MODERN SLAVERY

AND HUMAN RIGHTS STATEMENT

Spark Modern Slavery and Human Rights Statement FY24

About this statement

This Modern Slavery and Human Rights Statement is made on behalf of Spark New Zealand Limited ('Spark' and its subsidiaries, the 'Spark Group') for the period from 1 July 2023 to 30 June 2024. Spark New Zealand Limited is the parent entity of the Spark Group. Spark is publicly listed and our issued shares are quoted on the New Zealand Stock Exchange (NZX) and Australian Securities Exchange (ASX). (**NZX: SPK, ASX: SPK**).

Spark is a reporting entity for the purposes of the Australian Modern Slavery Act 2018. Spark engaged and consulted with the relevant companies we own or control (the Spark Group) in the development of this statement. As of 30 June 2024, the Spark Group comprised 30 controlled entities. See Appendix 1 for a full list of Spark subsidiaries.

We have integrated disclosure on our broader human rights impacts, alongside our detailed modern slavery statement reporting. This statement has been published in accordance with the requirements of the Australian Modern Slavery Act 2018. This Statement was approved by the Board on 22 August 2024.

Mandatory criteria of the Modern Slavery Act

Criterion	Reference
Identify the reporting entity	Page 2: About this statement
Describe the reporting entity's structure, operations and supply chains	Page 2: About this statement Pages 6-7: Spark's operations Pages 16-17: Mapping our global supply chain Pages 22-23: Demographics of our workforce; Workforce ethnic diversity Page 30: Spark Group structure and subsidiaries
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls	Pages 14–15: Due diligence Pages 16–22: Addressing potential impacts
Describe the actions taken by the reporting entity and any entity it owns or controls to assess and address those risks, including due diligence and remediation processes	Pages 14–15: Due diligence Pages 16–22: Addressing potential impacts
Describe how the reporting entity assesses the effectiveness of these actions	Page 13: Training and awareness Pages 27–29: Reviewing effectiveness and reporting
Describe the process of consultation with any entities that the reporting entity owns or controls (a joint statement must also describe consultation with the entity giving the statement)	Page 2: About this statement Page 10: Policies and governance Page 30: Spark Group structure and subsidiaries

Chair and CEO message

Justine Smyth CNZM, Chair
and Jolie Hodson MNZM, CEO

At Spark, we respect the freedom and human rights of every individual, regardless of who they are, or where they are from.

Modern slavery is a complex human rights challenge we are committed to address. It includes the exploitation of any person in any form – including forced labour, debt bondage, forced marriage, slavery, human trafficking, or situations where an individual cannot leave due to threats, violence, or deception.

Our people are at the heart of our business, and within our direct workforce we are focussed on not only complying with the letter and spirit of the law, but creating a highly engaged and inclusive culture. We want to provide fulfilling employment that rewards and recognises each individual fairly and for all our people to feel comfortable bringing their full selves to work.

As a telecommunications and digital services business, our supply chain is global, which makes our indirect workforce vast and diverse. We want to source our products and services from suppliers that provide safe working conditions, treat workers with respect and dignity, and conduct business in an environmentally and socially responsible manner. To achieve this, we are committed to ensuring we have the policies, processes, and practices in place to identify, prevent, mitigate, and remedy human rights issues when and where they occur. Because it is challenging for any individual business to influence the practices of so many varied organisations outside of its own, we work alongside our global peers

through the Joint Audit Cooperation (JAC) Initiative, to collaborate on solutions and increase our leverage in addressing these issues.

We also recognise that human rights considerations in our business extend beyond our people and supply chain, to the technologies we use, create, and deploy. The rapid acceleration of Artificial Intelligence (AI), particularly Generative AI, brings with it increasingly sophisticated capabilities, some of which can directly impact people or influence their behaviours, opinions, and choices. In line with these developments, we recognise our responsibility to ensure we take a responsible and ethical approach to the design and operation of AI technologies.

This statement provides a summary of our commitment to upholding human rights and addressing modern slavery risks across our value chain, including actions taken over the past year to strengthen our systems and processes. We welcome feedback and collaboration, as we strive for continual improvement in the years ahead.

Ngā mihi nui,

Justine Smyth CNZM
Chair

Jolie Hodson MNZM
CEO

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FY24 highlights

Dedicated Human Rights and Supply Chain **Steering Committee established**, building on work of previous ESG Squad

Eight **supplier audits** completed, with **77 findings** and corrective actions agreed

Designed and delivered **human rights and modern slavery training** to 56 people in Spark's supply chain, legal, and customer-facing teams, who are in roles most likely to identify potential impacts

Designed and implemented our first **supplier self-assessment questionnaire** for 57 high-risk suppliers in June 2024, with 25 completed to date – building our engagement and understanding of risk across priority suppliers
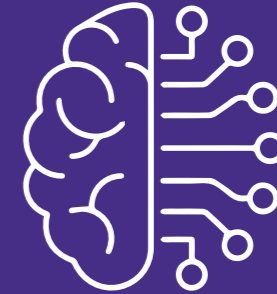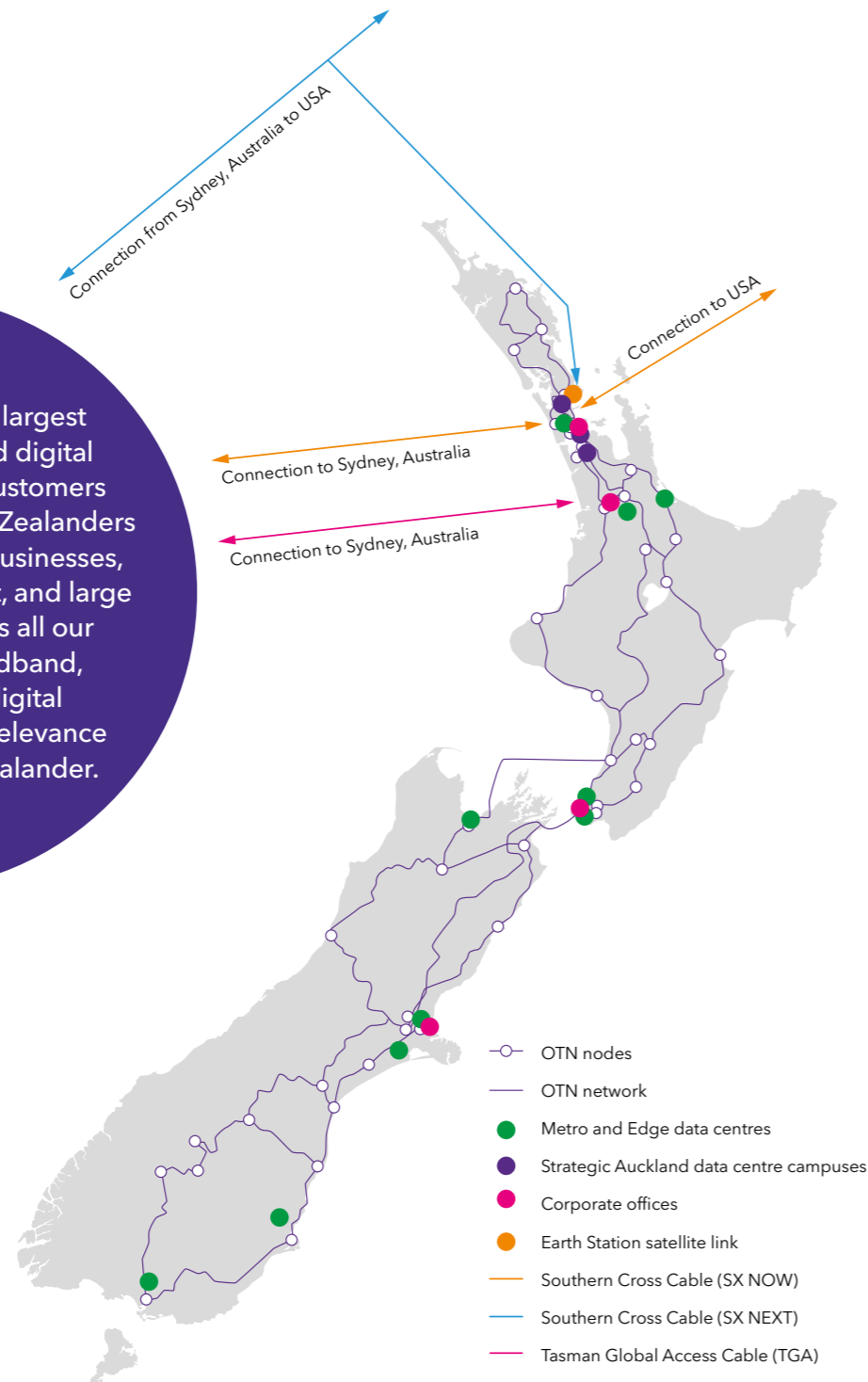
Data ethics and AI governance processes evolved, with new Data Ethics Committee established – to govern the responsible and ethical use of AI within Spark

AI Principles further embedded through a new **Generative AI Policy** for Spark people

Spark's operations

Spark is New Zealand's largest telecommunications and digital services company. Our customers range from individual New Zealanders and households to small businesses, not-for-profits, government, and large enterprise clients. Across all our services – mobile, broadband, digital services, and digital infrastructure – we have relevance for almost every New Zealander.

