



# GREENHOUSE GAS INVENTORY

Spark Greenhouse Gas  
Inventory Report 2022

# About this report

This document is the 2022 Greenhouse Gas Inventory Report for Spark New Zealand Limited (“Spark” and together with its subsidiaries, the “Spark Group”). This report covers the emissions for FY22 (1/7/2021 to 30/06/2022) and the previous two financial years, FY20 and FY21. It has been prepared in accordance with *The Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard (2004)* (‘the GHG Protocol’). For a detailed summary of our organisational and operational boundaries please see the Appendix.

This report has been approved by the Spark New Zealand Board and is dated 24 August 2022.



Justine Smyth, CNZM  
Chair

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## Spark’s science-based emissions reduction target

# 56%

Spark New Zealand commits to **reduce absolute Scope 1 and 2 GHG emissions 56% by 2030** from a FY2020 base year.

# 70%

Spark New Zealand commits that **70% of its suppliers by spend** covering purchased goods and services and capital goods, **will have SBTi-aligned targets in place by 2026.**

In August 2021, Spark received verification of its science-based emissions reduction target. The Science Based Targets initiative (SBTi) is established as the global standard for corporate emissions reduction targets. Over 1400 organisations have set verified emissions reduction targets since it launched in 2015. In New Zealand 14 companies have set targets, with a further six committed to set targets within two years.

All SBTi targets must have a strict absolute reduction target for scope 1 and 2 emissions, and also include a separate scope 3 target if these emissions are greater than 40% of the total footprint.

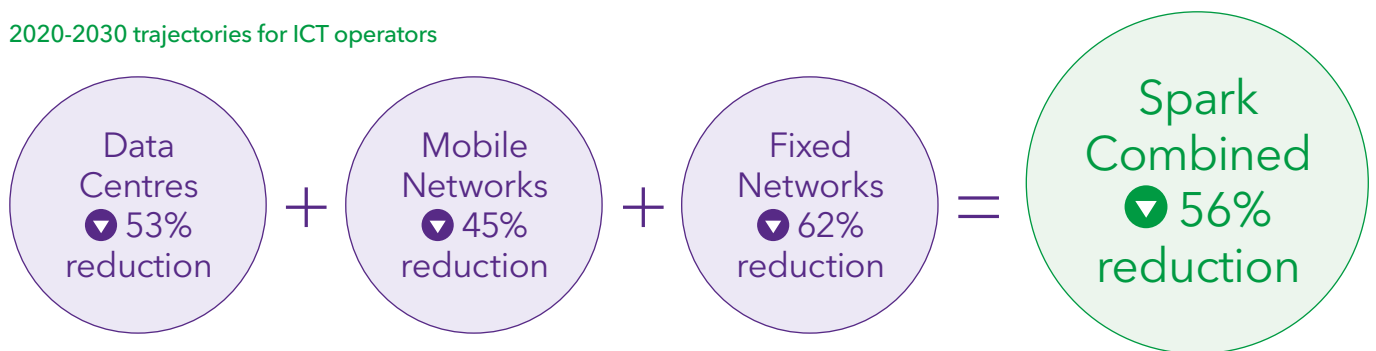
- **Scope 1:** Direct emissions from sources owned or controlled by Spark
- **Scope 2:** Indirect emissions from purchased electricity
- **Scope 3:** Indirect emissions from other sources in the value chain - e.g., production of purchased materials, transportation, business travel and use of sold products

SBTi targets are set against sector-specific emissions trajectories. The ICT sector pathways were developed with the International Telecommunications Union (ITU) and provide specific emissions reductions for mobile and fixed networks, and data centres, based on projected growth and efficiency gains. These reductions are then calculated against our own emissions profile and the share of our emissions from each activity, giving Spark a reduction target of 56% over the next decade.

The SBTi also set rules for recalculating targets for organisations that have significant changes to their structure, for example when investing or divesting business from group structures. This is to ensure targets maintain a consistent level of ambition. In FY22 there were no significant changes in our operation structure that would warrant this. However, changes related to the planned sale of 70% of TowerCo and the investment to take full ownership of Connect 8 as a fully owned subsidiary will mean that we will assess any need to adjust or re-baseline our emissions target in FY23.

