchased electricity is location-based. • It is assumed the provider has supplied data for all ICPs. • Uncertainty exists due to the use of an annual average volume-based emissions factor.
	3	Category 2: Embodied emissions from existing portfolio	Designed schedule of quantities for a standard 3-bedroom single-storey stand-alone home: • pre-1979 • 1979–2008 • 2008+. Internal reporting outlining Kāinga Ora social and supported housing details and attributes.	Average-data method: Reference building embodied emissions associated with maintenance and replacement (modules B2 and B4) for our existing portfolio are calculated using BRANZ LCAQuick v3.5, v3.6. Reference building outputs are then applied to the Kāinga Ora portfolio based on gross floor area.	BRANZ LCAQuick v3.5, v3.6 modules B2 and B4.	• It is assumed the useful life of timber buildings is 50 years and concrete buildings 90 years. This is a limitation because the actual useful life of buildings may vary. • It is assumed the embodied emissions associated with the maintenance of a stand-alone home are similar for other typologies. This is a limitation. • The assumed occupancy rate is based on the number of people registered in each home. However, there is a limitation that the exact number of people will vary if occupancy has changed but Kāinga Ora has not been informed. Kāinga Ora does not collect occupancy data for transitional housing and community housing provider leases, so it is assumed that these are occupied at the same rate as social and non-social housing. • It is assumed that electricity is the sole energy source. In reality some stock use gas, wood and geothermal energy, but this has been assessed as not material. • Uncertainty exists due to: – the use of reference buildings to represent actual dwellings – the assumptions used in life-cycle analysis of products and services included in reference buildings.

Kāinga Ora Group	GHG Protocol scope	Emissions source	Data source	Method	Emissions factors used	Assumptions and associated uncertainties
Buildings	3	Category 2: Embodied emissions from new builds	Designed schedule of quantities for: • 1-bedroom apartment • 2-bedroom 3-level walk-up • 2-bedroom duplex • 3-bedroom single-storey stand-alone home. Internal reporting outlining Kāinga Ora social and supported housing additions.	Average-data method: Reference building embodied emissions associated with new construction (modules A1–A5) are calculated using BRANZ LCAQuick v3.5, v3.6. Reference building outputs are then applied to the Kāinga Ora portfolio based on: • building typology • number of bedrooms. Embodied emissions (modules A1–A5) are reported upon building construction completion.	BRANZ LCAQuick v3.5, v3.6 modules A1–A5.	• It is assumed reference buildings are representative of the actual homes built. This is a limitation because emissions from actual homes built will vary based on a multitude of factors. • Embodied emissions from market housing purchased by Kāinga Ora but constructed before 1 January 2024 have not been included. It is assumed that market homes delivered after this date and purchased by Kāinga Ora have had no prior use. Therefore, the embodied emissions are attributable to us. • It is assumed each additional bedroom is 9 m² and emissions intensity of bedrooms is the same as the rest of the dwelling. This is a limitation because bedroom size and emissions intensity may vary. • The assumed occupancy rate used to determine occupancy for most housing types is 1.09 people/bedroom (2022/23: 1.11) based on the number of people registered in each home. However, there is a limitation that the exact number of people will vary if occupancy has changed but Kāinga Ora has not been informed. Kāinga Ora does not collect occupancy data for transitional housing and community housing provider leases, so it is assumed that these are occupied at the same rate as social and non-social housing. The assumed occupancy rate for Community Group Housing is 1.00 people/bedroom (2022/23: 1.00). • Uncertainty exists due to: – the use of reference buildings to represent actual dwellings – the assumptions used in life-cycle analysis of products and services included in reference buildings.