Connection from Sydney, Australia to USA

Connection to USA

Connection to Sydney, Australia

Connection to Sydney, Australia

○ OTN nodes
— OTN network
● Metro and Edge data centres
● Strategic Auckland data centre campuses
● Corporate offices
● Earth Station satellite link
— Southern Cross Cable (SX NOW)
— Southern Cross Cable (SX NEXT)
— Tasman Global Access Cable (TGA)

98%
of New Zealanders reached by our 4G network

99%
of the population reached by our Internet of Things network[1]

5,291
employees

>2.7m
mobile connections

>680k
broadband connections

>110k
small-medium business customers

~1,100
enterprise and government customers

61
retail stores

24
regional business hubs

2,176
mobile sites housing our active infrastructure[2]

>22MW
data centre capacity

Consumer	Business		Community	Other brands
Spark™	Spark Business Group	✳ Spark Health	Spark™ Foundation	Spark™ Wholesale
Skinny	CCL	Spark nz IoT	Skinny Jump	entelar group
	Digital Island*	adroit Environmental Intelligence		MATTR
	Qrious			

1 Cat-M1 Internet of Things network.
2. Includes Spark active equipment on 1,549 third party towers, 514 RCG towers, 98 small cells, and 15 temporary sites active at 30 June 2024.
Metrics correct as at 30 June 2024.

Our Human Rights and Modern Slavery Framework

Spark has policies and systems in place to assess, prevent, mitigate, and remedy instances of human rights or modern slavery violations as part of our overarching sustainability and risk management approach. This approach is outlined in our Framework below, and forms part of our broader Toitū Sustainability Framework and People and Culture practices.

Our Human Rights and Modern Slavery Statement is divided into five sections corresponding to the five elements of this framework.

Spark has a comprehensive suite of policies that support our human rights and modern slavery focus, with an ongoing work programme to drive continuous improvement. Our sustainability governance structure ensures that sustainability is overseen at the highest levels of our organisation and embedded throughout our everyday operations.

See pages 10 – 12

Training and awareness are critical to our ability to prevent and manage human rights and modern slavery risks across our business. We engage with key supplier and customer-facing teams to increase understanding and awareness of risk.

See page 13

We review progress against our Human Rights and Modern Slavery Programme every quarter through the Human Rights and Supply Chain Steering Committee and report to the Leadership Squad and Board quarterly. We report publicly on our progress annually through this statement and our broader Integrated Reporting.

See pages 27 – 29

We identify potential human rights and modern slavery risk areas through an ongoing human rights due diligence process, aligned to our annual sustainability materiality process and our principal risk assessment, alongside ongoing processes of supply chain risk assessment. We also have mechanisms in place to enable timely reporting of issues by our people.

See pages 14 – 15

Circular framework diagram with five outer segments:
1. Policies and governance
2. Training and awareness
3. Due diligence
4. Addressing potential impacts
5. Reviewing effectiveness and reporting

Inner ring — OUR VALUES:
- Maia, We are bold
- Whakamana, We empower
- Tūhono, We connect
- Matomato, We succeed together

We address upstream risk in our supply chain through the Joint Audit Cooperation (JAC) supply chain audit programme, led internally by our Audit and Risk team. This includes tracking corrective actions to address any issues identified. We have mature processes in place to manage issues, such as privacy. For emerging issues in our direct operations and downstream impacts, mitigation actions are agreed and tracked through the Human Rights and Supply Chain Steering Committee.

- Upstream impacts in our supply chain: **pages 16 – 20**
- Direct impacts in our operations: **pages 21 – 23**
- Downstream impacts of our products and services: **pages 24 – 26**
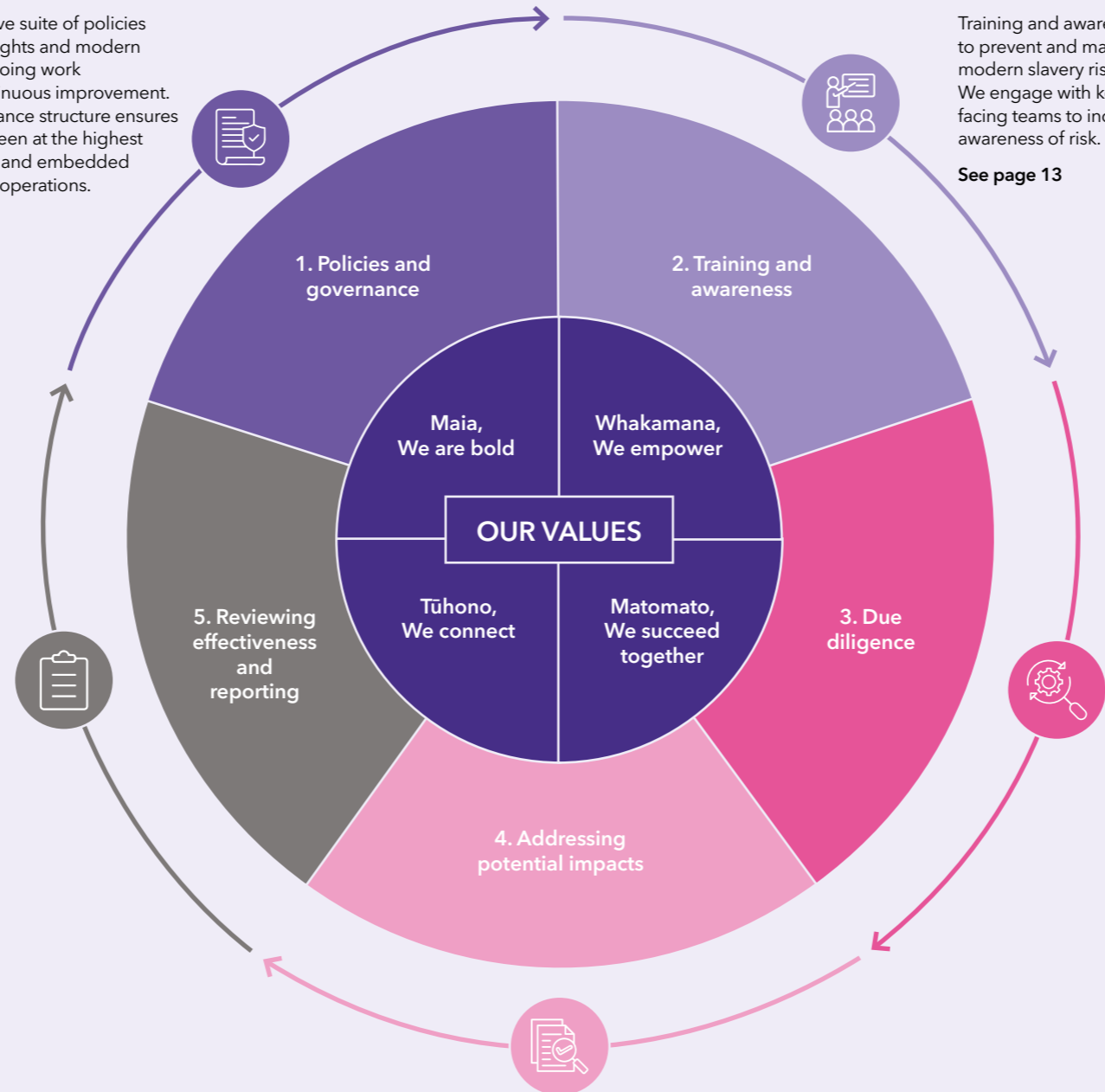
1. Policies and governance

Our human rights and modern slavery work programme is driven by our Human Rights and Supply Chain Squad (the squad). This squad is led by our Sustainability Lead, who reports to our Sustainability Director – a member of Spark's Leadership Squad.

The squad is comprised of representatives from the Spark Value Management, Legal, Digital Trust, and Risk and Internal Audit teams, and a supply chain representative from Spark subsidiary Entelar Group. The Human Rights and Supply Chain Steering Committee has governance oversight of the work programme and serves as an escalation point for important decisions. The Steering Committee includes three Leadership Squad members – the Sustainability Director, People and Culture Director, and Network and Operations Director.

We report on progress against this work programme to our Leadership Squad and Board on a quarterly basis. An overview of Spark's sustainability governance structure is provided below. This approach ensures sustainability is overseen at the highest levels of our organisation and embedded throughout our everyday operations.

Sustainability Governance

Spark New Zealand Board of Directors	Approval of business strategy and Sustainability Framework, including key policies and KPIs. Reviews sustainability progress quarterly. Reviews climate change and modern slavery risks.
Leadership Squad	Sets three-year business strategy and approves Sustainability Framework, including key policies and KPIs. Reviews sustainability progress quarterly. Reviews climate change and modern slavery risks.
Corporate Relations and Sustainability Director and Sustainability Team	Corporate Relations and Sustainability Director has overarching responsibility for the Sustainability Framework and Spark's progress against it. Sustainability Lead and Environment and Sustainability Manager lead execution through squads and reporting.
Steering Committees and Governance Forums: Human Rights and Supply Chain, Data Ethics, Climate Disclosures	Steering Committees and Governance Forums established to ensure Leadership Squad and subject matter expert oversight of progress against material sustainability focus areas and risks, where appropriate.
Governance and Reporting Squad / **Emissions Reduction Squads** / **Human Rights and Supply Chain Squad** / **Spark Foundation / Skinny Jump Squad**	Cross-functional squads established to improve sustainability performance and integrate it across Spark. Spark Foundation has a sole focus on digital equity and is governed by a Board of Trustees. Skinny Jump is operated by a dedicated squad. Spark's new Digital Equity Lead will report into the Corporate Relations and Sustainability Director, and have overarching responsibility for Spark's digital equity investments.
Sustainability Framework — **Economic Transformation** / **Digital Equity** / **Sustainable Spark**	Identifies most material focus areas to guide activity and resource allocation.
Quarterly Business Review (QBR)	Spark's business strategy is executed through a Quarterly Business Review (QBR) process, with priorities agreed every three months. Sustainability is a standing priority on the QBR.
All Spark people	Support execution of Sustainability Framework priorities and consider sustainability impacts in decision making.