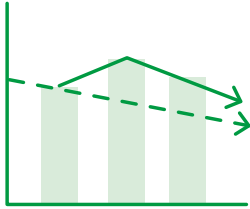
### Setting our scope 1 and 2 emissions target:

2020-2030 trajectories for ICT operators



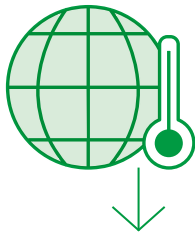
Source: Guidance for ICT companies setting science based targets, ITU, GESI, GSMA, SBTi

# Performance summary FY22



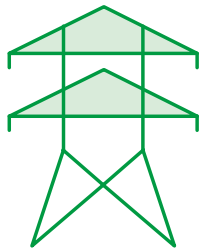
**18,299**  
tonnes CO<sub>2</sub>e

Scope 1 and 2 emissions tracking above our SBTi reduction target pathway



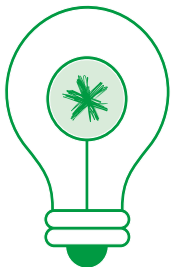
**-15.2%**  
scope 1 and 2 emissions

Scope 1 and 2 emissions reduced year-on-year, reversing growth from FY21 caused by more non-renewable electricity on the grid



**-11.2%**  
grid emissions intensity

Greater share of renewable generation in FY22 has driven down emissions per unit of electricity consumed



**-3.9%**  
electricity consumption

Our programme of network simplification has reduced electricity consumption by retiring legacy equipment

## About Spark

Spark is New Zealand's largest telecommunications and digital services company. Our customers range from consumers and households to small businesses, government, and large enterprise clients. Across all our services - mobile, broadband, cloud services, digital services, and entertainment - we have relevance for almost every New Zealander.

**98%**

of New Zealanders reached by our 4G network

**99%**

of the population reached by our Cat-M1 IoT network

**67**

retail stores

**704k**

Broadband connections

**24**

regional business hubs

**16**

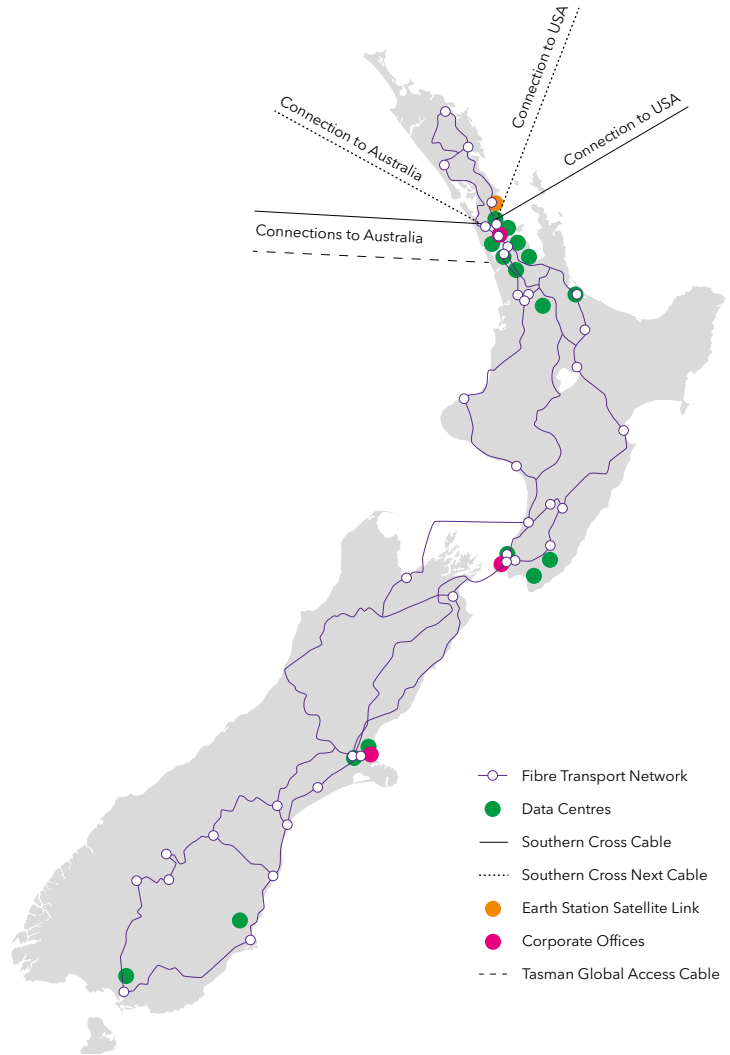
data centres

**~1,500**













mobile sites supporting more than 2.5 million mobile connections

**5,144<sup>1</sup>**

New Zealand employees



## We operate the following brands and businesses

Consumer	Business	Community	Growth markets	Other brands
  	<p>Spark Business Group</p> <p> Digital Island*</p> <p>Qrious </p>	<p> Spark Foundation</p> <p> Skinny Jump</p>	<p> Spark Health</p> <p> Spark IoT</p>	<p> Spark Wholesale</p> <p>MATT R</p> <p> entelar</p> <p>Connect </p>