Kāinga Ora Group	GHG Protocol scope	Emissions source	Data source	Method	Emissions factors used	Assumptions and associated uncertainties
Buildings	3	Category 2: Embodied emissions from retrofits	Designed schedule of quantities for a standard Kāinga Ora retrofit. Internal reporting outlining Kāinga Ora retrofit details.	Average-data method: Reference building embodied emissions associated with retrofits (modules A1–A5) are calculated using BRANZ LCAQuick v3.4.4. Reference building outputs are then applied to Kāinga Ora building retrofits based on number of bedrooms.	BRANZ LCAQuick v3.4.4 modules A1–A5.	- It is assumed the useful life of buildings is 50 years from the date of retrofit. This is a limitation because the actual useful life of buildings may vary. - It is assumed all retrofit buildings are stand-alone houses and that reference buildings are representative of the actual homes retrofitted. This is a limitation because typology and other attributes of retrofit buildings may vary. - It is assumed each additional bedroom is 9 m² and emissions intensity of bedrooms is the same as the rest of the dwelling. This is a limitation because bedroom size and emissions intensity may vary. - The assumed occupancy rate used to determine occupancy for most housing types is 1.09 people/bedroom (2022/23: 1.11) based on the number of people registered in each home. However, there is a limitation that the exact number of people will vary if occupancy has changed but Kāinga Ora has not been informed. Kāinga Ora does not collect occupancy data for transitional housing and community housing provider leases, so it is assumed that these are occupied at the same rate as social and non-social housing. The assumed occupancy rate for Community Group Housing is 1.00 people/bedroom (2022/23: 1.00). - Uncertainty exists due to: - the use of reference buildings to represent actual dwellings - the assumptions used in life-cycle analysis of products and services included in reference buildings.
		Category 1: Emissions from building design and consenting services	Internal reporting from Kāinga Ora accounting system.	Spend-based method: Total expenditure on purchased goods and services and capital goods is extracted from our accounting system and aggregated by purchase order category. Each category is reviewed to determine whether it pertains to building design and consenting services – otherwise, it is excluded and instead reported in purchased goods and services. The most appropriate spend-based emissions factor adjusted for inflation is used to calculate emissions.	Consumption emissions modelling prepared for Auckland Council by Market Economics Ltd (2023): various factors.	- It is assumed within a category the type of spending is relatively uniform, and the emissions factors used are most appropriate for the category of spend. - Uncertainty exists due to the use of spend-based emissions factors.

Kāinga Ora Group	GHG Protocol scope	Emissions source	Data source	Method	Emissions factors used	Assumptions and associated uncertainties
Buildings	3	Category 3: Social and supported housing transmission and distribution losses	Summary of billed kWh volumes from our energy providers.	Average-data method: Accurate records of kWh used.	MfE emissions factors (2025): Purchased grid-average electricity – annual average.	- Reporting of purchased electricity is location-based. - It is assumed the provider has supplied data for all ICPs. - Uncertainty exists due to the use of an annual average volume-based emissions factor.
		Category 13: Operational emissions from existing portfolio	Operational energy use (module B6): - BRANZ Household Energy End-use Project (HEEP1). - Winter Energy Study (WES) and Indoor Environmental Monitoring (IEM) study. - In-house modelling of building performance using a combination of ECCHO, DesignBuilder and Passive House Planning Package. - Internal reporting outlining Kāinga Ora social and supported housing details. - Data from installed PV systems on Kāinga Ora homes. Water use (module B7): - In-house modelling of building performance using a combination of ECCHO, DesignBuilder and Passive House Planning Package. - BRANZ typical water use report - Internal reporting outlining Kāinga Ora social and supported housing details.	Average-data method: Operational energy use (B6) is determined for reference buildings: - Single-storey stand-alone home with 3 bedrooms, pre-1979, 1979–2008, 2008+, climate zones 1–6. - Duplex with 3 bedrooms, pre-1979, 1979–2008, 2008+, climate zones 1–6. 3-level walk-up with 3 bedrooms, pre-1979, 1979–2008, 2008+, climate zones 1–6. - Apartment with 3 bedrooms, pre-1979, 1979–2008, 2008+, climate zones 1–6. Energy use is estimated based on the results of HEEP1, adjusted to align with the WES and IEM study. Adjustments are then made to take account of differing energy use associated with: - building typology - building performance standard - New Zealand Building Code clause H1 <i>Energy efficiency</i> 5th edition climate zone - floor area.	MfE emissions factors (2025): Purchased grid-average electricity – annual average. Domestic wastewater and water supply. 0% is calculated using data from suppliers or other value chain partners.	- It is assumed that the different HEEP1 energy use rates for each climate zone are comparable to the Kāinga Ora portfolio energy use rates and that the adjustments made based on the WES and IEM study apply across the climate zones. - It is assumed energy and water are used at a constant rate throughout the year. This is a limitation because, in reality, use depends on a number of factors, including seasons and weather. - It is assumed no Kāinga Ora homes exceed the 2008 Building Code performance standard. In reality, a small portion do, but the impact of this is immaterial for portfolio operational emissions. - It is assumed that the average generation from 536 PV installations that data has been sourced from is reflective of the remaining 94 that were not able to be sourced. - The assumed occupancy rate is determined by the number of people registered to the building. However, there is a limitation that the exact number of people will vary if occupancy has changed but Kāinga Ora has not been informed. Kāinga Ora does not collect occupancy data for transitional housing and community housing provider leases, so it is assumed that these are occupied at the same rate as social and non-social housing. - Uncertainty exists due to: - the use of reference buildings to represent actual dwellings - the assumptions used in life-cycle analysis of products and services included in reference buildings.