Our Human Rights and Modern Slavery work programme

In FY24 we established a Human Rights and Modern Slavery work programme, to enable prioritisation and guide resource allocation within the Spark Group. This programme was developed by our Human Rights and Supply Chain Squad and approved by the Human Rights and Supply Chain Steering Committee. For details on how we assess our performance against the work programme, see the final section of this report, Reviewing effectiveness and reporting, on page 27.

Focus area	Description	KPIs
Policies and governance	Robust standards that set clear expectations for our people, suppliers, and stakeholders, with effective governance processes in place to oversee the operationalisation of these standards.	• Our policies are fit for purpose • Our Human Rights and Modern Slavery Framework is aligned to best practice and updated as needed to respond to the evolving risk environment • We have a clear work programme to drive continual improvement
Training and awareness	Regular, effective communications to our people, suppliers, and other relevant stakeholders to ensure our policies and expectations are well understood.	• Our company-wide communications and training equip our people to understand relevant human rights risks, including how to raise concerns • Our training for supply chain and customer-facing teams equips the people most likely to identify human rights and modern slavery risks across our value chain with effective management approaches
Due diligence	Effective risk assessment and due diligence processes that enable the accurate and timely identification of potential human rights and modern slavery risks across our value chain, including trusted and accessible reporting mechanisms for employees to raise concerns.	• Our risk assessment processes accurately identify our human rights and modern slavery risks • Our due diligence processes enable us to identify and manage modern slavery risks relating to suppliers and other third parties • Our people have access to our whistleblowing processes to raise concerns if they need to
Addressing potential impacts	Engaging proactively across our value chain to address potential impacts, including third-party JAC audits of high-risk suppliers to identify and address upstream issues in our supply chain.	• Our suppliers have effective grievance mechanisms in place for their own workforces • Any modern slavery-related complaints received are appropriately identified, investigated, and addressed
Reviewing effectiveness and reporting	We review our progress regularly through our governance processes and provide transparent reporting annually to our stakeholders.	• Our governance process is operating as intended • Our reporting continues to improve year-on-year

1. Policies and governance (continued)

Our policies

Our Human Rights Policy makes clear our commitment to supporting and respecting internationally recognised human rights as laid out in the International Bill of Rights and the International Labour Organisation's (ILO) Declaration on the Fundamental Principles and Rights at Work.

This commitment is supported by a comprehensive set of policies that articulate our human rights expectations to our team and provide transparency on how team members can report issues they are concerned about. These policies are supported by our People and Culture team, which provides specialised advice to team members on human resources matters.

We review these policies on a regular basis to ensure they remain fit for purpose. Spark's corporate governance policies, practices, and processes, including Spark's Annual Corporate Governance Statement, can be found on the Governance section of our website. Spark's policies apply to Spark and all subsidiaries. The following policies are the most relevant to preventing human rights and modern slavery issues within our business:

Policy	Purpose
Human Rights Policy	Commits Spark to support and respect internationally recognised human rights. The policy includes details of potential human rights impact and policies and processes in place to address these.
Diversity and Inclusion Policy	Outlines how Spark aims to support diversity and inclusion, as well as proactively recognising equality across the business to deliver enhanced customer experiences and business performance.
Health and Safety Commitment	Aims to ensure that all Spark people go home safe and sound at the end of each working day.
Supplier Code of Conduct	Sets out the minimum standards we expect from all our suppliers across labour and human rights, health and safety, environmental sustainability, and ethical business practices. All new suppliers are required to sign up to the Code, or demonstrate commitment to an equivalent code of practice, as part of their onboarding process.
Privacy Values	Spark's Privacy Values (Protection, Fairness, Empathy, Transparency, Innovation, and Tikanga), supported by frameworks, processes, and training ensure that our people use our customers' personal information ethically and in accordance with all privacy laws.
Spark Privacy Policy	Explains how we collect, use, and share personal information and how we keep it safe.
Code of Ethics	Provides a framework for working at Spark and its related companies in a way that is consistent with Spark's values and standards, alongside guidance on decision-making and some known risk areas.
Whistleblowing Framework	Spark's whistleblowing system includes a number of reporting options. It is detailed in our Code of Ethics and covered in detail on our employee intranet. A key reporting channel is the Honesty Box, which enables reporting directly to the Digital Trust team, part of the Legal Centre of Excellence within Spark. All reports are investigated in confidence by appropriate specialist employees. Other reporting mechanisms also include a method for reporting directly to the Spark CEO.
Artificial Intelligence Principles	Outlines Spark's responsible and ethical approach to the design and operation of AI technologies.

2. Training and awareness

Training and awareness are critical to our ability to prevent and manage human rights and modern slavery risks across our business. Across many of our broader human rights topics, including privacy and security and diversity and inclusion, all employees are required to complete regular training.

In the past year we developed and delivered focussed supplier and customer risk awareness training to increase understanding and the ability of our teams to identify risk in our supply chain and support our customer-facing teams to identify and address human rights risk through our customers' use of our products.

We have delivered risk awareness training sessions to the people most likely to encounter these issues within our business:

- Spark Value Management team (17 people)
- Entelar Procurement team (11 people)
- Spark Legal Centre of Excellence (28 people)

The training for our supply chain teams included:

- An introduction to modern slavery, including high-risk geographies and procurement categories
- An overview of human rights and Spark's Human Rights Policy
- The requirements of Spark's Supplier Code of Conduct
- An overview of modern slavery reporting regulation and emerging best practice
- An overview of JAC and our supplier audit processes
- Details of our supplier risk assessment process and priority suppliers identified

The training featured a number of real-life case studies to illustrate potential impacts, and drive discussion around how best to address different risk scenarios. This included case studies featuring vulnerable groups or communities in our supply chain, working with partners in high-risk geographies, and high-risk supply categories.

We also piloted training to our customer-facing teams with our Internet of Things (IoT) sales team. This adapted our supply chain training, covering the same introduction to human rights risk, with a focus on vulnerable groups and high-risk categories and geographies relevant to work with our customer base.

In the year ahead we plan to further develop our training approach, to re-engage our procurement team, and extend our training to more customer-facing teams. The training will evolve as we develop and formalise our supplier and customer due diligence processes.
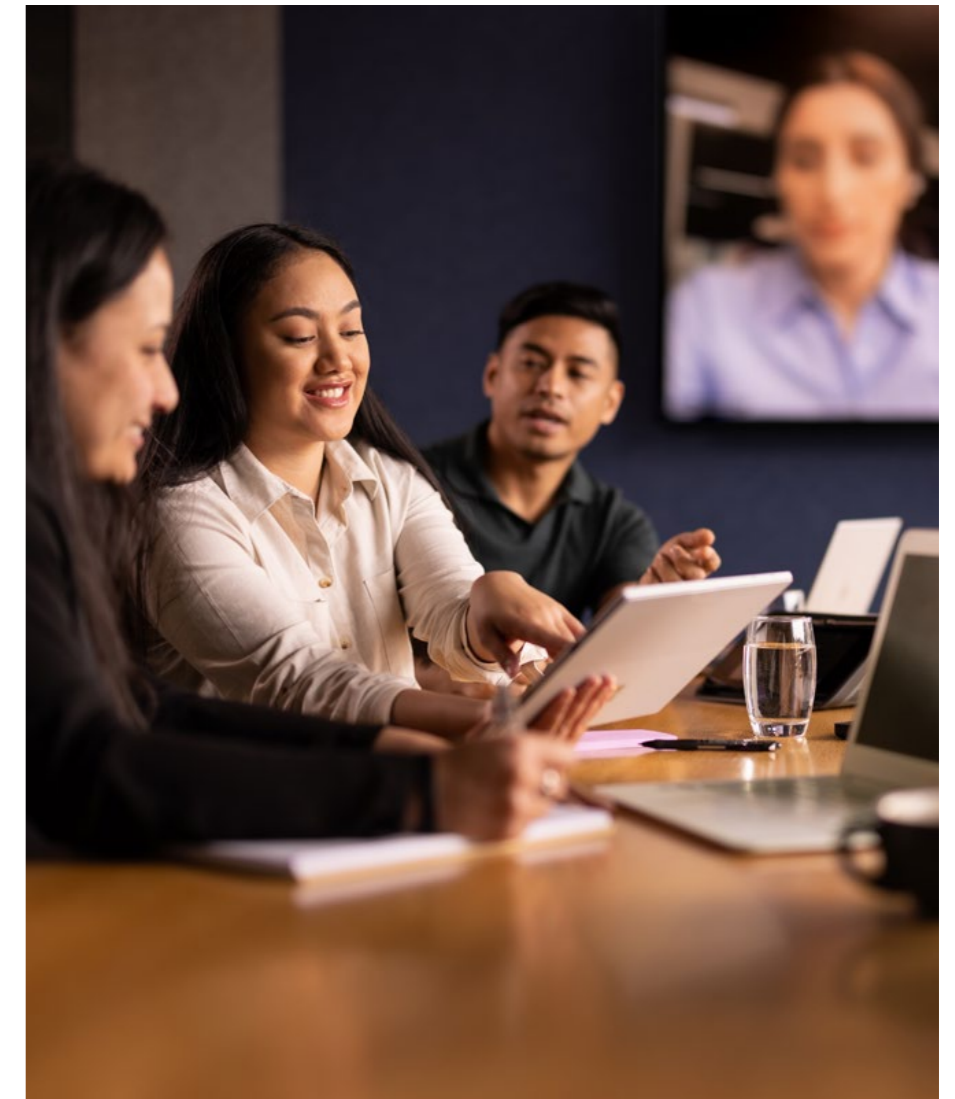
3. Due diligence

The United Nations Guiding Principles (UNGPs) on Business and Human Rights states that businesses have a responsibility to respect human rights wherever they operate and whatever their size. The UNGPs further affirm that businesses must prevent, mitigate, and where appropriate, remedy human rights abuses that they cause or contribute to, while seeking to prevent or mitigate any adverse impacts related to their operations, products or services, even if these impacts have been carried out by suppliers or business partners.