1. Total headcount including full-time, part-time and fixed-term employees.

## Our base year for reporting

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FY20 is our baseline year for emissions reporting and for our SBTi-verified emissions reduction target. In setting our target we refreshed our approach to emissions reporting to bring our processes in-house to provide more frequent internal reporting, better inform decision making, and support progress towards our emissions reduction target.

Our previous reporting prior to FY20 provides a long-term view of our emissions reduction performance. However, it is not directly comparable to our current reporting due to updated emission factors, updated measurement protocols, and updated assumptions covering waste, water, retail stores, and customer electricity use.

For future reports we will be consistent in our reporting approach. We will re-baseline our emissions for significant changes in Spark's operational footprint or reporting boundary, including acquisitions and divestments, or outsourcing and insourcing of activities that have a 5% or greater impact on our scope 1 and 2 emissions. A recalculation of baseline emissions will also be triggered by discovery of significant errors, a number of cumulative errors that are cumulatively significant, changes in calculation methodology, improvements in the accuracy of emissions factors, or activity data that results in a significant impact on the base year.

In FY22 Spark increased its shareholding of Connect 8 to make it a wholly owned subsidiary. Connect 8 is an infrastructure provider to the telecommunications, water, and power sectors. In FY23 Spark also announced the sale of 70% of TowerCo - a towers business with approximately 1,263 sites, with completion anticipated to occur in the first half of FY23, conditional on Overseas Investment Office approval. These changes are not represented in our FY22 inventory report but will be factored into future reporting from FY23 onwards.

## Greenhouse gas emissions

### Greenhouse gas emissions by scope and category

SCOPE/CATEGORY	GHG EMISSIONS (t CO <sub>2</sub> e)		
	2020	2021	2022
<b>Scope 1</b>	<b>2,042</b>	<b>2,142</b>	<b>1,690</b>
Fugitive emissions	654*	656*	655
Mobile combustion - Vehicle fleet	947	1,002	701
Stationary combustion - Diesel generators	426	470	325
Natural gas combustion	15	15	8
<b>Scope 2</b>	<b>15,855</b>	<b>19,428</b>	<b>16,609</b>
Corporate/Retail	1,450	1,722	1,361
Mobile Network	2,589	3,535	3,546
Fixed Network	9,061	10,725	8,474
Data centre	2,756	3,446	3,228
<b>Scope 3 (total C3,C6 &amp; C13)</b>	<b>6,277</b>	<b>4,127</b>	<b>3,805</b>
Category 3 - Fuel- & energy- related activities	1,394	1,356	1,458
Category 6 - Business Travel	3,236	707	620
Category 13 - Downstream leased assets	1,647	2,063	1,728
<b>Total Scope 1 and 2 (SBTi target emissions)</b>	<b>17,898</b>	<b>21,570</b>	<b>18,299</b>
<b>Total Scope 1, 2 and 3 (C3,C6 &amp; C13)</b>	<b>24,175</b>	<b>25,697</b>	<b>22,104</b>

#### Notes:

Please see Appendix A and B for information on methodologies used to calculate and measure emissions, and specific exclusions of sources.

We split our scope 2 electricity reporting across four categories - Corporate/Retail, Mobile Network, Fixed Network, and Data Centre. These operational categories align with the ICT sector pathways developed with the International Telecommunications Union (ITU) in their guidance for setting a science-based emissions reduction target.

Numbers may not sum due to rounding.

\* We have restated our FY20 and FY21 fugitive emissions due to a change in reporting methodology. See Appendix B page 12, Scope 1 Fugitive Emissions, for an explanation of our reporting methodology.