Kāinga Ora Group	GHG Protocol scope	Emissions source	Data source	Method	Emissions factors used	Assumptions and associated uncertainties
Buildings	3	Category 15: Construction emissions financed through home ownership products	Internal records of financing for new builds.	Spend-based method: Applied spend-based factor for construction to the total \$ amount of new build financing through the First Home Grant and First Home Partner schemes. ⁷	Consumption emissions modelling prepared for Auckland Council by Market Economics Ltd (2023): Residential building construction. 0% is calculated using data from suppliers or other value chain partners.	- It is assumed financing is used to directly pay for residential construction services for new builds. This assumption is reinforced by the requirement that applicants must reimburse Kāinga Ora if they do not end up building a dwelling on their land. - Uncertainty exists due to the use of spend-based emissions factors.
Infrastructure	3	Category 2: Embodied emissions from infrastructure development	Internal records of spend on infrastructure projects.	Spend-based method: Total expenditure for each project multiplied by an emissions factor calculated to reflect the specific project.	Spend-based factors have been developed based on the Kāinga Ora infrastructure emissions baselining work completed in 2023. These are based on different Kāinga Ora precincts (e.g. Roskill, Māngere) and different sectors (e.g. building site preparation, stormwater, utilities). 0% is calculated using data from suppliers or other value chain partners.	- Spend-based factors have been developed based on detailed design quantities as opposed to as-built data. - It is assumed spend-based factors represent actual consumption data. - Uncertainty exists due to the use of spend-based emissions factors.
Other purchased goods and services and capital goods	3	Category 1 & 2: Other purchased goods and services and capital goods	Internal reporting from Kāinga Ora accounting system.	Spend-based method: Total expenditure on purchased goods and services and capital goods extracted from our accounting system and aggregated by purchase order category. Each category is reviewed to determine whether it is already accounted for elsewhere in the emissions inventory and, if so, excluded from this emissions group. Where a category is not already accounted for, the most appropriate spend-based emissions factor is used to calculate emissions.	Consumption emissions modelling prepared for Auckland Council by Market Economics Ltd (2023): Various factors. 0% of emissions are calculated using data from suppliers or other value chain partners.	- It is assumed within each category the type of spending is relatively uniform, and the emissions factors used are the most appropriate for the category of spend. - Uncertainty exists due to the use of spend-based emissions factors.

7. Note that both schemes are no longer offered by Kāinga Ora from May 2024.

Exclusions

The table below sets out the emissions sources excluded from the inventory and the reason for exclusion.

Embodied emissions from civil infrastructure within our superlots (such as carparks, gardens, foundations and pathways) are excluded due to the lack of detailed information available to capture and measure these items reliably.

Table 17: Information on emissions sources excluded.

GHG Protocol scope	Description	Reason for exclusion
Scope 1: Direct emissions from sources owned or controlled by Kāinga Ora	Stationary combustion	Office generators – two of our offices have generators that run for a very limited time per year. Emissions are assessed to be immaterial.
	Emissions – industrial processes	Kāinga Ora has no direct emissions from industrial processes.
	Removals – industrial processes	
	Leakage of refrigerants	Leakage of refrigerants from housing portfolio heat pumps is included, but leakage of refrigerants from office building AC units is excluded as it is assessed as being immaterial.
	Treatment of waste	Kāinga Ora does not directly treat waste.
	Treatment of wastewater	Kāinga Ora does not directly treat wastewater.
	Land-use, land-use change and agricultural emissions	Kāinga Ora does not undertake any of these activities.
Scope 2: Indirect GHG emissions from imported energy	Imported energy	Electricity is the sole source of energy used in Kāinga Ora offices other than the two generators mentioned in Scope 1.
	Imported electricity for shared offices	Kāinga Ora shares several small offices with other organisations. Where Kāinga Ora does not pay the electricity bill, this electricity is excluded from the inventory as it is immaterial.
Scope 3 Category 3: Fuel and energy-related activities	Client-supplied electricity	Kāinga Ora does not use client-supplied electricity.
Scope 3 Category 4: Upstream Transport	Transport of purchased products	Not reported separately, but included in Category 1: Purchased Goods and Services