When we developed our Human Rights Policy, first introduced in 2022, we conducted a full due diligence process to identify areas of potential impact across our value chain. This process included internal and external stakeholder engagement, supported by a third-party review of our approach against our global peers. We identified a number of human rights topics that were relevant to our broader value chain, many of which were already addressed through existing policies and processes.

We continue to identify human rights and modern slavery risk through ongoing human rights due diligence processes. These diverse sources help us identify and prioritise our response to the most salient human rights risks, including emerging risks:

- An annual review of our material sustainability topics, which includes engagement with stakeholders, and peer review, to ensure we have identified emerging human rights topics

- Our ongoing process of principal risk assessment, which is undertaken by our Audit and Risk team and reported directly to the Board

- Our annual process of supply chain risk identification, including supplier self-assessments and ongoing supplier screening

- Independent supplier audits conducted through our membership of the Joint Audit Cooperation Initiative (JAC)

- Data ethics governance to identify and manage emerging issues in the application of data and new technologies, including artificial intelligence

All Spark people, as well as some of our indirect workforce, such as outsourced call centre employees, have access to Spark's whistleblowing processes. A key reporting channel is the Honesty Box, which enables reporting directly to the Digital Trust team, part of the Legal Centre of Excellence within Spark. All reports are investigated in confidence by appropriate specialist employees. Other reporting mechanisms also include a method for reporting directly to the Spark CEO. This enables reporting of new and emerging human rights issues for consideration.

Some submitters raised issues concerning behavioural matters, workplace environments, organisational design/change, and application of employee-related processes.

These were considered and addressed appropriately with the support of Spark's People and Culture Team.

We regularly remind Spark people of the reporting options available to them and are pleased to see the growing diversity of matters that submitters are comfortable raising. In FY25 we will continue to raise visibility and understanding of the importance and value of our whistleblowing processes.

Our approach

When we identify human rights or modern slavery risks or issues within our business or supply chain, our overriding objective is to work alongside our suppliers, partners, and customers to address and remediate these issues. In this way we can contribute to positive change within our value chain, rather than simply removing ourselves from the situation.

Our potential human rights impacts

Our human rights due diligence has identified a number of potential impacts across our value chain. For modern slavery risks we have also considered a number of ways in which we may be linked to potential impacts:

- **Cause**: A business may be a cause of modern slavery where their actions or omissions directly result in modern slavery occurring

- **Contribute**: A business may contribute to modern slavery where its actions or omissions significantly facilitate or incentivise modern slavery

- **Directly linked**: A business may be directly linked to modern slavery where its products, services, or operations are directly linked to harm carried out by a third party, such as a supplier

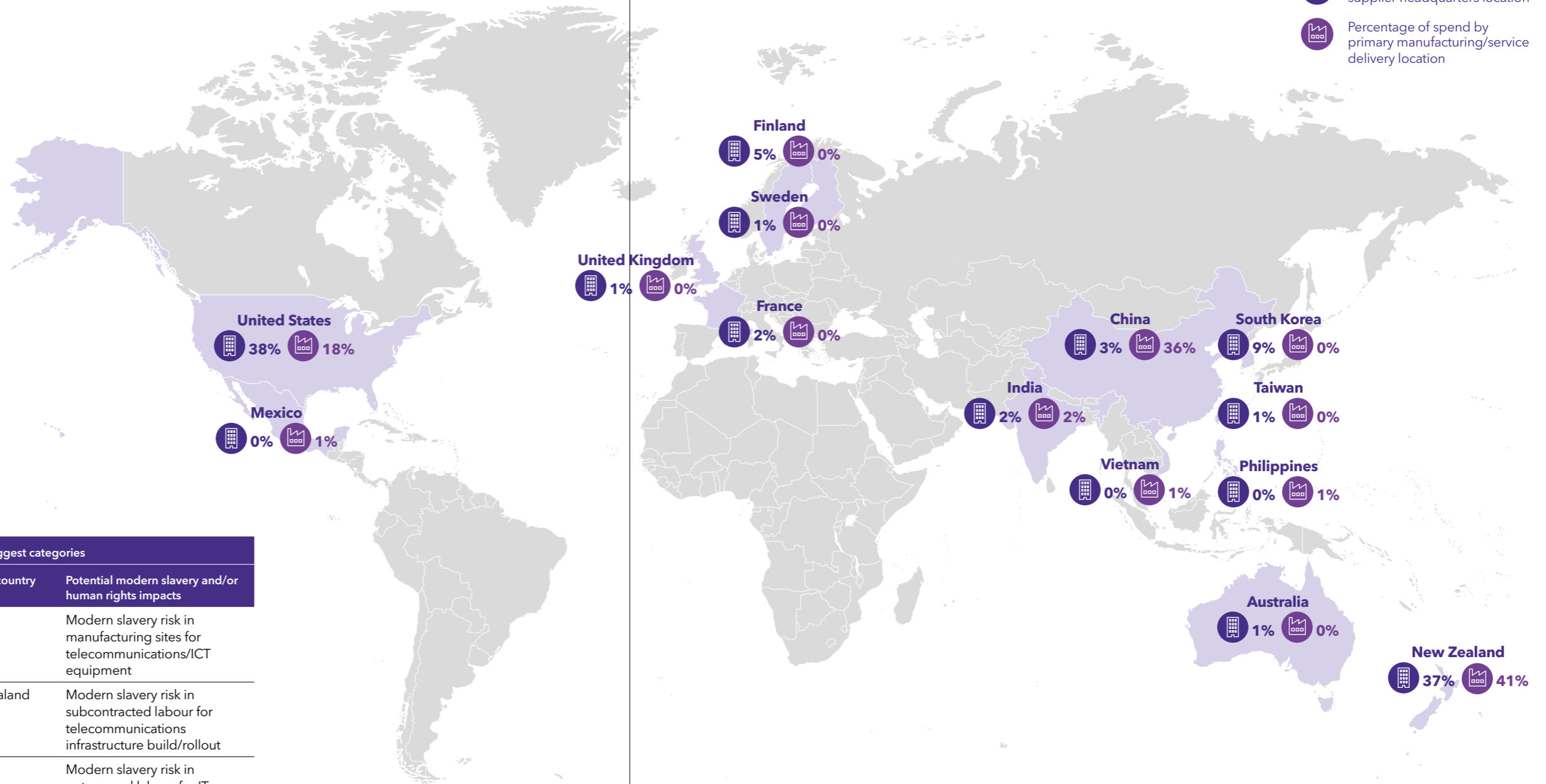| Upstream impacts in our supply chain Pages 16 – 20	Direct impacts in our operations Pages 21 – 23	Downstream impacts through our products and services Pages 24 – 26
Potential modern slavery impacts • Risk that Spark may be **directly linked** to modern slavery practices in its global supply chain, including forced and child labour. Particular risk in the manufacture of consumer and network telecommunications and ICT equipment • Risk that Spark may **contribute** to modern slavery practices by not implementing adequate processes to identify and address issues in its global supply chain **Other potential human rights impacts** • Risk that Spark may be **directly linked** to negative impacts of raw materials sourcing used in electronic equipment manufacturing e.g. conflict minerals • Risk of customer data privacy breach by one of our suppliers or partners	**Potential modern slavery impacts** • Risk that Spark may **cause** modern slavery practices in our direct workforce (low risk) or through its indirect/contracted workforce. Particular risk in overseas contracted workforce (e.g. call centres, ICT support/development services), and in potentially vulnerable New Zealand contact services (e.g. cleaning contractors) • Risk that Spark may **contribute** to modern slavery practices by not implementing adequate processes to identify and address issues in its contract workforce **Other potential human rights impacts** • Importance of diversity and inclusion across our business, including commitments to improve gender and ethnic representation across our business and reducing our gender and pay gap • Protection of employee data	**Potential modern slavery impacts** • We have not identified any downstream modern slavery impacts at this time **Other potential human rights impacts** • Potential impacts on our customers' human rights to privacy, including security protection • Potential impacts of our products and services, including emerging technologies such as AI • Importance of digital equity and inclusion, which is an enabler of many other human rights including access to education, healthcare, employment, and participation in society

4. Addressing potential impacts

Upstream impacts in our supply chain

We rely on a combination of local and global suppliers and partners to operate our business. We have over 2,000 suppliers, ranging from the largest global technology businesses to small local operators. Each year we spend around $2 billion to support our business and meet our customers' needs. Our global supply chain is complex, with many indirect suppliers providing the source materials and components required to deliver consumer electronics and network infrastructure. We set clear expectations for our suppliers related to social and environmental performance through our Supplier Code of Conduct. All new suppliers are requested to sign up to the Code, or demonstrate commitment to an equivalent code of practice, as part of their onboarding process.