## Greenhouse gas emissions (cont.)

### Greenhouse gas emissions by gas type

#### FY22

SCOPE/CATEGORY	GHG EMISSIONS (t CO <sub>2</sub> e)	CO <sub>2</sub>	CH <sub>4</sub>	N <sub>2</sub> O	HFC
<b>Scope 1</b>	<b>1,690</b>	<b>1,004</b>	<b>8</b>	<b>23</b>	<b>655</b>
Fugitive emissions	655	-	-	-	655
Mobile combustion - Vehicle fleet	701	672	7	22	-
Stationary combustion - Diesel generators	325	323	1	1	-
Natural gas combustion	8	8	0	0	-
<b>Scope 2</b>	<b>16,609</b>	<b>16,144</b>	<b>430</b>	<b>35</b>	<b>-</b>
Corporate/Retail	1,361	1,322	35	3	-
Mobile Network	3,546	3,447	92	7	-
Fixed Network	8,474	8,237	220	18	-
Data centre	3,228	3,138	84	7	-

**Note:** Spark does not have emissions of SF<sub>6</sub>, NF<sub>3</sub>, and PFCs. We exclude scope 3 emissions from our reporting by gas type due to incomplete data.

Numbers may not sum due to rounding.

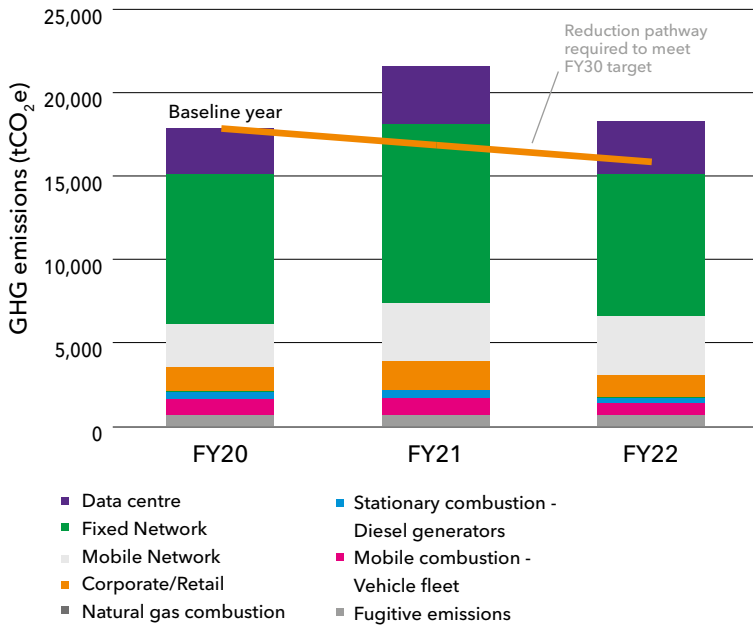
### Scope 1 and scope 2 energy usage by type

SCOPE/CATEGORY	ENERGY USAGE		
	2020	2021	2022
<b>Scope 1</b>			
Fugitive emissions	N/A	N/A	N/A
Vehicle fleet - premium petrol (litres)	54,547	53,928	12,559
Vehicle fleet - regular petrol (litres)	211,622	200,343	171,197
Vehicle fleet - diesel (litres)	10,372	11,405	4,406
Stationary combustion - Diesel generators (litres)	160,004	176,367	121,763
Natural gas combustion (KWh)	78,927	75,731	43,460
<b>Scope 2</b>			
Corporate/Retail (GWh)	14.67	13.83	12.28
Mobile Network (GWh)	26.18	28.38	32.02
Fixed Network (GWh)	91.62	86.12	76.50
Data Centre (GWh)	27.87	27.67	29.14

**Note:** Excludes CCL vehicle fuel usage as CCL fuel emissions were calculated on a per-km basis for FY20.



## Our emissions performance



### Our emissions reduction performance

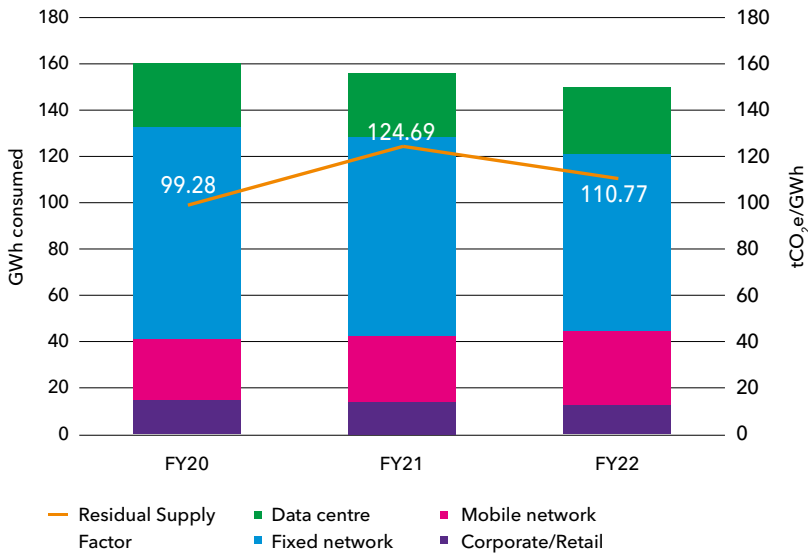
Our emissions reduced 15.2% over the past year, with 9.7% driven by a reduction in the emissions intensity of the electricity we consume on the New Zealand grid and 5.5% driven by a reduction in underlying energy use. Last year dry hydrological conditions saw a significant increase in non-renewable electricity generation on the New Zealand grid. While this has reduced in FY22, this year's emissions factor remains 11.6% above the FY20 factor used to set the baseline measures for our SBTi target.