GHG Protocol scope	Description	Reason for exclusion
Scope 3 Category 5: Waste generated in operations	Disposal of solid waste – landfilled	Emissions from the disposal of buildings not associated with larger infrastructure projects are not included because they are assessed to be immaterial.
	Disposal of solid waste – not landfilled	Kāinga Ora does not dispose of solid waste that is not landfilled.
	Disposal of liquid waste – not wastewater	Kāinga Ora does not dispose of liquid waste that is not wastewater.
Scope 3 Category 8: Upstream leased assets	Use of assets	There are no non-electricity emissions from the use of upstream leased assets.
Scope 3 Category 9: Downstream transportation and distribution	Downstream freight – paid by the customer/ others	Kāinga Ora does not charge customers or others for freight.
	Client and visitor transport	Kainga Ora has previously reported this optional emission source under the GHG Protocol but has excluded it this year due to the lack of ability to significantly influence tenants’ transport emissions.
Scope 3 Category 10: Processing of sold products	Processing of sold goods	Kāinga Ora is not in the business of selling tangible products.
Scope 3 Category 11: Use of sold products	Use stage of sold products	Kāinga Ora is not in the business of selling tangible products.
Scope 3 Category 12: End-of-life treatment of sold products	End-of-life stage of sold products	Kāinga Ora is not in the business of selling tangible products.
Scope 3 Category 14: Franchises	Franchises	Kāinga Ora has no franchises.



Independent Limited Assurance Report to the Directors of Kāinga Ora – Homes and Communities

Assurance Conclusion

Based on our limited assurance procedures performed and the evidence we have obtained, nothing has come to our attention that causes us to believe that the total gross Scope 1, Scope 2 and Scope 3 greenhouse gas (“GHG”) emissions reported in Kāinga Ora – Homes and Communities (“Kāinga Ora”) GHG Emissions Inventory Report, for the year ended 30 June 2025 (the “GHG Disclosures”) are not prepared, in all material respects, in accordance with the Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard and the Corporate Value Chain (Scope 3) Accounting and Reporting Standards.

Emphasis of Matter

We draw attention to the uncertainty in the calculation approaches and assumptions noted in Table 16 on pages 30-47. There is particular uncertainty in the calculation approaches and assumptions used to estimate the embodied emissions in Scope 3, Category 2 – Capital Goods (Embodied emissions from new builds, existing portfolio, and retrofitted properties), the emissions in Scope 3, Category 13 – Downstream leased assets (Operational emissions from existing portfolio), and from the use of spend-based emissions factors in the Scope 3, Category 1 – Purchased goods and services (Emissions from building design and consenting services and other purchased goods and services), Cateogry 2 – Capital Goods (Embodied emissions from infrastructure development and Other Capital Goods) and Cateogry 15 – Financed emissions (Construction emissions financed through home ownership products).

Our conclusion is not modified in respect of these matters.

Scope

Ernst & Young Limited (“EY”) has undertaken a limited assurance engagement to report on the total gross Scope 1, Scope 2 and Scope 3 GHG emissions in Kāinga Ora GHG Emissions Inventory Report 2024/25 on pages 15-49 within the Climate Statement 2024/25 (the “GHG Disclosures”) for the year ended 30 June 2025. The GHG Disclosures relate to the Company and its subsidiaries (together the “Group”).

Criteria applied by Kāinga Ora

In preparing the GHG Disclosures, Kāinga Ora applied the Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard and Corporate Value Chain (Scope 3) Accounting and Reporting Standards (together “the GHG Protocol” and the “Criteria”). In applying the Criteria, the methods and assumptions used are described on pages 30-47 of the GHG Disclosures, as are the estimation uncertainties inherent in the methods and assumptions used.