The majority of Spark's supply chain spend is across three categories, focussed on technology and telecommunications equipment and services to support our business and our customers. The remainder is spent on a range of services, such as marketing, corporate services, content rights, electricity, travel, freight and courier, office supplies, and leasing. Of our total spend, around 90% is with our top 100 suppliers.

Mapping our global supply chain

Key

Percentage of spend by supplier headquarters location

Percentage of spend by primary manufacturing/service delivery location

Finland 5% / 0%
Sweden 1% / 0%
United Kingdom 1% / 0%
France 2% / 0%
United States 38% / 18%
Mexico 0% / 1%
China 3% / 36%
South Korea 9% / 0%
India 2% / 2%
Taiwan 1% / 0%
Vietnam 0% / 1%
Philippines 0% / 1%
Australia 1% / 0%
New Zealand 37% / 41%

Analysis of spend for Spark's largest suppliers by spend. Geographic data covers ~80% of total spend. Data correct as at 30 June 2024.

Spend across our three biggest categories			
Procurement category	Percentage of supply chain spend	Primary country of spend	Potential modern slavery and/or human rights impacts
Electronic equipment, mobiles, accessories, network equipment	30%	China	Modern slavery risk in manufacturing sites for telecommunications/ICT equipment
Telecommunications services: interconnect, broadband	27%	New Zealand	Modern slavery risk in subcontracted labour for telecommunications infrastructure build/rollout
Software and IT services	21%	USA	Modern slavery risk in outsourced labour for IT services

4. Addressing potential impacts (continued)

Spark's Supplier Code of Conduct

Our Supplier Code of Conduct sets out the minimum standards we expect from all our suppliers across labour and human rights, health and safety, environmental sustainability, and ethical business practices. All new suppliers are requested to sign up to the Code, or demonstrate commitment to an equivalent code of practice, as part of their onboarding process.

The Code also requires suppliers to consider risks in their own supply chains. This includes processes for managing the responsible sourcing of materials used in electronic manufacturing, for example, tantalum and cobalt.

Grievance and reporting mechanisms are also an important requirement of the Code. We recognise it is impractical for our 2,000 suppliers to implement customer-specific grievance mechanisms within their supply chains. Instead, we set out clear expectations in our Supplier Code of Conduct, which requires our suppliers to:

- *"Allow all workers to communicate openly with management regarding working conditions and human rights without fear of reprisal, intimidation or harassment in accordance with local laws and in any event in a manner that respects basic rights of open communication, direct engagement and humane and equitable treatment"; and*

- *"Implement and maintain policies and processes to maintain whistle-blower confidentiality and protect whistle-blowers from retaliation and victimisation".*

For priority suppliers we gather information on our suppliers' policies and processes to ensure compliance with our requirements. For suppliers selected for JAC audit the presence of employee reporting mechanisms, and policies for responsible minerals sourcing, is an important part of the audit process. See the Supplier risk assessment and Supplier audit programme sections below for more information.

Supplier risk assessment

We have implemented an annual supplier risk assessment process to analyse our current supplier base and prioritise suppliers for further risk assessment, including self-assessment questionnaires and future JAC audits. This process considers a number of criteria:

- Top suppliers by spend and strategic suppliers – with data derived from spend data and key partnerships

- Suppliers linked to high-risk geographies aligned to World Economic Forum risk factors

- Suppliers in high-risk sectors, such as electronic equipment manufacturing, clothing/merchandising, and solar equipment manufacturing

- JAC database analysis – prioritising suppliers with a pattern of lower audit scores for tier 1/2/3 supplier sites

Our FY24 analysis identified a list of 57 high-priority suppliers. These suppliers were requested to complete a supplier self-assessment, which included disclosure on:

- Locations involved in the provision of goods and services to Spark. Our supplier location information is often tied to local New Zealand branch offices, or global headquarter addresses. By gathering data on supplier factory or support centre locations we can gather useful information to identify high-risk geographies upstream in our supply chain

- Detail on the processes suppliers have in place to identify and address instances of modern slavery, or broader human rights impacts, across their supply chains, or in their direct operations. This includes information on our suppliers' own modern slavery reporting, which many of our priority suppliers produce

- Disclosure on whether any instances of modern slavery, or other human rights impacts, have been identified by the supplier

- Information on suppliers' policies on conflict minerals in their supply chains

To date 25 assessments have been received. These provide useful information for further engagement with suppliers. None of the self-assessments declared any known instances of modern slavery in our suppliers' direct operations.

Some of our large technology providers with mature supplier audit processes did disclose findings of their own supplier audit programmes. These included issues of excessive working hours and forced or bonded labour related to onboarding fees or recruitment bonds – which are similar to the findings of our own supplier audits (see page 20). One supplier also reported six instances of potential risk or non-conformity related to child and young labour protection, not linked to Spark's direct supply chain. These included issues such as missing proof-of-age documents and exceeding the allowed percentage of student workers.

We are comfortable that these suppliers have processes in place to identify and address non-compliance and are transparent about the findings of their supplier audits, with many of them publishing their own annual modern slavery and/or human rights performance statements.

In the past year the Spark Risk, Internal Audit and Fraud team reviewed Spark and Computer Concepts Limited's (CCL) supplier due diligence processes, evaluating the design and effectiveness of due diligence controls and how risks are managed for new and existing suppliers. The review identified a number of opportunities to improve our processes, which are a focus for FY25.

Supplier audit programme

JAC is an international association of telecommunications operators. The core purpose is to enable members to work together to assess, verify, and improve the labour standards, health and safety, environmental, ethics, and management systems of the industry's supply chains, as well as identification of supplier sites to audit. JAC has been running for over a decade and has been gradually growing as new operators join the initiative. As of June 2024, the association included 27 telecommunications operators.

As a JAC member Spark is required to audit a minimum of five supplier locations each calendar year. The suppliers and locations are mutually agreed and allocated across the members. Findings and corrective actions are also shared among all JAC members, which provides visibility of risk across a larger number of suppliers than Spark would be able to audit individually and a platform for collective industry engagement to improve performance.

In the past calendar year (to 31 December 2023) JAC members conducted a total of 123 audits and also performed 13 confidential Mobile Workers' Surveys to complement on-site audits and capture worker sentiment directly. Across these audits 890 corrective actions were raised. The top audit findings were related to health and safety, working hours, environment, and wages and compensation.

As we share common global suppliers with our industry peers, many of the sites audited are relevant to our own supply chain, including a significant number of sites within the past two years. Details shared among JAC members are covered by a Non-disclosure Agreement, which means we cannot share details of JAC audits conducted by other members publicly, but we can use this information in our own internal risk assessment, to inform our engagement with suppliers, and to prioritise and select sites for auditing.

Within Spark our JAC audit programme is led by the Audit and Risk team. To undertake the assessments, we have engaged a third-party auditor experienced in delivering site assessments against the JAC methodology. Following an audit a Corrective Action Plan is agreed with the site that was audited, to address any issues identified. Progress against agreed actions is recorded in the shared JAC database and reported directly to the Spark Board.

We completed eight JAC audits in FY24, with our first five completed in 2023, and the further three audits completed in the first six months of 2024.

The sites audited include five manufacturing sites in China, two audits of our outsourced call centre operations in the Philippines, and one audit of an outsourced IT service provider in India. For our remaining two audits for the 2024 calendar year, we are targeting two New Zealand-based suppliers providing cleaning and security services – sectors we have identified as higher risk for potential modern slavery impacts in our local market.

4. Addressing potential impacts (continued)

Summary of JAC audit findings

Category	Number of minor findings	Number of major findings	Number of highest priority findings	Notes
Child labour	0	0	0	No issues found
Forced labour	0	2	1	Findings related to inadequate employment contracts for contracted workforce, and onboarding/health examinations fees charged to new employees
Health and safety	5	27	4	Majority of health and safety findings were corrected immediately or shortly after audit completion. Related to signage, labelling, access to fire exits, and availability of appropriate personal protection equipment (PPE)
Freedom of association	0	0	0	No issues found
Discrimination	0	1	0	One finding related to lack of policy or procedure to ensure reasonable accommodation for religious practices
Disciplinary practices	0	0	0	No issues found
Working hours	0	3	5	Findings related to excessive working hours – see commentary below
Wages and compensation	3	4	0	Findings related to lack of required social insurance, employee wage deductions, and holiday pay requirements
Environment	7	10	0	Findings related to lack of greenhouse gas (GHG) emissions reporting and reduction planning, supplier engagement on emissions, and environmental hazard identification
Business ethics	1	4	0	Findings related to lack of compliance process and performance review related to business ethics practices
Total findings*	16	51	10	
Total findings closed	8	18	3	

*   24 findings (all open) relate to the most recent audit completed in June 2024. The majority of open findings relate to audits completed in the final quarter of FY24. We are engaging with suppliers to ensure corrective action plans with timely due dates are in place.

Five of the eight sites audited have been tier 1 sites, meaning they are owned and operated directly by Spark suppliers. At these sites the audits found high levels of compliance with our requirements, with limited findings related to site health and safety and compliance issues. At some of the manufacturing sites using contracted labour, we found that the employment protections in place for direct employees were not consistent for workers indirectly employed at the sites. In these instances, we have required sites to implement corrective actions to ensure that conditions for all employees meet requirements.