As a result, our emissions are tracking down towards our SBTi pathway, although we are not yet aligned with a straight-line pathway set from our FY20 baseline. We are pleased that our underlying performance is laying the foundation for future emissions reductions, and despite the higher emissions factor, our emissions are now close to our FY20 baseline starting point due to significant reductions in the energy we used across our business. This was led by the continued reduction in electricity used by our fixed networks, as we decommission legacy equipment.

We have established an emissions reduction programme to drive our ongoing performance. The main focus in our network infrastructure, which includes our exchange sites, mobile towers, and data centres. We also have teams focused on the emissions from offices, retail, and fleet and business travel. Aligned to Spark's Agile ways of working, teams are responsible for managing workflow and a backlog of potential projects, prioritising and allocating resources. We have also established efficiency targets to ensure we are focused on improving underlying efficiency.

More information on our approach is available in the Environment section of our Annual Report ([www.sparknz.co.nz/about/governance](http://www.sparknz.co.nz/about/governance)) or on the sustainability section of our website: [www.sparknz.co.nz/sustainability/environment](http://www.sparknz.co.nz/sustainability/environment)

## Our electricity use



The **Residual Supply Factor** indicates the quantity of emissions per unit of electricity consumed. This is a market-based factor calculated on an annual basis considering the mix of electricity generation sources supplying the New Zealand grid.

### Electricity consumption

We have continued our programme of network simplification over the past year. This includes the decommissioning of legacy equipment such as the public switched telephone network (PSTN). We have also reported reduced electricity usage at operational sites we share with Chorus. As our equipment is removed from these sites, we have been adjusting down the share of electricity we account for.

In order to achieve our emissions reduction target we need to further reduce the emissions intensity of our electricity. It is projected that the New Zealand grid will continue to decarbonise over the next decade, aligned with New Zealand’s national emissions reduction budgets and plans. In the past year the emissions factor reduced 11.2% from 124.69 to 110.77 tCO<sub>2</sub>e/GWh. In addition to expected national improvements, Spark is actively pursuing options to link our electricity purchasing to new renewable electricity generation capacity, to create an incentive for new investment and to have greater control of how the energy mix of electricity from the grid will influence our ability to reduce emissions against our SBTi pathway.

In FY22 we reviewed our electricity supply contracts, with sustainability a key selection criterion in this process and a deciding factor in our purchasing decision. Our new energy partnership includes a commitment from our energy provider to work with Spark to achieve its SBTi target, through partnership in creating an emissions reduction plan, and through endeavours to link Spark’s electricity use to new renewable energy generation assets.

## Appendix A: Organisational boundary

Our organisational emissions reporting boundary takes an operational control approach as defined by the GHG Protocol and includes Spark and its subsidiaries.

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). As at 30 June 2022 the Spark Group comprised 26 controlled entities.

More information on significant subsidiaries and controlled entities in the Spark Group as at 30 June 2022 (including ownership percentages and principal activity information) is available in the **Spark FY22 Annual Report**.

