Human Rights Policy

Why Spark has this policy

Across our business Spark touches the lives of many people. This includes our own people, those employed in our supply chain, and those impacted by our operations, products, and services, including our customers and communities.

The purpose of this policy is to make clear our commitment to human rights and to communicate clear expectations to our people and those we work with that they will protect and enhance human rights across our value chain.

Our commitment

Spark will support and respect 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.

Spark will adhere to all local laws which protect human rights and labour standards.

Spark will implement processes to assess, prevent, mitigate and remedy human rights impacts across our operations and value chain.

Spark will uphold the freedom of association and the effective recognition of the right to collective bargaining.

Across our value chain we will pursue the elimination of all forms of forced and compulsory labour, the effective abolition of child labour, and elimination of discrimination in respect of employment and occupation.

Our approach to managing key human rights issues

In our supply chain

All suppliers are required to commit to the Spark Supplier Code of Conduct, or an equivalent policy, which commits them to upholding human rights and labour rights.

We will screen new suppliers for potential human rights issues. We will conduct an annual process of risk evaluation across our existing supplier base, to prioritise suppliers for further

engagement, including supplier self-assessment and third-party audits.

Any issues identified will be recorded, with remedial actions mutually agreed and completion tracked.

For more information see:

- [Spark Supplier Code of Conduct](#)

- [Spark Modern Slavery Statement](#)

Digital equity

Spark is committed to championing digital equity, so all New Zealanders have the opportunity to thrive in a digital future.

We invest, via the Spark Foundation, in community partnerships that improve digital access, digital skills and pathways, and digital wellbeing.

We address cost barriers to digital equity through our targeted, low-cost, not-for-profit broadband service Skinny Jump.

Spark will consider digital inclusion and accessibility in the design of our products and services.

Privacy and security

Spark puts cybersecurity, 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. We:

- Comply with the New Zealand Privacy Act 2020 and Telecommunications Information Privacy Code 2020
- Treat location information with sensitivity and give customers options about collection, use and disclosure of this information where practicable
- Provide customers with options on how we use their personal information. We also work hard to protect personal information from unauthorised access.

For more information see:

- [Spark Privacy Policy](#)

- [About Your Privacy](#)

Our workforce management and people policies

We are committed to protecting and enhancing human rights and labour rights in our own workforce.

We are committed to improving diversity and inclusion across our

business, to create a culture where all our people feel they belong. We have made public commitments to gender representation across our business and reducing our gender pay gap.

We have robust health and safety practices and a holistic wellbeing strategy, *Mahi Tahi*, that extends beyond physical safety to the work environment, mind health, connection, and energy.

For more information see:

- [Spark Diversity and Inclusion Policy](#)

- [Health and Safety Commitment](#)

Impacts of emerging technologies

We will take a precautionary approach to ensure that new technologies are implemented in a way to protect human rights, that the operation and impacts of systems should be transparent and explainable so outcomes can be understood and challenged, and that we retain an appropriate level of human oversight and accountability.

Our AI Principles outline Spark's expectations of its employees working with AI technologies in order to raise individual awareness and to ensure that due care and consideration is given to ethical AI and automated

solution design, so that we minimise the risk of unexpected and undesired outcomes which are contrary to our Purpose and our Values.

For more information see:

- [Spark AI Principles](#)

Risk in our customer base

We will implement a process to identify and review customers linked to potential human rights issues, considering high risk industries and geographies, for example customers under Government sanctions.

Where to get help

Further help and advice is available from the Sustainability Lead as the Policy Owner.

For specific issues included in this Policy please refer to the linked documents for further information and support.

Please report any potential breaches or breaches of this Policy using the [Spark Honesty Box](#).

Human Rights Policy: Roles and Responsibilities

Activity performed	Board	Leadership Squad	Issue Leads[1]	Sustain-ability	Tribe Leads	All Spark People
Approve the Human Rights Policy	■					
Provide oversight of the Policy	■					
Promote compliance with the Policy		■				
Ensure appropriate resource allocation and prioritisation to deliver policy outcomes		■				
Raise awareness of specific Human Rights-related issue across Spark, e.g. Privacy			■			
Manage risks in alignment with relevant policies			■			
Provide appropriate information and tools to support our people to follow relevant policies			■			
Provide strategic guidance to the business on embedding relevant policies			■			
Policy Owner – periodic review and update of Policy				■		
Administer annual Human Rights due diligence process aligned to sustainability materiality process				■		
Support people to understand how these issues apply in their squads and to their activities					■	
Understand and support compliance at a tribe, chapter and unit level					■	
Take an all-of-Spark perspective in supporting implementation of the policy					■	
Attend any training required						■
Seek assistance for any related queries or issues						■
Report any issues via the Spark Honest Box						■

[1] Issue Leads refers to Value Management (supply chain), Digital Trust (privacy), Cybersecurity (security), People, Culture and Ways of Working (workforce management and people policies), Data and Automation (impacts of emerging technologies)