Three of the sites audited were tier 2 sites, operated by suppliers to our suppliers. Two of these tier 2 sites had higher instances of non-compliance and issues than tier 1 sites. At both sites we found working hours

significantly exceeded expectations, with employees working beyond legal maximum weekly working hours and working in excess of seven days continuously. At one site the audit also found concerning practices regarding worker pay deductions for lateness and absences and health examination fees for new workers.

We take these findings seriously. As these are tier 2 suppliers our approach is to engage with our direct supplier and work in partnership with them to ensure corrective actions are implemented to address issues identified at the sites. This includes direct engagement with the Spark Risk, Internal Audit and Fraud Lead, Spark's Sustainability Lead, and the supplier relationship lead within Spark. Both suppliers are global technology companies headquartered in Europe, each with their own modern slavery supply chain processes in place.

Aligned to our overarching human rights approach, our objective is to work alongside our suppliers to remediate issues identified rather than simply removing ourselves from the situation. To date we have found our suppliers are responsive to corrective actions. If we find a supplier unable or unwilling to address serious non-compliance in the future this would cause us to review our commercial relationship with them.

As with all JAC audits, assessment findings and corrective actions are uploaded to the JAC database and are shared with all JAC members. To close an audit, evidence of corrective actions taken must be provided and uploaded. Open corrective actions are tracked and reported. Within Spark we also report the results of JAC audits to our Leadership Squad and Board on a regular basis.

Direct impacts in our operations

Our direct workforce

Our people have a broad range of skillsets, ranging from customer service to engineering and professional services. As of 30 June 2024, Spark directly employed 5,291 people, with more than 99% of these people located in New Zealand. Spark meets all requirements of New Zealand employment law for our New Zealand-based direct workforce and in many cases goes beyond statutory requirements. We seek to remunerate our people with competitive salaries, paying in line with the market so we can recruit and retain the best talent. In FY24 we made above-inflation adjustments for our lowest-paid employees, taking into consideration benchmarks, such as the (voluntary) Living Wage . Our Hiring People Policy ensures that 'right to work' checks are undertaken and work cannot commence without valid documentation.

Spark has a diverse workforce and a robust diversity, equity, and inclusion programme that is focussed on ensuring our people feel valued, respected, and confident to bring their whole selves to work. We use regular engagement and culture surveys with our people, which enables individuals to share their views and experiences confidentially and supports leaders to create healthy, safe, and engaging work environments for, and with, their team members.

Spark people undertake compliance training on a range of topics including, but not limited to, our Code of Ethics, health and safety, security and privacy, sustainability, and our policies around discrimination, bullying, and harassment, and diversity and inclusion. In addition, our people leaders receive training through our People and Culture team, as well as leadership development programmes that ensure they have an understanding of the standards and expectations in place for the protection of our people.

Spark occasionally employs interns in different areas of the business, including as part of our diversity and inclusion activities to provide valuable work experience. We have a general policy of paying our interns at least the minimum wage, and while our internships are not guaranteed pathways to roles at Spark, we provide advice and mentoring on career opportunities.

Our indirect workforce

We have an indirect workforce of around 2,600 people, with the majority located in New Zealand and approximately 500 people located offshore. We recognise our indirect workforce could potentially face higher risks of modern slavery than those employed directly by Spark, and we have checks and balances in place to mitigate these risks.

Our indirect workforce in New Zealand is a diverse mix of agency contractors, consultancy firms, independent contractors, suppliers (including people such as cleaners and security staff working in our buildings), and people employed by our Spark Business Hubs.

Our New Zealand-based indirect employees are all protected by New Zealand employment law and employed on a range of contractual arrangements, depending on the type of work they do and where they have been engaged. Our independent contractors and agency staff who contract directly to Spark are all engaged in accordance with our

own employment hiring process in terms of proof of right to work and rates of pay. Our Business Hubs operate under a licensing model with employment terms determined by each of the owner operators independently of Spark.

Before the end of 2024 we plan to complete JAC audits for two New Zealand-based suppliers providing cleaning and security services. These are sectors we have identified as higher risk for potential modern slavery impacts in our New Zealand indirect workforce.

The majority of our people located offshore are based in the Philippines, where we contract with an offshore partner to run customer care centres to serve our customer base in New Zealand. We require our partner in the Philippines to make formal commitments around its mitigation of modern slavery risk. Our partner has confirmed that it adheres to fair pay practices, including paying employees for all time worked and that all its employees,

4. Addressing potential impacts (continued)

contractors, and suppliers must comply fully with its Equal Employment Opportunity Policy and applicable employment laws. As part of our membership of the Joint Audit Cooperation (JAC) initiative we have audited two of our partner's call centre sites in the Philippines. Both site audits found good practices around employee wellbeing and compliance with employment regulations. More information on our JAC audit programme is available on page 19.

We also outsource some IT services work to contract staff at two different IT services businesses, both headquartered in India. The number of contractors from these businesses who are working with Spark fluctuates, depending on the work required, but as of 30 June 2024 it was around 100 people, with around two thirds based in

New Zealand and a third offshore in India or Australia. We also completed a JAC audit of our supplier's site in India, which showed good employment practices in place.

Our retail network

We operate 61 retail stores and 24 Business Hubs throughout New Zealand. We also have dealership arrangements with major retail chains across New Zealand to sell Spark products and services. Spark directly operates all its retail stores, and all the people working in Spark stores have an Employment Agreement directly with Spark. Our Business Hubs are operated by third-party licensees and their employees are employed directly by those third parties. We require within the licence terms that the terms of employment between the licensee and the staff member

must comply with all statutory and legal requirements. Under the licence agreement, licensees must offer employment on terms substantially consistent with a template agreement provided by Spark (being a fit-for purpose agreement that meets minimum legal requirements).

Demographics of our workforce

Including permanent and fixed-term employees of Spark and its directors, as of 30 June 2024.

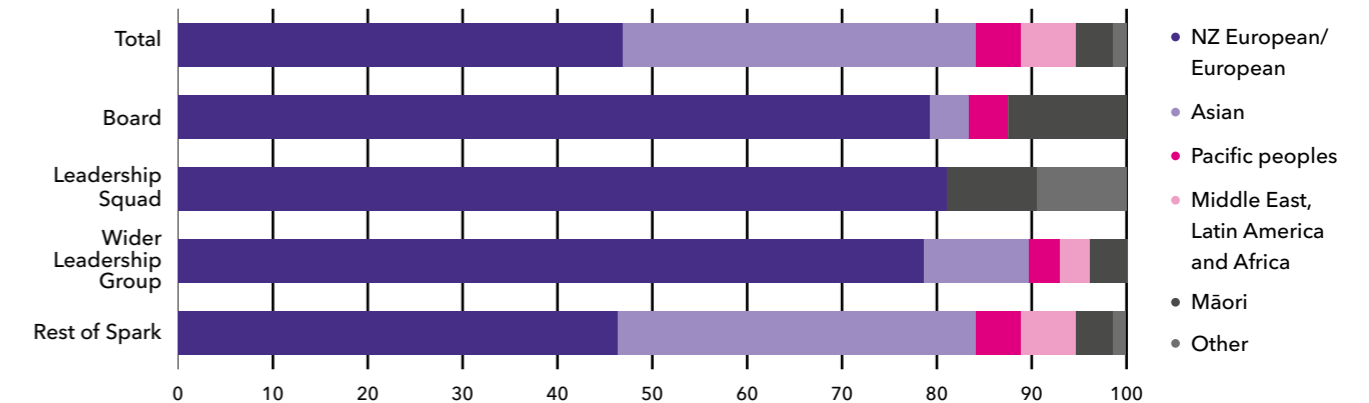|		Gender[1]					Age		
	Number of people	Female %	Male %	Female #	Male #	Gender diverse #[6]	Under 30 years old	30 – 50 years old	Over 50 years old
Directors	8	63%	37%	FY24: 5	FY24: 3		0%	14%	86%
	0	+13%	-13%	FY23: 4	FY23: 4		no change	+14%	-14%
Leadership Squad[2]	11[3]	55%	45%	FY24: 6	FY24: 5		0%	55%	45%
	+2	-1%	+1%	FY23: 5	FY23: 4		no change	-1%	+1%
Other leadership roles[4]	72	43%	57%	FY24: 31	FY24: 41		2%	58 %	40%
	+4	+2%	-2%	FY23: 28	FY23: 40		+1%	-11% %	+11%
Permanent starters	844	39%	59%	FY24: 330	FY24: 497		33%	56%	11%
	-430	-2%	no change	FY23: 518	FY23: 749		-2%	+4%	-1%
Permanent leavers	975	38%	60%	FY24: 369	FY24: 583		28%	53%	18%
	-169	no change	no change	FY23: 434	FY23: 687		-2%	-3%	+5%
Total[5]	5,298	34%	66%	FY24: 1,778	FY24: 3,435	FY24: 16	17%	57%	26%
				FY23: 1,832	FY23: 3,582	FY23: 10			
	-141	0%	0%				-2%	+1%	+2%

1. For the purposes of NZX Listing Rule 3.8.1(c) no directors or members of the Leadership Squad self-identify as gender diverse.
2. Includes the CEO who is also included as a Director in the line above. The Leadership Squad is considered 'senior managers' for the purposes of the Financial Markets Conduct Act 2013 and 'senior executives' for the purposes of the ASX Corporate Governance Council's Principles and Recommendations.
3. Leadership Squad consists of ten members as at 1 July 2024 with Tessa Tierney leaving Spark on 30 June 2024.
4. Substantive roles that report directly to members of the Leadership Squad.
5. Includes non-executive directors. Spark's employee headcount, including our CEO, is reported as 5,291.
6. Gender diverse totals only reported in total figures. There are an additional 61 people that have not provided/prefer not to disclose their gender.