### Significant Spark subsidiaries

NAME	PRINCIPAL ACTIVITY	EMISSIONS REPORTING INCLUSIONS
Computer Concepts Limited (NZ)	IT infrastructure and business cloud services	Electricity, business travel, fleet
Connect 8 Limited	Mobile infrastructure business	Excluded as previously a joint venture. To be included in FY23 reporting
Digital Island Limited (NZ)	Business telecommunications provider	Electricity, fleet
Gen-i Australia Pty Limited (Australia)	Provides international wholesale and outsourced telecommunications services	Excluded as no significant emissions
MATTR Limited (NZ)	Software company focussed on decentralised identity and verifiable data	Office electricity on a headcount estimate basis
Qrious Limited (NZ)	Data analytics business	Included in Spark Corporate Reporting
Revera Limited (NZ)	IT infrastructure and data centre provider	Electricity, business travel
Spark Finance Limited (NZ)	A Group finance company	Excluded as not an operating company
Spark New Zealand Trading Limited (NZ)	Telecommunications and digital services company	Included in Spark Corporate reporting
TCNZ (Bermuda) Limited	A holding company	Excluded as not an operating company
Teleco Insurance Limited (Bermuda)	A Group insurance company	Excluded as not an operating company
Telecom New Zealand USA Limited (USA)	Provides international wholesale telecommunications services	Excluded as no significant emissions
Telecom Southern Cross Limited (NZ)	A holding company	Excluded as not an operating company
Entelar Limited (NZ) (previously Telegistics Limited)	Mobile phone repair and equipment distribution	Electricity

### Investments in associates and joint ventures (at 30 June 2022)

Investments, associates and joint ventures are excluded from emissions disclosures as they are outside our operational control.

NAME	TYPE	COUNTRY	PRINCIPAL ACTIVITY
Adroit Holdings Limited	Associate	New Zealand	Environmental IoT solutions
Flok Limited	Associate	New Zealand	Hardware and software development
Pacific Carriage Holdings Limited, Inc.	Associate	United States	A holding company
Rural Connectivity Group Limited	Joint Venture	New Zealand	Rural broadband
Southern Cross Cables Holdings Limited	Associate	Bermuda	A holding company
TNAS Limited	Joint Venture	New Zealand	Telecommunications development

## Appendix B: Operational boundary

### Greenhouse gas emissions source inclusions

NAME	ACTIVITIES	METHODOLOGY, DATA QUALITY, UNCERTAINTY
Scope 1: Fugitive Emissions	Refrigerant top ups / leakage	<p>Refrigerant emissions data is based on a 3% annual loss estimate (based on <i>Ministry for the Environment - Guidance for voluntary greenhouse gas reporting</i>) applied to gases held across Spark operations. For our FY22 emissions reporting we have reset our baseline gas stock levels against cooling system data held in our eMaint asset management system, including estimated holdings for equipment without recorded refrigerant volume or type. We have restated our FY20 and FY21 emissions based on adjustments to this baseline for known system removals and additions over the previous two years. Data on CCL and Revera holdings of refrigerants is not available meaning their estimated leakage has been excluded.</p> <p>We have identified an opportunity to improve our future refrigerant reporting. We are looking to implement processes with our suppliers to capture refrigerant top-up data to more accurately record actual losses.</p>
Scope 1: Stationary Combustion	Diesel generator fuel usage	Records from supplier invoices and reporting.
Scope 1: Natural Gas	Gas usage for heating	Records from supplier invoices and reporting.
Scope 1: Mobile Combustion Fleet	Petrol and Diesel use for Spark vehicles	<p>Records from vehicle lease supplier reporting, including reporting of fuel card purchases. Fuel used by Spark franchisees is excluded where fuel use data is captured under the Spark lease agreement but fuel cost is paid by franchisees.</p> <p>For FY20 CCL fleet emissions used a per-km emissions factor due to unavailability of data in litres.</p>
Scope 2: Electricity	Electricity usage	<p>Reporting of monthly electricity billing for all sites. Includes Spark electricity usage in shared Chorus sites based on billing records between Spark and Chorus.</p> <p>FY20/FY21 Spark retail store electricity use is based on an extrapolation of available FY21 data. FY22 data is from billing records.</p> <p>The split in data across four categories (Corporate/Retail, Mobile Network, Fixed Network, and Data Centre) is based on records from electricity supplier billing against site type, e.g. data centre, telephone exchange, mobile sites. For sites with multiple category types, including exchange sites with significant office space and sites sharing fixed network and data centre equipment we adjust allocation of electricity based on a standard per-employee or per-rack calculation. For our mobile sites use we assume an additional 10% electricity use in the 'mobile core' based on a conservative estimate referencing a number of industry reports.</p> <p>Electricity consumed by customer equipment hosted in our data centres is reported as Scope 3, Category 13: Downstream leased assets (see below).</p> <p>We report our emissions using a market-based residual supply emissions factor.</p>
Scope 3, Category 3: Fuel and Energy Related Activities	Transport and distribution losses for electricity consumption	<p>We report our electricity Transport and Distribution losses because electricity usage is our most material source of emissions under our scope 1 and 2 emissions reduction target.</p> <p>Electricity usage collected for scope 2 reporting as above.</p>
Scope 3, Category 6: Business Travel	Flights, taxis, hire cars and accommodation	<p>We report our Business Travel emissions as they are a material source of emissions. They are also an emission source we can reduce through business policy, employee behaviour and adoption of new technologies.</p> <p>Records from business travel partners, including kms flown, hotel nights, and hire car usage. Taxi expenditure extracted from finance reports and expense claim data.</p>
Scope 3, Category 13: Downstream leased assets	Electricity use on-billed to customers	<p>In many of our data centres we host customer equipment. This equipment draws electricity which is on-billed to our hosted customers.</p> <p>Records from customer billing data based on automated direct metering systems, manual meter and load readings, and maximum input power of customer equipment.</p> <p>Revera's FY20 on-billed electricity is estimated from its FY20 total electricity usage based on the proportion of on-billed electricity to total electricity usage in FY21.</p> <p>Electricity use to power data centre services, including cooling and lighting, are included in our scope 2 reporting.</p>