Kāinga Ora Directors Responsibility

Kāinga Ora Directors are responsible, on behalf of Kāinga Ora, for the preparation of the GHG Disclosures in accordance with the Criteria. This responsibility includes establishing and maintaining internal controls, maintaining adequate records and making estimates that are relevant to the preparation of the GHG Disclosures, such that it is free from material misstatement, whether due to fraud or error.

EY’s Responsibility

Our responsibility is to express a limited assurance conclusion on the GHG Disclosures based on the procedures we have performed and the evidence we have obtained.



Our engagement was conducted in accordance with International Standard for Assurance Engagements (New Zealand): Assurance Engagements on Greenhouse Gas Statements (“ISAE (NZ) 3410”). This standard requires that we plan and perform this engagement to obtain limited assurance about whether the GHG Disclosures have been prepared, in all material respects, in accordance with the Criteria. The nature, timing and extent of the procedures selected depend on our judgment, including an assessment of the risk of material misstatement, whether due to fraud or error.

We believe that the evidence obtained is sufficient and appropriate to provide a basis for our limited assurance conclusion.

In addition to this limited assurance engagement, Ernst & Young is the Auditor General’s appointed audit service provider to Kāinga Ora. In this role Ernst & Young provides financial statement and performance information audit services on behalf of the Auditor-General, to Kāinga Ora. Partners and employees of our firm may deal with Kāinga Ora on normal terms within the ordinary course of trading activities of the business of Kāinga Ora. We have no other relationship with, or interest in, Kāinga Ora.

Our Independence and Quality Management

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

The firm applies Professional and Ethical Standard 3 *Quality Management for Firms that Perform Audits or Reviews of Financial Statements, or Other Assurance or Related*

Services Engagements, 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.

Description of procedures performed

Procedures performed in a limited assurance engagement vary in nature and timing from, and are less in extent than, for a reasonable assurance engagement. Consequently, the level of assurance obtained in a limited assurance engagement is substantially lower than the assurance that would have been obtained had a reasonable assurance engagement been performed. Our procedures were designed to obtain a limited level of assurance on which to base our conclusion and do not provide all the evidence that would be required to provide a reasonable level of assurance.

Our procedures did not include testing controls or performing procedures relating to checking aggregation or calculation of data within IT systems.

A limited assurance engagement consists of making enquiries, primarily of persons responsible for preparing the report and related information, and applying analytical and other relevant procedures.

Our procedures included:

- Obtaining, through inquiries, an understanding of Kāinga Ora control environment, processes and information systems relevant to the preparation of the GHG Disclosures. We did not evaluate the design of particular control activities, or obtain evidence about their implementation;
- Performing walkthroughs of key processes and data sets;
- Inquiring with relevant staff regarding any matters that arose in the application of the selected boundary in establishing the reported amounts;



- Evaluating whether Kāinga Ora methods for developing estimates are appropriate and had been consistently applied. Our procedures did not include testing the data on which the estimates are based;
- Testing a limited number of items to, or from, supporting records, as appropriate;
- Assessing a limited number of emission factor sources for appropriateness;
- Performing analytical procedures on selected emission categories and making inquiries of management to obtain explanations for any significant movements or unexpected variances; and
- Considering the presentation and disclosure of the GHG Disclosures.

We also performed such other procedures as we considered necessary in the circumstances.

Although we considered the effectiveness of management’s internal controls when determining the nature and extent of our procedures, our assurance engagement was not designed to provide assurance on internal controls.

Inherent Uncertainties

The GHG quantification process is subject to scientific uncertainty, which arises because of incomplete scientific knowledge about the measurement of GHGs. Additionally, GHG procedures are subject to estimation uncertainty resulting from the measurement and calculation processes used to quantify emissions within the bounds of existing scientific knowledge.

Other matters

The comparative information, being the restated 2023 and 2024 GHG disclosures on Scope 3 Category 2 – Capital Goods (Embodied emissions in new builds and in the existing portfolio) and Category 13 – Downstream leased assets (Operational emissions from existing portfolio) as noted on page 23-24, has not been subject to assurance. As such, it is not covered by our limited assurance conclusion.

Use of our Assurance Report

We disclaim any assumption of responsibility for any reliance on this assurance report to any persons other than the Directors of Kāinga Ora, or for any purpose other than that for which it was prepared.

Ernst & Young Limited
Auckland
30 September 2025

Copyright © 2025. This copyright work
is licensed under a Creative Commons
Attribution-Non-Commercial 3.0
New Zealand licence.