Workforce by gender and contract type

Employee types	Total		Auckland		Wellington		Christchurch		Other region			
Contract type	Female	Male	Female	Male	Female	Male	Female	Male	Female	Male	Other/Gender not disclosed	Total
Permanent full time	1,534	3,280	828	1,759	231	613	263	482	212	426	70	4,884
Permanent part time	227	136	62	49	24	18	64	21	77	48	6	369
Temporary full time	14	17	4	11	2	4	3	0	5	2	2	33
Temporary part time	3	2	2	1	0	0	1	0	0	1	0	5
Casual (non-guaranteed hours)	7	3	0	0	1	1	6	2	0	0	0	20
Total	1,785	3,438	896	1,820	258	636	337	505	294	477	78	5,311

Based on headcount. Casual contracts include any individuals on a non-guaranteed hours basis that were active as at 30 June 2024 and had received remuneration for hours worked in FY24.

Workforce ethnic diversity

Legend:
- NZ European/ European
- Asian
- Pacific peoples
- Middle East, Latin America and Africa
- Māori
- Other

Categories (top to bottom): Total, Board, Leadership Squad, Wider Leadership Group, Rest of Spark. X-axis: 0 to 100.

4. Addressing potential impacts (continued)

Downstream impacts of our products and services

We recognise that human rights risks exist beyond our supply chain and direct operations and could include the downstream impacts of our operations and the way our customers utilise the technology services we provide. This includes risks of potential impacts to the human right to privacy and to live free from discrimination. Digital equity is also a key enabler of human rights, by way of the role it plays in access to education, health and employment, and the ability for all groups to participate in society.

Our privacy programme

Spark puts cyber security, customer safety, and privacy at the forefront of everything we do. We have processes in place to ensure that appropriate ownership, oversight, and ongoing risk management is applied to our customers' and Spark's IT systems. Our processes are independently assured by our risk and internal audit functions. Our approach to privacy is based on the principles of customer centricity, fairness, transparency, autonomy, and simplicity.

Spark's Digital Trust team leads Spark's privacy programme, providing frameworks, tools, and training to support Spark people to follow our Privacy Policy and Values.

Internal processes and controls to safeguard customer privacy:

Risk assessments	Personal information access management	Responding to data breaches
New products and services are assessed for any privacy risks, with appropriate mitigations embedded into their design and implementation. For many of our business units, these assessments are conducted by Spark privacy ambassadors – specially trained team members equipped with Spark-made assessment tools and supported by dedicated privacy experts. New vendors are also screened to ensure privacy will be managed appropriately.	Spark's Call Investigation Centre (CIC) manages requests for personal information from customers and government agencies. We report agency request volumes in our **Spark Transparency Reports**.	Our dedicated Data Breach Reporting Tool enables any breaches to be reported by our people and managed in a customer-focussed way and in compliance with the Privacy Act 2020.

Awareness and support for our people:

Privacy resources	Privacy training	Resolving privacy issues
Our Policy Playbook contains guides for applying privacy considerations to everyday activities and comprehensive resources are provided for our people online.	All our people must complete privacy training on joining and annually, to ensure it remains top of mind.	Our people are encouraged to raise any privacy issues via the Digital Trust team or Spark's internal online whistleblowing tool, the Honesty Box.

For more detailed information on our approach to privacy please refer to our Annual Integrated Report.

Impacts of emerging technologies

The rapid development of AI technologies brings many benefits to New Zealand, while also presenting increasingly complex challenges in ensuring that both data and data applications are used by people and organisations ethically, safely, and lawfully.

Spark's use of AI is guided by our **Artificial Intelligence Principles**, which focus on a responsible and ethical approach to the design and operation of AI technologies within our business. Our principles are focussed around seven key areas: human centred; ethical design; diversity, inclusivity, and bias; safety and reliability; privacy; informed human decision-making; and explicability and transparency. These Principles are regularly reviewed and updated as we continue on our AI journey.

During FY24 we evolved our data governance strategy, restructuring our governance forums to enable a more targeted and purposeful approach.

We established an AI Executive Governance Committee, which provides executive oversight of Spark's deployment of AI across the business, including investment choices, benefit realisation, and associated changes to operating model design.

We also established a Data Ethics Committee, which is more specifically focussed on ensuring we are using data and data applications, including AI, ethically, legally, safely, and in line with stakeholder expectations.

Operational matters have now been integrated into our Information Security Risk Management Committee, which oversees data security and other risk domains more broadly.

The Data Ethics Committee includes representatives from the Leadership Squad, together with relevant subject matter experts, and provides oversight as our Artificial Intelligence Principles are further embedded into our systems and processes.

Up until this year our use of AI within Spark has been narrowly deployed against specific use cases and controlled by a centralised, specialist team who have continued to ensure our use of this technology aligns to our Artificial Intelligence Principles. For example, we have used AI to implement data-driven marketing and to increase automation within our network.

The acceleration of Generative AI opens up new opportunities for a much broader range of Spark people to utilise AI in their day-to-day activities and is another pillar to our overall AI roadmap. We are piloting and then scaling different use cases across the business, while enhancing our deployment approach in a carefully structured and staged manner. As this occurs, we will establish clear ownership by senior leaders across the business for change management in their areas, supported by our subject matter experts, and while maintaining Leadership Squad oversight through our governance forums.

To support this, during FY24 the Data Ethics Committee oversaw the creation and adoption of a new Generative AI Policy. This is an internal policy that operationalises our Artificial Intelligence Principles by providing specific usage guidelines for our people who are working with Generative AI tools within Spark. We are now disseminating and embedding this policy, in line with the staged rollout of Generative AI tools across the business.

To further embed our AI principle of privacy into our processes, we also require all new AI work that uses personal information in a new way to go through a Privacy Impact Assessment, which is then reviewed by a Privacy Ambassador or Privacy Officer. The Privacy Ambassador either approves, declines, or helps reframe requests that sit within guidelines, or escalates the request to the Privacy Officer and the Spark Legal team (as required) for further investigation and discussion. This process ensures that any privacy aspects of proposed data and AI work are considered prior to any development commencing.

4. Addressing potential impacts (continued)

Risk in our customer base

Our human rights due diligence process identified potential risks from our customers' use of our products and services. As a New Zealand-based business, most of our customers operate exclusively within New Zealand where strong human rights protections exist. Although the majority of Spark's customers pose a low risk, there is the potential for human rights impact for some high-risk sectors, high-risk geographies, high-risk product categories, or for customers working with vulnerable groups.

We have designed a new customer human rights risk screening process to help us identify and mitigate human rights risks arising from the use of our products and services. In FY24 we piloted training with customer-facing teams who are most likely to become aware of these risks. This adapted our supply chain training, covering the same introduction to human rights risk, with a focus on vulnerable groups and high-risk categories and geographies relevant to work with our customer base.

Our customer screening process requires us to consider if services provided to customers pose any risk of negative human rights impacts, are used with vulnerable groups, or in high-risk industries or geographies where there is a greater risk of negative human rights impacts. The process flags customers for further consideration where needed, for the Human Rights and Supply Chain Squad to conduct an initial review and provide a recommendation, with complex, high-risk, or high-value cases escalated to the Leadership Squad for a final decision. In line with human rights best practice, this includes understanding opportunities to work in partnership with customers to mitigate any risks and address underlying human rights issues.

In the year ahead our focus is to further embed the customer screening process and rollout training to more customer-facing teams. We will also review the process against our existing governance and due diligence processes covering our high-risk product categories through our privacy and data ethics processes.

Digital equity

Digital equity is an enabler of many other human rights, including access to education, healthcare, employment, and participation in society. Digital equity starts with having access to devices and a connection to the internet but this is really just the beginning. Beyond access, to close the digital divide our communities need the skills to use technology, trust in the digital world, and the motivation to participate.

Through Spark Foundation we invest in community partnerships that improve digital access, digital skills and pathways, and digital wellbeing. We also address cost barriers to digital equity through Skinny Jump, and consider digital inclusion and accessibility in the design of our products and services.

Improving access and affordability through Skinny Jump

Skinny Jump is Spark's not-for-profit wireless broadband service for people, who find cost a barrier to having an internet connection at home. The service is prepaid, so there are no long-term contracts or credit checks needed, removing potential barriers to digital access.

Jump is delivered by a dedicated squad of Spark people alongside a community partner network, which is overseen by Digital Inclusion Alliance Aotearoa (DIAA) and includes nearly 300 local organisations nationwide, spanning community libraries and community hubs amongst others.

There are now over 31,776 households across the country who are actively using Skinny Jump. Jump provides customers with 35GB of data for $5, with the first 15GB of data each month free. Customers can purchase up to six top-ups a month, which means Jump customers can access 225GB of data for just $30 a month.

In FY24 Skinny Jump continued its key partnerships, including the 'Ciena Jump for Students Fund', which gives eligible students free Skinny Jump connections until the end of the school year. There are now 1,160 students using the Ciena Jump for Students Fund.