## Appendix B: Operational boundary (cont.)

### GHG emissions source exclusions

NAME	ACTIVITIES	METHODOLOGY, DATA QUALITY, UNCERTAINTY
Category 1	Purchased goods and services	Excluded due to lack of available data and high degree of uncertainty. To shape our science-based emissions reduction target we gathered supplier emissions data, including equipment life-cycle emissions data. Complete data is unavailable. However, analysis of supplier and category spend shows this is a material source of emissions and is included in our scope 3 SBTi target.
Category 2	Capital goods	
Category 4	Upstream transportation and distribution	Excluded due to low materiality, lack of available data, and high degree of uncertainty.
Category 5	Waste generated in operations	
Category 7	Employee commuting	
Category 8	Upstream leased assets	
Category 9	Downstream transport and distribution	
Category 10	Processing of sold products	
Category 11	Use of sold products	
Category 12	End-of-life treatment of sold products	
Category 14	Franchisees	
Category 15	Investments	

## Guidance documents used in the preparation of Carbon Footprint

- *Greenhouse Gas Protocol – Scope 2 Guidance*
- *Greenhouse Gas Protocol – Scope 3 Calculation Guidance*
- *Ministry for the Environment – Guidance for voluntary greenhouse gas reporting – 2022 detailed guide (Mfe 2022)*
- The majority of emissions factors are sourced from Mfe 2022.
- For our scope 2 reporting we have used the electricity residual supply factor sourced from NZECS: [www.certifiedenergy.co.nz](http://www.certifiedenergy.co.nz)
- For our reporting of refrigerant R438C we have used a factor published by The California Air Resources Board.



## Independent Assurance Report

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### Independent Assurance Report on Spark New Zealand Limited's Greenhouse Gas Emissions Inventory Report for the year ended 30 June 2022

#### To the Board of Directors of Spark New Zealand Limited

##### Report on Greenhouse Gas Inventory Reports

We have undertaken a limited assurance engagement relating to the Greenhouse Gas Emissions Inventory Report (the 'inventory report') of Spark New Zealand Limited (the 'Group') for the year ended 30 June 2022, comprising the Emissions Inventory and the explanatory notes set out on pages 6 to 13.

The inventory report provides information about the greenhouse gas emissions of the Group for the year ended 30 June 2022 and is based on historical information. This information is stated in accordance with the requirements of the Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard (2004) ('the GHG Protocol') which can be accessed at <https://ghgprotocol.org/corporate-standard>.

##### Board of Directors' Responsibility

The Board of Directors are responsible for the preparation of the inventory report, in accordance with the GHG Protocol. This responsibility includes the design, implementation, and maintenance of internal control relevant to the preparation of an inventory report that is free from material misstatement, whether due to fraud or error.

##### Auditor's Responsibility

Our responsibility is to express a limited assurance conclusion on the inventory report based on the procedures we have performed and the evidence we have obtained. We conducted our limited assurance engagement in accordance with International Standard on Assurance Engagements (New Zealand) 3410: *Assurance Engagements on Greenhouse Gas Statements* ('ISAE (NZ) 3410'), issued by the New Zealand Auditing and Assurance Standards Board. That standard requires that we plan and perform this engagement to obtain limited assurance about whether the inventory report is free from material misstatement.

A limited assurance engagement undertaken in accordance with ISAE (NZ) 3410 involves assessing the suitability in the circumstances of the Group's use of the GHG Protocol as the basis for the preparation of the inventory report, assessing the risks of material misstatement of the inventory report whether due to fraud or error, responding to the assessed risks as necessary in the circumstances, and evaluating the overall presentation of the inventory report. A limited assurance engagement is substantially less in scope than a reasonable assurance engagement in relation to both the risk assessment procedures, including an understanding of internal control, and the procedures performed in response to the assessed risks.

The procedures we performed were based on our professional judgement and included enquiries, observations of processes performed, inspection of documents, analytical procedures, evaluating the appropriateness of quantification methods and reporting policies, and agreeing or reconciling with underlying records.

Given the circumstances of the engagement, in performing the procedures listed above we:

- Through enquiries, obtained an understanding of the Group's control environment and information systems relevant to emissions quantification and reporting, but did not evaluate the design of particular control activities, obtain evidence about their implementation or test their operating effectiveness.
- Evaluated whether the Group's methods for developing estimates are appropriate and had been consistently applied. However, our procedures did not include testing the data on which the estimates are based or separately developing our own estimates against which to evaluate the Group's estimates.
- Reviewed adherence to the principles and requirements outlined in GHG Protocol, which included a consideration of completeness.

The 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 we performed a reasonable assurance engagement. Accordingly, we do not express a reasonable assurance opinion about whether Spark New Zealand Limited's inventory report has been prepared, in all material respects, in accordance with the GHG Protocol.

## Independent Assurance Report (cont.)

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### Inherent Limitations

GHG quantification is subject to inherent uncertainty because of incomplete scientific knowledge used to determine emissions factors and the values needed to combine emissions of different gases.

### Our Independence and Quality Control

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

Other than this engagement and our role as auditor of the financial statements, our firm carries out other assignments for Spark New Zealand Limited in relation to regulatory audit, other assurance related services (such as trustee reporting), taxation compliance and non-assurance services provided to the Corporate Taxpayers Group of which Spark New Zealand Limited is a member. These services have not impaired our independence as auditor of the Group. In addition to this, the Chief Executive has both a sister and brother-in-law that are partners at Deloitte. These Deloitte partners are not involved in the provision of any services to the Group and its subsidiaries, and this matter has not impacted our independence. Also, partners and employees of our firm deal with the Group on normal terms within the ordinary course of trading activities of the business of the Group. The firm has no other relationship with, or interest in the Group.

The firm applies Professional and Ethical Standard 3 (Amended): *Quality Control for Firms that Perform Audits and Reviews of Financial Statements, and Other Assurance Engagements* issued by the New Zealand Auditing and Assurance Standards Board, and accordingly maintains a comprehensive system of quality control including documented policies and procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

### Use of Report

This report is provided solely for your exclusive use in accordance with the terms of our engagement. Our report is not to be used for any other purpose, recited or referred to in any document, copied or made available (in whole or in part) to any other person without our prior written express consent. We accept or assume no duty, responsibility or liability to any other party in connection with the report or this engagement, including without limitation, liability for negligence in relation to the opinion expressed in this report.

### Limited Assurance Conclusion

Based on the procedures we have performed and the evidence we have obtained, nothing has come to our attention that causes us to believe that Spark New Zealand Limited's inventory report for the year ended 30 June 2022 is not prepared, in all material respects, in accordance with the requirements of the GHG Protocol.



### Chartered Accountants

24 August 2022

Auckland, New Zealand

This limited assurance report relates to the Greenhouse Gas Emissions Inventory Report of Spark New Zealand Limited for the year ended 30 June 2022 included on Spark New Zealand Limited's website. Spark New Zealand Limited's Board of Directors is responsible for the maintenance and integrity of Spark New Zealand Limited's website. We have not been engaged to report on the integrity of Spark New Zealand Limited's website. We accept no responsibility for any changes that may have occurred to the Greenhouse Gas Emissions Inventory Report since they were initially presented on the website. The limited assurance report refers only to the Greenhouse Gas Emissions Inventory Report named above. It does not provide an opinion on any other information which may have been hyperlinked to/from these Greenhouse Gas Emissions Inventory Report. If readers of this report are concerned with the inherent risks arising from electronic data communication they should refer to the published hard copy of the Greenhouse Gas Emissions Inventory Report and related limited assurance report dated 24 August 2022 to confirm the information included in the Greenhouse Gas Emissions Inventory Report presented on this website.



Spark New Zealand Limited  
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