Skinny Jump also continued to support the 'Awhi Matihiko: Red Cross Digital Settlement Package' – a collaboration with New Zealand

Red Cross, Internet NZ, and Digital Inclusion Alliance Aotearoa that gives new refugees a free Skinny Jump connection (for 12 months) a laptop, and digital skills training.

Championing digital equity through Spark Foundation

Spark Foundation leads Spark's work in the community. The Foundation has a single-minded focus on digital equity, and its vision is that no New Zealander is left behind in a digital world. It has focussed its strategy on the areas it can make the biggest difference – **digital access, digital skills and pathways, and digital wellbeing**.

Spark Foundation allocates funding for programmes through a strategic partnership approach, working with organisations whose objectives are aligned to improving digital equity for Aotearoa. Most partnerships focus on empowering and equipping the next generation of digital thinkers and creators, especially Māori and youth, who are disproportionately impacted by digital exclusion.

Last year, Spark Foundation refreshed its strategic direction for the next three years, recognising the significant progress already made improving digital access through Skinny Jump and programmes such as Recycle A Device (RAD). While the Foundation's three focus areas remain, over the coming years the focus on building digital skills and pathways into technology for Māori and Pasifika will be upweighted. We believe that equitable participation in our sector is the ultimate expression of digital equity.

For more information on Spark's digital equity work please refer to our integrated Annual Report.

5. Reviewing effectiveness and reporting

To review our progress, we have detailed below how we assess the effectiveness of our actions against the stated focus areas and KPIs of our work programme.

This Modern Slavery and Human Rights Statement provides a detailed summary of our progress in FY24, which is also summarised below for completeness.

We review progress against our Human Rights and Modern Slavery Programme every quarter through the Human Rights and Supply Chain Steering Committee and report to the Leadership Squad and Board quarterly. We report publicly on our progress annually through this Statement and our broader Integrated Reporting.

Focus areas	Description	KPIs	How we assess effectiveness	Progress in FY24
Policies and governance	Robust standards that set clear expectations for our people, suppliers, and stakeholders, with effective governance processes in place to oversee the operationalisation of these standards.	• Our policies are fit for purpose • Our Human Rights and Modern Slavery Framework is aligned to best practice and updated as needed to respond to the evolving risk environment • We have a clear work programme to drive continual improvement	• Regular review of policies by relevant subject matter expert • Feedback from internal and external stakeholders • Feedback from the Leadership Squad and Board during progress updates • Performance in external sustainability benchmarks • Annual approval of the work programme by the Human Rights and Modern Slavery Steering Committee. • Completion of key action items identified by the work programme by financial year close	• Reviewed our Human Rights Policy and Supplier Code of Conduct • Held meetings with investors to gather feedback on our approach and areas for improvement • Human Rights and Modern Slavery Steering Committee established in March 2024 • Evolved our data ethics governance approach, with a new Data Ethics Committee established in June 2024 • Further embedded our AI Principles through the creation of a Generative AI Policy for Spark people • Maintained top-quartile global benchmark ratings in the Corporate Sustainability Assessment (Dow Jones Sustainability Index) and World Benchmarking Alliance Digital Inclusion Benchmark
Training and awareness	Regular, effective communications to our people, suppliers, and other relevant stakeholders to ensure our policies and expectations are well understood.	• Our company-wide communications and training equip our people to understand relevant human rights risks, including how to raise concerns • Our training for supply chain and customer-facing teams equips the people most likely to identify human rights and modern slavery risks across our value chain with effective management approaches	• Regular all-company communications that raise awareness of relevant policies, training, and Spark's Honesty Box (whistleblower process) • Tracking completion rates for our supply chain and high-risk customer team training and monitoring feedback from participants	• All Spark communications on Human Rights Policy, Sustainability Training, and Honesty Box processes delivered • Designed and delivered human rights and modern slavery training to 56 supply chain, subsidiary, and legal team members and piloted with customer-facing teams

5. Reviewing effectiveness and reporting (continued)

Focus areas	Description	KPIs	How we assess effectiveness	Progress in FY24
Due diligence	Effective risk assessment and due diligence processes that enable the accurate and timely identification of potential human rights and modern slavery risks across our value chain, including trusted and accessible reporting mechanisms for employees to raise concerns.	• Our risk assessment processes accurately identify our human rights and modern slavery risks • Our due diligence processes enable us to identify and manage modern slavery risks relating to suppliers and other third parties • Our people have access to our Honesty Box processes to raise concerns if they need to	• Periodic audits of supply chain due diligence processes by the Risk and Audit team • Conducting annual human rights due diligence, alongside our materiality assessment • Contributing to Spark's annual principal risk assessment, conducted by the Audit and Risk team • Ensuring our people have access to whistleblower tools, including our Honesty Box processes	• Supply chain due diligence audit conducted by Risk and Audit team, with areas for improvement planned for implementation in FY25 • Human rights due diligence completed alongside materiality assessment • The Principal Risk Assessment includes consideration of human rights and modern slavery risks • All Spark communications delivered on Honesty Box processes
Addressing potential impacts	Engaging proactively across our value chain to address potential impacts, including third-party JAC audits of high-risk suppliers to identify and address upstream issues in our supply chain.	• Our suppliers have effective grievance mechanisms in place for their own workforces • Any modern slavery-related complaints received are appropriately identified, investigated, and addressed	• Conducting an annual review to identify high-risk suppliers and identify candidates for supplier audits • Issuing an annual supplier self-assessment questionnaire to priority suppliers to identify risks and track compliance with our Supplier Code of Conduct and tracking completion rates • Conducting a minimum of five supplier audits annually via the Joint Audit Cooperation and ensuring corrective actions are closed • Tracking supplier compliance with grievance mechanism availability through our supplier assessment and new supplier onboarding • Implementing processes to address downstream impacts of products and services	• Annual review of high-risk suppliers completed, with 57 priority suppliers identified (see page 18 for details) • 25 suppliers completed self-assessment questionnaire to date (process ongoing) • Eight supplier audits completed (see pages 19 – 20 for details of audit programme and findings) • Data ethics governance processes evolved, with Data Ethics Committee established

Focus areas	Description	KPIs	How we assess effectiveness	Progress in FY24
Reviewing effectiveness and reporting	We review our progress regularly through our governance processes and provide transparent reporting annually to our stakeholders.	• Our governance process is operating as intended • Our reporting continues to improve year-on-year	• Reporting to Human Rights and Modern Slavery Steering Committee, Leadership Squad and Board is consistent with stated governance processes • Feedback from external stakeholders • Performance in external sustainability benchmarks • Tracking issues identified and sharing a summary of the resolution process in our annual Modern Slavery and Human Right Statement	• Human Rights and Modern Slavery Steering Committee met quarterly, from March 2024. Leadership Squad and Board received quarterly updates • FY24 Modern Slavery and Human Rights Statement significantly expanded from FY23 • Maintained top-quartile global benchmark ratings in Corporate Sustainability Assessment (DJSI) and World Benchmarking Alliance Digital Inclusion Benchmark

Appendix:

Spark Group structure and subsidiaries

Information on significant subsidiaries and controlled entities in the Spark Group as at 30 June 2024 (including ownership percentages and principal activity information) is available in the Spark Annual Report on page 149.

Spark New Zealand Trading Limited is the main trading entity within the Spark Group and is the parent company of many of Spark's operating subsidiaries.

Spark Finance Limited is the finance company for the Spark Group and raises debt funding in New Zealand and internationally. The majority of these funds are then advanced to other members of the Spark Group to assist in funding the Group's operations. Spark Finance has debt securities listed on the NZDX as SPF.

Spark subsidiaries

Adroit Holdings Limited	Environmental IOT solutions
Adroit IOT Limited	Environmental IOT solutions
Adroit Research Limited	Environmental IOT solutions
Circle Investments Limited	Delivers innovative and cost-effective solutions to the Contact Centre Industry
Computer Concepts Limited	IT infrastructure and Cloud services
Digital Island Limited	Business telecommunications provider
Entelar Group Limited	Telecommunications and IT infrastructure build and maintenance services, and distribution and supply chain services
Gen-i Australia Pty Limited	Provides international wholesale and outsourced telecommunications services
MATTR Limited	Software company focussed on decentralised identity and verifiable data
MATTR Trading Australia Pty Limited	Software company focussed on decentralised identity and verifiable data
MATTR Trading US, Inc	Software company focussed on decentralised identity and verifiable data
Qrious Limited	Data analytics business
Revera Limited	IT infrastructure and data centre provider
Spark Finance Limited	Group finance company
Spark New Zealand Cables Limited	Investment company
Spark New Zealand Trading Limited	Telecommunications and digital services company
Spark Trustee Limited	Trustee company
TCNZ Australia Investments Pty Limited	Australian operations
TCNZ (Bermuda) Limited	Holding company
TCNZ Financial Services Limited	Investment company
TCNZ (United Kingdom) Securities Limited	Holding/investment company
Teleco Insurance Limited	Group insurance company
Teleco Insurance (NZ) Limited	Mobile phone insurance
Telecom Capacity Limited	Holding company
Telecom Enterprises Limited	Investment company
Telecom New Zealand (UK) Enterprises Limited	Holding/investment company
Telecom New Zealand USA Limited	Provides international wholesale telecommunications services
Telecom Pacific Limited	Holding company
Telecom Southern Cross Limited	Holding company
Telecom Wellington Investments Limited	Investment company